Before Starting the CoC Application

The CoC Consolidated Application consists of three parts, the CoC Application, the CoC Priority Listing, and all the CoC's project applications that were either approved and ranked, or rejected. All three must be submitted for the CoC Consolidated Application to be considered complete.

The Collaborative Applicant is responsible for reviewing the following:

1. The FY 2018 CoC Program Competition Notice of Funding Available (NOFA) for specific application and program requirements.
2. The FY 2018 CoC Application Detailed Instructions which provide additional information and guidance for completing the application.
3. All information provided to ensure it is correct and current.
4. Responses provided by project applicants in their Project Applications.
5. The application to ensure all documentation, including attachment are provided.
6. Questions marked with an asterisk (*), which are mandatory and require a response.

1A. Continuum of Care (CoC) Identification

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1A-1. CoC Name and Number: CT-505 - Connecticut Balance of State CoC

1A-2. Collaborative Applicant Name: Connecticut Department of Mental Health and Addiction Services

1A-3. CoC Designation: CA

1A-4. HMIS Lead: CCEH

1B. Continuum of Care (CoC) Engagement

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1B-1. CoC Meeting Participants. For the period from May 1, 2017 to April 30, 2018, using the list below, applicant must: (1) select organizations and persons that participate in CoC meetings; and (2) indicate whether the organizations and persons vote, including selecting CoC Board members.

Organization/Person Categories	Participates in CoC Meetings	Votes, including selecting CoC Board Members
Local Government Staff/Officials	Yes	Yes
CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes
Law Enforcement	Yes	Yes
Local Jail(s)	Yes	Yes
Hospital(s)	Yes	Yes
EMS/Crisis Response Team(s)	Yes	Yes
Mental Health Service Organizations	Yes	Yes
Substance Abuse Service Organizations	Yes	Yes
Affordable Housing Developer(s)	Yes	Yes
Disability Service Organizations	Yes	Yes
Disability Advocates	Yes	Yes
Public Housing Authorities	Yes	Yes
CoC Funded Youth Homeless Organizations	Yes	Yes
Non-CoC Funded Youth Homeless Organizations	Yes	Yes
Youth Advocates	Yes	Yes
School Administrators/Homeless Liaisons	Yes	No
CoC Funded Victim Service Providers	Yes	Yes
Non-CoC Funded Victim Service Providers	Yes	Yes
Domestic Violence Advocates	Yes	Yes
Street Outreach Team(s)	Yes	No
Lesbian, Gay, Bisexual, Transgender (LGBT) Advocates	Yes	Yes
LGBT Service Organizations	Yes	Yes
Agencies that serve survivors of human trafficking	Yes	Yes
Other homeless subpopulation advocates	Yes	Yes
Homeless or Formerly Homeless Persons	Yes	Yes
Mental Illness Advocates	Yes	Yes
Substance Abuse Advocates	Yes	Yes

Other:(limit 50 characters)		
AIDS CT	Yes	Yes
Partnership for Strong Communities	Yes	Yes
Corporation for Supportive Housing	Yes	Yes

1B-1a. Applicants must describe the specific strategy the CoC uses to solicit and consider opinions from organizations and/or persons that have an interest in preventing or ending homelessness.
(limit 2,000 characters)

1)The CoC solicits input from the vast and broad range of stakeholders involved in the board and many committees off the CoC and Reaching Home campaign. CoC has many members with extensive knowledge of homelessness on the Reaching Home Steering Committee (RHSC), the CoC Steering Committee (SC), and numerous work groups & subcommittees. This includes 8 state agencies, representatives from the judicial branch, law firms, banks, hospitals, community health centers, housing authorities and foundations. In addition 16 Coordinated Access Network (CAN) representatives, CT Coalition to End Homelessness, CSH, Partnership for Strong Communities, CT Coalition Against Domestic Violence and 2 formerly homeless individuals are participants in planning. The PIT/HIC Committee includes ES/TH/PH and outreach providers, formerly homeless persons (including youth and Veterans) to inform the PIT count. CoC also gets input from stake holders at the bi-annual all-CoC mtgs. 2) All CoC mtgs are open & there is no application to join – information is posted on the CoC website (www.ctbos.org) including meeting announcements, minutes, agendas, training and funding opportunities and resources. The Reaching Home e-mail newsletter w/info on public mtgs/forums is distributed to 1400 individuals. 3) The CoC has a transparent process to take input into consideration in deciding how to plan, fund & execute on prevention, diversion, shelter & housing programs. For example, the Youth Work Group was integral in deciding on program models and funding allocations for the YHDP plan submitted to HUD this year. The group also helped plan the 2018 Youth PIT count and worked to ensure that the count was as inclusive as possible and resulting in the most accurate and comprehensive collection of data. The CoC is also using a broad-based RRH work group to get recommendations for policy revisions on standards for assistance. Providers, state agencies and consumer input is being sought through the group.

1B-2.Open Invitation for New Members. Applicants must describe:
(1) the invitation process;
(2) how the CoC communicates the invitation process to solicit new members;
(3) how often the CoC solicits new members; and
(4) any special outreach the CoC conducted to ensure persons experiencing homelessness or formerly homeless persons are encouraged to join the CoC.
(limit 2,000 characters)

1) Membership in the CoC is open to all parties interested in ending homelessness in CT. There is no application process to join and new members

are always welcome anytime. The CoC maintains a website www.ctboscoc.org where people can access info about the CoC and sign up for multiple email listservs that are free and open to the general public. All CoC, Coordinated Access Networks (CAN) and Reaching Home work groups meetings are open to the public and all interested parties are encouraged to attend. 2) Meeting announcements, minutes and upcoming meeting agendas are posted on the CoC and the Reaching HOME websites. CoC e-mail goes out to over 400 individuals and Reaching Home e-mail newsletter is distributed to 1400 individuals both of which include: providers, consumers, local/state/federal agencies, businesses, landlords, health care providers, advocates, and legislators. The 8 CANs meet regularly and provide CoC info to their members & invite them to CoC meetings. 3) The CoC is always soliciting new members through the websites and various committee and work group meetings. 4) The CoC Board and Steering Committee each have two formerly homeless persons as voting members and regularly discusses how to engage more consumers in the CoC. The SC works closely w/CT Coalition to End Homelessness & providers to ensure that consumers know about meetings and participate. CCEH solicit people who have experienced homelessness to be on the PIT committee to participate in the count. Every CAN has homeless/formerly homeless persons on the PIT committee and participating in the count. BOS also holds semi-annual meetings publicizing widely. Every CAN has a Youth Engagement Team Initiative (YETI) group and these groups include young adults who currently or formerly experienced homelessness. These members conduct outreach to ensure that the YETI, CAN and SC and other committees have youth and young adults engaged in the CoC.

1B-3.Public Notification for Proposals from Organizations Not Previously Funded. Applicants must describe how the CoC notified the public that it will accept and consider proposals from organizations that have not previously received CoC Program funding, even if the CoC is not applying for new projects in FY 2018, and the response must include the date(s) the CoC publicly announced it was open to proposals.
(limit 2,000 characters)

1)BOS widely distributes RFPs for new project applications thru its website (www.ctboscoc.org), email list & websites/social media and listervs of related statewide orgs. RFPs clearly state that all eligible entities are encouraged to apply. Two RFPs were distributed/posted to the CoC listservs/website & listservs/websites from Partnership for Strong Communities, CCEH & CSH. CCEH also posted on Facebook & Twitter. The RFPs reached hundreds of organizations including those that have never received CoC funding. Numerous non-funded CoC agencies submitted applications. TA was provided to ensure the process was accessible to all applicants. RFPs provided a deadline, instructions for submission by email to the CoC and included instructions on eligible applicants, project types, participants, costs, funding restrictions, and HUD/CoC requirements. 2) The CoC has a Scoring Committee comprised of non-conflicted individuals with experience in homelessness, affordable housing, and grant making. The committee met twice and used objective criteria and a scoring tool that evaluated: agency capacity and experience, program outreach and Housing First approach, connections to mainstream resources, prioritizing highest need, participation in CES, and reasonable costs. DV projects were assessed on additional criteria including approach to ensuring client safety and use of trauma-informed care. New projects are selected for inclusion in the

2018 CoC application to HUD based on the score received and the top scoring projects are included in this submission. 3) The CoC publicly announced it was open to proposals for new projects on 5/25/2018 and 7/6/2018. RFPs were posted on the CoC and related websites and social media and sent to numerous email listservs

1C. Continuum of Care (CoC) Coordination

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1C-1. CoCs Coordination, Planning, and Operation of Projects. Applicants must use the chart below to identify the federal, state, local, private, and other organizations that serve individuals, families, unaccompanied youth, persons who are fleeing domestic violence who are experiencing homelessness, or those at risk of homelessness that are included in the CoCs coordination, planning, and operation of projects.

Entities or Organizations the CoC coordinates planning and operation of projects	Coordinates with Planning and Operation of Projects
Housing Opportunities for Persons with AIDS (HOPWA)	Yes
Temporary Assistance for Needy Families (TANF)	Yes
Runaway and Homeless Youth (RHY)	Yes
Head Start Program	Yes
Funding Collaboratives	Yes
Private Foundations	Yes
Housing and services programs funded through U.S. Department of Justice (DOJ) Funded Housing and Service Programs	Yes
Housing and services programs funded through U.S. Health and Human Services (HHS) Funded Housing and Service Programs	Yes
Housing and service programs funded through other Federal resources	Yes
Housing and services programs funded through State Government	Yes
Housing and services programs funded through Local Government	Yes
Housing and service programs funded through private entities, including foundations	Yes
Other:(limit 50 characters)	
CT Depart of Mental Health & Addiction Services	Yes
CT Department of Housing	Yes

1C-2. CoC Consultation with ESG Program Recipients. Applicants must describe how the CoC:
(1) consulted with ESG Program recipients in planning and allocating ESG funds; and
(2) participated in the evaluating and reporting performance of ESG Program recipients and subrecipients.
(limit 2,000 characters)

1)ESG recipients in the CoC include the CT Department of Housing (Balance of State) and the jurisdictions of Waterbury, Hartford and New Haven. CT DOH reports on ESG monitoring activities, services & outcomes at monthly Steering Committee (SC) mtgs. DOH has a standing agenda item at each meeting and

there is discussion and input sought on the planning and allocation of ESG funds. Steve DiLella, Co-Chair of the SC & DOH rep to the SC brings back feedback and priorities from the SC to DOH and uses this information to plan the use of ESG funds. The State of CT Action Plan which included ESG allocations was presented at the April 2018 CoC Steering Committee by Michael Santoro of DOH. SC members provided feedback and the CoC endorsed the plan in May 2018; the Action Plan is posted on the BOS website. The CoC also gives input on the allocation of ESG thru the local Coordinated Access Networks (CANs). In Waterbury, Hartford & New Haven, ESG entitlement communities, CoC CAN members work w/ESG recipients on planning, allocation, performance standards & monitoring. 2) The CoC participates in ESG evaluation through the CoC Reaching Home Retooling Workgroup which is drafting performance measures for all ESG programs to ensure alignment across ESG jurisdictions. CAN staff along with CoC providers provided feedback and suggestions to ESG recipients on subrecipient performance. Reports on ESG performance are generated from the CT HMIS for both recipients and sub-recipients. The CoC distributed 2018 PIT homeless counts to all 17 Con Plan jurisdictions: Bristol, Danbury, East Hartford, Hamden, Hartford, Hartford County, Litchfield County, Manchester, Meriden, Middlesex County, Middletown, Milford, New Haven, New Britain, New Haven County, New London, New London County, Norwich, Tolland County, Waterbury, West Hartford, West Haven and Windham County.

1C-2a. Providing PIT and HIC Data to Consolidated Plan Jurisdictions. Did the CoC provide Point-in-Time (PIT) and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions within its geographic area?	Yes to both
1C-2b. Providing Other Data to Consolidated Plan Jurisdictions. Did the CoC provide local homelessness information other than PIT and HIC data to the jurisdiction(s) Consolidated Plan(s)?	Yes

1C-3. Addressing the Safety Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors. Applicants must describe:
(1) the CoC's protocols, including the existence of the CoC's emergency transfer plan, that prioritizes safety and trauma-informed, victim-centered services to prioritize safety; and
(2) how the CoC maximizes client choice for housing and services while ensuring safety and confidentiality.
(limit 2,000 characters)

1)The CoC adopted an Emergency Transfer (ET) plan that requires all providers & coord access networks (CANs) to use consistent procedures prioritizing safety. Victims of DV, dating violence, sexual assault, stalking &/or human trafficking who identify a threat of imminent harm from further violence by remaining in their current dwelling can request an ET to a new unit. All

recipients of federal/state/county funds are required to follow the ET plan. The ET plan & CoC policies require safety, privacy, choice & access to trauma-informed/victim-centered services for all survivors. Upon DV disclosure household (HH) is referred to the DV hotline, which provides lethality screening & connection to DV shelter. Survivors w/high lethality scores are prioritized on the by-name list (BNL) & essential info on choice & safety is gathered. 2) Survivors can opt to receive DV-specific or CoC services. Access to CoC, ESG, DOJ, HHS, & CT DSS funded programs is offered through CANs & the DV hotline. HH's choose the type & location of services preferred. HH have full access to CoC resources thru 211/the CAN & HHs fleeing DV are assessed w/VI-SPDAT & added anonymously to the BNLs. Accommodations are made to reduce victim returns to areas that may increase risk of violence & CAN Housing Matching committees partner with survivors to consider a variety of factors & determine which types of assistance best allow a HH to maintain stable housing and safety. DV providers do not enter personally identifiable information (PII) into HMIS but are required to create a record in the ETO database so that client confidentiality is not compromised. The platform is comparable to HMIS & compatible with the BNL maintained thru the HMIS system but protects PII. A range of services including ES, TH, Host Homes, PSH, RRH crisis intervention, safety planning, counseling, legal services, financial planning & pet services are available to help ensure safety

1C-3a. Applicants must describe how the CoC coordinates with victim services providers to provide annual training to CoC area projects and Coordinated Entry staff that addresses best practices in serving survivors of domestic violence, dating violence, sexual assault, and stalking. (limit 2,000 characters)

1) The CoC holds quarterly trainings to instruct CoC area project staff & Coordinate Entry (CAN) staff on safety and planning protocols in serving survivors. Training includes Connecticut's CAN process for DV survivors, administering the VI-SPDAT, available housing resources, & how to safely collect & record personal information. Trainings also include best practices on safety and planning protocols, including on client-centered services (e.g., affirming the client's ability/right to make decisions) & trauma-informed care (e.g., not requiring victims to retell their stories). DV providers are additionally trained on entering data into the comparable database to ensure compatibility with the by-name list (BNL) without compromising client confidentiality. Additional related, in person and web-based training is provided to DV, sexual assault, homeless services, and CAN staff multiple times per year on topics including: how to access, coordinate and reduce gaps in services for clients who have experienced sexual assault; working with people who have experienced multiple traumas, especially women, people with disabilities, LGBTQ people, and other underserved communities; how to make informed referrals that strengthen providers' responses to survivors of violence; and how to combat human trafficking, & engage & connect trafficking survivors to resources. This includes information on trafficker profiles, recruitment strategies, victim profiles, and methods of control that facilitate human trafficking; 2) As described under #1, the CoC provides training at least quarterly for Coordinated Entry staff that addresses best practices (e.g., Trauma-informed Care and client-centered services) on safety and planning protocols for serving survivors.

1C-3b. Applicants must describe the data the CoC uses to assess the scope of community needs related to domestic violence, dating violence, sexual assault, and stalking, including data from a comparable database. (limit 2,000 characters)

The CoC uses data from three sources to assess the scope of community needs related to DV, dating violence, sexual assault, and stalking 1) An HMIS-comparable database is used by DV providers, ETO. This anonymous system created with input from national partners allows for collection of data on DV clients while ensuring VAWA compliance. The CoC uses de-identified, disaggregated data to identify the special needs of survivors. Data collected from the comparable database is used, for example, to identify the demographic makeup of the population, previous living situations, sources and amounts of employment and non-employment income, and information on disabling conditions. The CoC uses these data to inform service delivery and training needs. For example, the information has been used to identify the increasing number of young families and provide additional resources and trainings geared towards serving that specific population. In addition, information from this system is used to evaluate the extent to which CoC funded DV projects are meeting the needs of survivors, e.g., increasing earned and other income, ensuring enrollment in non-cash benefits, exiting participants to PH, and helping participants to maintain PH. 2) CT HMIS, the statewide HMIS system. All HUD required data is collected and entered by non-victim service providers about DV survivors into HMIS. Victims sign a waiver to be entered into HMIS and are counseled around any potential risks to safety. To assess the scope of community needs, data related to disabling conditions, income at program entry, and prior episodes of homelessness are analyzed to ensure that households are able to access the appropriate services. 3) Data from the DV provider coalition data system are also used. For example, these data have revealed that, outside of basic needs at 17%, victims identified housing as their next greatest need at 15% and that DV shelters in CT routinely operate at 122% of project capacity.

1C-4. DV Bonus Projects. Is your CoC applying for DV Bonus Projects? Yes

1C-4a. From the list, applicants must indicate the type(s) of DV Bonus project(s) that project applicants are applying for which the CoC is including in its Priority Listing.

SSO Coordinated Entry	
RRH	X
Joint TH/RRH	

1C-4b. Applicants must describe:
(1) how many domestic violence survivors the CoC is currently serving in the CoC's geographic area;
(2) the data source the CoC used for the calculations; and
(3) how the CoC collected the data.

(limit 2,000 characters)

1) Based on the information from the data sources cited below, the CoC is annually serving 2,083 unduplicated households who reported actively fleeing DV. In the PIT count in 2018 – 165 children and 413 adult survivors of DV were counted (322 adults in ES & 73 in TH) representing a 13% increase from 2017. Connecticut's 18 designated domestic violence organizations housed 519 households in FY18. Of that number, some clients choose to access housing through the CoC, while others seek safety and stability in other ways to include transitional housing which exists at six of the 18 provider sites. Annually 15% of the ES population – 1,117 households – report experiencing DV. 2) The sources of data used to calculate how many individuals the CoC is currently serving include the HIC and PIT along with data that is collected in CT HMIS and in the comparable DV database, ETO. Additionally, the CoC used data collected via the Coordinated Entry process and recorded in HMIS regarding experience of domestic violence. 3) All systems collect information at intake about clients' experience with DV – including if they are actively fleeing and when the experience occurred. As with all aspects of the CoC's data collection, clients are informed that they do not have to answer any questions they prefer not to answer. The number cited above (i.e., 2,083 households was calculated using the annual count from HMIS, including those who are referred into the system through the confidential process used by DV providers. Using the PIT and HIC data to compare rates of households fleeing domestic violence, combined with robust HMIS coverage, the CoC can accurately report the annual number of survivors served

1C-4c. Applicants must describe:
(1) how many domestic violence survivors need housing or services in the CoC's geographic area;
(2) data source the CoC used for the calculations; and
(3) how the CoC collected the data.
(limit 2,000 characters)

1)CT's DV providers respond to nearly 40K unduplicated victims annually on average who need services, including affordable, sustainable housing options. In FY18 6,052 were assisted w/identifying housing options. Based on data from the By-Name List (BNL), approximately 14% of those identified as needing homeless services & who identified as experiencing DV, sexual assault, or stalking will self-resolve their homelessness. Using historic BNL data, we anticipate that, of the remainder, approximately 8% need TH, 54% need RRH, and 38% need PSH. Using the total of the 2,083 households fleeing DV served in the CoC and assuming that 14% will self-resolve, the CoC estimates that 1,791 households (HH) will need housing services in the next year. This would be approximately 143 needing TH, 967 needing RRH, and 681 needing PSH. 2) Data used to calculate how many households need housing in the CoC comes from CT HMIS and the comparable DV database, ETO. Data used to calculate the percentage that will self-resolve and that need various intervention types comes from BNL data, including VI-SPDAT scores. Data used to calculate the number who need any type of services come from the DV Coalition's data system. 3) Housing need estimates were calculated by applying the indicated % of HH that will self-resolve or need each intervention type to the total annual count of 2,083 HH. All systems collect information at intake about clients' experience with DV – including if they are actively fleeing, and when the experience occurred. Additionally, CT HMIS contains the CoCs BNL – which

tracks characteristics of the households and allows the CoC to use real time data to assess the current level of need of all subpopulations on the list. These data are collected over time and updated regularly by the coordinated access networks to reflect the actual status of every person in need of housing in the CoC, allowing the CoC to understand the scope of the need

1C-4d. Based on questions 1C-4b. and 1C-4c., applicant must:
(1) describe the unmet need for housing and services for DV survivors, or if the CoC is applying for an SSO-CE project, describe how the current Coordinated Entry is inadequate to address the needs of DV survivors;
(2) quantify the unmet need for housing and services for DV survivors;
(3) describe the data source the CoC used to quantify the unmet need for housing and services for DV survivors; and
(4) describe how the CoC determined the unmet need for housing and services for DV survivors.
(limit 3,000 characters)

1)The unmet need for Rapid Re-Housing (RRH) for households experiencing domestic violence, sexual assault, or stalking in the CoC is greater than any other housing intervention as demonstrated in #2 below. There are no current DV-specific RRH projects in the CoC, and the largest percentage of the DV population in the CoC is not eligible for permanent supportive housing, and scores in the RRH range on the VI-SPDAT. Historic data from the CoC's By-name list (BNL) clearly show the overwhelming housing intervention needed in the region for survivors is RRH, and the CoC is applying for a RRH DV Bonus Project. To a lesser extent the CoC has also identified unmet need for TH and PSH as described in #2 below. 2) Taking the number of households that need housing intervention types available through the CoC, as indicated in 1C-4c, and subtracting the total annual number of units expected to be available as described below in #4, the CoC has an annual unmet need of 830 RRH units for DV survivors. While RRH is by far the largest unmet housing need for survivors in the CoC, there is also a need for 41 TH units, and 590 PSH units. 3) To quantify unmet need, the CoC used HIC data on the total number of available units of each intervention type. CT HMIS and the comparable database (ETO) were used to determine the average turnover and length of stay for the various model types. Need estimates by model type were calculated from the CoC's By-name List (BNL), which is housed within CT HMIS. The BNL includes the common assessment score and allows the CoC to understand trends around level of services needed. 4) Unmet need was determined by comparing the total number of households that are in need of each housing intervention and the inventory of available units in the CoC. Looking at multiple years of data across the CoC, transitional housing units turnover at a rate of 2.2 per year, RRH have an average length of stay of 6 months, and PH units turnover at an annual rate of 14%. DV specific projects have the same percentage of PSH turnover, with a lower turnover rate in their TH project of just once a year. The full PIT capacity of CoC housing resources for the region is 245 TH units, 457 RRH units, and 4,193 PSH units. Calculating the turnover for each project type, and assuming that 15% of these resources are utilized to house survivors – this gives us a total annual number units available for DV in the CoC of 102 TH units, 137 RRH units, and 91 PSH units. By subtracting the total number of households that are in need of each housing intervention annually from this estimate of units available to meet this need, the CoC arrived at the quantified unmet need estimates provides in #2 above.

1C-4e. Applicants must describe how the DV Bonus project(s) being applied for will address the unmet needs of domestic violence survivors. (limit 2,000 characters)

The CoC's analysis demonstrated an annual unmet need for 830 units of RRH for survivors. The CoC is applying for one DV Bonus project providing 67 RRH units at a PIT and anticipated to serve 134 DV survivor households annually. If funded, the project will fill 16% of the estimated unmet need. The project will address survivors' unmet needs through a systemic collaboration that leverages the strengths of domestic violence, human trafficking and housing providers. Each partner will provide housing and services tailored specifically to survivors' needs and choices. For example, DV and human trafficking providers will offer strengths-based, client-centered, trauma-informed services to empower victims to plan for safety, overcome the impacts of abuse, increase income, and determine their own futures. Survivors will receive advocacy and tailored case management services that best meet their needs. Housing providers will assist in quickly locating safe, affordable and sustainable housing, including assessing client strengths, housing barriers, and safety concerns, engaging landlords and educating them about legal protections available to survivors and addressing landlord concerns. The project will leverage the expertise of specific providers to quickly address survivors' needs, improving self-esteem and self-sufficiency and assisting them to locate and retain stable housing. Staff at all partner organizations will be trained to help survivors access effective services and overcome their unique barriers to housing stability, including ongoing threats to safety, complex legal issues, adequate income, economic abuse, and the impacts of trauma. The project will use a flexible progressive engagement model that accounts for the unique needs of survivors. The project will serve clients from the by-name list (BNL) for housing resources, in priority order as defined by prioritization protocols and in accordance with confidentiality protocols.

1C-4f. Applicants must address the capacity of each project applicant applying for DV bonus projects to implement a DV Bonus project by describing:
(1) rate of housing placement of DV survivors;
(2) rate of housing retention of DV survivors;
(3) improvements in safety of DV survivors; and
(4) how the project applicant addresses multiple barriers faced by DV survivors.
(limit 4,000 characters)

The CT Department of Housing (DOH) is the sole applicant & will be the grantee and fiscal manager for the project. DOH currently manages over $25M in HUD funded housing projects annually, including almost $3 million in CoC funded RRH, and oversees a state run rental assistance program with over 1,000 units dedicated to homeless individuals. The project sub-recipient, CCADV, is a membership organization comprised of 18 domestic violence service agencies that provide critical support to victims including safety planning, emergency shelter, court advocacy, counseling and support groups, among other services. CCADV will coordinate provision of all housing and services, which will be provided by DV, human trafficking, and housing providers from across the CoC. 1) the rate of housing placement of DV

survivors among the CoC funded organizations that will provide housing location and/or case management services through this project is 96% annually. The positive exit rate from shelter and transitional housing for all DV providers statewide is 98%. 2) the rate of housing retention of DV survivors among the CoC funded organizations that will provide housing location and/or case management services through this project is 98% annually 3) Project partner organizations have demonstrated capacity to assist providers to improve safety. DV advocates at each organization are certified and adhere to state standards around trauma-informed, victim-centered advocacy, which includes risk assessment, safety plans, counseling, medical advocacy, and assistance meeting basic needs, lack of which often serves as an impediment to safety. Each involved DV provider has a Child Advocate to help parents understand how DV impacts the child and to develop safety plans when the offending parent is involved. With support from CCADV's Law Enforcement Initiative, each organization provides support, information and advocacy services to better inform the safety of victims throughout the arrest and prosecution process. Each participating DV provider also has a Family Violence Victim Advocate that provides specialized support and advocacy to help survivors to navigate civil and criminal court systems, understand their options, explore how options may impact safety and assist with the development of a safety plan. In addition, CCADV member organizations partner with municipal and state police, colleges and universities, and tribal police across the state on a two-pronged intervention that uses a nationally recognized lethality risk assessment and accompanying protocol to assess and reduce lethality risk. CCADV also leads the Connecticut Domestic Violence Fatality Review Committee and, through this experience, has extensive capacity to conduct multi-disciplinary, systemic examinations of intimate partner fatalities and apply lessons learned to make systems changes and prevent future fatalities. Similarly CCADV has led efforts in CT to develop effective partnerships with law enforcement and is well positioned to ensure the project coordinates effectively with and advances best practices for police response to domestic violence in the communities that will be served. 4) The project will address multiple barriers faced by survivors through an established, best-practice model of victim-centered advocacy to overcome challenges such as trauma, risk, mental health, substance use and housing instability. Participating organizations provide ongoing trauma-informed support and counseling including assistance with benefits, employment and education through established relationships with other social service/community providers. Staff at each participating DV provider has been trained on use of a self-assessment and planning tool that helps agencies evaluate and assess the extent to which current practices are trauma-informed, identify and prioritize key areas for change, and track progress towards a trauma-informed service system.

1C-5. PHAs within CoC. Applicants must use the chart to provide information about each Public Housing Agency (PHA) in the CoC's geographic areas:
(1) Identify the percentage of new admissions to the Public Housing or Housing Choice Voucher (HCV) Programs in the PHA who were experiencing homelessness at the time of admission;
(2) Indicate whether the PHA has a homeless admission preference in its Public Housing and/or HCV Program; and

(3) Indicate whether the CoC has a move on strategy. The information should be for Federal Fiscal Year 2017.

Public Housing Agency Name	% New Admissions into Public Housing and Housing Choice Voucher Program during FY 2017 who were experiencing homelessness at entry	PHA has General or Limited Homeless Preference	PHA has a Preference for current PSH program participants no longer needing intensive supportive services, e.g. move on?
Windsor Locks Housing Authority	50.00%	Yes-Public Housing	No
Danbury Housing Authority	11.00%	Yes-Both	No
Torrington Housing Authority	21.40%	Yes-Both	No
City of Hartford Housing Authority	64.50%	Yes-Both	Yes
Department of Housing	16.50%	Yes-HCV	Yes

If you select "Yes--Public Housing," "Yes--HCV," or "Yes--Both" for "PHA has general or limited homeless preference," you must attach documentation of the preference from the PHA in order to receive credit.

1C-5a. For each PHA where there is not a homeless admission preference in their written policy, applicants must identify the steps the CoC has taken to encourage the PHA to adopt such a policy. (limit 2,000 characters)

Each of the noted PHAs has a homeless preference. The CoC is working in close collaboration with the HUD Hartford Field Office and PHAs throughout the CoC to create more opportunities for persons experiencing homelessness to have an admission preference in HCV and public housing. The CoC and HUD Hartford Field Office have held roundtables to bring PHAs, providers, government staff & officials together to encourage preferences for homeless households. New partnerships are developing and PHAs who currently do not have homeless admission preferences are working toward creating them. Each of the Coordinated Access Networks has PHAs as active members and through on-going collaboration, new partnerships will be formed so that preferences for homeless families and individuals will grow in the CoC.

1C-5b. Move On Strategy with Affordable Housing Providers. Does the CoC have a Move On strategy with affordable housing providers in its jurisdiction (e.g., multifamily assisted housing owners, PHAs, Low Income Tax Credit (LIHTC) developments, or local low-income housing programs)? Yes

Move On strategy description. (limit 2,000 characters)

The State of CT has been working on Move On strategies for the last few years. CT Dept. of Housing (DOH) created a preference in its HCV program for persons moving on from permanent supportive housing a few years ago. DOH created a HCV preference for young adult families ready to move-on from supportive housing. Persons transitioning out of the Department of Housing and Urban Development Continuum of Care housing programs (formerly Shelter Plus Care/Supportive Housing Programs) and/or any state funded Permanent

Supportive Housing programs into permanent housing are included as priority groups with a preference in the state's HCV program. The Reaching Home Affordable Housing Workgroup has been working to create an inventory of LIHTC projects that have dedicated homeless units to use possible moving on options from PSH and making them accessible through the local Coordinated Access Networks (CANS). Additionally, the City of Hartford PHA has a Moving On Pilot Program designed to assist the most vulnerable homeless individuals in accessing supportive housing by expanding the capacity of supportive housing programs with Project-Based Vouchers. Moving On focuses on redirecting supportive housing services to target those with higher needs. As individuals successfully stabilize in supportive housing, their need for support services may decline over time but their need for rental assistance remains. Moving On Pilot Program (Moving On) focuses on "unclogging" the system by allowing current, stable tenants of supportive housing that no longer need an intensive level of support services to maintain permanent housing by providing them with a mainstream HCV rental subsidy. Moving On then backfills those supportive housing slots with the most vulnerable long term shelter stayers and high service utilizers in need of the intensive services.

1C-6. Addressing the Needs of Lesbian, Gay, Bisexual, Transgender (LGBT). Applicants must describe the actions the CoC has taken to address the needs of Lesbian, Gay, Bisexual, and Transgender individuals and their families experiencing homelessness.
(limit 2,000 characters)

BOS is committed to meeting the needs of LGBT individuals experiencing homelessness & LGBT advocacy groups are part of and collaborate w/CoC work in a number of ways. The ED of True Colors, Inc. is a voting member of the Youth & Young Adult Homelessness Workgroup. At the 2018 CT Coalition to End Homelessness (CCEH) Annual Training Institute, True Colors presented on LGBTQ Youth Homelessness 101. In 2017, CCEH and CT Department of Housing, AIDS CT and the CT TransAdvocacy Coalition conducted training on Safe Shelter & Fair Housing Trainings to educate providers on meeting the needs of the LGBTQ community & ensure equal access in each of the 8 Coordinated Access Networks (CANs); CCEH and DOH had webinars on "Re-Imagining Shelter Space" and "Queering Care to improve services to LGBTQ Youth & Young Adults". CCEH website has LGBTQ resources for providers including webinars & info pertaining to legal protections for transgender individuals. On 11/21/17, CoC staff trained on Equal Access at the HUD CoC Policies: Rules for Running Your Program which included training on Equal Access in Accordance w/Gender Identity Final Rule. On 6/27/13, the CoC implemented a non-discrimination policy which prohibits discrimination of any kind & notes that providers shall have non- discrimination policies in place and assertively outreach to people least likely to engage in the homeless system. In Dec of 2016, CoC updated P&P to include final Equal Access Rule. January 2018, the CoC adopted the CT CANs P&P Manual which included the CANs require providers to comply w/applicable civil rights, equal access, and fair housing laws. Providers must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws. And, CANs must ensure that CoC resources are eligible to all individuals regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, or marital status.

1C-6a. Anti-Discrimination Policy and Training. Applicants must indicate if the CoC implemented a CoC-wide anti-discrimination policy and conducted CoC-wide anti-discrimination training on the Equal Access Final Rule and the Gender Identity Final Rule.

1. Did the CoC implement a CoC-wide anti-discrimination policy that applies to all projects regardless of funding source?	Yes
2. Did the CoC conduct annual CoC-wide training with providers on how to effectively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity (Equal Access Final Rule)?	Yes
3. Did the CoC conduct annual CoC-wide training with providers on how to effectively implement Equal Access to Housing in HUD Programs in Accordance with an Individual's Gender Identity (Gender Identity Final Rule)?	Yes

1C-7. Criminalization of Homelessness. Applicants must select the specific strategies the CoC implemented to prevent the criminalization of homelessness in the CoC's geographic area. Select all that apply.

Engaged/educated local policymakers:	X
Engaged/educated law enforcement:	X
Engaged/educated local business leaders:	X
Implemented communitywide plans:	X
No strategies have been implemented:	
Other:(limit 50 characters)	
Advocate for changes in local ordinances	X

1C-8. Centralized or Coordinated Assessment System. Applicants must: (1) demonstrate the coordinated entry system covers the entire CoC geographic area; (2) demonstrate the coordinated entry system reaches people who are least likely to apply homelessness assistance in the absence of special outreach; (3) demonstrate the assessment process prioritizes people most in need of assistance and ensures they receive assistance in a timely manner; and (4) attach CoC's standard assessment tool. (limit 2,000 characters)

1)BOS Coordinated Assessment System begins with 211, a statewide response system that provides 24-hr referrals to basic needs such as food, clothing, shelter, health care, SA & MH & emergencies via phone, the web or text. 211

offers resources to resolve housing crises and if unable to resolve, household (HH) is offered an appointment at their local Coordinated Access Network (CAN). 211 and 8 CANs cover 100% of the CoC geographic area. 2) CAN providers ensure intake can happen at any location (e.g., jail, hospital, etc.), for clients unable/unwilling to travel to the CAN intake offices; outreach workers assist in this process. PATH outreach in each CAN focuses on the most vulnerable mentally ill people. BOS affirmatively markets to persons least likely to apply and reaches people regardless of race, color, national origin, English proficiency, religion, sex, sexual orientation, gender identity/expression, age, familial status, or disability. At sites across the CoC, including those communities with a high proportion of racial/ethnic minorities, 211 disseminates multi-lingual marketing info. 3) CANs complete assessments using a common tool (VI-SPDAT) to prioritize HH for housing. Statewide By Name List, filtered by CAN region, is in HMIS. HH most in need of assistance are prioritized based on criteria and processes established in CoC P&P. PSH prioritizes in accordance with CPD 16-11 (i.e., based on VI-SPDAT score, length of homelessness, & level of functioning). The HMIS administrator monitors wait-time for CAN appts, provides data to CANs and CANs work to ensure that people receive assistance in a timely manner. There are a broad range of organizations in CANs in BOS, over 50 agencies participate including but not limited to: municipalities, hospitals, outreach, police, school systems, ESG administrators, and mental health, substance abuse, shelter, TH, RRH, PSH providers. 211 uses CT's largest human service database with 4,100 agencies providing 40,000+ programs

1D. Continuum of Care (CoC) Discharge Planning

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1D-1. Discharge Planning–State and Local. Applicants must indicate whether the CoC has a discharge policy to ensure persons discharged from the systems of care listed are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply (note that when "None:" is selected no other system of care should be selected).

Foster Care:	X
Health Care:	X
Mental Health Care:	X
Correctional Facilities:	X
None:	

1D-2. Discharge Planning Coordination. Applicants must indicate whether the CoC actively coordinates with the systems of care listed to ensure persons who have resided in them longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply (note that when "None:" is selected no other system of care should be selected).

Foster Care:	X
Health Care:	X
Mental Health Care:	X
Correctional Facilities:	X
None:	

1E. Continuum of Care (CoC) Project Review, Ranking, and Selection

Instructions

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1E-1. Project Ranking and Selection. Applicants must indicate whether the CoC used the following to rank and select project applications for the FY 2018 CoC Program Competition:
(1) objective criteria;
(2) at least one factor related to achieving positive housing outcomes;
(3) a specific method for evaluating projects submitted by victim services providers; and
(4) attach evidence that supports the process selected.

Used Objective Criteria for Review, Rating, Ranking and Section	Yes
Included at least one factor related to achieving positive housing outcomes	Yes
Included a specific method for evaluating projects submitted by victim service providers	Yes

1E-2. Severity of Needs and Vulnerabilities. Applicants must describe:
(1) the specific severity of needs and vulnerabilities the CoC considered when reviewing, ranking, and rating projects; and
(2) how the CoC takes severity of needs and vulnerabilities into account during the review, rating, and ranking process.
(limit 2,000 characters)

1)The CoC's ranking & selection process prioritizes funding for projects serving these specific vulnerabilities: chronic homelessness, zero income, criminal history, active substance use, psychiatric/physical disability, and unsheltered homelessness. 2) The CoC took the following actions to ensure consideration of these vulnerabilities during the review, rating and ranking process. Projects were ranked and selected based on: applicant experience/capacity to serve chronically homeless, active substance users, people with criminal history and/or disabilities, unsheltered; a clear outreach & supportive services plan to engage and serve the most vulnerable populations using Housing First. Evaluation standards for renewal projects differ for PSH from TH & RRH given the higher need population in PSH (i.e, chronically homeless people with significant behavioral/physical health issues). RRH, TH and DV programs have customized performance benchmarks based on expected level of severity of need among the client population served. Projects are scored objectively using these customized standards and ranking is based on evaluation scores. DV projects are evaluated recognizing the difference in population they serve and have alternate standards on using by-name-list, Length of stay in TH, and exits

to permanent housing. For new PSH projects, in the 2018 competition, the CoC identified a priority for PSH projects for 100% chronically homeless.

1E-3. Public Postings. Applicants must indicate how the CoC made public: (1) objective ranking and selection process the CoC used for all projects (new and renewal); (2) CoC Consolidated Application–including the CoC Application, Priority Listings, and all projects accepted and ranked or rejected, which HUD required CoCs to post to their websites, or partners websites, at least 2 days before the CoC Program Competition application submission deadline; and (3) attach documentation demonstrating the objective ranking, rating, and selections process and the final version of the completed CoC Consolidated Application, including the CoC Application with attachments, Priority Listing with reallocation forms and all project applications that were accepted and ranked, or rejected (new and renewal) was made publicly available, that legibly displays the date the CoC publicly posted the documents.

Public Posting of Objective Ranking and Selection Process		Public Posting of CoC Consolidated Application including: CoC Application, Priority Listings, Project Listings	
CoC or other Website	☐	CoC or other Website	☐
Email	☐	Email	☐
Mail	☐	Mail	☐
Advertising in Local Newspaper(s)	☐	Advertising in Local Newspaper(s)	☐
Advertising on Radio or Television	☐	Advertising on Radio or Television	☐
Social Media (Twitter, Facebook, etc.)	☐	Social Media (Twitter, Facebook, etc.)	☐

1E-4. Reallocation. Applicants must indicate whether the CoC has cumulatively reallocated at least 20 percent of the CoC's ARD between the FY 2014 and FY 2018 CoC Program Competitions.

Reallocation: No

1E-4a. If the answer is "No" to question 1E-4, applicants must describe how the CoC actively reviews performance of existing CoC Program-funded projects to determine the viability of reallocating to create new high performing projects. (limit 2,000 characters)

1) The CoC has implemented a comprehensive process that uses HIC/PIT/by-name list and project/system performance data to determine how to most effectively use resources to end homelessness. CoC reallocates projects, as needed, to improve system performance. Each year the CoC: conducts a performance evaluation of all CoC projects; monitors a portion of CoC projects; and analyzes program spending and cost/household for each project. Results from these assessments are reviewed by the Steering Committee (SC). If

projects score poorly on renewal evaluation and fall into corrective action for more than one year, repeatedly under spend, have high costs that are not justified, or fail to correct monitoring findings, the SC will consider those projects for reallocation. If a project is chosen for reallocation, agencies can appeal to the CoC Grievance Comm. CoC also works closely with agencies to do voluntary reallocations when agency may no longer be able to provide high quality housing and services and/or funds could be used more effectively elsewhere in the CoC. BOS posts to its website and widely distributes an RFP for new projects funded through both bonus and reallocation. 2) Since 2012, the CoC has been actively reallocating projects in each competition. CoC has reallocated all TH projects except ones serving youth and survivors of DV. CoC has analyzed project spending, monitoring findings, cost and performance data and reallocated funds from projects with repeated under spending, unjustified costs, ongoing performance issues or uncorrected monitoring findings. To date, the CoC has reallocated all funds where it makes sense, including partial or full reallocation of 6 projects totaling $580,000 in the FY18 competition. The CoC has also succeeded in working with projects to quickly correct problems and will be reallocating funds in future competitions if issues are not corrected. Over the next year, CoC focus will be on cost-effectiveness.

1E-5. Local CoC Competition. Applicants must indicate whether the CoC: (1) established a deadline for project applications that was no later than 30 days before the FY 2018 CoC Program Competition Application deadline–attachment required; (2) rejected or reduced project application(s)–attachment required; and (3) notify applicants that their project application(s) were being rejected or reduced, in writing, outside of e-snaps, at least 15 days before FY 2018 CoC Program Competition Application deadline–attachment required. :

(1) Did the CoC establish a deadline for project applications that was no later than 30 days before the FY 2018 CoC Program Competition Application deadline? Attachment required.	Yes
(2) If the CoC rejected or reduced project application(s), did the CoC notify applicants that their project application(s) were being rejected or reduced, in writing, outside of e-snaps, at least 15 days before FY 2018 CoC Program Competition Application deadline? Attachment required.	Yes
(3) Did the CoC notify applicants that their applications were accepted and ranked on the Priority Listing in writing outside of e-snaps, at least 15 before days of the FY 2018 CoC Program Competition Application deadline?	Yes

2A. Homeless Management Information System (HMIS) Implementation

Intructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2A-1. Roles and Responsibilities of the CoC and HMIS Lead. Does your CoC have in place a Governance Charter or other written documentation (e.g., MOU/MOA) that outlines the roles and responsibilities of the CoC and HMIS Lead? Attachment Required.	Yes	
2A-1a. Applicants must: (1) provide the page number(s) where the roles and responsibilities of the CoC and HMIS Lead can be found in the attached document(s) referenced in 2A-1, and (2) indicate the document type attached for question 2A-1 that includes roles and responsibilities of the CoC and HMIS Lead (e.g., Governance Charter, MOU/MOA).	1) pages 3 through 7	2) MOU
2A-2. HMIS Policy and Procedures Manual. Does your CoC have a HMIS Policy and Procedures Manual? Attachment Required.	Yes	
2A-3. HMIS Vender. What is the name of the HMIS software vendor?	CaseWorthy	
2A-4. HMIS Implementation Coverage Area. Using the drop-down boxes, applicants must select the HMIS implementation Coverage area.	Statewide HMIS (multiple CoC)	

2A-5. Bed Coverage Rate. Using 2018 HIC and HMIS data, applicants must report by project type:
(1) total number of beds in 2018 HIC;
(2) total beds dedicated for DV in the 2018 HIC; and

(3) total number of beds in HMIS.

Project Type	Total Beds in 2018 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ES) beds	2,036	210	1,780	97.48%
Safe Haven (SH) beds	0	0	0	
Transitional Housing (TH) beds	377	57	275	85.94%
Rapid Re-Housing (RRH) beds	696	0	673	96.70%
Permanent Supportive Housing (PSH) beds	5,175	58	3,846	75.16%
Other Permanent Housing (OPH) beds	0	0	0	

2A-5a. To receive partial credit, if the bed coverage rate is 84.99 percent or lower for any of the project types in question 2A-5., applicants must provide clear steps on how the CoC intends to increase this percentage for each project type over the next 12 months.
(limit 2,000 characters)

1) All bed types except PSH exceed the targeted bed coverage rate. All CoC-funded PSH projects enter in HMIS. CoC has 768 HUD-VASH beds and has approximately 500 PSH beds funded by the CT Department of Mental Health and Addiction Services (DMHAS) which do not enter into HMIS and significantly impacts the coverage rate. Coordination with the VA has been ongoing and will continue over the next 12 months. The CT Coalition to End Homelessness (CCEH) recently was able to provide "read only" access to HMIS to the VA. The CoC is working on an HMIS MOU with the VA which should be completed by the end of the year. The VA is currently reviewing it. CCEH will continue to work on integrating the HUD-VASH beds and participant info into the HMIS and is prepared to assist with data entry. Efforts will also continue to integrate the PSH beds that are funded by DMHAS in the “Next Steps” and “PILOTS” initiatives into HMIS. Programs enter into the state database but not into HMIS. DMHAS has been working on creating a crosswalk between DDaP, the state system, and HMIS so that data can be entered once by providers and exported to HMIS. CCEH and DMHAS will continue to work on this option and expect to have the crosswalk completed in the next few months with data integration occurring within 6-9 months. 2) The CoC will implement these steps by having the Chairs of the Steering Committee (SC) work with CCEH to execute the HMIS MOU with the VA by 12/31/2018. CCEH will then start adding users from the VA to HMIS, providing training and support to achieve full implementation by the end of 2019. CCEH and VA will provide monthly updates on the progress of the MOU at the CoC SC meetings. The Chairs will meet with Alice Minervino, DMHAS rep to the SC, to create a plan to phase in non-CoC projects into HMIS beginning with agencies who have CoC funding for other projects and moving on to agencies with no CoC funding. DMHAS will provide monthly updates on progress at the CoC SC.

2A-6. AHAR Shells Submission: How many 2017 Annual Housing Assessment Report (AHAR) tables shells did HUD accept? 12

2A-7. CoC Data Submission in HDX. 01/23/2018

Applicants must enter the date the CoC submitted the 2018 Housing Inventory Count (HIC) data into the Homelessness Data Exchange (HDX). (mm/dd/yyyy)

2B. Continuum of Care (CoC) Point-in-Time Count

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2B-1. PIT Count Date. Applicants must enter the date the CoC conducted its 2018 PIT count (mm/dd/yyyy).	01/23/2018
2B-2. HDX Submission Date. Applicants must enter the date the CoC submitted its PIT count data in HDX (mm/dd/yyyy).	04/27/2018

2C. Continuum of Care (CoC) Point-in-Time (PIT) Count: Methodologies

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2C-1. Change in Sheltered PIT Count Implementation. Applicants must describe any change in the CoC's sheltered PIT count implementation, including methodology and data quality changes from 2017 to 2018. Specifically, how those changes impacted the CoC's sheltered PIT count results.
(limit 2,000 characters)

The sheltered count implementation expanded to include Hurricane Maria evacuees this year. This involved getting data from FEMA and extrapolating demographic information to the households staying in CT Hotels paid for by FEMA. This led to a large shelter bed increase for the CoC for this year. CT BOS is committed to improving the quality of the sheltered count each year. To train on the sheltered count, the CoC conducts in-person trainings for providers to encourage face to face learning. A follow up webinar version of the training is also offered for people who cannot attend in person or for those who would like the refresher. A recording of the training is then made available to providers for reference. Additionally an electronic document of the point-in-time data workflow for people to verify and validate their data is provided to users for their convenience. These trainings not only cover the technical aspects of how to collect and validate the data, but also include rationale for why each element is necessary in an effort to provide a holistic approach to each users understanding of the data collection needs for the Point-in-Time Count. If a provider still has difficulty or confusion after providing this thorough training and support resources, they have access to the CT HMIS helpdesk for one-on-one assistance with their PIT data.

2C-2. Did your CoC change its provider coverage in the 2018 sheltered count? Yes

2C-2a. If "Yes" was selected in 2C-2, applicants must enter the number of beds that were added or removed in the 2018 sheltered PIT count.

Beds Added:	587
Beds Removed:	259
Total:	328

2C-3. Presidentially Declared Disaster Changes to Sheltered PIT Count. Did your Yes

CoC add or remove emergency shelter, transitional housing, or Safe Haven inventory because of funding specific to a Presidentially declared disaster, resulting in a change to the CoC's 2018 sheltered PIT count?

2C-3a. If "Yes" was selected for question 2C-3, applicants must enter the number of beds that were added or removed in 2018 because of a Presidentially declared disaster.

Beds Added:	587
Beds Removed:	259
Total:	328

2C-4. Changes in Unsheltered PIT Count Implementation. Did your CoC change its unsheltered PIT count implementation, including methodology and data quality changes from 2017 to 2018? If your CoC did not conduct and unsheltered PIT count in 2018, select Not Applicable. Yes

2C-4a. If "Yes" was selected for question 2C-4, applicants must:
(1) describe any change in the CoC's unsheltered PIT count implementation, including methodology and data quality changes from 2017 to 2018; and
(2) specify how those changes impacted the CoC's unsheltered PIT count results.
(limit 2,000 characters)

For the 2018 unsheltered point-in-time count, a mobile app was the required method of data collection for all volunteers this year. Everything was done electronically, there were no paper surveys used and this increased efficiency of counting efforts. The use of mobile technology and real-time monitoring of surveying activities allowed for simultaneous quality assurance of data; phone calls were made to volunteers who had data anomalies to correct issues immediately so that the data was of the highest possible quality. Additionally, there was improved coordination with street outreach workers which led to better canvasing strategies of known locations where people were experiencing homelessness.

2C-5. Identifying Youth Experiencing Homelessness in 2018 PIT Count. Did your CoC implement specific measures to identify youth experiencing homelessness in its 2018 PIT count? Yes

2C-5a. If "Yes" was selected for question 2C-5., applicants must describe:

(1) how stakeholders serving youth experiencing homelessness were engaged during the planning process;
(2) how the CoC worked with stakeholders to select locations where youth experiencing homelessness are most likely to be identified; and
(3) how the CoC involved youth experiencing homelessness in counting during the 2018 PIT count.
(limit 2,000 characters)

1)BOS engaged stakeholders serving youth experiencing homelessness during the planning for the 2018 PIT count. Every Coordinated Access Network (CAN) in CT has 1 Youth Engagement Team Initiative (YETI) group that works w/in that region including schools (i.e. McKinney-Vento Liaisons), youth, youth-serving agencies (i.e.: RHY providers, DCF, DMHAS), Local Implementation Service Teams (LISTS; groups of professionals & families organized around juvenile justice) & designated CAN reps. Teams partner w/youth to assist in the direction & implementation of the Youth Count. Statewide YETI mtgs occurred monthly for Youth PIT Count & teams provided trauma-informed, best practices for engaging w/homeless youth, designing questions & how to reach youth 2) Stakeholders selected locations where homeless youth are most likely to be identified & regions of the state collected info from focus groups of youth w/lived experience to determine locations to conduct surveys. YETIs outreached to McKinney-Vento liaisons to connect w/schools & determined where youth were already identified as homeless.YETI leaders worked w/107 schools in CT; schools provided administration of the survey by staff/volunteers. Youth Service Bureaus, Regional Dept of Children & Family Offices, RHY Providers, Outreach Programs & Juvenile/Young Adult Services (Access centers, LGBTQIA Support Services & others) provided locations for youth to be identified & surveyed. A new partnership with CT's Community Health Centers resulted in allowed survey conducted at numerous Community Health Centers across CT 3) BOS involved youth experiencing homelessness in counting during the 2018 PIT count; youth were critical in the use of technology for mapping "hotspots:" indoor & outdoor locations where youth & young adults tend to congregate; Youth Action Hub (advisory group of youth w/lived experience who work w/stakeholders throughout CT) members participated in the development & administration of the survey during the count.

2C-6. 2018 PIT Implementation. Applicants must describe actions the CoC implemented in its 2018 PIT count to better count:
(1) individuals and families experiencing chronic homelessness;
(2) families with children experiencing homelessness; and
(3) Veterans experiencing homelessness.
(limit 2,000 characters)

1) Outreach workers provided valuable help to regional coordinators plan locations for volunteers to canvas based on known locations of people experiencing homelessness, including those experiencing CH. All volunteer teams had an outreach worker, social service worker, or person with lived experience as part of their group to ensure all persons experiencing homelessness were counted, especially those who might be harder to identify or approach like families with children or those who are CH. Rigorous data collection of all homeless people encountered during PIT survey activities ensures that all people who meet the HUD criteria of CH are properly identified. All respondents receive questions that determine if they are literally homeless, have a disability of long duration, and have a length of time homeless that meet

the requirements outlined in HUD's final rule on defining CH. 2) CT has a "no unsheltered families with children" protocol: if a household with children is identified as experiencing unsheltered homelessness, outreach gets them into safe shelter or a hotel if ES is unavailable. As a result, no families with children were counted as unsheltered during the 2018 PIT. All literally homeless families were sheltered and entered into HMIS for the night of the count, thus ensuring an accurate count of families with children. 3) BOS has improved the counting of homeless veterans; the local VA plays a key role in preparing for the count, including providing outreach and by regional coordination for the efforts (i.e. recruiting other veterans and formerly homeless volunteers to administer the count survey, determine known locations, and managing volunteer teams on the night of the count). PIT survey questions are asked to specifically determine if a person is a veteran of US military service as opposed to service in other countries, eliminating false positives for people who may not have served in the US

3A. Continuum of Care (CoC) System Performance

Instructions

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

3A-1. First Time Homeless as Reported in HDX. In the box below, applicants must report the number of first-time homeless as reported in HDX.

Number of First Time Homeless as Reported in HDX.	6,184

3A-1a. Applicants must:
(1) describe how the CoC determined which risk factors the CoC uses to identify persons becoming homeless for the first time;
(2) describe the CoC's strategy to address individuals and families at risk of becoming homeless; and
(3) provide the name of the organization or position title that is responsible for overseeing the CoC's strategy to reduce the number of individuals and families experiencing homelessness for the first time. (limit 2,000 characters)

1)The CoC has made a concerted effort, using a multi-pronged approach, funded through state, federal, local, and private resources to reduce first time homelessness. In FY 2017, there were 6184 1st time homeless in ES/TH/SH, a decrease of 16% from FY 2016 with 7189 first time homeless. In order to better understand the first time homeless population and provide appropriate and effective interventions, the HMIS administrator selects first time homeless cohort and runs reports to analyze characteristics and risk factors. Results from the report indicate that of the first time homeless, 19% are living with mental health issues, 16% living with substance abuse and 15% were living doubled-up.
2) BOS has successfully been using diversion as a strategy to prevent first time homelessness. Diversion is the first intervention for all people seeking homeless assistance. In the past year, 21% of people who had a Coordinated Access Network (CAN) appointment were diverted. 211 connects callers to utility & short -term rent assistance; 60% of callers were provided w/resources preventing meeting w/the CAN for shelter or housing. CT Dept. of Housing (DOH) has a new CDBG diversion program w/$600,000 to fund CAN staff in 3 CANs to expand diversion services. CT Coalition to End Homelessness provides extensive diversion training & has a train-the-trainer model to train CAN staff on diversion. CCEH has the Be Homeful program, a campaign to raise funds for family diversion and provide monies and other services to keep families out of shelter. With diversion, providers identify alternate housing arrangements, connect clients to conflict resolution & mediation, locate & secure housing through financial assistance & advocacy. NAEH, DOH and CCEH have launched the ES Learning Collaborative with the goal of enhancing diversion and increasing rapid exits to permanent housing.

3)CT DOH oversees the strategy to reduce first time homelessness.

3A-2. Length-of-Time Homeless as Reported in HDX. Applicants must:
(1) provide the average length of time individuals and persons in families remained homeless (i.e., the number);
(2) describe the CoC's strategy to reduce the length-of-time individuals and persons in families remain homeless;
(3) describe how the CoC identifies and houses individuals and persons in families with the longest lengths of time homeless; and
(4) provide the name of the organization or position title that is responsible for overseeing the CoC's strategy to reduce the length of time individuals and families remain homeless.
(limit 2,000 characters)

1)In 2017, the average length of time people remained homeless (LOTH) was 122 days. BOS is committed to reducing the LOTH households are homeless. Providers have reported that diversion has been successful and has resulted in keeping households (HH) with the fewest barriers out of ES and TH, and that programs are now serving the most vulnerable and resource needy HH. 2) BOS has numerous strategies to reduce LOTH. BOS is working to increase housing options (affordable, RRH, PSH) so that HH can exit more quickly. BOS continues to increase the number of PSH units available in the CoC with the 2017 HUD bonus project of 44 units for CH individuals and is applying for an additional 62 PSH and 200+ RRH units in this application to HUD. BOS increased LIHTC for homeless persons by 52 units in 2017, and each year seeks to add to that inventory and anticipates another 30-40 units for homeless HH to be awarded in the 2018 LIHTC round. CT Department of Housing (DOH) is using $875,000 in ESG funding for rapid rehousing. In October, DOH will direct $3 million in HOME funding for security deposit and first month's rent to serve approximately 750 homeless households annually. DOH makes 1145 Rental Assistance Program vouchers available for homeless HHs. CCEH is coordinating Learning Collaboratives w/ES staff to focus staff on shortening LOTH and strategies to expedite getting shelter stayers to PH as quickly as possible.3) All of the Coordinated Access Networks (CANs) assess consumers using the VI-SPDAT and verify homeless history through HMIS and/or third-party verification. CANs maintain by-name lists and factor LOTH into the prioritization processes for RRH and PSH (in addition to other factors related to vulnerability). BOS adopted CPD Notice 16-11 to prioritizes PSH based on length of homelessness. 100% of BOS PSH projects are dedicated to CH and employ Housing First to ensure quick access to housing. 4) CT DOH oversees strategy to reduce LOTH.

3A-3. Successful Permanent Housing Placement and Retention as Reported in HDX. Applicants must:
(1) provide the percentage of individuals and persons in families in emergency shelter, safe havens, transitional housing, and rapid rehousing that exit to permanent housing destinations; and
(2) provide the percentage of individuals and persons in families in permanent housing projects, other than rapid rehousing, that retain their permanent housing or exit to permanent housing destinations.

	Percentage

Report the percentage of individuals and persons in families in emergency shelter, safe havens, transitional housing, and rapid re-housing that exit to permanent housing destinations as reported in HDX.	44%
Report the percentage of individuals and persons in families in permanent housing projects, other than rapid re-housing, that retain their permanent housing or exit to permanent housing destinations as reported in HDX.	98%

3A-3a. Applicants must:
(1) describe the CoC's strategy to increase the rate at which individuals and persons in families in emergency shelter, safe havens, transitional housing and rapid rehousing exit to permanent housing destinations; and
(2) describe the CoC's strategy to increase the rate at which individuals and persons in families in permanent housing projects, other than rapid rehousing, retain their permanent housing or exit to permanent housing destinations.
(limit 2,000 characters)

1)CT BOS has multiple strategies to increase PH exits from ES,TH, and RRH. Each quarter, the Steering Committee reviews the SPMs including exits to permanent and adjusts interventions as needed to improve performance. Successful PH placement is part of the scoring criteria in the annual renewal evaluation and is assessed during monitoring visits as well. Projects with poor performance are offered technical assistance. Another strategy includes expanding exit options for people in ES, TH and RRH: DOH was awarded 50 Mainstream Section 8 vouchers that will be available starting October 2018; BOS received 44 new CH PSH units in 2017 HUD CoC competition; CT Dept of Housing (DOH) is dedicating more resources to RRH, beginning in October 2018, there will be $3 million in HOME funds for security deposits and first months' rent for approximately 750 homeless households. DOH will continue to dedicate $875,000 of ESG for RRH. 2) BOS has a 98% rate at which people in permanent housing projects, other than rapid rehousing, retain their PH or exit to PH destinations. BOS strategies to maintain/improve this rate include: ensuring the BOS policy on CAN case conferencing for tenants facing eviction is occurring for all tenants at risk of eviction to help to preserve housing or secure an alternative placement, plan for the best outcome and try to prevent a return to homelessness; continue to monitor and evaluate CoC funded projects for exits to or retention of permanent housing and provide technical assistance to providers unable to meet standards; convening annual employment and benefits training for providers on resources & best practices; providing trainings to providers on topics such as eviction prevention, housing stabilization, Critical Time Intervention and client-centered case management. 3) DOH oversees the strategy to increase exits to PH from ES, TH and RRH. 4) DOH oversees strategy to increase PH retention and exits to PH.

3A-4. Returns to Homelessness as Reported in HDX. Applicants must report the percentage of individuals and persons in families returning to homelessness over a 6- and 12-month period as reported in HDX.

	Percentage
Report the percentage of individuals and persons in families returning to homelessness over a 6- and 12-month period as reported in HDX	10%

3A-4a. Applicants must:
(1) describe how the CoC identifies common factors of individuals and

persons in families who return to homelessness;
(2) describe the CoC's strategy to reduce the rate of additional returns to homelessness; and
(3) provide the name of the organization or position title that is responsible for overseeing the CoC's strategy to reduce the rate individuals and persons in families returns to homelessness.
(limit 2,000 characters)

1)The CT HMIS platform tracks information on returns to homelessness (RTH) in a number of ways. The SPM report shows the timeframe that individuals return to homelessness – w/the majority of those who exit homelessness & return, end up returning w/in 6 months. CT HMIS allows the CoC to identify common factors in those who are returning to homelessness. Households (HHs) who had returns to homelessness included the following characteristics: 52% living with no income; 24% living with mental illness; 19% domestic violence survivors; and 18% with a history of evictions. 2) The CoC's strategy to decrease RTH includes quarterly review of SPM at Steering Committee (SC) meetings to adjust planning, programs and resource allocation to improve outcomes. In addition, Coordinated Access Networks (CANs) flag HHs returning to homelessness at intake, assess reasons for return and provide additional housing supports to these people. The CoC has a requirement in the P&P that if an individual or family residing at a permanent housing project is at risk of returning to homelessness, the service provider is required to notify the local CAN and the CAN will convene a case conference to preserve housing or secure an alternative placement, plan for the best outcome and try to prevent a return to homelessness. Housing providers assist participants w/obtaining & maintaining benefits & employment. Providers use SOAR to obtain SSI/SSDI and work closely w/tenants to complete DSS applications & follow-up until benefits are obtained, focus on housing stabilization & assist with eviction prevention strategies through work on lease compliance, negotiate w/landlords and teach tenancy skills. Providers ensure that participants have community connections w/health, mental health & substance abuse providers. RTH are assessed annually in the BOS renewal evaluation process and in monitoring of CoC and DMHAS funded programs. 3)The CT BOS Steering Committee, w/Co-Chairs John Merz & Steve DiLella.

3A-5. Job and Income Growth. Applicants must:
(1) describe the CoC's strategy to increase access to employment and non-employment cash sources;
(2) describe how the CoC works with mainstream employment organizations to help individuals and families increase their cash income; and
(3) provide the organization name or position title that is responsible for overseeing the CoC's strategy to increase job and income growth from employment.
(limit 2,000 characters)

1)CoC's strategies for increasing access to cash resources include: close monitoring of program performance on rates of cash income receipt, provider training & TA, cross-systems collaboration w/mainstream workforce dev & employment pgms, statewide use of SSI/SOAR, and coord. w/DSS, the agency that administers non-cash assistance in CT. With support of Melville Trust, CT completed a 2-year pilot project to increase the income of families transitioning from homelessness by integrating homeless & workforce sectors. The Secure

Jobs pilot started 7-2015 for families in RRH in 5 CANs and clients more than doubled wages 15+ months after enrolling. Lessons from the pilot will be used by CoC to inform future strategies for increasing income. BOS evaluates employment & non-employment income during the annual evaluation & quarterly, the Steering Comm. reviews SPM on rates of income change. Each year, employment trainings held w/CoC and WF Investment Boards, Bureau of Rehab Services, employment specialists to share info on WIOA, supported employment, & job opportunities. For non-employment income, staff work w/consumers & DSS to obtain & maintain benefits. All programs assist w/applications & documents, accompany or assist w/transport & follow-up until benefit is obtained. Consumers have access to SOAR staff who help w/obtaining SSI/SDI (61% success rate). On 6/14/18, BOS hosted annual training w/120 providers delivered by CT DSS on public assistance pgms in CT: Medicaid, CHIP, TANF, cash assistance, & SNAP. 2) CoC working w/mainstream employment orgs as all providers have connected with local DOL American Job Centers and CT Works, One Stop Career Centers & Labor Ready. Capital Workforce Partners is working w/Central & Hartford CANs to coordinate sessions at ES & at Job Centers for clients & staff to ensure everyone uses available resources; working to expand this program to the other BOS CANs. 3)The CT BOS Steering Committee, w/Co-Chairs John Merz & Steve DiLella

3A-6. System Performance Measures Data Submission in HDX. Applicants must enter the date the CoC submitted the System Performance Measures data in HDX, which included the data quality section for FY 2017 (mm/dd/yyyy)	05/29/2018

3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Instructions

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

3B-1. DedicatedPLUS and Chronically Homeless Beds. In the boxes below, applicants must enter: (1) total number of beds in the Project Application(s) that are designated as DedicatedPLUS beds; and (2) total number of beds in the Project Application(s) that are designated for the chronically homeless, which does not include those that were identified in (1) above as DedicatedPLUS Beds.

Total number of beds dedicated as DedicatedPLUS	0
Total number of beds dedicated to individuals and families experiencing chronic homelessness	
Total	0

3B-2. Orders of Priority. Did the CoC adopt the Orders of Priority into their written standards for all CoC Program-funded PSH projects as described in Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing? Attachment Required. Yes

3B-2.1. Prioritizing Households with Children. Using the following chart, applicants must check all that apply to indicate the factor(s) the CoC currently uses to prioritize households with children during FY 2018.

History of or Vulnerability to Victimization (e.g. domestic violence, sexual assault, childhood abuse)	X
Number of previous homeless episodes	X
Unsheltered homelessness	X
Criminal History	X
Bad credit or rental history	X
Head of Household with Mental/Physical Disability	X

3B-2.2. Applicants must:
(1) describe the CoC's current strategy to rapidly rehouse every household of families with children within 30 days of becoming homeless;
(2) describe how the CoC addresses both housing and service needs to ensure families successfully maintain their housing once assistance ends; and
(3) provide the organization name or position title responsible for overseeing the CoCs strategy to rapidly rehouse families with children within 30 days of becoming homeless.
(limit 2,000 characters)

1)BOS strategies to re-house families w/in 30 days include maintaining and expanding permanent housing exit options. DOH is using federal funds to increase RRH with an annual investment of $875,000 in ESG and, beginning in October, $3M in HOME funds for rapid exit w/one month security deposit and one month rent available to serve 750 families annually. Young families will be able to access 54 RRH units through the newly funded YHDP and DOH just added 50 new mainstream HCV for homeless HH. DOH is applying for 200+ units of RRH and 62 units of PSH in this HUD NOFA and 100 vouchers from the Family Unification Program. Another strategy is to ensure that Coordinated Access Networks (CANs) have the data they need and CCEH will continue to develop reports on CAN housing placements and resources to track progress weekly on efforts to end family homelessness. CCEH has monthly diversion trainings, sponsors a learning collaborative for shelters and provides extensive technical assistance to providers to increase the speed of access to permanent housing and rapid exits. All HH are diverted if possible thru 211/the CANs. If ES is needed, all households are assessed and referred for PH based on VI-SPDAT score and Length of Time Homeless. Shelters provide low-barrier, safe, and housing-focused shelter for families, prepare housing plans, connect to jobs and community-resources and focus on rapid exit and PH access. 2) Strategies to ensure housing and service needs are met so families successfully maintain their housing include, CoC providing: eviction prevention (including financial assistance to address rent/utility arrears), housing stabilization planning, intensive case management (at least monthly & more often depending on need) that includes home visits, assistance w/securing/improving employment, benefits advocacy, budgeting, & accessing community resources (e.g., child care, behavioral health/medical services, transportation, etc.). 3) DOH oversees the strategy.

3B-2.3. Antidiscrimination Policies. Applicants must check all that apply that describe actions the CoC is taking to ensure providers (including emergency shelter, transitional housing, and permanent supportive housing (PSH and RRH) within the CoC adhere to antidiscrimination policies by not denying admission to or separating any family members from other members of their family or caregivers based on age, sex, gender, LGBT status, marital status, or disability when entering a shelter or housing.

CoC conducts mandatory training for all CoC and ESG funded service providers on these topics.	☐
CoC conducts optional training for all CoC and ESG funded service providers on these topics.	☐
CoC has worked with ESG recipient(s) to adopt uniform anti-discrimination policies for all subrecipients.	☐
CoC has worked with ESG recipient(s) to identify both CoC and ESG funded facilities within the CoC geographic area that may be out of compliance, and taken steps to work directly with those facilities to come into compliance.	☐

CoC has sought assistance from HUD through submitting AAQs or requesting TA to resolve non-compliance of service providers.	☐

3B-2.4. Strategy for Addressing Needs of Unaccompanied Youth Experiencing Homelessness. Applicants must indicate whether the CoC's strategy to address the unique needs of unaccompanied homeless youth includes the following:

Human trafficking and other forms of exploitation	Yes
LGBT youth homelessness	Yes
Exits from foster care into homelessness	Yes
Family reunification and community engagement	Yes
Positive Youth Development, Trauma Informed Care, and the use of Risk and Protective Factors in assessing youth housing and service needs	Yes

3B-2.5. Prioritizing Unaccompanied Youth Experiencing Homelessness Based on Needs. Applicants must check all that apply from the list below that describes the CoC's current strategy to prioritize unaccompanied youth based on their needs.

History or Vulnerability to Victimization (e.g., domestic violence, sexual assault, childhood abuse)	X
Number of Previous Homeless Episodes	X
Unsheltered Homelessness	X
Criminal History	X
Bad Credit or Rental History	X

3B-2.6. Applicants must describe the CoC's strategy to increase:
(1) housing and services for all youth experiencing homelessness by providing new resources or more effectively using existing resources, including securing additional funding; and
(2) availability of housing and services for youth experiencing unsheltered homelessness by providing new resources or more effectively using existing resources.
(limit 3,000 characters)

1) In 2018, BOS was awarded $6.6M for a Youth Homeless Demonstration Program (YHDP) to expand housing and services ,State and HUD HOME funds are being used as match providing additional new resources. YHDP new resources include: 54 RRH units, 8 Crisis beds, 52 TH units and 40 PSH units. CT Department of Housing (DOH) and CT Department of Mental Health and Addiction Services (DMHAS) are providing capital, operating, and service funding for new supportive housing projects for Young Adults. DOH created an HCV preference for young adult families ready to move-on from supportive housing. DOH and CT Department of Children and Families (DCF) applied for 100 new Family Unif. Program vouchers to serve families and youth in CT BOS. Work to more effectively use existing resources includes: 2 CoC TH programs changed their focus to serving young adults, 18-24 to meet that growing need -

BOS now has 47 TH units for young adults; the Youth and Young Adult Work Group (YYAWG) is partnering with DCF, DMHAS and providers to better coordinate access to their housing resources; coord entry is ensuring the most vulnerable youth are prioritized; YYAWG is drafting a Progressive Engagement protocol for youth to ensure the least assistance necessary is offered & more youth can be served with existing and new resources. 2) YHDP is funding new crisis housing to ensure unsheltered young adults have a safe place to temporarily reside. The annual Youth Count has spurred focus on effective outreach to unsheltered youth and the Northeast Coord Access Network (CAN) secured local funds for enhanced street outreach. DOH is more effectively using its HUD CDBG-Small Cities award by prioritizing operating and service funding for young adult crisis housing. YYAWG is drafting a new ES prioritization protocol for youth to ensure the most vulnerable, including unsheltered youth, are sheltered. A new Diversion/Rapid Exit Fund for youth will be funded by YHDP and will assist unsheltered youth rapidly exit homelessness with one-time financial assistance. YHDP-funded Youth Navigators will work closely with unsheltered youth to assist them with removing barriers to housing. Each CAN in BOS has a Youth Engagement Team Initiative (YETI) committee comprised of youth service providers, RHY providers, McKinney-Vento liaisons from schools, representatives from government agencies, local community foundations, and young adults with experience with homelessness. YETI provides invaluable insights on how to effectively use current resources to address unsheltered homelessness & is working to ensure rapid access to housing and services for unsheltered youth. CT Coalition to End Homelessness (CCEH) is collaborating with DCF, the Trafficking in Persons Council and others to provide training to homeless youth providers on the signs of and services for sex trafficking survivors and hosted a similar training already in 2018. CCEH providing training on safe shelter and fair housing for transgender people.

3B-2.6a. Applicants must:
(1) provide evidence the CoC uses to measure both strategies in question 3B-2.6. to increase the availability of housing and services for youth experiencing homelessness;
(2) describe the measure(s) the CoC uses to calculate the effectiveness of the strategies; and
(3) describe why the CoC believes the measure it uses is an appropriate way to determine the effectiveness of the CoC's strategies.
(limit 3,000 characters)

1)Evidence to measure effectiveness of strategies (#1 in 3B-2.6) include: PIT/Annual Counts of homeless youth, length of time homeless/# homeless for the first time among youth, % youth exiting to/retaining PH, # returns to homelessness, income increases, renewal eval scores for youth projects, amount of public/private funds invested, timeliness of youth project occupancy, & vacancy data. YYAWG monitors: coordinated entry measures (e.g., placement on shelter waitlist, time to housing, # of youth unmatched to housing), permanent connections and social/emotional well-being outcomes. Evidence to measure the effectiveness of strategies (#2 in 3B-2.6): youth unsheltered PIT Count data, timeliness of new ES/crisis housing projects opening, project vacancy data, & measures monitored by YYAG & described above among unsheltered youth. 2)Measures to calculate the effectiveness of strategies listed under #1 in 3B-2.6: reduction in PIT/Annual Counts of homeless youth, reduction in average/median length of time homeless,

reduction in # youth homeless for 1st time, increase in % youth who exit to/retain PH, decrease in % youth exiting to PH who return to homelessness, income increase among youth, increase in renewal eval scores for youth projects, increase in amount of public/private funds invested in youth programs, % on schedule occupancy of new youth units & % of vacant units in youth projects, increased CES efficiency, connection & well-being outcomes. Measures to calculate the effectiveness of strategies listed under #2 in 3B-2.6: decrease in youth unsheltered PIT Count, on schedule occupancy of new unit & % of vacant units in youth projects, & improvement in CES efficiency, connection & well-being outcomes among unsheltered youth. 3) The CoC believes these are appropriate measures because they capture quantitative & qualitative data, involve young people in evaluating services they receive, are consistent with USICH recommendations, & hold system planners accountable.

3B-2.7. Collaboration–Education Services. Applicants must describe how the CoC collaborates with:
(1) youth education providers;
(2) McKinney-Vento State Education Agency (SEA) and Local Education Agency (LEA);
(3) school districts; and
(4) the formal partnerships with (1) through (3) above.
(limit 2,000 characters)

1)CT BOS partners with the CT Office of Early Childhood (OEC) on Head Start & Birth to 3 programs working together to ensure homeless children have prioritized access, receive services in their current location & have flexibility on usual enrollment requirements. All BOS ES, TH, PH family & youth providers refer to youth education programs including: Bridge Family Center, YWCA Greater Hartford, Marshall House & the Right Place. 2)The Director of McKinney-Vento Homeless Education at CT Dept of Education is a voting member of CT BOS Steering Committee (SC) & shares info & resources; SEA staff sits on the CT Birth to Three State Interagency Coordinating Council. OEC Programs collaborate with CoC projects & LEA liaisons to identify homeless children & connect them to resources. Community-based School Readiness Councils include their local McKinney-Vento liaison as members & liaisons sit on the Youth Engagement Team Initiative (YETI) in each of the 8 Coordinated Access Networks (CANs). 3) CoC , CANs & providers work closely with school districts as follows: all ES/TH/PH programs serving young adults & children are connected to school counselors & the homeless liaison for the jurisdiction; staff ensure that children's ESSA rights are protected, support parents & attend school meetings with teachers & counselors. Community Health Resources, a CoC provider, has staff in the schools to provide case management. 4) CoC has an MOU with OEC to facilitate access to Birth to 3 & Head Start programs; providers throughout the CoC have MOUs w/Birth to 3 & Head Start programs; SEA is a voting member of the SC and CoC Board; OEC is member of CoC Board; homeless liaisons are voting members of the 8 YETIs; YETIs had agreements with 107 schools in CT for the 2018 youth PIT; school district staff serve on the CANs; Women & Families Center has an MOU with Meriden Schools to support homeless youth; Bristol Board of Ed members are on 10 year plan to end homelessness committee.

3B-2.7a. Applicants must describe the policies and procedures the CoC

**adopted to inform individuals and families who become homeless of their eligibility for education services.
(limit 2,000 characters)**

The CoC's Policies and Procedures (P&P) include provisions to ensure that homeless households are informed of their eligibility for education services under the McKinney-Vento Education Act. BOS has P&P for Coordinated Access Network (CAN) reps as well as ones for providers in the CoC. CoC P&P note that CAN reps are "responsible for coordinating with your local school district(s), charter school(s), and CAN in the following ways: ensure that all families with children and young adults who qualify in your area are informed about their educational rights and their eligibility for educational services and they receive those services." For recipients/sub-recipients, the CoC P&P note, "The Program Director and/or designee is responsible for: ensuring that all families with children and young adults participating in this project are informed about their educational rights and their eligibility for educational services at intake and as necessary thereafter." All agencies serving children and youth are required to have a staff person designated as a liaison to the local school districts. BOS has a host of policies outlining responsibilities for CANs and recipients/sub-recipients. All of the policies are written to ensure that participants are helped to understand their rights under Subtitle VII-B of the McKinney-Vento Homeless Assistance Act and most recently reauthorized by the Every Student Succeeds Act; to ensure that children and young adults are immediately enrolled in school, as required by federal and State law, & to ensure that they are connected to transportation and educational services to help them succeed in school. CoC provided training on these polices and the full set of ESSA and BOS policies related to education for children and youth at the HUD compliance training on 12/14/2017. In addition, BOS CoC evaluates compliance with ESSA during CoC, PATH, and Housing Assistance Fund program monitoring

3B-2.8. Does the CoC have written formal agreements, MOU/MOAs or partnerships with one or more providers of early childhood services and supports? Select "Yes" or "No". Applicants must select "Yes" or "No", from the list below, if the CoC has written formal agreements, MOU/MOA's or partnerships with providers of early childhood services and support.

	MOU/MOA	Other Formal Agreement
Early Childhood Providers	Yes	Yes
Head Start	Yes	No
Early Head Start	Yes	No
Child Care and Development Fund	No	No
Federal Home Visiting Program	No	No
Healthy Start	No	No
Public Pre-K	No	Yes
Birth to 3 years	Yes	No
Tribal Home Visting Program	No	No
Other: (limit 50 characters)		
Meriden Board of Education	No	Yes
Ahmadiyya Muslim Community CT Chapter	Yes	No

3B-3.1. Veterans Experiencing Homelessness. Applicants must describe the actions the CoC has taken to identify, assess, and refer Veterans experiencing homelessness, who are eligible for U.S. Department of Veterans Affairs (VA) housing and services, to appropriate resources such as HUD-VASH, Supportive Services for Veterans Families (SSVF) program and Grant and Per Diem (GPD).
(limit 2,000 characters)

Outreach teams, 211 and Coordination Access Networks (CANs) identify veterans by asking each sheltered and unsheltered person about military service; VISPDAT is administered to all and veteran status is queried. Veterans are referred by Outreach, CANs and providers to New Haven and Newington VA Medical Centers (VAMCs) where they receive medical, mental health, job training and other services. VAMC's conduct eligibility determinations for VA services. Veterans who do not want VA services and those deemed ineligible by the VA access CoC services thru 211 and the CANs via the By-Name Lists. There is good collaboration between CoC and VA; Kris Dalao, of the VA is a member of the Steering Committee. There is a veteran's workgroup that meets monthly to review the status of veteran homelessness in CT co-chaired by Maureen Pasko, VA and Chris McCluskey, CRT, a Hartford SSVF provider and hosted at the VA's Errera Center in West Haven. There are 8 GPD programs with 71 beds, 768 VASH units & 149 SSVF units; providers refer veterans via the CANs & VAMC's to these resources. Providers of these programs also sit on the CT BOS Steering Committee. A daily email is sent to VA and SSVF providers for every new veteran enrolled in any CoC project for immediate outreach. In 2016, the State of CT was confirmed as having effectively ended Veteran homelessness.

3B-3.2. Does the CoC use an active list or by name list to identify all Veterans experiencing homelessness in the CoC?	Yes
3B-3.3. Is the CoC actively working with the VA and VA-funded programs to achieve the benchmarks and criteria for ending Veteran homelessness?	Yes
3B-3.4. Does the CoC have sufficient resources to ensure each Veteran experiencing homelessness is assisted to quickly move into permanent housing using a Housing First approach?	Yes
3B-5. Racial Disparity. Applicants must: (1) indicate whether the CoC assessed whether there are racial disparities in the provision or outcome of homeless assistance;	Yes

(2) if the CoC conducted an assessment, attach a copy of the summary.

3B-5a. Applicants must select from the options below the results of the CoC's assessment.

People of different races or ethnicities are more or less likely to receive homeless assistance.	X
People of different races or ethnicities are more or less likely to receive a positive outcome from homeless assistance.	X
There are no racial disparities in the provision or outcome of homeless assistance.	
The results are inconclusive for racial disparities in the provision or outcome of homeless assistance.	X

3B-5b. Applicants must select from the options below the strategies the CoC is using to address any racial disparities.

The CoC's board and decisionmaking bodies are representative of the population served in the CoC.	
The CoC has identified steps it will take to help the CoC board and decisionmaking bodies better reflect the population served in the CoC.	
The CoC is expanding outreach in geographic areas with higher concentrations of underrepresented groups.	
The CoC has communication, such as flyers, websites, or other materials, inclusive of underrepresented groups	
The CoC is training staff working in the homeless services sector to better understand racism and the intersection of racism and homelessness.	
The CoC is establishing professional development opportunities to identify and invest in emerging leaders of different races and ethnicities in the homelessness sector.	
The CoC has staff, committees or other resources charged with analyzing and addressing racial disparities related to homelessness.	
The CoC is educating organizations, stakeholders, boards of directors for local and national non-profit organizations working on homelessness on the topic of creating greater racial and ethnic diversity.	
The CoC reviewed coordinated entry processes to understand their impact on people of different races and ethnicities experiencing homelessness.	
The CoC is collecting data to better understand the pattern of program use for people of different races and ethnicities in its homeless services system.	
The CoC is conducting additional research to understand the scope and needs of different races or ethnicities experiencing homelessness.	
Other:	

4A. Continuum of Care (CoC) Accessing Mainstream Benefits and Additional Policies

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

4A-1. Healthcare. Applicants must indicate, for each type of healthcare listed below, whether the CoC: (1) assists persons experiencing homelessness with enrolling in health insurance; and (2) assists persons experiencing homelessness with effectively utilizing Medicaid and other benefits.

Type of Health Care	Assist with Enrollment	Assist with Utilization of Benefits?
Public Health Care Benefits (State or Federal benefits, Medicaid, Indian Health Services)	Yes	Yes
Private Insurers:	Yes	Yes
Non-Profit, Philanthropic:	Yes	Yes
Other: (limit 50 characters)		
ACCESS CT	Yes	Yes

4A-1a. Mainstream Benefits. Applicants must: (1) describe how the CoC works with mainstream programs that assist persons experiencing homelessness to apply for and receive mainstream benefits; (2) describe how the CoC systematically keeps program staff up-to-date regarding mainstream resources available for persons experiencing homelessness (e.g., Food Stamps, SSI, TANF, substance abuse programs); and (3) provide the name of the organization or position title that is responsible for overseeing the CoC's strategy for mainstream benefits. (limit 2,000 characters)

1)All CoC funded projects assess participants at entry & every 6 months for benefits eligibility and to ensure continued receipt of benefits in place. Referrals are made to food/clothing/furniture banks, MH services, SA treatment, job training & employment assistance & staff connects clients to DSS, provides transportation, help w/on-line application for food stamps, TANF, General Assistance, Medicaid, & follow-ups until benefits are obtained. Providers assess benefits at least every 6 months to ensure benefits are maintained. 2) BOS convenes an annual Benefits Trainings for all providers including outreach, ES, TH and PH with DSS trainers on resources, eligibility, updates & application processes. On 6/14/18, 120 providers attended the DSS Benefits Training. CT Department of Mental Health & Addiction Services (DMHAS) funds SOAR case

managers in every Coordinated Access Network to assist clients applying for SSI/D (61% success rate w/getting initial apps approved for persons in CoC). Providers & DMHAS have formed a SOAR Committee which meets every other month to streamline the process w/SSA. A rep from DSS, is on CoC Steering Community & shares resources & updates on mainstream benefits. Alice Minervino, DMHAS, is an active member of the SC & ensures providers are connecting clients to the wide array of MH & substance programs DMHAS offers. DMHAS coordinates the PATH & PSH/RA quarterly meetings & provides updates & info on SOAR, as well as detox beds available, in-patient resources & a host of other services. BOS renewal eval process evaluates projects on: percentage of consumers w/cash & non-cash benefits. 211 provides 24-hr referrals to basic needs such as food, clothing, shelter, health/disability services, housing, etc. The CoC coordinates with the Community Health Centers Association, also a CoC Board member, to increase access to healthcare and effective use of Medicaid benefits. 3) The CoC Steering Committee is responsible for overseeing strategy

4A-2.Housing First: Applicants must report: (1) total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition; and (2) total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition that have adopted the Housing First approach–meaning that the project quickly houses clients without preconditions or service participation requirements.

Total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition.	103
Total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition that have adopted the Housing First approach–meaning that the project quickly houses clients without preconditions or service participation requirements.	103
Percentage of new and renewal PSH, RRH, Safe-Haven, SSO non-Coordinated Entry projects in the FY 2018 CoC Program Competition that will be designated as Housing First.	100%

4A-3. Street Outreach. Applicants must: (1) describe the CoC's outreach; (2) state whether the CoC's Street Outreach covers 100 percent of the CoC's geographic area; (3) describe how often the CoC conducts street outreach; and (4) describe how the CoC tailored its street outreach to persons experiencing homelessness who are least likely to request assistance. (limit 2,000 characters)

1)CT Dept of Mental Health & Addiction Services (DMHAS) provides funding to 1 agency in each of the 8 Coordinated Access Networks (CAN) to conduct street outreach statewide; agencies receive trainings & TA & are monitored annually. Larger cities have multiple outreach teams & coordinate efforts thru the CANs. To ensure that all persons experiencing unsheltered homelessness are identified & engaged, teams outreach in locations such as: streets, woods, underpasses, abandoned buildings, & public transportation sites. Outreach

teams work closely w/ area police, libraries, soup kitchens, ES & other agencies to develop a presence in the community so that when people need services, teams can be contacted to go to the location. Teams make strong community connections, building trust w/community partners & clients to ensure that they are able to contact/engage anyone living outdoors; teams track unsheltered persons by entering data into HMIS. When teams find unsheltered persons, they complete an assessment (VISPDAT), refer to the CAN & stay connected w/the client until the client has obtained housing. Outreach teams use a client centered approach allowing for choice & creation of a housing plan meeting individual needs of the client. Teams connect to: drop-in centers, mobile MH, addiction screening/counseling/treatment; help w/ benefits & employment, transportation & applying for ID. 2) 100% of BOS CoC geography is covered by outreach teams. 3) Outreach is conducted M-F including early mornings & late evenings. After hours calls are handled by 911 & 211 & mobile crisis as needed. 4) Outreach focuses on those least likely to request assistance: teams use a Housing First approach, motivational interviewing, are trained to engage/work w/persons w/cognitive issues & work w/clients as long as necessary. TTY services are available for deaf persons, outreach teams have access to bilingual staff for people w/limited English proficiency, workers provide access to phones, computers.

4A-4. Affirmative Outreach. Applicants must describe:
(1) the specific strategy the CoC implemented that furthers fair housing as detailed in 24 CFR 578.93(c) used to market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, gender identify, sexual orientation, age, familial status or disability; and
(2) how the CoC communicated effectively with persons with disabilities and limited English proficiency fair housing strategy in (1) above.
(limit 2,000 characters)

1)1)The CT BOS CoC promotes affirmative outreach and fair housing with the following BOS Policies and Procedures: “Providers shall have non-discrimination policies in place and assertively outreach to people least likely to engage in the homeless system” and “Providers shall comply w/all Federal statutes including, the Fair Housing Act & the ADA.” At the 12/14/2017 Managing HUD Grants training, BOS CoC trained on Affirmative Outreach and monitors Fair Housing compliance during program monitoring. CCEH has trained on: The LGBTQ Community, Safe Shelter, & Fair Housing; Safe Shelter and Fair Housing for Transgender Individuals; and Disabilities in Shelter. All projects are required to document provision of a “CT BOS CoC Client Bill of Rights” to each applicant & participant, outlining fair housing and equal access rights. This document includes instructions on filing related complaints. State contracts w/ES/TH/PH & affordable housing providers include language on Affirmative Outreach. The CT Fair Housing Work Group, co-chaired by DOH Commissioner & Rep. Lemar examines systemic barriers to housing choice across CT; the goal is to assist municipalities w/ their obligation to affirmatively further fair housing & make recs to the General Assembly on how to address segregation in CT. 2) 211, the first point of entry in the coordinated access system which refers to ES/TH/PSH/RRH & affordable housing, advertises in multiple languages, locates translators for persons with Limited English proficiency & connects deaf persons to TTY. 211 is accessible by phone/web & is publicized through print & electronic media. The 211 website can be

translated in 31 languages. 211 offers online Live Chat allowing users of the 211 website to connect w/a professional contact specialist via computer or mobile device & provides instant messaging for help navigating the website, questions about resources & another channel to access traditional info, assessment & referral support.

4A-5. RRH Beds as Reported in the HIC. Applicants must report the total number of rapid rehousing beds available to serve all household types as reported in the Housing Inventory Count (HIC) for 2017 and 2018.

	2017	2018	Difference
RRH beds available to serve all populations in the HIC	634	696	62

4A-6. Rehabilitation or New Construction Costs. Are new proposed project applications requesting $200,000 or more in funding for housing rehabilitation or new construction? No

4A-7. Homeless under Other Federal Statutes. Is the CoC requesting to designate one or more of its SSO or TH projects to serve families with children or youth defined as homeless under other Federal statutes? No

4B. Attachments

Instructions:

Multiple files may be attached as a single .zip file. For instructions on how to use .zip files, a reference document is available on the e-snaps training site: https://www.hudexchange.info/resource/3118/creating-a-zip-file-and-capturing-a-screenshot-resource

Document Type	Required?	Document Description	Date Attached
1C-5. PHA Administration Plan–Homeless Preference	No	BOS PHA - homeles...	09/11/2018
1C-5. PHA Administration Plan–Move-on Multifamily Assisted Housing Owners' Preference	No	BOS PHA Move-On	09/11/2018
1C-8. Centralized or Coordinated Assessment Tool	Yes	Centralized Asses...	09/09/2018
1E-1. Objective Critiera–Rate, Rank, Review, and Selection Criteria (e.g., scoring tool, matrix)	Yes	BOS Objective Cri...	09/11/2018
1E-3. Public Posting CoC-Approved Consolidated Application	Yes		
1E-3. Public Posting–Local Competition Rate, Rank, Review, and Selection Criteria (e.g., RFP)	Yes		
1E-4. CoC's Reallocation Process	Yes	Reallocation Process	09/13/2018
1E-5. Notifications Outside e-snaps–Projects Accepted	Yes	BOS Notifications...	09/11/2018
1E-5. Notifications Outside e-snaps–Projects Rejected or Reduced	Yes	BOS Notifications...	09/11/2018
1E-5. Public Posting–Local Competition Deadline	Yes	CT BOS Local Comp...	09/13/2018
2A-1. CoC and HMIS Lead Governance (e.g., section of Governance Charter, MOU, MOA)	Yes	CT BOS CoC HMIS MOU	09/13/2018
2A-2. HMIS–Policies and Procedures Manual	Yes	HMIS P&P	09/09/2018
3A-6. HDX–2018 Competition Report	Yes	CT BOS CoC HDX - ...	09/10/2018
3B-2. Order of Priority–Written Standards	No	CT BOS CoC Order ...	09/09/2018

3B-5. Racial Disparities Summary	No	BOS - Racial Disp...	09/11/2018
4A-7.a. Project List–Persons Defined as Homeless under Other Federal Statutes (if applicable)	No		
Other	No		
Other	No		
Other	No		

Attachment Details

Document Description: BOS PHA - homeless preference

Attachment Details

Document Description: BOS PHA Move-On

Attachment Details

Document Description: Centralized Assessment Tool

Attachment Details

Document Description: BOS Objective Criteria

Attachment Details

Document Description:

Attachment Details

Document Description: Public Posting - Local Competition

Attachment Details

Document Description: Reallocation Process

Attachment Details

Document Description: BOS Notifications Outside of esnaps - accepted

Attachment Details

Document Description: BOS Notifications outside of snaps-rejections

Attachment Details

Document Description: CT BOS Local Competition Postings

Attachment Details

Document Description: CT BOS CoC HMIS MOU

Attachment Details

Document Description: HMIS P&P

Attachment Details

Document Description: CT BOS CoC HDX - Competition Report

Attachment Details

Document Description: CT BOS CoC Order of Priority Standards

Attachment Details

Document Description: BOS - Racial Disparities Summary

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Submission Summary

Ensure that the Project Priority List is complete prior to submitting.

Page	Last Updated
1A. Identification	09/11/2018
1B. Engagement	09/11/2018
1C. Coordination	09/13/2018
1D. Discharge Planning	09/11/2018
1E. Project Review	09/12/2018
2A. HMIS Implementation	09/12/2018
2B. PIT Count	09/11/2018
2C. Sheltered Data - Methods	09/14/2018
3A. System Performance	09/13/2018
3B. Performance and Strategic Planning	Please Complete
4A. Mainstream Benefits and Additional Policies	09/11/2018
4B. Attachments	Please Complete

Submission Summary	No Input Required

4.9 NOTIFICATION OF NEGATIVE ACTIONS

Any applicant whose name is being removed from the waiting list will be notified by the Torrington Housing Authority, in writing, that they have ten (10) calendar days, from the date of the written correspondence, to present mitigating circumstances or request an informal review. The letter will also indicate that their name will be removed from the waiting list if they fail to respond within the timeframe specified. The Torrington Housing Authority's system of removing applicants' names from the waiting list will not violate the rights of persons with disabilities. If an applicant's failure to respond to a request for information or updates was caused by the applicant's disability, the Torrington Housing Authority will provide a reasonable accommodation. If the applicant indicates that they did not respond due to a disability, the Torrington Housing Authority will verify that there is in fact a disability and that the accommodation they are requesting is necessary based on the disability.

4.10 INFORMAL REVIEW

If the Torrington Housing Authority determines that an applicant does not meet the criteria for receiving Section 8 assistance, the Torrington Housing Authority will promptly provide the applicant with written notice of the determination. The notice must contain a brief statement of the reason(s) for the decision, and state that the applicant may request an informal review of the decision within 10 calendar days of the denial. The Torrington Housing Authority will describe how to obtain the informal review. The informal review process is described in Section 16.2 of this Plan.

5.0 SELECTING FAMILIES FROM THE WAITING LIST

5.1 WAITING LIST ADMISSIONS, SPECIAL ADMISSIONS AND SET-ASIDES

The Housing Authority may admit an applicant for participation in the program either as a special admission or as a waiting list admission.

If HUD awards funding that is targeted for families with specific characteristics or families living in specific units, the Torrington Housing Authority will use the assistance for those families. If this occurs, the Torrington Housing Authority will maintain records demonstrating that these targeted housing choice vouchers were used appropriately. When one of these targeted vouchers turns over, the voucher shall be issued to applicants with the same specific characteristic as the targeted program describes.

The Torrington Housing Authority has a set-aside for U.S. honorably discharged veterans. This set aside is for a maximum of 25 vouchers. The Torrington Housing Authority will use the set-aside for assistance for those families. Any veteran families participating in this set-aside must also meet all of the eligibility requirements of the regular Housing

Sec 8

Choice Voucher program. The Torrington Housing Authority will maintain records demonstrating that these targeted housing choice vouchers were used appropriately. When one of these targeted vouchers turns over, the voucher shall be issued to applicants with the same specific characteristic as the targeted program describes.

The Torrington Housing Authority has a set-aside for homeless persons/families participating in a program for homeless persons/families being administered by an agency participating in the New Beginnings of Northwest Hills Litchfield County, Inc. This set-aside is for a maximum of ten (10) vouchers. The Torrington Housing Authority will use the set-aside for assistance for those families. Any families participating in this set-aside must also meet all of the eligibility requirements of the regular Torrington Housing Authority Section 8 Housing Choice Voucher Program. The Torrington Housing Authority will maintain records demonstrating that these targeted Housing Choice Vouchers are used appropriately. When one of these targeted vouchers turns over, the voucher shall be issued to applicants with the same specific characteristic(s) as the targeted program describes.

5.2 PREFERENCES

Consistent with the Torrington Housing Authority Agency Plan, the Torrington Housing Authority will select families based on the following preferences based on local housing needs and priorities.

A. Applicants who are being moved or displaced due to government action or government sponsored action with the City of Torrington will be given a preference of 100 points.

B. Residents in the Torrington Housing Authority Public Housing Program who are required to move and who cannot be placed in another public housing unit. (50 points)

C. All other applicants (0 points).

Of the preferences specified above, families with the total highest points will be offered a housing choice voucher first.

Notwithstanding the above, in the case of a local/state or federally declared disaster, the Torrington Housing Authority reserves the right for its Executive Director to suspend its preference system for whatever duration the Executive Director feels is appropriate and to admit victims of the disaster to the program instead of those who would be normally admitted. Any other provisions of this policy can also be suspended during the emergency at the discretion of the Executive Director so long as the provision suspended does not violate a law. If regulatory waivers are necessary, they shall be promptly requested of the HUD Assistant Secretary for Public and Indian Housing.

Public Hsg.

10.0 TENANT SELECTION AND ASSIGNMENT PLAN

10.1 PREFERENCES

The Torrington Housing Authority will select families based on the following preferences within each bedroom size category based on our local housing needs and priorities:

A. Applicants who are being moved or displaced due to government action or government sponsored action within the City of Torrington will be given a preference of 50 points.

B. All other applicants. (0 points)

Of the preferences specified above, families with the total highest points will be offered first.

Notwithstanding the above, in the case of a federally declared disaster, the Torrington Housing Authority reserves the right for its Executive Director to suspend its preference system for whatever duration the Executive Director feels is appropriate and to admit victims of the disaster to the program instead of those who would be normally admitted. Any other provisions of this policy can also be suspended during the emergency at the discretion of the Executive Director so long as the provision suspended does not violate a law. If regulatory waivers are necessary, they shall be promptly requested of the HUD Assistant Secretary for Public and Indian Housing.

The date and time of application will be noted and utilized to determine the sequence within the above prescribed preferences.

Notwithstanding the above, families who are elderly, disabled, or displaced will be offered housing before other single persons.

Buildings Designed for the Elderly and Disabled: Preference will be given to elderly and disabled families. If there are no elderly or disabled families on the list, preference will

then be given to near-elderly families. If there are no near-elderly families on the waiting list, units will be offered to families who qualify for the appropriate bedroom size using these priorities. All such families will be selected from the waiting list using the preferences as outlined above.

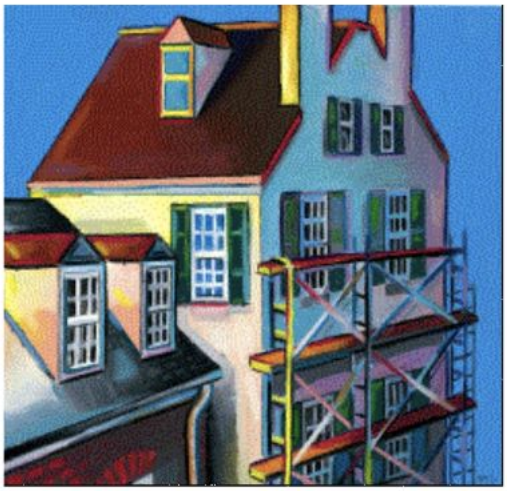
Accessible Units: Accessible units will be first offered to families who may benefit from the accessible features who reside in the development that has the vacancy. If there are no families residing in that development needing the accessible unit, it shall then be offered to families residing in other developments who may benefit from the accessible unit. If there are no families residing in the other developments needing the accessible unit, it shall then be offered to applicants on the waiting list who may benefit from the accessible features. Applicants for these units will be selected utilizing the same preference system as outlined above.

If there are no applicants who would benefit from the accessible features, the units will be offered to other applicants in the order that their names come to the top of the waiting list. Such applicants, however, will be requested to sign a lease rider stating they will accept a transfer (at the Housing Authority's expense) if, at a future time, a family requiring an accessible feature applies or a family requires a transfer from a non-accessible unit. Any family required to transfer will be given a 30-day notice.

10.2 ASSIGNMENT OF BEDROOM SIZES

HOUSING AUTHORITY OF THE CITY OF DANBURY (CT)
MILL RIDGE ROAD
DANBURY, CT 06811

ADMISSIONS AND CONTINUED OCCUPANCY POLICY



EQUAL HOUSING OPPORTUNITY

III. APPLICATION FOR ADMISSION

A. Application Intake

HACD will accept pre-applications for the Housing Choice Voucher programs including Federal Housing Choice Voucher, Designated Housing Choice Voucher, Family Unification Program, Vouchers for Victims of Domestic Violence; Moderate Rehabilitation and Substantial Rehabilitation family programs; Eden Drive and Laurel Gardens federal family programs; State Moderate Rental Family; Federal Elderly, for which all new admissions shall be at least 62 years of age; Crosby Manor federal elderly program; Glen Apartments and Ives Manor Elderly, for which the head, spouse or co-head must be either 62 years of age or a person with a disability(ies) as defined in Appendix G; and Single Room Occupancy House programs at the office located at 2 Mill Ridge Road, via mail, and each site office when the waiting list(s) is open, and only during publicly announced time periods during which all interested persons may apply for admission. Accommodations will be made for interested, disabled applicants.

HACD maintains a community-wide waiting list for its Federal Housing Choice Voucher program, Designated Housing Voucher program, Family Unification Program, Vouchers for Victims of Domestic Violence, Moderate Rehabilitation and Substantial Rehabilitation family programs, State Moderate Rental Family, Federal Elderly, Ives Manor Elderly and Single Room Occupancy programs. HACD maintains site-based waiting lists for Laurel Gardens and Eden Drive federal family programs, Crosby Manor federal elderly program, and Glen Apartments state elderly program. Wait Lists for each program will be maintained by bedroom size with the exception of Housing Choice Voucher, Designated Voucher, Family Unification Program and Vouchers for Victims of Domestic Violence, which will be maintained by date and time of application.

Individuals with documented disabilities that may prevent them from completing a pre-application or formal application may contact HACD to make special arrangements for completing the housing application. HACD will make reasonable accommodation to ensure all applicants have the opportunity to complete the housing application.

B. Closing/Opening of Waiting List(s)

When the number of applicants who can be served within a reasonable period of time is reached, the waiting list(s) may be closed by unit size and/or housing type. Notice of opening and closing of the waiting list(s) shall be made in the Danbury News Times on two (2) consecutive Sundays and announced by other suitable means.

C. Criteria for Placement on Waiting List

Eligible applicants will be placed on the waiting list(s) based on information provided on the pre-application form and according to:

1. Unit size/type needed
2. Local preference declaration

3. Date and time of application

Federal regulations no longer give preference to elderly, disabled, or displaced families over other single persons in federal housing programs.

HACD shall utilize a preliminary application form (pre-application). The purpose of the pre-application is to permit HACD to assess a family's preliminary eligibility and placement on the waiting list(s). Factors considered include family's income within HUD established income limits, the family's eligibility for a waiting list that is currently open, and if the family has provided all required forms and documentation. Duplicate pre-applications, including applications from a segment of an applicant household, will not be accepted. Ineligible applicants or incomplete applications from applicants will not be placed on the waiting list.

Incomplete applications will be returned to the applicant with a list of missing and/or deficient items.

If an applicant is determined to be ineligible for placement on the waiting list based on the information provided in the pre-application, HACD will notify the applicant in writing, state the reasons, and inform the applicant of his/her right to an Informal Review.

D. Maintaining an Active Waiting List(s)

The pool of active applicants will be kept current by requiring each applicant to inform HACD at least once annually of continued interest. HACD will send a notice to the applicant, requiring the applicant to indicate continued interest and any updated information, such as change of address or household information within ten (10) business days. If the applicant fails to respond within that time frame, the applicant's name will be removed from the waiting list(s).

Applicants may request in writing information on the family's position on the waiting list(s). Telephone or in-person requests will not be honored.

E. Responsibility to Report Changes

Applicants on the waiting list(s) must also provide in writing to HACD any changes in income, family composition, address or any other information provided on the preliminary application within 10 business days of the change. Any such changes could affect the applicant's status or eligibility for housing. Any applicant knowingly providing false information or fraudulent statements affecting the applicant's status or eligibility for housing will be removed from the waiting list(s).

F. Removal from the Waiting List

An applicant may withdraw an application at any time. A withdrawn application cannot be reactivated and the applicant who has withdrawn an application shall be required to reapply when the waiting list is open. Any applicant removed from the waiting list by HACD will be notified in writing of the reason(s) for which the application is being removed. Such notification shall inform the applicant of his/her right to an Informal Review (see Appendix A) of the determination, the time frame for requesting the Informal Review, and will be made part of the

application record. HACD will provide the applicant, upon written request and within a reasonable time frame an opportunity for an Informal Review of the determination of removal from the waiting list.

G. Record Keeping

HACD will keep a copy of each pre-application and formal application received. For each applicant, HACD will document its determination that the applicant is eligible and meets tenant selection standards, or is ineligible and does not meet tenant selection standards, or is removed from the waiting list for any other reason.

HACD will also maintain a record of the dwelling unit(s) offered to an eligible applicant, including the location, date, and circumstances of the offer and its acceptance or rejection. A copy of each application will become a part of a tenant's file during participation in the program. Inactive files will be maintained for a minimum of three years from the date of final action. Waiting list information will include race or ethnic designation of head of household.

H. Final Eligibility Determination

Based on staff estimates of the availability of units, ten (10) applicants in waiting list order will be called off of the waiting list (s) and invited to attend an interview and submit a formal application for final eligibility for housing, after which the formal verification process and tenant selection process will commence as described in Chapter II of this policy.

THE PLAN

for Administration of the U. S. Department of Housing and Urban Development (HUD)

SECTION 8 Housing Choice Voucher Program

Effective JULY 2018

Office of Individual and Family Program

A tool for administering and managing the federal Section 8 voucher programs of the Connecticut Department of Housing. These programs include the Housing Choice Voucher, both tenant-based and project-based, Family Unification, Mainstream Housing Opportunities Program for Persons with Disabilities and the Veterans Affairs Supportive Housing Programs

STATE OF CONNECTICUT

Department of Housing

505 Hudson Street

Hartford, CT 06106-7107

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Chapter 1 STATEMENT OF POLICIES AND OBJECTIVES

INTRODUCTION

The Section 8 program (*now known as the Section 8 Housing Choice Voucher Program*) became law as part of the Housing and Community Development Act of 1974 that re-codified the U. S. Housing Act of 1937. The Housing and Community Development Act has been amended from time to time and its requirements, as they apply to the Section 8 tenant-based assistance program, are described in and implemented through this Administrative Plan.

Administration of the Section 8 Housing Choice Voucher Program (HCV) described herein is the responsibility of the State of Connecticut Department of Housing (DOH) and its contract administrator, jointly hereafter referred to as the public housing agency (PHA). Administration of the DOH Section 8 Housing Choice Voucher Program shall comply with the Section 8 Housing Choice Voucher regulations of the U. S. Department of Housing and Urban Development (HUD) as well as with all federal, state and local fair housing laws and regulations**.** The Department of Housing and its contractors comply with the State Code of Ethics as set forth in Connecticut General Statutes Title 1, Chapter 10, Sections 1-79 through 1-101 inclusive.

Jurisdiction

State law, Section 8-37r of the Connecticut General Statutes, designates the Department of Housing has as a public housing agency for the purpose of administering the housing voucher program pursuant to the Housing Act of 1937 in all one-hundred sixty-nine incorporated towns in the state.

A. DEPARTMENT MISSION STATEMENT/OVERVIEW

The Department of Housing (DOH) is a statewide public agency that works in concert with municipal leaders, public agencies, community groups, local housing authorities, and other housing developers in the planning and development of affordable homeownership and rental housing units, the preservation of existing multi-family housing developments, community revitalization and financial and other support for our most vulnerable residents through our funding and technical support programs. As the State's lead agency for all matters relating to housing, DOH provides leadership for all aspects of policy and planning relating to the development, redevelopment, preservation, maintenance and improvement of housing serving very low, low, and moderate-income individuals and families. DOH is also responsible for overseeing compliance with applicable statutes, regulations and financial assistance agreements for funded activities through long-term program compliance monitoring. DOH is also designated as a public housing agency for the purposes of administering the Section 8 Housing Choice Voucher (HCV) Program under the federal Housing Act and its mission is to provide safe, decent, affordable housing for eligible Connecticut residents.

DOH strengthens and revitalizes communities by promoting affordable housing opportunities. DOH seeks to eliminate homelessness and to catalyze the creation and preservation of quality,

affordable housing to meet the needs of all individuals and families statewide to ensure that Connecticut continues to be a great place to live and work.

The executive management of the department is vested in a Commissioner of Housing and a Deputy Commissioner. The Department of Economic and Community Development, which provides shared services, including but not limited to Human Resources, and Information Technology, supports DOH administratively. By statute, a statewide Housing Advisory Council provides guidance and assistance to the Commissioner. DOH has approximately 35 full-time employees and administers more than one-hundred and eighty million dollars in state general fund and state bond fund allocations, as well as fifty million dollars in direct federal grant funds.

Within the department, the Office of Individual and Family Programs is authorized to administer the HCV Program. In addition to the HCV program, the group maintains oversight of the Section 8 Moderate Rehabilitation Program, and the state-funded Rental Assistance Program (RAP) that has a significant commitment to supportive housing.

B. LOCAL GOALS [§ 24 CFR 982.1]

The Section 8 program is designed to achieve these major objectives:

1. To provide decent, safe and sanitary housing for very low-income families while maintaining their rent payments at an affordable level.

2. To ensure that all units meet housing quality standards and those families pay fair and reasonable rents.

3. To promote fair housing and the opportunity for very low-income families of all backgrounds to experience freedom of housing choice.

4. To aide in the elimination of chronic homelessness, and the achievement of the goals and objectives of ZERO 2016.

5. To promote a housing program that maintains quality service and integrity while providing an incentive to private property owners to rent to very low-income families**.**

In addition, the PHA has the following goals for the program:

1. To assist the local economy by increasing the occupancy rate and the amount of money flowing into the community.

2. To encourage the self-sufficiency of participating families.

3. To create positive public awareness and expand the level of support among families, owners and the community in accomplishing the PHA's mission.

4. To attain and maintain a high level of standards and professionalism in our day-to-day management of all program components.

5. To administer an efficient, high-performing agency through continuous improvement of the PHA's support systems and commitment to our employees and their development

C. PURPOSE OF THE PLAN [§ 24 CFR 982.54]

The purpose of the administrative plan is to establish policies for carrying out the programs in a manner consistent with HUD requirements and local goals and objectives contained in the Agency Plan. The Housing Choice Voucher Program was implemented as of October 1, 1999. The PHA is responsible for complying with all changes in HUD regulations pertaining to these programs. If such changes conflict with this plan, HUD regulations will have precedence. The original plan and any changes must be approved by the Commissioner of DOH, with the pertinent sections included in the Agency Plan and a copy provided to HUD.

Applicable regulations include:

1. § 24 CFR Part 5, General Program Requirements

2. § 24 CFR Part 8, Nondiscrimination Based on Handicap in Federally Assisted Programs

3. § 24 CFR Part 982, Section 8 Tenant-Based Assistance

D. ADMINISTRATIVE FEE RESERVE [§ 24 CFR 982.54(d)(21)]

All expenditures from the administrative fee reserve will be approved by the Commissioner and made in accordance with the approved budget.

E. RULES AND REGULATIONS [§ 24 CFR 982.52]

This administrative plan is set forth to define the PHA's local policies for operation of the housing programs in the context of federal laws and regulations. All issues related to Section 8 not addressed in this document are governed by such federal regulations, HUD memos, notices and guidelines or other applicable law. The policies in this Administrative Plan have been designed to ensure compliance with the consolidated annual contributions contract (ACC) and all HUD-approved applications for program funding.

F. LOCAL PREFERENCE FOR ADMISSION

Homeless Preference for Admission

The PHA will give preference to applicant households meeting all of the following criteria:

1. Are referred to PHA by either a statewide homeless service provider with whom PHA has executed a Memorandum of Understanding (MOU) outlining the provider's

responsibilities with respect to the provision of supportive housing and supportive services for the referred household, or through a DOH-funded homeless service program;

2. Have received a written commitment from the homeless service provider for supportive services to help the household's transition from supportive to permanent housing; and

3. Have received a written commitment from the homeless service provider for supportive services to help the household comply with Housing Choice Voucher program rules.

Persons transitioning out of the Department of Housing and Urban Development Continuum of Care housing programs (formerly Shelter Plus Care/Supportive Housing Programs) and/or any state funded Permanent Supportive Housing programs into permanent housing will be included as a priority group as part of this preference.

This preference shall be limited to applicants who have been certified as meeting the criteria for this preference by the homeless service provider noted above.

This preference shall be limited to two vouchers in three issued by the PHA.

G. TERMINOLOGY

The State of Connecticut Department of Housing and its contract administrator are referred to as the "PHA" or "public housing agency" throughout this document.

1. "Family" is used interchangeably with the words "applicant" or "participant" and can refer to a single person family.

2. "Tenant" is used to refer to participants in terms of their relation to owners.

3. "Disability" is used where "handicap" was formerly used.

4. "Non-citizens rule" refers to the regulation effective June 19, 1995 restricting assistance to U. S. citizens and eligible immigrants.

5. The Section 8 program also is known as the Housing Choice Voucher (HCV) Program.

6. "HQS" means the housing quality standards required by regulations and enhanced by the PHA.

7. "Failure to provide" refers to all requirements in the first Family Obligation. See Chapter 15, "Denial or Termination of Assistance."

8. "Merger date" refers to October 1, 1999 that is the effective date of the merging of the Section 8 Certificate and Voucher program into the Housing Choice Voucher Program.

See Glossary for other terminology.

H. FAIR HOUSING POLICY [§ 24 CFR 982.54(d)(6)]

It is the policy of the PHA to comply fully with all federal, state and local nondiscrimination laws and with the rules and regulations governing fair housing and equal opportunity in housing and employment.

The PHA shall not deny any family or individual the equal opportunity to apply for or receive assistance under the Section 8 program based on race, color, sex, gender identity or expression, religion, creed, national or ethnic origin, ancestry, age, familial or marital status, lawful source of income, handicap or disability, or sexual orientation. The PHA will make every effort to provide training and materials to its staff to enable them to inform owners and tenants of the requirements of § 46a-7 (*discrimination based on physical or mental disability*) and § 46a-11f (*discrimination based on lawful sources of income*) of the Connecticut General Statutes.

To further its commitment to full compliance with applicable civil rights laws, the PHA will provide federal/state/local information to voucher holders regarding unlawful discrimination and any recourse available to families who believe they are victims of a discriminatory act. Such information will be made available during the family briefing session and all applicable fair housing information and discrimination complaint forms will be made a part of the voucher holder's briefing packet and available upon request at the front desk.

All PHA staff will be required to attend fair housing training and informed of the importance of affirmatively furthering fair housing and providing equal opportunity to all families, including providing reasonable accommodations to persons with disabilities, as a part of the overall commitment to quality customer service. Fair housing posters are posted throughout PHA offices, including in the lobby and interview rooms and the equal opportunity logo will be used on all outreach materials. Staff will attend local fair housing update training sponsored by HUD and other local organization to keep current with new developments.

Except as otherwise provided in § 24 CFR 8.21(c)(1), 8.24(a), 8.25 and 8.31, no individual with disabilities shall be denied the benefits of, be excluded from participation in or otherwise be subjected to discrimination because the PHA's facilities are inaccessible to or unusable by persons with disabilities. Posters and housing information are displayed in locations throughout the PHA's offices in such a manner as to be readable easily from a wheelchair.

The PHA's offices are accessible to persons with disabilities. Accessibility for the hearing impaired is provided by the TDD/TTY telephone service provider.

The PHA will attempt to remedy discrimination complaints made against the PHA.

The PHA will provide a copy of a discrimination complaint form to any person or family claiming to be aggrieved and provide that person or family with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO) including the provision of the toll free numbers for the Housing Discrimination Hotline (800)-669-9777 and Federal Relay Service at (800) 887-8339 or www.gsa.gov/fedrelay .

I. REASONABLE ACCOMMODATIONS POLICY [§ 24 CFR 100.202]

It is the policy of this PHA to be service-directed in the administration of our housing programs, and to exercise and demonstrate a high level of professionalism while providing housing services.

A person with a disability must request a specific change to a policy or practice as an accommodation of his or her disability before the PHA will treat a person differently than anyone else. The PHA's policies and practices will provide persons with disabilities with reasonable accommodations, upon request, so that they may fully access and utilize the housing program and related services. The PHA will provide information concerning reasonable accommodations at the initial tenant briefing and again at each annual re-examination. This policy is intended to afford persons with disabilities an equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as those who do not have disabilities, and is applicable to all situations described in this administrative plan, including, but not limited to:

1. when a person initiates contact with the PHA, when the PHA initiates contact with a person (*including when a person applies*), and

2. when the PHA schedules or reschedules appointments of any kind.

A person requesting a reasonable accommodation must meet the definition of a person with a disability, as "disability" is defined in the Americans with Disabilities Act ("ADA"):

1. A physical or mental impairment that substantially limits one or more of the major life activities of the individual;

2. A record of such an impairment; or

3. Being regarded as having such impairment.

[Note: This is not the same as the HUD definition used for purposes of determining allowances.]

The term "physical or mental impairment" includes alcoholism and drug addiction, other than addiction caused by current, illegal use of a controlled substance. A person who has successfully completed a supervised drug rehabilitation program or has otherwise been successfully rehabilitated and is no longer engaging in the illegal use of drugs, or is participating in a supervised rehabilitation program and is no longer engaging in the illegal use of drugs, is covered under the ADA. Current drug users are not covered.

A person requesting a reasonable accommodation should explain what type of accommodation the person is requesting and, if the need for the accommodation is not readily apparent or not known to the PHA, explain the relationship between the requested accommodation and the disability. A person with a disability that is not readily apparent must provide the PHA with reliable information that verifies that the person meets the definition of disabled, describes the needed accommodation, and shows the relationship between the person's disability and the need for the requested accommodation. The PHA will provide forms to assist a person making a

reasonable accommodation request to verify such information, although the person is not required to use the forms to make the request. The PHA will keep all information relevant to a reasonable accommodation request confidential.

If the PHA finds that the requested accommodation creates an undue administrative or financial burden or fundamentally alters the nature of the provider's operations, the PHA will, in a reasonable time, deny the request in writing and discuss with the person whether there is an alternate accommodation it believes will meet the needs of the person.

If a person is denied the accommodation or feels that the alternative suggestions are inadequate, they may request an informal hearing to review the PHA's decision.

A person with a disability may identify a designee to provide information to the PHA.

All PHA mailings will be made available in an accessible format upon request, as a reasonable accommodation.

Applying for Admission

All persons who wish to apply for any of the PHA's programs must submit a pre-application via written format, as indicated in our public notice. Applications will be made available in an accessible format upon request from a person with a disability.

To provide specific accommodation to persons with disabilities, upon request, the information may be mailed to the applicant and, if requested, it will be mailed in an accessible format.

The full application is completed at the eligibility appointment in the applicant's own handwriting, unless assistance is needed, or a person with a disability requests an accommodation. Applicants then will be interviewed by PHA staff to review the information on the full application form. Verification of disability, as it relates to Section 504, Fair Housing, or ADA reasonable accommodation, will be requested at this time.

J. TRANSLATION OF DOCUMENTS

The PHA has bilingual staff to assist non-English speaking families in Spanish and other languages spoken in the communities. Documents will be translated into Spanish and other languages as determined by the PHA.

In determining whether it is feasible to provide translation of documents written in English into other languages, the PHA will consider the following factors:

1. Number of applicants and participants in the jurisdiction who do not speak English and speak the other language.

2. The availability of local organizations to provide translation services to non-English speaking families.

3. Availability of bi-lingual staff to provide translation for non-English speaking families.

K. MANAGEMENT ASSESSMENT OBJECTIVES

The PHA operates its housing assistance program with efficiency and can demonstrate to HUD auditors that the PHA is using its resources in a manner that reflects its commitment to quality and service. The PHA policies and practices are consistent with the goals and objectives of the following HUD SEMAP indicators:

1. Selection from the Waiting List
2. Reasonable Rent
3. Determination of Adjusted Income
4. Utility Allowance Schedule
5. HQS Quality Control Inspections
6. HQS Enforcement
7. Expanding Housing Opportunities
8. Payment Standards
9. Annual Re-examinations
10. Correct Tenant Rent Calculations
11. Pre-Contract HQS Inspections
12. Annual HQS Inspections
13. Lease-up
14. Family Self-Sufficiency Enrollment and Escrow Account Balances
15. Bonus Indicator (*de-concentration*)

A PHA supervisor or other qualified person other than the person who performed the work, as required by HUD, on the following SEMAP factors, will perform supervisory quality control reviews:

1. Selection from the waiting list
2. Rent reasonableness

3. Determination of adjusted income

4. HQS enforcement

5. HQS quality control

The annual sample of files and records will be drawn in an unbiased manner, leaving a clear audit trail.

L. RECORDS FOR MONITORING PHA PERFORMANCE

In order to demonstrate compliance with HUD and other pertinent regulations, the PHA will maintain records, reports and other documentation for a time that is in accordance with HUD requirements and in a manner that will allow an auditor, housing professional or other interested party to follow, monitor and or assess the PHA's operational procedures objectively and with accuracy and in accordance with SEMAP requirements with internal supervisory audits.

In addition to the required SEMAP documentation, supervisory staff audits the following functions:

1. Not less than five percent of reexaminations.

2. Not less than five percent of new applications.

3. Not less than five percent of claims processed.

Family File

To facilitate monitoring and program auditing the PHA will maintain a file for each family when the family is selected from the waiting list and keep the file active until the family is no longer a program participant. The inactive file should be kept for a minimum of three years. The file should contain the following:

1. Application forms

2. Income verification forms

3. A copy of each voucher issued

4. Copies of relevant correspondence

5. All requests for lease approval

6. A copy of all approved leases

7. All rent reasonableness determinations

8. All unit inspection forms

9. A copy of each HAP contract executed by PHA and owner

10. Interim re-determination forms and related records

11. Notification of lease disapproval, if applicable

12. Records concerning denial of assistance or termination of assistance

13. All PHA records and determinations concerning informal reviews or hearings

14. DCF referral (*for Family Unification Participants only*)

15. Social Security number verification

16. Non-citizen verification

17. Proof of legal identity for all family members

M. PRIVACY RIGHTS [§ 24 CFR 5.212]

Applicants and participants, including all adults in their households, are required to sign the HUD Form 9886, Authorization for Release of Information. This document incorporates the Federal Privacy Act Statement and describes the conditions under which HUD will release family information.

The PHA's policy regarding release of information is in accordance with state and local laws that may restrict the release of family information. All family information is subject to Connecticut's Freedom of Information Act ("FOIA") and all corresponding rules, regulations, and interpretations.

All information that would lead one to determine the nature and/or severity of a person's disability must be kept in a separate folder and marked "confidential". The personal information in this folder must not be released except on an "as needed" basis in cases where an accommodation is under consideration. All requests for access and granting of accommodations based on this information must be approved by the PHA.

The PHA's practices and procedures are designed to safeguard the privacy of applicants and program participants. All applicant and participant files will be stored in a secure location that is only accessible by authorized staff.

PHA staff will not discuss family information contained in files unless there is a business reason to do so. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action.

All files must be signed for when removed from the secured file storage area.

N. FAMILY OUTREACH

The PHA will publicize and disseminate information to make known the availability of housing assistance and related services for very low-income families on a regular basis. When the PHA's waiting list is open, the PHA will publicize the availability and nature of housing assistance for very low-income families in newspapers of general circulation, minority media, the agency website and by other suitable means. Notices will also be provided in Spanish and other languages upon request.

The PHA will communicate the status of housing availability to other service providers in the community; advise them of housing eligibility factors and guidelines in order that they can make proper referrals for housing assistance.

O. OWNER OUTREACH [§ 24 CFR 982.54(d)(5)].

The PHA encourages owners of decent, safe and sanitary housing units to lease to Section 8 families. The PHA maintains a list of interested owners for the Section 8 program and updates this list at least annually. When listings from owners are received, they will be compiled by the PHA staff by bedroom size.

The PHA will maintain lists of available housing submitted by owners in all neighborhoods within the PHA's jurisdiction to ensure greater mobility and housing choice to very low-income households. The lists of owners will be provided at the front desk and provided at briefings.

The staff of the PHA initiates personal contact with private property owners and managers by conducting formal and informal discussions and meetings.

Printed material is offered to acquaint owners and managers with the opportunities available under the program.

The PHA conducts periodic meetings with participating owners to improve owner relations and to recruit new owners.

P. DISCRETION TO OPERATE A PROJECT-BASED VOUCHER (PBV) PROGRAM [§ 24 CFR 983.5 (c), 983.6 (a), 983.51(b)(d)

The PHA will exercise its discretionary authority to operate a project-based component. The option to set-aside up to twenty percent of budget authority (§ 24 CFR *983.6(a)*) will permit the PHA to develop and maintain long-term safe, decent and affordable housing that is accessible to its Section 8 applicants and program participants. The PHA has not set a specific goal for its budget authority that it will dedicate to its PBV program; however, in any given calendar year,

the PHA reserves the right to utilize up to twenty percent of its budget authority for its PBV program.

Selection of PBV Owner Proposals

The final rule establishes two methods that a PHA can use to select owner proposals. These methods are found at § 24 CFR 983.51(b)(1) and (2). The PHA will utilize the following PBV proposal selection methods:

1. § 24 CFR 983.51(b)(1) permits the PHA publicly to issue a competitive request for PBV proposals.

    a. The PHA, at its discretion, may make vouchers available in support of Connecticut's Interagency Committee on Supportive Housing and Homelessness initiative. Competitive RFP's are periodically issued by the Connecticut Housing Finance Authority (CHFA) on behalf of the partnering agencies for capital funds, service dollars and rent subsidies. If implemented, proposals will be reviewed and selected by representatives from participating agencies. CHFA will notify successful applicants and public announcement will be completed by the partner agencies on their respective websites.

    b. In addition, project-based vouchers may be made available by the PHA, at its discretion, for supportive housing, housing for homeless families or for housing with a veteran's preference through the Department of Housing's competitive funding processes, including but not limited to the Competitive Housing Assistance for Multifamily Properties initiative (CHAMP).

    c. The PHA may also consider making project-based vouchers available in conjunction with supportive housing, housing for homeless families or housing with a veteran's preference included in the 9% tax credit competitive proposal process under CHFA's Federal Low-Income Housing Tax Credit program. CHFA administers the Federal Low-Income Housing Tax Credit Program and at least annually conducts a competitive procurement for 9% tax credits based on criteria in its Qualified Allocation Plan (QAP). At the PHA's discretion, the tax credit procurement may include PHA section 8 project-based vouchers to be made available for tax credit units dedicated for supportive housing, housing for homeless families or housing with a veteran's preference. Proposals will be reviewed and selected based on competitive criteria by staff of the authority and the PHA. Successful applicants will be notified and public notice provided through the PHa's and the authority's websites.

2. § 24 CFR 983.51(b)(2) permits the PHA to select proposals that have successfully competed for housing assistance under a federal, state or local government housing assistance, community development or supportive services program, provided the proposal has been selected in accordance with such program's competitive selection

requirements within three years of the PBV proposal selection date and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance.

At its option and on a case-by-case basis, the PHA may entertain requests to attach PBV assistance to units previously selected by a non-PBV competition, in accordance with the requirement of § 24 CFR 983.51(b)(2)), under the following circumstances:

1. Adequate PBV voucher and budget authority is projected to be available when the units are ready for occupancy;

2. The request meets a compelling need and is otherwise consistent with the PHA's long-term affordable housing goals;

3. The project is otherwise in compliance with all HUD and the PHA's PBV requirements.

The owner/project sponsor must initiate a written request for PBV assistance to the PHA accompanied by a letter from the "selection agency" that competitively selected the project for housing assistance under a federal, state or local government program. This letter, submitted on the "selection agency's" letterhead and signed by an authorized official, must include the following information:

1. Date of the proposal selection;

2. A certification that the proposal was competitively selected by the agency in full compliance with all publicly advertised selection requirements;

3. A statement that proposal selection did not involve any consideration that the project would receive PBV assistance.

4. A copy of the NOFA or other similar solicitation for affordable housing assistance that the owner/project sponsor responded to; and,

5. A description of the housing program that the applicant successfully completed, noting any special deed restrictions and/or special considerations such as tenant selection preferences.

When the PHA receives the "selection agency" letter, it will request that the owner/project sponsor fill out a PHA PBV application and subsequently determine if a reservation of PBV can and will be made.

Public notice of PHA PBV owner/project sponsor selection (§ 24 CFR 983.51(d))

Once the PHA has received all required HUD approvals to proceed to AHAP or HAP and all other program requirements have been met, the PHA will publicly announce the selection of owner proposals on its website at http://www.ct.gov/DOH/site/default.asp.

Chapter 2 ELIGIBILITY FOR ADMISSION [§ 24 CFR Part 5, Subparts B, D & E; Part 982, Subpart E]

INTRODUCTION

This chapter defines both HUD's and the PHA's criteria for admission and denial of admission to the program. The policy of this PHA is to strive for objectivity and consistency in applying these criteria to evaluate the eligibility of families who apply. The PHA staff will review all information provided by the family carefully and without regard to factors other than those defined in this chapter. Families will be provided the opportunity to explain their circumstances, to furnish additional information, if needed and to receive an explanation of the basis for any decision made by the PHA pertaining to their eligibility.

A. ELIGIBILITY FACTORS [§ 24 CFR 982.201(b)]

The PHA accepts applications only from families whose head or spouse is at least 18 years of age or is an emancipated minor under state law.

To be eligible for participation, an applicant must meet HUD's criteria, as well as any permissible additional criteria established by the PHA.

The HUD eligibility criteria are:

1. An applicant must be a "family"

2. An applicant must be within the appropriate income limits

3. An applicant must furnish Social Security numbers for all family members age six and older

4. An applicant must furnish evidence of citizenship or eligible immigrant status and verification where required

5. An applicant must furnish proof of legal identity

At least one member of the applicant family must either be a U. S. citizen or have eligible immigration status before the PHA may provide any financial assistance.

Reasons for denial of admission are addressed in Chapter 15 of this Administrative Plan, "Denial or Termination of Assistance." These reasons for denial constitute additional admission criteria.

The family's initial eligibility for placement on the waiting list will be made in accordance with the eligibility factors.

Evidence of citizenship or eligible immigrant status will not be verified until the family is selected from the waiting list for final eligibility processing for issuance of a voucher, unless the PHA

determines that such eligibility is in question, whether or not the family is at or near the top of the waiting list.

B. FAMILY COMPOSITION [§ 24 CFR 982.201(c)]

The applicant must qualify as a family. A family may be a single person or a group of persons.

A family includes a family with a child or children. A group of persons consisting of two or more elderly persons or disabled persons living together or one or more elderly, near elderly, or disabled persons living with one or more live-in aides is a family. The PHA determines if any other group of persons qualifies as a family.

A single person family may be:

1. An elderly person.

2. A displaced person.

3. A person with a disability.

   (*Individuals may not be considered disabled for eligibility purposes solely based on any drug or alcohol dependence*.)

4. Any other single person.

5. A child who is temporarily away from home because of placement in foster care is considered a member of the family. This provision only pertains to the foster child's temporary absence from the home and is not intended to enlarge artificially the space available for other family members.

Head of Household

The head of household is an adult member of the household, designated by the family as head, who is wholly or partially responsible for paying the rent and has the legal capacity to enter into a lease under state law**.** Emancipated minors who qualify under state law will be recognized as head of household.

Spouse or Head

Spouse means the husband or wife of the head.

For proper application of the non-citizens rule, the definition of spouse is the marriage partner who would need to be divorced to dissolve the relationship. It includes the partner in a common law marriage. The term "spouse" does not apply to boyfriends, girlfriends, significant others or co-heads.

Co-Head

An individual in the household who is equally responsible for the lease with the head of household. A family may have a spouse or co-head, but not both. A co-head never qualifies as a dependent.

Minors who are emancipated under state law may be designated as a co-head.

Live-in Attendants

A family may include a live-in aide provided that such live-in aide:

1. Is determined by the PHA to be essential to the care and well-being of an elderly person, a near-elderly person (*i.e., aged 50-61*) or a person with disabilities,

2. Is not obligated for the support of the person(s) and

3. Would not be living in the unit except to provide care for the person(s).

A live-in aide is treated differently than family members:

1. Income of the live-in aide will not be counted for purposes of determining eligibility or level of benefits.

2. Live-in aides are exempt from the non-citizen rule requirements.

3. Live-in aides will not be considered as a remaining member of the tenant family.

Relatives are not excluded automatically from being live-in aides, but they must meet all of the elements in the live-in aide definition described above.

A live-in aide may only reside in the unit with the approval of the PHA. Written verification will be required from a reliable, knowledgeable professional, such as a doctor, social worker or caseworker. The verification provider must certify that a live-in aide is needed for the care of the family member who is elderly, near elderly (*i.e., aged 50-61*) or disabled.

The PHA will approve a live-in aide if needed as a reasonable accommodation to make the program accessible to and usable by the family member with a disability. Approval of a live-in aide for reasonable accommodation will be in accordance with § 24 CFR Part 8 and the reasonable accommodations section in Chapter 1 of this Administrative Plan, "Statement of Policies and Objectives."

Verification must include the hours during which the care will be provided.

[§ 24 CFR 982.316] At any time, the PHA may refuse to approve a particular person as a live-in aide or may withdraw such approval if:

1. The person commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;

2. The person commits drug-related criminal activity or violent criminal activity; or

3. The person currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.

Split Households Before Voucher Issuance

When a family on the waiting list splits into two otherwise eligible families due to divorce or legal separation and the new families both claim the same placement on the waiting list and there is no court determination, the PHA will make the decision taking into consideration the following factors:

1. Which family member applied as head of household.

2. Which family unit retains the children or any disabled or elderly members.

3. Restrictions that were in place at the time the family applied.

4. Role of domestic violence or criminal activity in the split.

5. Recommendations of social service agencies or qualified professionals such as children's protective services.

Documentation of these factors is the responsibility of the applicant families. If either or both of the families do not provide the documentation, they may be denied placement on the waiting list for failure to supply information requested by the PHA.

Multiple Families in the Same Household

When families apply that consist of two families living together (*such as a mother and father and a daughter with her own husband or children*), if they apply as a family unit, they will be treated as a family unit.

Joint Custody of Children

Children who are subject to a joint custody agreement but live with one parent at least fifty-one percent of the time will be considered members of the household. "Fifty-one percent of the time" is defined as one-hundred eight-three calendar days that do not have to be consecutive.

When both parents are on the waiting list and both are trying to claim the child, the parent whose address is listed in the school records will be allowed to claim the school-age child as a dependent.

C. INCOME LIMITATIONS [§ 24 CFR 982.201(b), 982.353]

In order to be eligible for assistance, an applicant must have an annual income at the time of admission that does not exceed the very low-income limits for occupancy established by HUD.

To be income-eligible the family may be under the low-income limit in any of the following categories: [§ 24 CFR 982.201 (b)]

1. A very low-income family.

2. A low-income family that is continuously assisted under the 1937 Housing Act.

   An applicant is continuously assisted if the family has received assistance under any 1937 Housing Act program within one-hundred twenty calendar days of voucher issuance. Programs include public housing, all Section 8 programs and all Section 23 programs.

3. A low-income family physically displaced by rental rehabilitation activity under § 24 CFR Part 511.

4. A low-income non-purchasing family residing in a HOPE 1 or HOPE 2 project.

5. A low-income non-purchasing family residing in a project subject to a home-ownership program under § 24 CFR 248.173.

6. A low-income family displaced because of the prepayment of a mortgage or voluntary termination of a mortgage insurance contract under § 24 CFR 248.165.

7. A low-income family that qualifies for voucher assistance as a non-purchasing family residing in a project subject to a resident home ownership program.

To determine if the family is income-eligible, the PHA compares the annual income of the family to the applicable income limit for the family's size.

Families whose annual income exceeds the income limit will be denied admission and offered an informal review.

For admission to the program (*initial lease-up*), seventy-five percent of the families must be within the extremely low-income limit for the jurisdiction of the receiving PHA that they want to live.

Portability – for initial lease-up, families who exercise portability must be within the very low-income limit for the jurisdiction of the receiving PHA in which they want to live.

D. MANDATORY SOCIAL SECURITY NUMBERS [§ 24 CFR 5.216, 5.218]

Families are required to provide verification of Social Security numbers for all family members age 6 and older before admission, if they have been issued a number by the Social Security Administration. This requirement also applies to persons joining the family after admission to the program.

Failure to furnish verification of social security numbers is grounds for denial or termination of assistance.

Persons who have not been issued a Social Security number must sign a certification that they have never been issued a Social Security number.

Persons who disclose their Social Security number but cannot provide verification must sign a certification and provide verification within sixty business days. Elderly persons must provide verification within one-hundred twenty calendar days.

E. CITIZENSHIP/ELIGIBLE IMMIGRATION STATUS [§ 24 CFR Part 5, Subpart E]

In order to receive assistance, a family member must be a U. S. citizen or eligible immigrant. Individuals who are neither may elect not to contend their status. Eligible immigrants are persons who are in one of the immigrant categories as specified by HUD.

For the citizenship/eligible immigration requirement, the status of each member of the family is considered individually before the family's status is defined.

Mixed Families. A family is eligible for assistance as long as at least one member is a citizen or eligible immigrant. Families that include eligible and ineligible individuals are called "mixed." Such applicant families will be given notice that their assistance will be pro-rated based on the number of citizens and eligible immigrants to the number in the household. A family may request a hearing if they contest their determination as a mixed family.

All members ineligible. Applicant families that include no eligible members will be ineligible for assistance. Such families will be denied admission and offered an opportunity for a hearing.

Non-citizen students. As defined by HUD in the non-citizen regulations at § 24 CFR 5.522, these persons are not eligible for assistance.

Appeals. For this eligibility requirement only, the applicant is entitled to a hearing exactly like those provided for participants, as described in greater detail in Chapter 18 of this administrative plan.

F. OTHER CRITERIA FOR ADMISSIONS [§ 24 CFR 982.552(b)]

The PHA will apply the following criteria, in addition to the HUD eligibility criteria, as grounds for denial of admission to the program.

The family must have not violated any family obligation during the last year of previous participation in the Section 8 program before final eligibility determination.

The PHA will make an exception, if the family member who violated the family obligation is not a current member of the household on the application.

The family must be in good standing regarding any current payment agreement made with another PHA for a previous debt incurred, before this PHA will allow participation in its Section 8 program.

No family member may have been evicted from public housing for any reason during the last three years before final eligibility determination.

The PHA will check criminal history for all adults in the household to determine whether any member of the family has violated any of the prohibited behaviors as referenced in Chapter 15 of this Administrative Plan, "Denial or Termination of Assistance."

If any applicant deliberately misrepresents the information that eligibility or tenant rent is established, the PHA may deny assistance and may refer the family file/ record to the proper authorities for appropriate disposition.

G. TENANT SCREENING [§ 24 CFR 982.307)]

The PHA will take into consideration any of the criteria for admission described in Chapter 15 of this Administrative Plan, "Denial or Termination of Assistance."

The PHA will not screen family behavior or suitability for tenancy. The PHA will not be liable or responsible to the owner or other persons for the family's behavior or the conduct in tenancy.

The owner is responsible for screening and selection of the family to occupy the owner's unit. At or before PHA approval of the tenancy, the PHA will inform the owner that screening and selection for tenancy is the responsibility of the owner.

The owner is responsible for screening families based on their tenancy histories, including such factors as [§ 24 CFR 082.307(a)(3)]

1. Payment of rent and utility bills

2. Caring for a unit and premises

3. Respecting the rights of other residents to the peaceful enjoyment of their housing

4. Drug-related criminal activity or other criminal activity that is a threat to the health, safety or property of others; and

5. Sexual Offender subject to state or federal registration

6. Compliance with other essential conditions of tenancy.

The PHA will give the owner**:**

1. The family's current and prior address as shown in the PHA's records; and

2. The name and address (if known by the PHA) of the owner at the family's current and prior addresses.

The PHA will advise families how to file a complaint if they believe they have been discriminated against by an owner. The PHA will advise the family to make a fair housing complaint. The PHA may also report the owner to HUD (*Fair Housing/Equal Opportunity*) or the local fair housing organization.

H. CHANGES IN ELIGIBILITY BEFORE EFFECTIVE DATE OF CONTRACT

Changes that occur during the period between placement on the waiting list and issuance of a voucher may affect the family's eligibility or share of the rental payment.

I. INELIGIBLE FAMILIES

Families who are determined to be ineligible will be notified in writing of the reason for denial and given an opportunity to request an informal review or an informal hearing if they were denied due to non-citizen status. See Chapter 18 of this Administrative Plan, "Complaints and Appeals," for additional information about reviews and hearings.

J. PROHIBITED ADMISSIONS CRITERIA [§ 24 CFR 982.202(b)]

Admission to the program may not be based on:

1. Where the family lives (housing, not geography) before admission to the program.

2. Discrimination because the members of the family are unwed parents, recipients of public assistance or children born out of wedlock.

3. Discrimination because a family includes children.

4. Whether a family decides to participate in a family self-sufficiency (FSS) program; or

5. Other reasons as listed in Chapter 1 of this Administrative Plan, "Statement of Policies and Objectives," under the Fair Housing and Reasonable Accommodations section.

Chapter 3 APPLYING FOR ADMISSION [§ 24 CFR 982.204, § 24 CFR 983.203, 66FR 3607-9]

INTRODUCTION

The policy of the PHA is to ensure that all families who express an interest in housing assistance are given an equal opportunity to apply and are treated in a fair and consistent manner. This chapter describes the policies and procedures for completing an initial application for assistance, placement or denial of placement on the waiting list and limitations on who may apply. The primary purpose of the intake function is to gather information about the family, but the PHA will also utilize this process to provide information to the family so that an accurate and timely decision of eligibility can be made. Applicants will be placed on the waiting list in accordance with this plan.

A. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT and STALKING [§ 24 CFR Part 5, Subpart L]

The Violence Against Women Reauthorization Act of 2013 (VAWA) prohibits denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence, sexual assault or stalking.

Definitions [§ 24 CFR 5.2003]

As used in VAWA:

1. The term "*bifurcate"* means, with respect to a public housing or a Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.

2. The term "*domestic violence"* includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

3. The term "*dating violence"* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:

    a. The length of the relationship

    b. The type of relationship

c. The frequency of interaction between the persons involved in the relationship

4. The term *"stalking"* means:

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

     - Fear for the person's individual safety or the safety of others; or

     - Suffer substantial emotional distress.

5. The term *"affiliated individual"*, with respect to an individual, means:

   a. A spouse, parent, brother or sister or child of that individual, or a person to whom that individual stands in the position or place of a parent or guardian; or

   b. Any individual, tenant, or lawful occupant living in the household of that individual.

6. The term *"sexual assault"* means any nonconsensual sexual act proscribed by Federal, tribal, or state law, including when the victim lacks capacity to consent.

Notification - *PHA Policy*

The PHA acknowledges that a victim of domestic violence, dating violence, sexual assault or stalking may have an unfavorable history (*e.g., a poor credit history, a record of previous damage to an apartment, a prior arrest record*) that would warrant denial under the PHA's policies. Therefore, if the PHA makes a determination to deny admission to an applicant family, the PHA will include in its notice of denial:

1. A statement of the protection against denial provided by VAWA

2. A description of PHA confidentiality requirements

3. A request that an applicant wishing to claim this protection submit to the PHA documentation meeting the specifications below with her or his request for an informal review

Victim Documentation - *PHA Policy*

An applicant claiming that the cause of an unfavorable history is that a member of the applicant family is or has been a victim of domestic violence, dating violence, sexual assault or stalking must provide documentation demonstrating the connection between the abuse and the unfavorable history and naming the perpetrator of the abuse. The documentation may consist of any of the following:

1. A statement signed by the victim certifying that the information provided is true and correct and that it describes bona fide incident(s) of actual or threatened domestic violence, dating violence, sexual assault or stalking

2. A police or court record documenting the domestic violence, dating violence or stalking

3. Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, sexual assault or stalking or the effects of such abuse. This person may be an employee, agent or volunteer of a victim service provider; an attorney; or a medical or other knowledgeable professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

Perpetrator Documentation *- PHA Policy*

If the perpetrator of the abuse is a member of the applicant family, the applicant must provide additional documentation consisting of one of the following:

1. A signed statement

    a. requesting that the perpetrator be removed from the application and

    b. certifying that the perpetrator will not be permitted to visit or to stay as a guest in the assisted unit

2. Documentation that the perpetrator has successfully completed or is successfully undergoing, rehabilitation or treatment. The documentation must be signed by an employee or agent of a domestic violence service provider or by a medical or other knowledgeable professional from whom the perpetrator has sought or is receiving assistance in addressing the abuse. The signer must attest, under penalty of law, that, to the best of his or her knowledge, the rehabilitation is successfully completed or is progressing successfully. The victim and perpetrator must also sign or attest to the documentation.

Time Frame for Submitting Documentation *- PHA Policy*

The applicant must submit the required documentation with her or his request for an informal review or must request an extension in writing at that time. If the applicant so requests, the PHA will grant an extension of ten business days and will postpone scheduling the applicant's informal review until after it has received the documentation or the extension period has elapsed. If after reviewing the documentation provided by the applicant the PHA determines that the family is eligible for assistance, no hearing will be scheduled and the PHA will proceed with admission of the applicant family.

PHA Confidentiality Requirements [§ 24 CFR 5.2007(a)(1)(v)] – *PHA Policy*

All information provided to the PHA regarding domestic violence, dating violence, sexual assault or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence and may neither be entered into any shared database nor provided to any related entity, except to the extent that the disclosure

1. is requested or consented to by the individual in writing,

2. is required for use in an eviction proceeding or

3. is otherwise required by applicable law.

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the PHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

B. OVERVIEW OF THE APPLICATION PROCESS

The PHA has two Section 8 waiting list types: one for admission to the tenant-based rental assistance program (*referred to as the "tenant-based program"*) and site-based for admission to the project-based rental assistance program (*referred to as the "project-based program"*).

The purpose of application taking is to permit the PHA to gather information and determine placement on either or both of these waiting lists. The application will contain questions designed to obtain pertinent program information.

Families who wish to apply for any of the PHA's programs must complete a written pre-application form when application taking is open, i.e., when applications are being accepted. Pre-applications will be made available in an accessible format upon request from a person with a disability.

When the waiting list is open, any family asking to be placed on the waiting list for Section 8 rental assistance will be given the opportunity to do so by completing an application.

Applications will be made available to interested families upon request.

The application process will involve two phases. The first is the "initial" application for assistance (*referred to as a pre-application*). This first phase results in the family's placement on the waiting list.

The second phase is the "final determination of eligibility" (*referred as the full application*). The full application takes place when the family reaches the top of the waiting list. At this time, the PHA ensures that verification of all HUD and PHA eligibility factors is current in order to determine the family's eligibility for the issuance of a voucher.

C. OPENING/CLOSING OF PRE-APPLICATION PROCESS [§ 24 CFR 982.206, 982.54(d)(1), § 24 CFR 982.203(a)(3)&(4)]

Opening the Waiting list

The PHA will utilize the following procedures for opening the waiting list.

When the PHA opens the waiting list, the PHA will advertise through public notice in newspapers, minority publications, the agency website and other media entities the location(s) and program(s) that pre-applications are being accepted.

The notice will contain:

1. The locations where families may access pre-application forms as well as where and when to mail the application.

2. The programs that pre-applications will be taken.

3. Identify the programs.

4. Limitations, if any, on who may apply.

5. Opening and close date for acceptance of pre-applications.

The notices will be made in an accessible format if requested. They will provide potential applicants with information that includes the PHA address and telephone number, how to submit a pre-application and information on eligibility requirements.

If the waiting list is open, any family asking to be placed on the waiting list for the Section 8 tenant-based program or a waiting list for the Section 8 project-based program or both, will be given the opportunity to complete a pre-application.

If the waiting list is open, the PHA will accept pre-applications from families.

Closing the Waiting List

The PHA may stop accepting applications for the tenant-based program, if there are enough applicants to fill anticipated openings for the next twelve months. The PHA may stop accepting applications for a project-based site if there are enough applicants to fill immediate openings. The waiting lists may not be closed if it would have a discriminatory effect inconsistent with applicable civil rights laws.

The PHA will announce the last date pre-applications will be accepted in the same notice that advertises the opening of the list.

When the period for accepting applications is over, the PHA will add the new applicants to both tenant based and project based lists using the following method:

1. As the pre-applications are received by the PHA, they will be data-entered, with the date of the pre-application recorded. Preference status will be indicated when appropriate for a project-based list.

2. Once the list is closed and all the pre-applications have been data-entered, a computer

   lottery will be completed to determine placement order on the tenant based waiting list.

3. Applicants will be placed on the list after applicants who were on the list previously. Project based preferences may allow an applicant to move to the top of a specific site's waiting list.

D. "INITIAL" APPLICATION PROCEDURES [§ 24 CFR 982.204(b)]

The PHA will utilize a preliminary-application form (*pre-application*). The information is to be filled out by the applicant whenever possible. It may also be mailed to the applicant and, if requested, it will be mailed in an accessible format. Translations will be provided for non-English speaking applicants, where possible.

The purpose of the pre-application is to permit the PHA to assess family eligibility or ineligibility in a preliminary fashion and to determine placement on the waiting list. The pre-application will contain questions designed to obtain the following information:

1. Applicant name and number of family members

2. Street address and telephone number(s)

3. Mailing address (*if post office box or other permanent address*)

4. Amount(s) of income received by household members

5. Social Security numbers

6. Race/ethnicity

7. Request for specific accommodation needed to fully utilize program and services

Duplicate pre-applications, including pre-applications from a segment of an applicant household, will not be accepted.

The information on the pre-application will not be verified until the applicant has been selected for final eligibility determination. Final eligibility will be determined when the full application process is completed and all information is verified.

Applicants are required to inform the PHA in writing of changes in address. Applicants are also required to respond to requests from the PHA to update information on their pre-application and to determine their continued interest in assistance.

E. APPLICANT STATUS WHILE ON WAITING LIST [§ 24 CFR 982.204 & 66FR 3607]

After a preliminary review of the application, if the family is determined to be eligible for the tenant-based program they will be notified in writing (*or in an accessible format upon request, as a reasonable accommodation*).

This written notification of preliminary eligibility will be:

1. mailed to the applicant by first class mail or

2. distributed to the applicant in the manner requested as a specific accommodation.

F. APPLICANT STATUS WHILE ON THE PROJECT-BASED PROGRAM WAITING LIST [§ 24 CFR 982.204, 983.203]

After a preliminary review of the application, if the family is determined to be eligible for the project-based program they will be notified in writing (*or in an accessible format upon request, as a reasonable accommodation*).

The notice will inform the applicant of documentation that is required to demonstrate eligibility for preferences under the particular project-based program site.

This written notification of preliminary eligibility will be:

1. mailed to the applicant by first class mail or

2. distributed to the applicant in the manner requested as a specific accommodation.

G. TIME OF SELECTION

Tenant-based program [§ 24 CFR 982.204]

When funding is available, families will be selected from the waiting list in their determined sequence regardless of family size, subject to income targeting requirements. When there is insufficient funding available for the family at the top of the list, the PHA will not admit any other applicant until funding is available for the first applicant.

Based on the PHA's turnover and the availability of funding, groups of families will be selected from the waiting list to form a final eligibility pool. Selection from the pool will be based on waiting list sequence**/**completion of verification**.**

Project-based program [§ 24 CFR 983.203; 66FR 3609]

When the owner of dwelling units receiving project-based assistance notifies the PHA of a vacancy in one or more assisted dwelling units, the PHA will give permission to the project to advertise (*content and format of advertisement to be approved by the PHA*) that they are accepting applications. Applications received will be forwarded to the PHA to be added to the site's waiting list. The PHA will refer to the owner one or more families of the appropriate size on the project-based program waiting list in their determined sequence, subject to income targeting requirements. Before making the referral, the PHA will evaluate the family's housing needs and determine their eligibility for Section 8 housing assistance in accordance with Sections G, H and I below. A family becomes a participant in the project-based program when the family and the owner execute a lease for a unit with project-based assistance. A family that refuses the offer of an assisted unit or that is rejected for admission to an assisted unit by an owner maintains its place on the waiting list as though no offer had been made. The owner of assisted dwelling units is responsible for the screening and selection of tenants in accordance with the owner's written tenant selection procedures.

H. COMPLETION OF A FULL APPLICATION

Applicants will be required to complete a full application in their own handwriting (*unless assistance is needed or a request for accommodation is made by a person with a disability*). Applicants will then be interviewed by PHA staff to review the information on the full application form.

The full application will be mailed to the applicant (*or communicated as requested, as an accommodation to a person with a disability*) to complete in advance when the applicant is invited to attend the interview.

I. VERIFICATION [§ 24 CFR 982.201(e)]

Information provided by the applicant will be verified, using the verification procedures outlined in Chapter 7 of this Administrative Plan, "Verification Procedures." Family composition, income, allowances and deductions, assets, full-time student status, eligibility and rent calculation factors and other pertinent information will be verified.

J. FINAL DETERMINATION AND NOTIFICATION OF ELIGIBILITY [§ 24 CFR 982.201]

After the verification process is completed, the PHA will make a final determination of eligibility. This decision is based upon information provided by the family, the verification completed by the PHA and the current eligibility criteria in effect. If the family is determined to be eligible, the PHA will mail the family a notification of eligibility. A briefing will be scheduled in order to issue a voucher to the family and to orient them to the housing program.

Chapter 4 MAINTAINING THE WAITING LIST [§ 24 CFR Part 5, Subpart D; 982.54(d)(1); 982.204, 982.205, 982.206, 983.203, 66FR 3609]

INTRODUCTION

It is the PHA's objective to ensure that families are placed on the waiting list in the proper order and are selected from the waiting list for admissions in accordance with the policies in this Administrative Plan.

By maintaining an accurate waiting list, the PHA will be able to perform the activities that will ensure that an adequate pool of qualified applicants will be available so that program funds are used in a timely manner.

A. WAITING LIST [§ 24 CFR 982.204]

The PHA uses three waiting lists for admission to its Section 8 tenant-based assistance program. Persons eligible for the Housing Choice Voucher Program or the Mainstream Housing Opportunities Program are maintained on one list. A second list is for families who have been referred to the Family Unification Program (FUP) by the State of Connecticut Department of Children and Families (DCF). The DCF referral form serves the same purpose in the FUP as the pre-application form serves in the other tenant-based programs. The third list is produced through the Coordinated Access Network ("CAN") for those vouchers specifically targeted at homeless persons and families.

The PHA maintains separate site-specific waiting lists for admission to its Section 8 project-based assistance program.

Except for special admissions, applicants will be selected from the appropriate PHA waiting list in accordance with policies defined in this Administrative Plan.

The PHA will maintain information that permits proper selection from the waiting list.

The waiting list contains the following information for each applicant listed:

1. Applicant name

2. Racial or ethnic designation of the head of household

3. Annual (*gross*) family income

4. Number of persons in family

The waiting list will be maintained in accordance with the following guidelines:

1. The application will be a permanent file.

2. All applicants must meet very low-income eligibility requirements as established by HUD. Any exceptions to these requirements, other than those outlined in chapter 2 of this Administrative Plan, "Eligibility for Admission," must have been approved previously by the HUD field office.

Special Admissions [§ 24 CFR 982.54(d)(e), 982.203]

Applicants, who are admitted under special admissions, rather than from the waiting list, are identified by codes in the automated system and are not maintained on separate lists.

B. WAITING LIST PREFERENCES [§ 24 CFR 982.207]

Tenant-based program preferences:

Pre-applications for admission to the tenant-based program will be selected in lottery-determined order, with the following exceptions:

Chronically homeless preference:

After placement on the tenant-based waiting list as noted above, applicants will be screened for eligibility as chronically homeless. A secondary waiting list will be generated based on this screening, and one of every three vouchers issued will be made available to a chronically homeless applicant.

When this secondary list has been exhausted, families who qualify as chronically homeless will be selected from the waiting list generated by the CAN based on their vulnerability index.

Homeless Young Family preference:

One of every three vouchers issued will be made available to homeless young families as defined in the Glossary.

The family unification preference:

Families who qualify for the family unification preference are families for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child or children in out-of-home care or in the delay of discharge of a child or children to the family from out-of-home care, will have their referral/pre-application forms from the Department of Children and Families (DCF) to the PHA. The PHA will determine if the families are eligible for Section 8 rental assistance.

If a family for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child or children in out-of-home care or in the delay of discharge of a child or children to the family from out-of home care is determined eligible by the PHA to receive a HCV, the family will be invited to participate in the program in accordance with HUD regulations and other requirements and with policies stated in the DOH administrative plan.

All persons interested in utilizing this preference must be referred to the PHA by DCF. The PHA will accept referrals/pre-applications only from DCF staff. DCF will designate gatekeepers to identify and refer eligible families to the PHA. The PHA will determine if the families are eligible for Section 8 rental assistance.

This preference will enhance the State of Connecticut's continuing efforts to maintain intact families and to provide decent, safe and sanitary housing for families. Referrals to Section 8 FUP will remain open for this preference and the PHA will accept referrals/pre-applications until further notice.

Project-based program preferences:

Applicants for admission to the project-based program will be selected in chronological order, subject to the availability of assisted dwelling units that are appropriate to the size of the family. Priority will be given to families who qualify for the following preferences:

Project-based supportive housing preferences:

1. **The supportive housing preference.** This preference is given to an applicant on the PBV-based voucher project waiting list who qualifies for the targeted CT Department of Mental Health and Addiction (DMHAS) funded supportive services linked through the Supportive Housing RFP process to the PBV-funded supportive housing units.

2. **The homeless family preference.** A preference will be given to families who are homeless for project-based units designated for homeless families. A homeless family is one that meets the HUD definition of homeless at 24 CFR 91.5.

The PHA may place a family referred by an owner of assisted dwelling units on its waiting list, subject to the provisions in Chapter 3 of this Administrative Plan, "Applicant Status While on the Project-Based Waiting List."

C. DENIAL OF PREFERENCE [§ 24 CFR 5.410(C)(3)]

No preference of any kind will be given to an applicant if a member of the applicant's family was evicted during the past three years from housing assisted under the 1937 Housing Act Program because of drug-related criminal activity, except that the PHA may give an admissions preference if the PHA determines that the evicted person:

1. has successfully completed a rehabilitation program approved by the PHA or

2. clearly did not participate in or know about the drug-related criminal activity or

3. no longer participates in any drug-related criminal activity.

D. EXCEPTIONS FOR SPECIAL ADMISSIONS [§ 24 CFR 982.203, 982.54(d)(3)]

If HUD awards the PHA program funding that is targeted for families living in specified units, the PHA will admit these families under a special admission procedure and will use the assistance for the families living in these units.

These special admission families will be admitted outside of the regular waiting list process. They are not required to be on the waiting lists. The PHA will maintain separate records of these admissions.

The following are examples of types of program funding that may be designated by HUD for families living in a specified unit:

1. A family displaced because of demolition or disposition of a public or Indian housing project;

2. A family residing in a multifamily rental housing project when HUD sells, forecloses or demolishes the project;

3. For housing covered by the Low-Income Housing Preservation and Resident Home ownership Act of 1990 (*41 U.S.C. 4101 et seq.*);

4. A family residing in a project covered by a project-based Section 8 HAP contract at or near the end of the HAP contract term;

5. A non-purchasing family residing in a project subject to a homeownership program (*under § 24 CFR 248.173*);

6. A family displaced because of mortgage prepayment or voluntary termination of a mortgage insurance contract (*as provided for in § 24 CFR 248.165*); or

7. A non-purchasing family residing in a HOPE 1 or HOPE 2 project.

In addition, the PHA may select the following families for admission to the project-based program without prior placement on the waiting list:

> In-place existing occupants of dwelling units selected by the PHA to receive project-based rental assistance and who are eligible for Section 8 assistance. [§ 24 CFR 983.203(6)(b)]

The PHA may select the following families for tenant-based rental assistance without prior placement on the waiting list:

> A family that moves after twelve months of occupancy (*in good standing*) from a dwelling unit assisted under the PHA project-based program. If tenant-based

rental assistance is not available at the time that the family moves, the family will receive priority for the next available tenant-based voucher.

E. FUNDING FOR SPECIFIED CATEGORY OF WAITING LIST FAMILIES [§ 24 CFR 982.204 (e), 206 (a)(b)]

When HUD awards funding for a specified category of families meeting specific requirements, the waiting list is searched for eligible families. If there is not a sufficient number of eligible families on the waiting list, the waiting list will be opened to applicants eligible for the specified category. When the pre-application is submitted to the PHA, it will be date and time stamped to determine placement order on the waiting list.

Applicants, who meet the criteria for a specified category and are admitted under targeted funding and who are not identified as a special admission, are identified by codes in the automated system and, except for FUP families, are not maintained on separate waiting lists.

The PHA has the following programs funded for specified categories of waiting list families:

1. Certain Developments Program for Non-Elderly Persons with Disabilities

2. Family Unification Program

3. Mainstream Housing Opportunities Program for Persons with Disabilities

4. Veterans Affairs Supportive Housing

Family Unification Program

Program Description and Referrals

Through the linkage of DOH and the Department of Children and Families (DCF)**,** the Family Unification Program (FUP**)** will provide a comprehensive array of services to families that have been identified and referred to the PHA by DCF. DCF will refer families for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child or children in out-of-home care or in the delay of discharge of a child or children to the family from out-of home care and the PHA will determine if the families are eligible for Section 8 rental assistance.

Tenant Selection Process

When an FUP voucher becomes available, a family will be refered from DCF. After the family is determined eligible to receive a Section 8 subsidy, the family will be admitted to participate in the program in accordance with HUD regulations and other requirements and with policies stated in the DOH administrative plan.

The PHA's Section 8 FUP will continue to accept referrals/pre-applications until further notice.

The PHA may regularly review the extent of need for FUP vouchers. The PHA may apply a preference for up to two-hundred fifty additional HCVs (*i.e., beyond our allocation of three-hundred FUP vouchers from HUD*) from its current allocation as FUP vouchers. This is because DCF has demonstrated that a lack of adequate affordable housing is preventing eligible families from finding suitable housing, thus obstructing unification with a child or children or causing a child or children to be placed out of the home.

Mainstream Housing Opportunities Program for Persons with Disabilities

Program Description

The Mainstream Housing Opportunities Program for Persons With Disabilities (*Mainstream Program*) will enhance the State of Connecticut's continuing efforts to provide, decent, safe and sanitary housing to persons with disabilities.

Waiting List and Tenant Selection Process

The PHA will identify eligible disabled persons on its waiting list. After the family is determined eligible to receive a Section 8 subsidy, the family will be admitted to participate in the program in accordance with HUD regulations and other requirements and with policies stated in the DOH administrative plan. If any vouchers remain, the PHA will open its waiting list to disabled persons who have not applied for the PHA's Section 8 Housing Choice Voucher Program.

The PHA may stop accepting applications if there are enough applicants to fill anticipated openings. The waiting list may not be closed if it would have a discriminatory effect inconsistent with applicable civil rights laws.

The PHA will announce the last date applications that will be accepted in the same notice that advertises the opening of the list.

Veterans Affairs Supportive Housing (VASH)

Program Description

The HUD-VASH Program combines the Section 8 HCV Program with case management and clinical services provided by the Department of Veteran's Affairs Medical Centers (VAMC).

Generally, the HUD-VASH HCV program will be administered in accordance with Section 8 HCV program requirements however Federal Register Vol. 73, No. 88 allows HUD to waive or specify alternative requirements for any provision of any statute or regulation that HUD administers in connection with this program in order to effectively deliver and administer HUD-VASH voucher assistance. The HUD-VASH Operating Requirements (*including the waivers and alternative requirements from HCV program rules*) were published in the Federal Register on May 6, 2008.

Referrals and Waiting List

The VAMC will refer HUD-VASH eligible families to the PHA for the issuance of vouchers. Written documentation of these referrals must be maintained in the tenant file at the PHA. Therefore, the PHA will not have the authority to maintain a waiting list or apply local preferences for HUD-VASH vouchers. Accordingly, § 8(o)(6)(A) of the USHA of 1937, 42 U.S.C. 1437f(o)(6)(A), concerning preferences, has been waived to provide for the effective administration of the program. In addition, § 24 CFR 982.202, 982.204 and 982.207, relating to applicant selection from the waiting list and local preferences, are also waived.

Sections 982.203, 982.205 and 982.206 of § 24 CFR regarding special admissions, cross listing of the waiting list and opening and closing the waiting list do not apply to the HUD-VASH program. The VAMC will screen all families in accordance with its screening criteria. By agreeing to administer the HUD-VASH program, the PHA is relinquishing its authority to determine the eligibility of families in accordance with regular HCV program rules and PHA policies.

Denial of Applicants

Specifically, under the HUD-VASH program, PHAs will not have the authority to screen potentially eligible families or deny assistance for any grounds permitted under § 24 CFR 982.552 (broad denial for violations of HCV program requirements) and 982.553 (*specific denial for criminals and alcohol abusers*), with one exception. PHAs will still be required to prohibit admission if any member of the household is subject to a lifetime registration requirement under a state sex-offender registration program. Accordingly, the Department is exercising its authority to waive 42 U.S.C. 1437d(s); 42 U.S.C. 13661(a), (b) and (c); and § 24 CFR Sections 982.552 and 982.553, with the exception of 982.553(a)(2)(i) that requires denial of admission to certain registered sex offenders.

Voucher Term

Recognizing the challenges that HUD-VASH participants may face with their housing search, HUD-VASH vouchers must have an initial search term of at least one-hundred twenty calendar days. Therefore, § 24 CFR 982.303(a) that states that the initial search term must be at least sixty calendar days, shall not apply, since the initial term must be at least one-hundred twenty calendar days.

One sixty-day extension to participants will be granted upon written request. No further extensions will be approved. The total search time will be for a maximum of one-hundred eighty calendar days.

Case Management Requirements

As a condition of rental assistance, the HUD-VASH family must receive case management services from the VAMC. Failure to participate, without good cause will result in termination of HUD-VASH voucher assistance as verified by the VAMC. However, if the VAMC determines the family

no longer requires case management services, the family will be offered continued HCV assistance and transferred to a Housing Choice Voucher pending funding availability so the HUD-VASH voucher may be used by another family referred by the VAMC.

With the exception of the above statements, all other provisions of the Housing Choice Voucher Program apply.

F. INCOME TARGETING

In accordance with the Quality Housing and Work Responsibility Act of 1998, each fiscal year the PHA will reserve a minimum of seventy-five percent of its Section 8 new admissions for families whose income does not exceed thirty percent of the area median income. HUD refers to these families as "extremely low-income families." The PHA will admit families who qualify under the extremely low-income limit to meet the income-targeting requirement, regardless of preference.

The PHA's income targeting requirement does not apply to low-income families continuously assisted as provided for under the 1937 Housing Act.

The PHA also is exempted from this requirement where the PHA is assisting low-income or moderate-income families entitled to preservation assistance under the tenant-based program because of a mortgage prepayment or opt-out.

G. INCOME TARGETING ELIGIBILITY [§ 24 CFR 982.207]

Change in Circumstances

If the family's verified annual income, at final eligibility determination, does not fall under the extremely low-income limit and the family was selected for income targeting purposes before a family or families with a higher preference, the family will be returned to the waiting list.

H. REMOVAL FROM WAITING LIST AND PURGING [§ 24 CFR 982.204(c)]

The PHA will periodically send applicants an update inquiry to ensure the applicant has continued interest in and need for, housing. The PHA will conduct this process at least every three years. An applicant who does not return the inquiry by the requested deadline date will have his or her name removed from the waiting list.

The project-based waiting lists will be purged at least annually.

An extension of not less than ten business days to respond will be granted, if requested and needed as a reasonable accommodation for a person with a disability.

Any mailings to the applicant that require a response will state that failure to respond within fifteen business days will result in the applicant's name being dropped from the waiting list.

If a letter is returned by the post office without a forwarding address, the applicant will be removed without further notice and the envelope and letter will be maintained in the file. If a letter is returned with a forwarding address, it will be re-mailed to the address indicated**.**

If a family is removed from the waiting list for failure to respond, the Housing Director may reinstate the family if s/he determines the lack of response was due to PHA error or family medical disability. The PHA will reinstate the applicant in the family's former position on the waiting list.

Chapter 5 SUBSIDY STANDARDS [§ 24 CFR 982.54(d)(9)]

INTRODUCTION

HUD guidelines require that PHAs establish subsidy standards for the determination of family unit size and that such standards provide for a minimum commitment of subsidy while avoiding overcrowding. The standards used for the unit size also must be within the minimum unit size requirements of HUD's Housing Quality Standards. This chapter explains the subsidy standards that will be used to determine the voucher size for families when they are selected from the waiting list, as well as the PHA's procedures when a family's size changes or a family selects a unit size that is different from the voucher size.

A. DETERMINING FAMILY UNIT (VOUCHER) SIZE [§ 24 CFR 982.402]

The PHA does not determine who shares a bedroom/sleeping room, but there must be at least one person per bedroom on the voucher. The PHA's subsidy standards for determining voucher size shall be applied in a manner consistent with fair housing guidelines.

All standards in this section relate to the number of bedrooms on the voucher, not the family's actual living arrangements.

The unit size on the voucher remains the same as long as the family composition remains the same, regardless of the actual unit size rented.

The head of household and spouse or partner shall be entitled to one bedroom.

Household members under twenty-six, who are of the same gender, shall share a bedroom, with the following exceptions for those household members between ages 13 and 26:

1. Household members who are more than five years apart,

2. Persons of the opposite sex (*other than spouses*), and

3. unrelated adults.

Foster children will be included in determining unit size only if they will be in the unit for more than six months. A foster child is a child that is in the legal guardianship of a state, private adoption or foster care agency, yet is cared for by foster parents in their own homes, under some kind of short-term or long-term foster care arrangement with the custodial agency.

A child who is temporarily absent due to placement in foster care is considered a family member when determining unit size.

Live-in attendants may be provided a separate bedroom. No additional bedrooms are provided for the attendant’s family.

Space may be provided for a child who is away at school but who lives with the family during school recesses.

A pregnant woman will be determined as a two-person household when determining unit size.

Space will not be provided for a family member, other than a spouse, who will be absent most of the time, such as a member who is away in the military.

GUIDELINES FOR DETERMINING VOUCHER SIZE

Voucher Size	Persons in Household (Minimum Number)	Persons in Household (Maximum Number)
0 Bedroom	1	1
1 Bedroom	1	2
2 Bedroom	2	4
3 Bedroom	3	6
4 Bedroom	4	8
5 Bedroom	6	10
6 Bedroom	8	12

B. EXCEPTIONS TO SUBSIDY STANDARDS [(§ 24 CFR 982.403(a)&(b)]

The PHA shall grant exceptions from the subsidy standards if the family requests and the PHA determines the exceptions are justified by the relationship, age, sex, health or disability of family members or other individual circumstances.

The PHA will grant an exception upon request as an accommodation for persons with disabilities.

Circumstances may dictate a larger size than the subsidy standards permit when persons cannot share a bedroom because of a need, such as a:

1. Verified medical or health reason; or

2. Elderly persons or persons with disabilities who may require a live-in attendant.

Request for Exception to Subsidy Standards

The family may request a larger family unit-sized voucher than indicated by the PHA's subsidy standards. Such request must be made in writing within thirty calendar days of the PHA's determination of family unit size. The request must explain the need or justification for a larger family unit-sized voucher. Documentation verifying the need or justification will be required as appropriate.

Requests based on health-related reasons must be verified by a doctor/medical professional/ social service professional.

PHA error

If the PHA errs in the bedroom size designation, the family will be re-issued a voucher of the appropriate size so that the family is not penalized.

Changes for Applicants

The voucher size is determined before the briefing by comparing the family composition to the PHA subsidy standards. If an applicant requires a change in the voucher size, based on the requirements of the PHA subsidy standards, the above-referenced guidelines will apply.

Changes for Participants

All members of the family residing in the unit must be approved by the PHA. The family must obtain approval for any additional family member before the new member occupies the unit except for additions by birth, adoption or court-awarded custody, that case the family must inform the PHA within thirty calendar days. The above-referenced guidelines will apply.

Under-housed Families

If a unit does not meet HQS living space standards due to an increase in family size (*i.e., the unit is too small*), the PHA will issue a new voucher of the appropriate size and assist the family in locating a suitable unit.

The PHA will also notify the family of the circumstances under which an exception will be granted, such as:

1. If a family with a disability is under-housed in an accessible unit.

2. If a family requires the additional bedroom because of a health problem that has been verified by the PHA.

3. The family has been unable to locate a unit within sixty calendar days.

C. UNIT SIZE SELECTED [§ 24 CFR 982.402(c)]

The family may select a different size dwelling than that listed on the voucher. There are three criteria to consider:

1. Subsidy Limitation – The family unit size as determined for a family under the PHA subsidy standard for a family assisted in the voucher program is based on the PHA's adopted payment standards. The payment standard for a family shall be the lower of:

   a. The payment standard amount for the family unit size or

   b. The payment standard amount for the unit size rented by the family.

2. Utility Allowance – The PHA is required to use the lower of the Voucher size or the actual number of bedrooms when calculating the S8 Utility Allowances.

3. Housing Quality Standards – The standards allow two persons per living/sleeping room and permit maximum occupancy levels (*assuming a living room is used as a living/sleeping area*) as shown in the table below. The levels may be exceeded if a room in addition to bedrooms and the living room is used for sleeping.

HQS GUIDELINES FOR UNIT SIZE SELECTED

		Maximum Number in Household
0	Bedroom	1
1	Bedroom	4
2	Bedroom	6
3	Bedroom	8
4	Bedroom	10
5	Bedroom	12
6	Bedroom	14

Chapter 6 FACTORS RELATED TO TOTAL TENANT PAYMENT AND FAMILY SHARE DETERMINATION [§ 24 CFR Part 5, Subparts E and F; 982.153, 982.551]

INTRODUCTION

The PHA will use the methods set forth in this Administrative Plan to verify and determine that family income at admission and re-examination are correctly calculated. The accurate calculation of annual income and of adjusted income will ensure that families are not paying more or less money for rent than is their obligation under the regulations

This chapter defines the allowable expenses and deductions are to be subtracted from annual income. The chapter also defines how the presence or absence of household members may affect the total tenant payment (TTP). Income and TTP are calculated in accordance with § 24 CFR Part 5, Subparts E and F and further instructions set forth in notices and memoranda issued by HUD. The formula for the calculation of TTP is specific and is not subject to interpretation. The PHA's policies in this chapter address those areas that allow the PHA discretion to define terms and to develop standards in order to ensure consistent application of the various factors that relate to the determination of TTP.

A. INCOME AND ALLOWANCES [§ 24 CFR 5.609]

Income includes all monetary amounts that are received on behalf of the family. For purposes of calculating the total tenant payment, HUD defines in the federal regulations what is to be included and what is to be excluded. In accordance with this definition, all income that is not specifically excluded in the regulations is counted**.**

Annual income is defined as the gross (*or total*) amount of income anticipated to be received by the family during the twelve months after certification or re-examination. Gross income is the amount of income, before any expenses or deductions allowed by HUD, and does not include income that has been excluded by HUD. Annual income is used to determine whether applicants are within the applicable income limits.

Adjusted income is defined as the annual income minus any expenses or deductions allowed by HUD.

HUD has established the following allowable deductions from annual income:

1. Dependent allowance – four-hundred eighty dollars each for family members (*other than the head or spouse*) who are minors and for family members who are age eighteen or older and who are full-time students or disabled.

2. Elderly/disabled allowance – four-hundred dollars per family for families whose head or spouse is age sixty-two or over or disabled.

3. The cost of childcare expenses necessary to permit employment (see applicability in section B, below).

The sum of the following, to the extent that the sum exceeds three percent of annual income:

4. Allowable medical expenses that are not reimbursed and that are deducted for all family members of an eligible elderly/disabled family.

5. Allowable disability assistance expenses deducted for attendant care or for any auxiliary apparatus for persons with disabilities, if these are needed to enable the individual or adult family member to work.

B. DISALLOWANCE OF EARNED INCOME FROM RENT DETERMINATIONS FOR PERSONS WITH DISABILITIES [§ 24 CFR 5.617; 982.201(b)(3)]

The annual income for qualified families may not be increased because of increases in the earned income of a family member who is a person with disabilities, beginning on the date that the increase in earned income begins and continuing for a cumulative twelve-month period. After the disabled family receives twelve cumulative months of the full exclusion, annual income determinations will include a phase-in period during which one-half the earned income will be excluded from annual income for a period of an additional twelve cumulative months.

A family that qualifies to receive the earned income exclusion is a disabled family that is receiving tenant-based rental assistance under the HCV program and:

1. whose annual income increases because of the employment of a family member who is a person with disabilities and who was previously unemployed for one or more years before employment; or whose annual income increases because of increased earnings by a family member who is a person with disabilities participating in any economic self-sufficiency or other job training program; or

2. whose annual income increases because of the new employment or increased earnings of a family member during or within six months after receiving assistance, benefits or services under any state TANF program, provided that the total amount of the increase over a six-month period is at least five hundred dollars.

The HUD definition of “previously unemployed” includes a person with disabilities who has in the previous twelve months earned no more than the equivalent earnings for working ten hours per week for fifty weeks at the minimum wage. Minimum wage is the prevailing minimum wage in the state or locality.

The HUD definition of an economic self-sufficiency program is any program designed to encourage, assist, facilitate or train for the economic independence of assisted families or to provide work for such families. Such programs may include job training, employment counseling, work placement, basic skills training, education, English proficiency, workfare, financial or

household management, apprenticeship or any other program necessary to ready a participant to work (*such as substance abuse treatment or mental health treatment*).

Amounts to be excluded are any earned income increases of a family member who is a person with disabilities during participation in an economic self-sufficiency or job-training program but not increases that occur after the conclusion of their participation, unless the training provides continuing assistance, training or mentoring that continues after employment begins.

The amount of TANF benefits received in the six-month period includes monthly income and such benefits and services as one-time payments, wage subsidies or transportation assistance.

The amount that is subject to the disallowance is the amount of incremental increase in income of a family member who is a person with disabilities. The incremental increase in income is calculated by comparing the amount of the disabled family member's income before the beginning of qualifying employment or the increase in earned income to the amount of such income after the beginning of employment or the increase in earned income.

Initial Twelve-Month Exclusion

During the cumulative twelve month period beginning on the date a member who is a person with disabilities of a qualified family is first employed or the family first experiences an increase in annual income attributable to employment, the PHA will exclude from the annual income of a qualified family any increase in income of the family member who is a person with disabilities because of employment over the prior income of that family member.

Second Twelve-Month Exclusion

During the second cumulative twelve month period, beginning immediately after the expiration of the initial cumulative twelve month period referred to above, the PHA must exclude from the annual income of a qualified family fifty percent of the total amount of any increase in the income of a family member who is a person with disabilities that occurs because of the employment of that family member, when that amount represents an increase over the income of that family member before the beginning of such employment.

No earned income disallowance will be applied after the conclusion of the twenty-four month period following the initial date that the exclusion was applied.

Applicability to Child Care Expense and Disability Assistance Expense Deductions

The amount deducted for childcare and disability assistance expenses necessary to permit employment shall not exceed the amount of employment income that is included in annual income. Therefore, for families entitled to the earned income disallowance, the amounts of the full and phase-in exclusions from income shall not be used in determining the cap for child care deductions.

Tracking the Earned Income Exclusion

The earned income exclusion will be reported on the HUD Form 50058 Family Report. Documentation will be included in the family's file to show the reason why the increase in earned income did not result in an increase in tenant rent.

Such documentation will include:

1. Date that the increase in earned income was reported by the family.

2. Name of the family member whose earned income increased.

3. Reason (*such as new employment, participation in job training program, within six months after receiving TANF*) for the increase in earned income.

4. Amount of the increase in earned income (*i.e., the amount to be excluded*).

5. Date that the increase in income is first excluded from annual income.

6. Dates (*if any*) that the increase in earned income ended and then resumed during the initial cumulative twelve-month period of exclusion.

7. Date that the family member had received a total of twelve months of the initial exclusion.

8. Date that the twelve-month phase-in period began.

9. Dates (*if any*) that the increase in earned income ended and then resumed during the second cumulative twelve-month (*phase-in*) period of exclusion.

10. Date that the family member had received a total of twelve months of the phase-in exclusion.

11. Ending date of the maximum forty-eight-month (*four-year*) period during which the disallowance applied (*forty-eight months from the date of the initial earned income disallowance*).

The PHA will maintain a tracking system to ensure the correct application of the earned income disallowance.

Inapplicability to Admission

The earned income disallowance is only applied to determine the annual income of families who are participants in the HCV program and therefore it does not apply for purposes of admission to the program (*including the determination of income eligibility or any income targeting that may be applicable*).

C. MINIMUM RENT [§ 24 CFR 5.630]

Minimum Rent

The minimum rent is fifty dollars. Minimum rent refers to the total tenant payment and is the minimum amount a family pays towards rent and utilities (*combined*) when it is applied.

Hardship Requests for an Exception to Minimum Rent

The PHA recognizes that in some circumstances even the minimum rent may create a financial hardship for families. The PHA will review all relevant circumstances brought to its attention regarding financial hardship as it applies to the minimum rent. The following section states the PHA's procedures and policies concerning financial hardship caused by the minimum rent. HUD has defined circumstances under which a hardship could be claimed.

Criteria for Hardship Exception

In order for a family to qualify for a hardship exception, the family's circumstances must fall under any of the following HUD hardship criteria:

1. The family has lost eligibility or is awaiting an eligibility determination for federal, state or local assistance; including a family with a member who is a non-citizen lawfully admitted for permanent residence under the Immigration and Naturalization Act and who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996, or

2. The family would be evicted due to the imposition of the minimum rent requirement, or

3. The income of the family has decreased because of changed circumstances, including loss of employment (other than for willful misconduct or voluntary separation), death in the family or other circumstances as determined by the PHA or HUD.

   The loss of employment for willful misconduct or voluntary separation shall not be grounds for a hardship exception for six months from the date of separation.

PHA Notification to Families of Right to Hardship Exception

The PHA will notify all families subject to the minimum rent of their right to request a minimum rent hardship exception. Those families subject to the minimum rent are those for whom the minimum rent is the greatest figure in the calculation of TTP as determined by the following:

1. thirty percent of monthly-adjusted income,

2. ten percent of monthly income, or

3. minimum rent.

If the minimum rent is the greatest figure in the calculation of total tenant payment, PHA staff will include in the family's file a copy of the notice regarding the family's right to make a hardship request that has been provided to the family.

The PHA notification to families will advise them that hardship exception determinations are subject to the PHA review and hearing procedures. All requests for minimum rent hardship exceptions are required to be made in writing. Requests for minimum rent hardship exceptions must include a statement of the family circumstances that qualify the family for an exception.

The PHA will review all family requests made for exception to the minimum rent due to financial hardship in thirty calendar days. The PHA will use its standard verification procedures to verify circumstances that are claimed to have resulted in financial hardship.

Suspension of Minimum Rent

The PHA will grant the minimum rent exception to all families who request it, effective the first of the following month. The minimum rent will be suspended until the PHA determines whether a hardship exists and, if it exists, whether the hardship is temporary or long-term.

Suspension means that the PHA must not enforce the minimum rent calculation until the PHA has made its decision whether to grant a request for an exception. During the minimum rent suspension period, the family will not be required to pay a minimum rent and the housing assistance payment will be increased accordingly.

Temporary Hardship

If the PHA determines that the hardship is temporary, a minimum rent will not be imposed for a period of up to ninety calendar days from the date of the family's request. At the end of the temporary suspension period, a minimum rent will be imposed retroactively to the time of suspension.

The PHA will offer a repayment agreement to the family for any such rent not paid during the temporary hardship period (*see Chapter17 of this Administrative Plan, "Owner or Family Debts to the PHA," for the repayment agreement policy*).

Long-Term Hardship

If the PHA determines that there is a qualifying long-term financial hardship, the PHA must exempt the family from the minimum rent requirement for as long as the hardship continues. The exception from minimum rent shall apply from the first day of the month following the family's request for exemption. Every ninety calendar days, the family will be required to demonstrate that the circumstances that qualify the family for an exception continue to exist.

Denial of Hardship Exception

If the PHA determines that there is not a qualifying financial hardship, the PHA must notify the family in writing of the denial of its request within thirty calendar days. The PHA will offer a repayment agreement to the family for any rent not paid during the period when the PHA was evaluating the hardship exception request (*see Chapter 17 of this Administrative Plan, "Owner or Family Debts to the PHA," for the repayment agreement policy*).

D. DEFINITION OF TEMPORARY OR PERMANENT ABSENCE [§ 24 CFR 982.54(d)(10), 982.312, 982.551]

It is the responsibility of the head of household to report changes in family composition. The PHA will evaluate absences from the unit using this policy**.**

> *Should the absence fall during the recertification period, including HQS inspections, it is the responsibility of the head of household to ensure that appropriate program requirements are fulfilled.«*

Temporary Absence of Any Member

The PHA must compute all applicable income of every family member who is on the lease, including those who are temporarily absent. In addition, the PHA must count the income of the spouse or the head of the household if that person is temporarily absent, even if that person is not on the lease.

If the spouse is temporarily absent and in the military, all military pay and allowances (*except hazardous duty pay when a person is exposed to hostile fire and any other exceptions to military pay that HUD may define*) is counted as income.

Permanent Absence of Any Member

Any member of the household will be considered permanently absent if she or he is away from the unit for three consecutive months except as otherwise provided in this chapter. Income of persons permanently absent will not be counted.

Absence due to Medical Reasons

If any family member leaves the household to enter a facility such as hospital, nursing home or rehabilitation center, the PHA will seek advice from a reliable qualified source as to the likelihood and timing of their return. If the verification indicates that the family member will be confined to a nursing home, the family member will be considered absent. If, within a calendar year**,** the verification indicates that the family member will return in less than three months, the family member will not be considered absent.

If the person who is determined to be permanently absent is the sole member of the household, assistance will be terminated in accordance with the PHA's "Absence of Entire Family" policy.

Absence Due to Full-time Student Status

Full time students who attend school away from the home will be treated in the following manner:

> A student (*other than the head of household or spouse*) who attends school away from home but lives with the family during school recesses may, at the family's choice, be considered either temporarily or permanently absent. Income over four-hundred eighty dollars is not counted for full-time students. If the family decides that the member is permanently absent, income of that member will not be included in total household income, the member will not be included on the lease and the member will not be included for determination of voucher size.

Absence Due to Incarceration

If the sole member of a family is incarcerated for more than three months, she or he will be considered permanently absent. Any member of the family other than the sole member will be considered permanently absent if she or he is incarcerated for three consecutive months. The PHA will determine if the reason for incarceration is for drug-related or violent criminal activity.

Absence of Children Due to Placement in Foster Care

If the family includes a child or children temporarily absent from the home due to placement in foster care, the PHA will determine from the appropriate agency when the child or children will be returned to the home.

If the time-period is to be greater than twelve months from the date of removal of the child or children, the voucher size will be reduced. If all children are removed from the home permanently, the voucher size will be reduced in accordance with the PHA's subsidy standards.

Absence of Entire Family

These policy guidelines address situations when the family is absent from the unit, but has not moved out of the unit. In cases where the family has moved out of the unit, the PHA will terminate assistance in accordance with appropriate termination procedures contained in this plan.

Families are required both to notify the PHA before they move out of a unit and to give the PHA information about any family absence from the unit.

Families must notify their owner and PHA if they are going to be absent from the unit for more than thirty consecutive calendar days. Approval will be granted by the PHA on a case-by-case basis.

If the entire family is absent from the assisted unit for more than ninety consecutive calendar days, the unit will be considered to be vacated and the assistance will be terminated.

Absent means that no family member is residing in the unit.

In order to determine if the family is absent from the unit, the PHA may:

1. Write letters to the family at the unit

2. Telephone the family at the unit

3. Interview neighbors

4. Verify if utilities are in service

5. Check with the post office

A person with a disability may request an extension of time as an accommodation, if the extension requested does not go beyond the HUD-allowed limit of one-hundred eighty consecutive calendar days.

If the absence that resulted in the termination of assistance was due to a person's disability, if the PHA can verify that the person was unable to notify the PHA in accordance with the family's responsibilities, and if funding is available, the PHA may re-instate the family as an accommodation if requested by the family.

Caretaker for Children

If neither parent remains in the household nor the appropriate agency has determined that another adult is to be brought into the assisted unit to care for the children for an indefinite period, the PHA will treat that adult as a visitor until court-awarded custody or legal guardianship has been awarded to the caretaker. The voucher will then be transferred to the caretaker.

If the appropriate agency cannot confirm the guardianship status of the caretaker, the PHA will review the status at thirty-day intervals.

If custody or legal guardianship has not been awarded by the court, but the action is in process, the PHA will secure verification from social services staff as to the status.

When the PHA approves a person to reside in the unit as caretaker for the children, the income of the caretaker should be counted pending a final disposition. The PHA will work with the appropriate service agencies and the owner to provide a smooth transition in these cases.

If a member of the household is subject to a court order that restricts him or her from the home for more than three months, the person will be considered permanently absent.

Visitors

Any adult, regardless of degree of relationship, not included on the HUD Form 50058 who has been in the unit for more than thirty consecutive calendar days without PHA approval will be considered to be living in the unit as an unauthorized household member.

Statements from neighbors and/or the owner will be considered in making the determination.

Use of the unit address as the visitor's current residence for any purpose that is not explicitly temporary shall be construed as evidence of permanent residence.

If the PHA has evidence that indicates the individual has been residing in the unit for more than thirty business days, the family will be terminated since prior approval was not requested for the addition. The family will have the opportunity to request an informal hearing to refute the evidence.

Minors and college students who were part of the family but who now live away from home during the school year and are no longer on the lease may visit for up to sixty consecutive calendar days per year without being considered a member of the household.

In a joint custody arrangement, if the minor is in the household less than fifty-one percent of the year, the minor will be considered an eligible visitor and not a family member.

Reporting Additions to Owner and PHA

Reporting changes in household composition to the PHA is both a HUD requirement and a PHA requirement.

The family obligations require the family to inform the PHA of the birth, adoption or court-awarded custody of a child and to request PHA approval to add any other family member as an occupant of the unit. The family must request prior approval of additional household members in writing. If any new family member is added, the income of the additional member will be included in the family income, as applicable under HUD regulations.

Families are required to report any additions to the household in writing to the PHA within thirty business days of the move-in date.

An interim re-examination will be conducted in the event of any additions to the household.

Reporting Absences to the PHA

Reporting changes in household composition is both a HUD requirement and a PHA requirement.

If a family member leaves the household, the family must report this change to the PHA, in writing, within thirty business days of the change (*i.e., after the change*) and certify as to whether the member is temporarily absent or permanently absent.

The PHA will conduct an interim evaluation for changes that affect the total tenant payment in accordance with the interim policy.

E. AVERAGING INCOME

When annual income cannot be anticipated for a full twelve months, the PHA may:

1. Average all known sources of income that vary, in order to compute an annual income, or

2. Annualize the income anticipated for a shorter period, subject to a re-determination at the end of the shorter period.

If there are possible bonuses or overtime payments that the employer cannot anticipate for the next twelve months, bonuses and overtime received the previous year will be used.

If an estimate can be made for those families whose income fluctuates from month to month by averaging, this estimate will be used to reduce the number of interim adjustments.

The method to be used depends upon the regularity, source and type of income.

F. MINIMUM INCOME

There is no minimum income requirement. Families who report zero income are required to complete a written certification of no income every 6 months.

G. INCOME OF PERSON PERMANENTLY CONFINED TO NURSING HOME [§ 24 CFR 982.54(d)(10)]

If a family member is permanently confined to a hospital or nursing home and there is a family member left in the household, the PHA will calculate the income by using the following methodology and use the income figure that would result in a lower payment by the family:

1. Exclude the income of the person permanently confined to the nursing home and give the family no deductions for the medical expenses of the confined family member or

2. Exclude the income and deductions of the member if his/her income goes directly to the facility.

H. REGULAR CONTRIBUTIONS AND GIFTS [§ 24 CFR 5.609]

Regular contributions and gifts received from persons outside the household are counted as income for calculation of the total tenant payment.

Any contribution or gift received every six months or more frequently will be considered a regular contribution or gift, unless the amount totals less than five-hundred dollars per year. This includes rent and utility payments made on behalf of the family as well as other cash or non-cash contributions provided on a regular basis. It does not include casual contributions or sporadic gifts. (*See Chapter 7 of this Administrative Plan, "Verification Procedures," for further definition.*)

I. ALIMONY AND CHILD SUPPORT [§ 24 CFR 5.609]

Regular alimony and child support payments are counted as income for purposes of the calculation of total tenant payment.

The PHA will count court-awarded amounts for alimony and child support unless the PHA verifies that:

1. the payments are *not* being made, and

2. the family has made reasonable efforts to collect the amounts due, including filing with the courts or agencies responsible for enforcing payments.

The PHA will accept as verification that the family is receiving an amount less than the award if:

1. The PHA receives verification from the agency responsible for enforcement or collection.

2. The family furnishes documentation of a child support or alimony collection action filed through a child support enforcement or collection agency or documentation that they have filed enforcement or collection action through an attorney.

It is the family's responsibility to supply a certified copy of the divorce decree.

Should alimony or child support be received in a lump sum(s) due to a court action or voluntary payment(s) on a court ordered arrearage, the payment(s) will be treated as income and calculated as such using the methodology outlined under the heading LUMP-SUM RECEIPTS.

J. LUMP-SUM RECEIPTS [§ 24 CFR 5.609]

Lump-sum additions to family assets, such as inheritances, insurance payments (*including payments under health and accident insurance or worker's compensation*), capital gains and settlement for personal or property losses are not included in income but may be included in assets.

Lump-sum payments caused by delays in processing periodic payments such as unemployment or welfare assistance are counted as income. Lump sum payments from Social Security or SSI are excluded from income, but any amount remaining will be considered an asset. Deferred periodic payments that have accumulated due to a dispute will be treated the same as periodic payments that are deferred due to delays in processing.

In order to determine the amount of retroactive tenant rent that the family owes because of the lump sum receipt:

The PHA uses a calculation method that calculates prospectively or retroactively, depending on the circumstances.

The PHA will calculate prospectively if the family reported the payment within thirty business days and retroactively to the date of receipt if the receipt was not reported with that period.

Prospective Calculation Methodology

If the payment is reported on a timely basis, the calculation will be done prospectively and will result in an interim adjustment calculated as follows:

> The entire lump-sum payment will be added to the annual income at the time of the interim.

Retroactive Calculation Methodology

1. The PHA will use the date that the lump-sum payment was received or to the date of admission, whichever is closer.

2. The PHA will determine the amount of income for each certification period, including the period during which the lump sum was received and recalculate the tenant rent for each certification period to determine the amount due the PHA.

The amount owed by the family is a collectible debt even if the family becomes unassisted.

Attorney Fees

The family's attorney fees may be deducted from lump-sum payments when computing annual income if the attorney's efforts have recovered lump-sum compensation and if the recovery paid to the family does not include an additional amount in full satisfaction of the attorney fees.

K. CONTRIBUTIONS TO RETIREMENT FUNDS - ASSETS [§ 24 CFR 5.603(d)]

Contributions to company retirement or pension funds are handled as follows:

1. While an individual is employed, count as assets only those amounts the family can withdraw without retiring or terminating employment.

2. After retirement or termination of employment, count as an asset any amount the employee elects to receive in a lump sum.

L. ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE [§ 24 CFR 5.603(d)(3)]

The PHA must count assets disposed of for less than fair market value during the two years preceding certification or re-examination. The PHA will count the difference between the market value and the actual payment received in calculating total assets.

Assets disposed of because of foreclosure or bankruptcy is not considered assets disposed of for less than fair market value. Assets disposed of because of a divorce or separation is not considered assets disposed of for less than fair market value.

M. CHILD CARE EXPENSES [§ 24 CFR 5.603]

Child care expenses for children under age thirteen may be deducted from annual income if they enable an adult to work, to attend school or actively to seek employment.

Deductions for child care expenses will be allowed ability of is based on the following guidelines:

1. Child care for work – The maximum child care expense allowed must be less than the amount earned by the person enabled to work that is included in the family's annual income. The person enabled to work will be the adult member of the household who earns the least amount of income from working.

2. Child care for school – The number of hours claimed for child care may not exceed the number of hours the family member is attending school, including reasonable travel time to and from school.

3. Amount of expense – Licensed, registered or otherwise regulated childcare providers will provide a signed statement of childcare expenses. The maximum allowance for all other child care is eighty-nine dollars per child, per week

N. MEDICAL EXPENSES [§ 24 CFR 5.609(a)(2), 5.603]

When it is unclear in the HUD rules as to whether or not to allow an item as a medical expense, IRS Publication 502 will be used as a guide.

Non-prescription medicines will be counted toward medical expenses for families who qualify, if the family furnishes legible receipts.

O. PRO-RATION OF ASSISTANCE FOR MIXED FAMILIES [§ 24 CFR 5.520]

Applicability

Pro-ration of assistance must be offered to any mixed applicant or participant family. A mixed family is one that includes at least one U. S. citizen or eligible immigrant and any number of ineligible members.

Mixed families that were participants on / as of June 19, 1995 and that do not qualify for continued assistance must be offered pro-rated assistance (*see Chapter 12 of this Administrative Plan, "Re-examinations."*). Mixed applicant families are entitled to pro-rated assistance. Families that become mixed after June 19, 1995 by the addition of an ineligible member are entitled to pro-rated assistance.

Pro-rated Assistance Calculation

Pro-rated assistance is calculated by determining the amount of assistance payable if all family members were eligible and multiplying by the percent of the family members who actually are eligible. Total tenant payment is the gross rent minus the pro-rated assistance.

P. INCOME CHANGES RESULTING FROM WELFARE PROGRAM REQUIREMENTS

The PHA will not reduce the TTP for families whose welfare assistance is reduced specifically because of:

1. fraud by a family member in connection with the welfare program; or

2. failure to participate in an economic self-sufficiency program; or

3. non-compliance with a work activities requirement.

However, the PHA will reduce the TTP if the welfare assistance reduction is a result of:

1. The expiration of a lifetime time limit on receiving benefits; or

2. A situation where a family member has not complied with other welfare agency requirements; or

3. A situation where a family member has complied with welfare agency economic self-sufficiency or work activities requirements but cannot or has not obtained employment, such as when the family member has complied with welfare program requirements, but the durational time limit, such as a cap on the length of time a family can receive benefits, causes the family to lose their welfare benefits.

Imputed welfare income is the amount of annual income not actually received by a family because of a specified welfare benefit reduction that is included in the family's income for determining the rental contribution.

Imputed welfare income is not included in annual income if the family was not an assisted family at the time of sanction.

The amount of imputed welfare income is offset by the amount of additional income a family receives that begins after the sanction is imposed.

When additional income is at least equal to the imputed welfare income, the imputed welfare income is reduced to zero.

Verification Before Denying a Request to Reduce Rent

The PHA will obtain written verification from the welfare agency stating that the family's benefits have been reduced for fraud or noncompliance with economic self-sufficiency or work activities requirements *before* denying the family's request for rent reduction.

The welfare agency, at the request of the PHA, will inform the PHA of:

1. the amount and term of specified welfare benefit reductions for the family;

2. the reason for the reduction; and

3. any subsequent changes in term or amount of reduction.

Q. UTILITY ALLOWANCE AND UTILITY REIMBURSEMENT PAYMENTS [§ 24 CFR 982.153, 982.517, 982.514(b)]

The same utility allowance schedule is used for all tenant-based programs.

The utility allowance is intended to cover the cost of utilities not included in the rent. The allowance is based on the typical cost of utilities and services paid by energy-conservative households that occupy housing of similar size and type in the same locality. Allowances are not based on an individual family's actual energy consumption.

The PHA's utility allowance schedule and the utility allowance or an individual family, must include utilities and services that are necessary in the locality to provide housing that complies with the housing quality standards.

The PHA may not provide any allowance for non-essential utility costs, such as costs of cable or satellite television.

The PHA must classify utilities in the utility allowance schedule according to the following general categories:

1. space heating,

2. cooking,

3. water heating,

4. other electric, water,

5. sewer,

6. trash collection,

7. refrigerator (*amortized cost of tenant-supplied refrigerator*),

8. range (*amortized cost of tenant-supplied range*) and

9. other specified services.

The PHA will review the utility allowance schedule annually. If the review finds that a utility rate has changed by ten percent or more since the last revision of the utility allowance schedule, the schedule will be revised to reflect the new rate. Revised utility allowances will be applied in a participant family's rent calculation at the family's next re-examination.

The approved utility allowance schedule is given to families along with their voucher. The utility allowance calculation is based on the actual unit size selected.

Where families provide their own range and refrigerator, the PHA will establish an allowance adequate for the family to purchase or rent a range or refrigerator, even if the family already owns either appliance. Allowances for ranges and refrigerators will be based on the lesser of the cost of leasing or purchasing the appropriate appliance over a twelve-month period.

Where the calculation on the HUD Form 50058 results in a utility reimbursement due the family, the PHA will provide a utility reimbursement payment to the family monthly. The check will be made out directly to the tenant or, if the tenant has agreed, in writing, a check will be made out directly to utility company(ies).

The PHA will approve a higher utility allowance for a family including a person with a disability, if needed.

Chapter 7 VERIFICATION PROCEDURES [§ 24 CFR Part 5, Subparts B, D, E and F; § 24 CFR 982.158; § 24 CFR 5.617]

INTRODUCTION

HUD regulations require that the factors of eligibility and total tenant payment/family share be verified by the PHA. PHA staff will obtain written verification from independent sources (*i.e., third party verification*) whenever possible. If it is not possible for PHA staff to obtain third party verification, staff will document in the tenant files why they were not able to do so.

Applicants and program participants must provide true and complete information to the PHA whenever information is requested. The PHA's verification requirements are designed to maintain program integrity. This chapter explains the PHA's procedures and standards for determining income, assets, allowable deductions, family status and changes in family composition. The PHA will obtain proper authorization from the family before requesting information from independent sources.

ENTERPRISE INCOME VERIFICATION (EIV) POLICY AND PROCEDURES

RETENTION AND DESTRUCTION POLICY

All Up-front Income Verification UIV (EIV) documents will be maintained in the participants file that will be placed in a locked file cabinet. Unused UIV (EIV) data, Credit reports and Criminal reports will be placed in a separate locked file cabinet and the Housing Agency will occasionally shred these materials. When shredding is used for disposition, the paper will be shred to effect 5/16 wide or smaller so the strips are not readable.

COMPUTER MATCHING

Where allowed by HUD and/or other State or local agencies, computer matching will be done. HUD has conducted a computer matching initiative to verify independently resident income. The Up Front Income Verification system also known as EIV created by HUD allows the PHA to access income information and compare it to information submitted by PHA's on the HUD Form 50058 form. To obtain the EIV data there must be a HUD Form 9886 signed in the participants file, without the signed HUD Form 9886, EIV cannot be accessed. The programs administrators' Security Officer or designated staff, will assure that a copy of HUD Form 9886 form has been signed by all household members 18 years of age and older is in the household file. The data provided via EIV system must be protected to ensure that it is only used for official purposes and not disclosed in any way that would violate the privacy of the individuals represented in the system data.

A. METHODS OF VERIFICATION AND TIME ALLOWED [§ 24 CFR 982.516]

The PHA will verify information through the four methods of verification acceptable to HUD in the following order:

1. Up-front Income Verification (*EIV, EMS, CCSES etc.*) when available

2. third-party written

3. third-party oral

4. review of documents

5. certification/self-declaration

The PHA will allow three weeks for return of third-party written verification. PHA staff will allow two weeks per attempt to obtain other types of verification before going on to the next method. The PHA will place documentation in the tenant file as to why third party written verification was not obtained**.** When the applicant or tenant brings verification **(***excluding 3rd party verification***)** to the PHA, in person, the verification will be date stamped and a date stamped copy will be returned to the tenant.

For applicants, verifications may not be more than sixty calendar days old at the time of voucher issuance. For participants, verifications are valid for one-hundred twenty calendar days from date of receipt.

Up-Front Income Verification (UIV)

Up-front verification refers to the PHA's use of the verification tools available from independent sources that maintain computerized information about earnings and benefits (*HUD's EIV, EMS, CCSES etc.*).

There may be legitimate differences between information provided by the family and **EIV** generated information. No adverse action can be taken against a family until the PHA has independently verified the **EIV** information and the family has been given the opportunity to contest any adverse findings through the informal review/ hearing process.

Under no circumstances should a family be terminated solely on information generated through use of **EIV**.

Third-Party Written Verification

Third-party written verification is used to verify information directly from the source. Third-party written verification forms will be sent and returned via first class mail and/or facsimile (FAX) transmittal. Each adult family member (*i.e., age eighteen or older*) will be required to sign an authorization allowing an information source to release the specified information.

Verifications received by FAX directly from the source are considered third-party written verifications.

Third-party verification forms will not be hand-carried by the family with the exception of computer printouts delivered by the family from the following agencies:

1. Social Security Administration

2. Veterans Administration

3. State Department of Social Services (*Welfare Assistance*)

4. State Labor Department (*Unemployment Compensation*)

5. State or federal courts

Third-Party Oral Verification

Oral third-party verification will be used when written third-party verification is delayed or not possible. When third-party oral verification is used, staff will be required to complete a Certification of Document Viewed or Person Contacted form, noting with whom they spoke, the date of the conversation and the facts provided. If oral third party verification is not available, the PHA will compare the information to any documents provided by the family. If obtained by telephone, the PHA must originate the call.

Review of Documents

In the event that third-party written or oral verification is unavailable, the PHA will notate the file accordingly and utilize documents provided by the family as the primary source if the documents provide complete information.

All such documents, excluding government checks, will be photocopied and retained in the applicant file. In cases where documents are viewed that cannot be photocopied, staff viewing the document(s) will certify the document was reviewed.

The PHA will accept the following documents from the family, if the document is such that tampering would be easily noted:

1. Printed wage stubs

2. Computer print-outs from the employer

3. Signed letters (*provided that the information is confirmed by telephone*)

4. Other documents noted in this chapter as acceptable verification

Self-Certification/Self-Declaration

When verification cannot be made by third-party verification or review of documents, families will be required to submit a self-certification.

Self-certification is accomplished by means of an affidavit that must be witnessed by a representative of the PHA and that is obtained under penalty of perjury.

Discrepancy Resolution Procedure

If third-party verification is received after documents have been accepted as provisional verification and there is a discrepancy, the PHA will attempt to contact both parties providing information in order to resolve the discrepancy. The PHA will place in the family file an explanation of the manner that the discrepancy was resolved.

B. RELEASE OF INFORMATION [§ 24 CFR 5.230]

All adult family members will be required to sign a copy of HUD form 9886, Authorization for Release of Information/Privacy Act Form.

In addition, all adult family members will be required to sign specific authorization forms when information is needed that is not covered by HUD form 9886.

Each member requested to consent to the release of specific information will be provided with a copy of the appropriate forms for their review and signature.

Family refusal to cooperate with the HUD prescribed verification system will result in denial of admission or termination of assistance because it is a family obligation to supply any information and to sign consent forms requested by the PHA or HUD.

C. COMPUTER MATCHING

For some time, HUD has conducted a computer matching initiative to verify independently resident income. HUD can access income information and compare it to information submitted by PHAs on the Form 50058 form. HUD can disclose Social Security information to PHAs, but is precluded by law from disclosing Federal tax return data to PHAs. If HUD receives information from Federal tax return data indicating a discrepancy in the income reported by the family, HUD will notify the family of the discrepancy. The family is required to disclose this information to the PHA (*§ 24 CFR 5.240*). HUD's letter to the family will also notify the family that HUD has notified the PHA in writing that the family has been advised to contact the PHA. HUD will send the PHA a list of families who have received “income discrepancy” letters.

When the PHA receives notification from HUD that a family has been sent an “income discrepancy” letter, the PHA will wait forty calendar days after the date of notification before contacting tenant.

On the forty-first day following the date of notification, the PHA will contact the tenant by mail asking the family to furnish any letter or other notice by HUD concerning the amount or verification of family income within thirty calendar days.

The PHA will fully document the contact in the tenant's file, including a copy of the letter to the family.

When the family provides the required information, the PHA will verify the accuracy of the income information received from the family, review the PHA's interim recertification policy, will identify unreported income, will charge retroactive rent as appropriate and change the amount of rent or terminate assistance, as appropriate, based on the information.

If tenant fails to respond to PHA:

1. The PHA will ask HUD to send a second letter.

2. After an additional forty calendar days, the PHA will ask HUD to send a third letter.

3. After an additional forty calendar days, the PHA will send a letter to the head of household, warning of the consequences if the family fails to contact the PHA within two weeks.

If the tenant claims a HUD letter was not received:

1. The PHA will ask HUD to send a second letter with a verified address for the tenant.

2. After forty calendar days, the PHA will contact the tenant family.

3. If the tenant family still claims they have not received a letter, the PHA will ask HUD to send a third letter.

4. After an additional forty calendar days, the PHA will set up a meeting with the family to complete IRS Forms 4506 and 8821.

5. If the tenant family fails to meet with the PHA or will not sign the IRS Forms, the PHA will send a warning letter to the head of household, notifying the family that termination proceedings will begin within one week if the tenant fails to meet with the PHA and/or sign forms.

If tenant does receive a discrepancy letter from HUD:

1. The PHA will set up a meeting with the family.

2. If the family fails to attend the meeting, the PHA will reschedule the meeting.

3. If the family fails to attend the second meeting, the PHA will send a termination warning.

4. The family must bring the original HUD discrepancy letter to the PHA.

If tenant disagrees with the Federal tax data contained in the HUD discrepancy letter:

1. The PHA will ask the tenant to provide documented proof that the tax data is incorrect.

2. If the tenant does not provide documented proof, the PHA will obtain proof to verify the Federal tax data using third party verification.

D. ITEMS TO BE VERIFIED [§ 24 CFR 982.516]

All income, including income exclusions.

Full-time student status including high school students who are eighteen or over.

Current assets including assets disposed of for less than fair market value in preceding two years.

Child care expense where it allows an adult family member to be employed, to seek work actively or to further his /her education.

Total medical expenses of all family members in households whose head or spouse is elderly or disabled.

Disability assistance expenses to include only those costs associated with attendant care or auxiliary apparatus for a disabled member of the family that allows an adult family member to be employed.

Disability for determination of preference status, allowances or deductions

Proof of legal identity

U. S. citizenship/eligible immigrant status

Social Security Numbers for all family members over 6 years of age or older who have been issued a social security number.

Familial/Marital status when needed for head or spouse definition.

All utilities that are the tenant's responsibility are operational.

E. VERIFICATION OF INCOME [§ 24 CFR 982.516]

This section defines the methods the PHA will use to verify various types of income.

Employment Income

Verification forms request the employer to specify the:

1. Dates of employment
2. Amount and frequency of pay
3. Date of the last pay increase
4. Likelihood of change of employment status and effective date of any known salary increase during the next twelve months
5. Year to date earnings
6. Estimated income from overtime, tips, bonus pay expected during next twelve months

Acceptable methods of verification include, in this order:

1. Employment verification form completed by the employer or income verification provided by a state or federal agency.
2. Third-party oral verification.
3. Check stubs or earning statements for a minimum of six weeks or three bi-weekly pay periods that indicate the employee's gross pay, frequency of pay or year-to-date earnings or W-2 forms plus an income tax return.
4. Self-certifications or income tax returns signed by the family that may be used to verify self-employment income or income from tips and other gratuities.

Self-Employment

The PHA will require the family member to supply the IRS Form 1099 as verification of earned income.

If a family member has been self-employed for less than three months, the PHA will accept a certified estimate of income from the family member and schedule an interim reexamination in three months. If the family member has been self-employed for three to twelve months, the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income. If in fact the family member's period of self-employment spans from one tax year to the next, even if the employment period is less than three months, the IRS Form 1099 will be required for the previous year.

Applicants and program participants may be requested to sign an authorization for release of information from the Internal Revenue Service for further verification of income.

In cases where there are questions about the validity of information provided by the family, the PHA will require the most recent federal income tax statements.

Where doubt regarding income exists, a referral to IRS for confirmation will be made on a case-by-case basis.

Social Security, Pensions, Supplementary Security Income (SSI), Disability Income

Acceptable methods of verification include, in this order:

1. Benefit verification form completed by agency providing the benefits.

2. Award or benefit notification letters prepared and signed by the providing agency.

3. Computer report obtained electronically or in hard copy.

Unemployment Compensation

Acceptable methods of verification include, in this order:

1. Verification form completed by the unemployment compensation agency.

2. Computer printouts from unemployment office stating payment dates and amounts.

3. Payment stubs.

4. EMS print out

Welfare Payments or General Assistance

Acceptable methods of verification include, in this order:

1. PHA verification form completed by payment provider.

2. Written statement from payment provider indicating the amount of payment, start date of payments and anticipated changes in payment in the next twelve months.

3. Computer-generated Notice of Action.

Alimony or Child Support Payments

Acceptable methods of verification include the following, in descending order of priority:

1. Copy of a separation or settlement agreement or a divorce decree stating the amount and type of support and the payment schedules or a statement provided by the child support agency.

2. A notarized letter from the person paying the support.

3. Copy of latest check or the payment stubs from the Court Trustee. The PHA must record the date, amount and number of the check.

If payments are irregular, the family must provide:

1. A copy of the separation or settlement agreement or a divorce decree stating the amount and type of support and payment schedules.

2. A statement from the agency responsible for enforcing payments to show that the family has filed for enforcement.

3. A welfare notice of action showing amounts received by the welfare agency for child support.

4. A written statement from an attorney certifying that a collection or enforcement action has been filed.

Net Income from a Business

In order to verify the net income from a business, the PHA will view IRS and financial documents from prior years and use this information to anticipate the income for the next twelve months.

Acceptable methods of verification include:

1. IRS Form 1040, including:

    a. Schedule C (*Small Business*)
    b. Schedule E (*Rental Property Income*)
    c. Schedule F (*Farm Income*)

2. If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

Audited or unaudited financial statements of the business.

Child Care Business

If an applicant/participant is operating a licensed day care business, income will be verified as with any other business.

If the applicant/participant is operating a "cash and carry" operation (*which may or may not be licensed*), the PHA will require the applicant/participant to complete a form for each customer that indicates:

1. The name of person whose child/children is being cared for,

2. The person's telephone number,

3. The number of hours child is being cared for,

4. The method of payment (*check, check, etc.*),

5. The amount paid and

6. The signature of person, and

If the family has filed a tax return, the family will be required to provide it.

Recurring Gifts

The family must furnish a self-certification that contains the following information:

1. The person who provides the gifts

2. The value of the gifts

3. The regularity (*dates*) of the gifts

4. The purpose of the gifts

Zero Income Status

Families that claim zero income will be required to attend an interview at the PHA every six months and sign a new zero income statement. The PHA will run a computer match in EMS-CAP and through the state Department of Labor (DOL) at the same time.

Full-time Student Status

Only the first four-hundred eighty dollars of the earned income of full time students, other than head or spouse, will be counted towards family income.

Financial aid, scholarships and grants are not counted towards family income.

Verification of full time student status includes:

1. Written verification from the registrar's office or other school official.

2. School records indicating enrollment for a sufficient number of credits to be considered a full time student by the educational institution.

F. INCOME FROM ASSETS [§ 24 CFR 982.516]

Savings Account Interest Income and Dividends

Acceptable methods of verification include, in this order:

1. Account statements, passbooks, certificates of deposit or PHA verification forms completed by the financial institution.

2. Broker's statements showing value of stocks or bonds and the earnings credited the family. Earnings can be obtained from current newspaper quotations or oral broker's verification.

3. IRS Form 1099 from the financial institution, if the PHA must adjust the information to project earnings expected for the next twelve months.

Interest Income from Mortgages or Similar Arrangements

Acceptable methods of verification include, in this order:

1. A letter from an accountant, attorney, real estate broker, the buyer or a financial institution stating interest due for next twelve months. (*A copy of the check paid by the buyer to the family is not sufficient unless a breakdown of interest and principal is shown*.)

2. Amortization schedule showing interest for the twelve months following the effective date of the certification or recertification.

Net Rental Income from Property Owned by Family

Acceptable methods of verification include, in this order:

1. IRS Form 1040 with Schedule E (*Rental Income*).

2. Copies of latest rent receipts, leases or other documentation of rent amounts.

3. Documentation of allowable operating expenses of the property:

    a. tax statements,
    b. insurance invoices,
    c. bills for reasonable maintenance and utilities and
    d. bank statements or amortization schedules showing monthly interest expense.

4. Lessee's written statement verifying rent payments to the family and family's self-certification as to net income realized.

G. VERIFICATION OF ASSETS

Family Assets

The PHA will require the necessary information to determine the current cash value (*the net amount the family would receive if the asset were converted to cash*) of assets:

1. Verification forms, letters or documents from a financial institution or broker.

2. Passbooks, checking account statements, certificates of deposit, bonds or financial statements completed by a financial institution or broker.

3. Quotes from a stockbroker or realty agent as to net amount family would receive if they liquidated securities or real estate.

4. Real estate tax statements if the approximate current market value can be deduced from assessment.

5. Financial statements for business assets.

6. Copies of closing documents showing the selling price and the distribution of the sales proceeds.

7. Appraisals of personal property held as an investment.

8. Family's self-certification describing assets or cash held at the family's home or in safe deposit boxes.

The PHA will verify information on assets through the four methods of verification acceptable to HUD in the following order:

1. third-party written

2. third-party oral

3. review of documents

4. certification/self-declaration

Assets Disposed of for Less than Fair Market Value (FMV) During Two Years Preceding Effective Date of Certification or Re-examination

1. For all certifications and re-examinations, the PHA will obtain the family's certification as to whether any member has disposed of assets for less than fair market value during the two years preceding the effective date of the certification or re-examination.

2. If the family certifies that they have disposed of assets for less than fair market value, certification is required that shows:

    a. all assets disposed of for less than FMV,

    b. the date they were disposed of

    c. the amount the family received and

    d. the market value of the assets at the time of disposition.

Third party verification will be obtained wherever possible.

Procedure if there is a service charge for obtaining third party verification

The PHA will determine that third-party verification is not available when there is a service charge for verifying an asset or expense *and* the family has original documents that prove the necessary information.

If the family cannot provide the documents, the PHA will pay the service charge required to obtain the third-party verification, unless it is not cost effective. If obtaining the verification is not cost effective, case self-certification will be acceptable as the only means of verification. The cost of verification will not be passed on to the family.

The cost of postage and envelopes to obtain third-party verification of income, assets and expenses is considered reasonable.

H. VERIFICATION OF ALLOWABLE DEDUCTIONS FROM INCOME [§ 24 CFR 982.516]

Child Care Expenses

1. Written verification from the person who receives the payments is required. If the child care provider is an individual, s/he must provide a statement of the amount they are charging the family for their services.

2. Verifications must specify the child care provider's name, address, telephone number, Social Security Number**,** the names of the children cared for, the number of hours the child care occurs, the rate of pay and the typical yearly amount paid, including school and vacation periods.

3. Family's certification as to whether any of those payments have been or will be paid or reimbursed by outside sources.

4. Verification that childcare provider is licensed/registered or otherwise regulated must be obtained from provider, otherwise childcare situation will be treated as unregulated and eligible only for a maximum allowance of eighty-nine dollars per child, per week.

Medical Expenses

Families who claim medical expenses will be required to submit a certification as to whether or not any expense payments have been or will be, reimbursed by an outside source. All expense claims will be verified by one or more of the methods listed below:

1. Written verification by a doctor, hospital or clinic personnel, dentist, pharmacist, of

    a. the anticipated medical costs to be incurred by the family and regular payments due on medical bills; and

    b. extent to that those expenses will be reimbursed by insurance or a government agency.

2. Written confirmation by the insurance company or employer of health insurance premiums to be paid by the family.

3. Written confirmation from the Social Security Administration of Medicare premiums to be paid by the family over the next twelve months. A computer printout will be accepted.

4. For attendant care:

    a. A reliable, knowledgeable professional's certification that the assistance of an attendant is necessary as a medical expense and a projection of the number of hours the care is needed for calculation purposes.

    b. The attendant's written confirmation of hours of care provided and amount and frequency of payments received from the family or agency (*or copies of canceled checks the family used to make those payments*) or stubs from the agency providing the services.

5. Receipts, canceled checks or pay stubs that verify medical costs and insurance expenses likely to be incurred in the next twelve months.

6. Copies of payment agreements or most recent invoice that verify payments made on outstanding medical bills that will continue over all or part of the next twelve months.

7. Receipts or other record of medical expenses incurred during the past twelve months that can be used to anticipate future medical expenses. PHA may use this approach for

"general medical expenses" such as non-prescription drugs and regular visits to doctors or dentists, but not for one time, nonrecurring expenses from the previous year.

8. The PHA will use mileage at the IRS rate or cab, bus fare or other public transportation cost for verification of the cost of transportation directly related to medical treatment.

Assistance to Persons with Disabilities [§ 24 CFR 5.611(c)]

1. In All Cases:

   a. Written certification from a reliable, knowledgeable professional that the person with disabilities requires the services of an attendant and/or the use of auxiliary apparatus to permit him/her to be employed or to function sufficiently independently to enable another family member to be employed.

   b. Family's certification as to whether they receive reimbursement for any of the expenses of disability assistance and the amount of any reimbursement received.

2. Attendant Care:

   a. Attendant's written certification of amount received from the family, frequency of receipt and hours of care provided.

   b. Certification of family and attendant and/or copies of canceled checks family used to make payments.

3. Auxiliary Apparatus:

   a. Receipts for purchases or proof of monthly payments and maintenance expenses for auxiliary apparatus.

   b. In the case where the person with disabilities is employed, a statement from the employer that the auxiliary apparatus is necessary for employment.

I. VERIFYING NON-FINANCIAL FACTORS [§ 24 CFR 5.617(b)(2)]

Verification of Legal Identity

In order to prevent program abuse, the PHA will require applicants to furnish verification of legal identity for all family members.

The documents listed below will be considered acceptable verification of legal identity for adults. If a document submitted by a family is illegible or otherwise questionable, more than one of these documents may be required.

1. Certificate of Birth, naturalization papers

2. Church issued baptismal certificate

3. Current, valid Driver's license

4. U. S. military discharge (*DD 214*)

5. U. S. passport

6. Voter's registration

7. Company/agency Identification Card

8. State or Federal government issued identification card

9. DOH Eligibility Management System (EMS) print-out

Documents considered acceptable for the verification of legal identity for minors may be one or more of the following:

1. Certificate of Birth

2. Adoption papers

3. Custody agreement

4. Health and Human Services ID

5. School records

Verification of Marital Status

[INSTRUCTION: This would be used to determine spouse for income and deduction and non-citizen purposes]

1. Verification of divorce status will be a certified copy of the divorce decree, signed by a Court Officer.

2. Verification of a separation may be a copy of court-ordered maintenance or other records.

3. Verification of marriage status is a marriage certificate.

Familial Relationships

Certification will normally be considered sufficient verification of family relationships. In cases where reasonable doubt exists, the family may be asked to provide verification.

The following verifications will always be required if applicable:

1. Verification of relationship:

    a. Official identification showing names

    b. Birth Certificates

    c. Baptismal certificates

2. Verification of guardianship is:

    a. Court-ordered assignment

    b. Verification from social services agency

    c. School records

Verification of Permanent Absence of Family Member If an adult member who was formerly a member of the household is reported permanently absent by the family, the PHA will consider any of the following as verification:

1. Husband or wife institutes divorce action.

2. Husband or wife institutes legal separation.

3. Order of protection/restraining order obtained by one family member against another.

4. Proof of another home address, such as utility bills, canceled checks for rent, driver's license or lease or rental agreement, if available.

5. Statements from other agencies such as social services or a written statement from the owner or manager that the adult family member is no longer living at that location.

6. If no other proof can be provided, the PHA will accept a self-certification from the head of household or the spouse or co-head, if the head is the absent member.

7. If the adult family member is incarcerated, a document from the Court or prison should be obtained stating how long they will be incarcerated.

Verification of Change in Family Composition

The PHA may verify changes in family composition either reported or unreported through letters, telephone calls, utility records, inspections, owners, neighbors, credit data, school or DMV records and other sources.

Verification of Disability

Verification of disability must be receipt of SSI or SSA disability payments under Section 223 of the Social Security Act or 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (*42 U.S.C. 6001(7*)) or verified by appropriate diagnostician such as physician, psychiatrist, psychologist, therapist, rehab specialist or licensed social worker, using the HUD language as the verification format.

Verification of Citizenship/Eligible Immigrant Status [§ 24 CFR 5.508,5.510, 5.512, 5.514]

To be eligible for assistance, individuals must be U. S. citizens or eligible immigrants. Individuals who are neither may elect not to contend their status. Eligible immigrants must fall into one of the categories specified by the regulations and must have their status verified by Citizenship and Immigration Service (CIS). Each family member must declare their status once. Assistance cannot be delayed, denied or terminated while verification of status is pending except that assistance to applicants may be delayed while the PHA hearing is pending.

1. Citizens or Nationals of the United States are required to sign a declaration under penalty of perjury. The PHA will require citizens to provide documentation of citizenship. Acceptable documentation will include at least one of the following original documents:

    a. United States Birth Certificate

    b. United States passport

    c. Resident alien/registration card

    d. Social Security card

2. Eligible Immigrants aged 62 and over are required to sign a declaration of eligible immigration status and provide proof of age.

3. Non-citizens with eligible immigration status must sign a declaration of status and verification consent form and provide their original immigration documents that are copied front and back and returned to the family. The PHA verifies the status through the CIS SAVE system. If this primary verification fails to verify status, the PHA must request within ten business days that the CIS conduct a manual search.

4. Ineligible family members who do not claim to be citizens or eligible immigrants must be listed on a statement of ineligible family members signed by the head of household or spouse.

5. Non-citizen students on student visas are ineligible members even though they are in the country lawfully. They must provide their student visa but their status will not be verified and they do not sign a declaration but are listed on the statement of ineligible members.

Failure to Provide. If an applicant or participant family member fails to sign required declarations and consent forms or provide documents, as required, they must be listed as an ineligible member. If the entire family fails to provide and sign as required, the family may be denied or terminated for failure to provide required information.

Time of Verification

For applicants, verification of U. S. citizenship/eligible immigrant status occurs at the same time as verification of other factors of eligibility for final eligibility determination**/**at the time of initial application**.**

For participants, it is done at the first regular recertification after June 19, 1995. For family members added after other members have been verified, the verification occurs at the first recertification after the new member moves in.

Once verification has been completed for any covered program, it need not be repeated except that, in the case of port-in families, if the initial PHA does not supply the documents, the PHA must conduct the determination.

Extensions of Time to Provide Documents

The PHA will grant an extension of fifteen business days for families to submit evidence of eligible immigrant status.

Acceptable Documents of Eligible Immigration

The regulations stipulate that only the following documents are acceptable unless changes are published in the Federal Register.

1. Resident Alien Card (*I-551*)

2. Alien Registration Receipt Card (*I-151*)

3. Arrival-Departure Record (*I-94*)

4. Temporary Resident Card (*I-688*)

5. Employment Authorization Card (*I-688B*)

6. Receipt issued by the CIS for issuance of replacement of any of the above documents that shows individual's entitlement has been verified

A birth certificate is not acceptable verification of status. All documents in connection with U. S. citizenship/eligible immigrant status must be kept five years.

The PHA will verify the eligibility of a family member at any time such eligibility is in question, without regard to the position of the family on the waiting list.

If the PHA determines that a family member has knowingly permitted another individual who is not eligible for assistance to reside permanently in the family's unit, the family's assistance will be terminated for thirty-six months, unless the ineligible individual has already been considered in prorating the family's assistance.

Verification of Social Security Numbers [§ 24 CFR 5.216]

Social security numbers must be provided as a condition of eligibility for all family members age six and over if they have been issued a number. Verification of Social Security numbers will be done through a Social Security Card issued by the Social Security Administration. If a family member cannot produce a Social Security Card, only the documents listed below showing his or her Social Security Number may be used for verification. The family is also required to certify in writing that the document(s) submitted in lieu of the Social Security Card information provided is/are complete and accurate:

1. A driver's license

2. Identification card issued by a Federal, State or local agency

3. Identification card issued by a medical insurance company or provider (*including Medicare and Medicaid*)

4. An identification card issued by an employer or trade union

5. An identification card issued by a medical insurance company

6. Earnings statements or payroll stubs

7. Bank Statements

8. IRS Form 1099

9. Benefit award letters from government agencies

10. Retirement benefit letter

11. Life insurance policies

12. Court records such as real estate, tax notices, marriage and divorce, judgment or bankruptcy records

13. Verification of benefits or Social Security Number from Social Security Administration

14. EMS print-out

New family members ages six and older will be required to produce their Social Security Card or provide the substitute documentation described above together with their certification that the

substitute information provided is complete and accurate. This information is to be provided at the time the change in family composition is reported to the PHA.

If an applicant or participant is able to disclose the Social Security Number but cannot meet the documentation requirements, the applicant or participant must show proof they have applied to Social Security for a replacement card. The applicant/participant or family member will have an additional thirty business days to provide proof of the Social Security Number. If they fail to provide this documentation, the family's assistance will be terminated.

In the case of an individual at least sixty-two years of age, the PHA may grant an extension for an additional sixty calendar days to a total of one-hundred twenty calendar days. If, at the end of this time, the elderly individual has not provided documentation, the family's assistance will be terminated.

If the family member states they have not been issued a number, the family member will be required to show they have applied for a Social Security Number.

Chapter 8 VOUCHER ISSUANCE AND BRIEFINGS [§ 24 CFR 982.302]

INTRODUCTION

The PHA's goals and objectives are designed to assure that families selected to participate are equipped with the tools necessary to locate an acceptable housing unit and that families are provided with sufficient information to acquire knowledge regarding the program and how to achieve maximum benefit while complying with program requirements. When eligibility has been determined, the PHA will conduct a mandatory briefing to ensure that families know how the program works. The briefing will describe broadly the responsibilities of the owner, the family and the PHA's procedures and explain how to lease a unit. The family will also receive a briefing packet. The packet will provide more detailed information about the program. The information will include the benefits of moving outside areas of poverty and minority concentration. This chapter describes how briefings will be conducted, the information that will be provided to families and the policies for how changes in family composition will be handled.

A. ISSUANCE OF VOUCHERS [§ 24 CFR 982.204(d), 982.54(d)(2)]

When funding is available, the PHA will issue vouchers to applicants whose eligibility has been determined. The issuance of vouchers must be within the dollar limitations set by the ACC budget.

The number of vouchers issued must ensure that the PHA stays as close as possible to one hundred percent (*one-hundred percent*) lease-up. The PHA performs a monthly calculation to determine whether applications can be processed, the number of vouchers that can be issued and to what extent the PHA can over-issue vouchers (*i.e., issue more vouchers than the budget allows*).

The PHA may over-issue vouchers only to the extent necessary to meet its leasing goals. All vouchers that are over-issued must be honored. If the PHA finds it is over-leased, it must adjust its future issuance of vouchers in order not to exceed the ACC budget limitations over the fiscal year.

B. BRIEFING TYPES AND REQUIRED ATTENDANCE [§ 24 CFR 982.301]

Initial Applicant Briefing

A full HUD-required briefing will be conducted for applicant families who are determined to be eligible for assistance. The briefings will be conducted in-group and/or individual meetings. Families that attend group briefings and still have the need for individual assistance will be referred to a housing coordinator. Specific riefings will be conducted for Family Unification Program (FUP) participants so that they may better understand the family obligations specific to this program as they relate to DCF and the PHA. Briefings will be conducted in English and, when necessary, in Spanish.

The purpose of the briefing is to explain the documents in the voucher-holder's packet to families so that they are fully informed about the program. This will enable them to utilize the program to their fullest advantage and it will prepare them to discuss the voucher program with potential owners and property managers.

Separate briefing sessions may be held for applicants who are eligible to participate in the Family Unification Program and Mainstream Housing Opportunities for Persons With Disabilities Program. Applicants will be informed of the requirements and family obligations specific to the Family Unification Program and the Mainstream Housing Opportunities for Persons With Disabilities Program. Briefings must be scheduled to accommodate applicants' employment schedules.

The PHA will not issue a voucher to a family unless the household representative has attended a briefing and signed the voucher. Applicants who provide prior notice of inability to attend a briefing will automatically be scheduled for the next briefing. Applicants who fail to attend two scheduled briefings without prior notification and approval of the PHA may be denied admission based on failure to supply information needed for certification. The PHA will conduct individual briefings for families with disabilities at their homes, upon request by the family, if this is required as a reasonable accommodation.

All clients who have been properly briefed will sign an acknowledgement indicating that they are aware of their mobility rights. They will indicate the communities (*if any*) to which they are interested in moving. The acknowledgement will be written in English and Spanish.

Follow-up Applicant Briefings

The PHA shall use its discretion in determining whether a participant shall be required to attend a briefing after the initial briefing. Follow-up briefings communicate new or revised information concerning families' rights or responsibilities. The PHA shall not use the follow-up briefing process to deny program participants continued access to the families' voucher.

Briefing Packet [§ 24 CFR 982.301(b)]

The documents and information provided in the briefing packet for the voucher programs will comply with all HUD requirements. The PHA also includes other information and materials that are not required by HUD.

The family is provided with the following information and materials:

1. The voucher, with the term of the voucher indicated and the PHA policy for requesting extensions to the term of the voucher.

2. A description of the method used to calculate the housing assistance payment (HAP) for a family, information on the utility allowance and the payment standards for the voucher program.

3. How the payment standard is determined, including an explanation of rent reasonableness.

4. Families will be made aware of mobility counseling.

5. An explanation of the geographical area that the family may lease a unit, including an explanation of portability. The applicant will indicate the towns that he or she is interested in living on a mobility notification form. The applicant will sign this form and receive a copy.

6. The Request for Tenancy Approval and a description of the procedure for requesting approval of a rental dwelling unit.

7. The PHA policy on providing information about families to prospective owners.

8. The subsidy standards**,** including when and how exceptions are made and how the voucher size relates to the unit size selected.

9. The HUD brochure on how to select a unit and/or the HUD brochure "A Good Place to Live," concerning how to select a unit that complies with HQS.

10. The HUD pamphlet on lead-based paint entitled "Protect Your Family From Lead in Your Home" and information about where blood level testing is available**.**

11. The Department of Public Health pamphlet on Lead Poisoning Prevention.

12. Information on federal, state and local equal opportunity laws, a list of Commission on Human Rights and Opportunities (CHRO) offices and brochures from the Connecticut Fair Housing Center and Statewide Legal Referral Services. The PHA will also include the pamphlet "Fair Housing: It's Your Right" and information such as the "take one, take all" law and the telephone number of the local HUD enforcement office.

13. Resources to identify suitable rental units.

14. If the family includes a person with disabilities, notice that the PHA will assist in locating accessible units and a list of available accessible units known to the PHA.

15. The family obligations under the program.

16. The grounds that the PHA may terminate assistance for a participant family because of family action or failure to act.

17. PHA informal hearing procedures, including when the PHA is required to offer a participant family the opportunity for an informal hearing and how to request the hearing.

18. An owner's handbook, an HQS checklist and a sample HAP contract.

19. Procedures for notifying the PHA and/or HUD of program abuses such as side payments, extra charges, violations of tenant rights and owner failure to repair.

20. The family's rights as a tenant and as a program participant.

21. Requirements for reporting changes occurring between certifications.

22. Information on security deposits.

23. The publication *Things You Should Know (HUD–1140 - OIG)* that explains types of actions a family must avoid and the penalties for program abuse.

24. Information concerning Reasonable Accommodation and how to make application if necessary

Other Information to be Provided at the Briefing [§ 24 CFR 982.301(a)]

The person conducting the briefing will describe how the program works and the relationship between the family and the owner, the family and the PHA and the PHA and the owner.

The briefing presentation emphasizes:

1. Family and owner responsibilities.

2. The role of DOH in monitoring the program (which may include an HQS inspection by DOH staff).

3. How portability works for families eligible to exercise portability.

4. Advantages in moving to an area with a low concentration of poor families if the family is living in a high poverty census tract in the PHA's jurisdiction.

5. Exercising choice in residency.

6. Choosing a unit carefully and only after due consideration.

7. The Family Self-Sufficiency (FSS) program and its advantages.

8. Mobility services.

If the family includes a person with disabilities, the PHA will ensure compliance with CFR 8.6 to ensure effective communication.

C. ENCOURAGING PARTICIPATION IN AREAS WITHOUT LOW-INCOME OR MINORITY CONCENTRATION [SEMAP Indicator]

At the briefing, families are encouraged to search for housing in non-impacted areas and mobility counselors are available to assist families who wish to do so.

The mobility services provided may include:

1. Direct contact with owners.
2. Counseling with the family.
3. Providing information about services in various non-impacted areas.
4. Meeting with neighborhood groups to promote understanding.
5. Formal or informal discussions with owner groups
6. Formal or informal discussions with social service agencies
7. Meeting with rental referral companies or agencies
8. Meeting with fair housing groups or agencies

D. ASSISTANCE TO FAMILIES WHO CLAIM DISCRIMINATION

The PHA will give participants a copy of HUD form 903 to use in the event that they decide to file a complaint. When housing discrimination is alleged, PHA staff will help clients who require assistance in filling out discrimination complaint forms by referring them to the appropriate legal authority or legal services representative.

Each administering agency shall establish procedures for tracking reports of housing discrimination. Logs of all reported instances of housing discrimination will be maintained and forwarded to the Connecticut Fair Housing Center on a quarterly basis.

E. SECURITY DEPOSIT REQUIREMENTS [§ 24 CFR 982.313]

Security deposits charged by owners may not exceed those charged to unassisted tenants (*or the maximum prescribed by state law, (i.e., two-month's rent or one-month's rent if the tenant is 62 or older)*.

For lease-in-place families, responsibility for the first and last month's rent is not considered a security deposit issue**.** In these cases, the owner should settle the issue with the tenant before the beginning of assistance.

F. TERM OF VOUCHER [§ 24 CFR 982.303, 982.54(d)(11)]

During the briefing session, each household will be issued a voucher that represents a contractual agreement between the PHA and the family specifying the rights and responsibilities of each party. It does not constitute admission to the program that occurs when the lease and contract become effective.

Expirations

The voucher is valid for a period of at least ninety calendar days from the date of issuance. The family must submit a Request for Tenancy Approval within the ninety-day period, unless an extension has been granted by the PHA or the voucher will expire (*i.e., the family will lose the voucher*).

If the voucher expired or was not extended by the PHA or expired after an extension, the family is denied assistance. The family will not be entitled to a review or a hearing. If the family is currently assisted, they may remain as a participant in their unit if an assisted lease and contract are in effect.

Suspensions

When a Request for Tenancy Approval is received, the PHA will suspend or stop the clock on the term of the voucher and will not deduct the number of business days required to process the request.

Extensions

The PHA will extend the term of the voucher up to one-hundred eighty calendar days from the beginning of the initial term. If the family needs and request an extension and it is granted, it will be granted in thirty-day increments not to exceed three extensions. Approval of each extension should be granted by a housing supervisor.

Extensions are granted at the discretion of the PHA primarily for the following reasons:

1. The PHA is satisfied that the family has made a reasonable effort to locate a unit, including seeking the assistance of the PHA through its mobility services, throughout the initial ninety-day period. A completed search record is required.

2. The family was prevented from finding a unit due to the disability accessibility requirement of a family member.

Special Extensions

Special extensions beyond the one-hundred eighty day maximum search time may be granted by the PHA, but only in cases where there are circumstances documented and verified that are beyond the family's control and that affect the family's ability to find suitable housing within the

initial ninety calendar days and subsequent allowable extensions.

The housing supervisor must review the family's search record and all documentation provided by the family to verify and support the request. The housing supervisor shall approve or disapprove the special extension. If the family does not provide proper documentation, a special extension will not be granted.

Assistance to Voucher Holders

Families who require additional assistance during their search may call the PHA office to request assistance. Voucher holders will be notified at their briefing session that the PHA periodically updates the listing of available units and shall be told how the updated list may be obtained.

The PHA will assist families with negotiations with owners and provide other assistance related to the families' search for housing.

G. VOUCHER ISSUANCE DETERMINATION FOR SPLIT HOUSEHOLDS [§ 24 CFR 982.315]

In those instances when a family assisted under the Section 8 program becomes divided into two otherwise eligible families due to divorce, legal separation or the division of the family and the new families cannot agree as to that new family unit should continue to receive the assistance and there is no determination by a court, the PHA shall consider the following factors to determine that of the families will continue to be assisted:

1. Which of the two new family units has custody of dependent children?

2. Which family member was the head of household when the voucher was initially issued (*listed on the initial application*).

3. The composition of the new family units and that unit contains elderly or disabled members.

4. Whether domestic violence was involved in the breakup.

5. Which family members remain in the unit.

6. Recommendations of social service professionals.

Documentation of these factors will be the responsibility of the requesting parties. If documentation is not provided, the PHA will terminate assistance based on failure to provide information necessary for a re-examination.

If the family break-up results from an occurrence of domestic violence, dating violence, sexual assault, or stalking as provided in 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), the PHA will ensure that the victim retains assistance.

H. VOUCHER RETENTION [§ 24 CFR 982.315]

A voucher may be retained by another household member only if the following conditions are met:

1. The current voucher holder is deceased or absent due to incarceration or absent due to confinement in a medical facility without the expectation of return to the unit and

    a. The household member has reached the age of majority and is related by blood or law to the voucher holder, and

    b. The household member was included on the voucher at the time of death, incarceration or confinement for a period of five years or more, or

2. The current voucher holder is deceased or absent due to incarceration or absent due to confinement in a medical facility without the expectation of return to the unit and

    The remaining household member(s) is/are minors who were a household member(s) at the time of the death or absence and

    a. Has been awarded emancipated minor status or

    b. Has been placed in the care of another adult to be brought into the unit by action of the judicial system or the state child protection agency.

A live-in attendant, by definition, is not a member of the family and will not be considered a remaining member of the family.

The PHA will assess all family eligibility factors before issuing a new voucher. All changes in family eligibility factors will be reflect in the new voucher.

Chapter 9 REQUEST FOR TENANCY APPROVAL AND CONTRACT EXECUTION [§ 24 CFR 982.302]

INTRODUCTION [§ 24 CFR 982.305(a)]

The PHA's program operations are designed to utilize available resources in a manner that is efficient and provides eligible families with timely assistance based on the number of units that have been budgeted. The PHA's objectives include maximizing the use of HUD funds by assisting to as many eligible families and for as many eligible units as the budget will allow.

After families are issued a voucher, they may search for a unit anywhere within the jurisdiction of the PHA or outside of the PHA's jurisdiction if they qualify for portability. The family must find an eligible unit under the program rules, with an owner/owner who is willing to enter into a housing assistance payment (HAP) contract with the PHA. This chapter defines the types of eligible housing, the PHA's policies that pertain to initial inspections, lease requirements, owner disapproval and the processing of requests for tenancy approval.

A. REQUEST FOR TENANCY APPROVAL [§ 24 CFR 982.302, 982.305(b)]

The Request for Tenancy Approval (RTA) and a copy of the proposed lease, including the HUD-prescribed tenancy addendum, must be submitted by the family during the term of the voucher. The family must submit the request for tenancy approval in the form and manner required by the PHA.

The RTA must be signed by both the owner and voucher-holder, and the PHA will not permit the family to submit more than one RTA at a time.

The PHA will review the proposed lease and the RTA to determine whether they are approvable. The RTA will be approved if:

1. The unit is an eligible type of housing,

2. The unit meets HUD's Housing Quality Standards (*and any additional criteria as identified in this Administrative Plan*),

3. The rent is reasonable,

4. The security deposit is approvable in accordance with any limitations in this plan,

5. The proposed lease complies with HUD and PHA requirements (*see "Lease Review" section below*), and

6. The owner is approvable and there are no conflicts of interest (*see "Owner Disapproval" section below*).

In addition to the above, at the time a family initially receives assistance in a particular rental unit (*i.e., new admissions and moves*), if the gross rent for the unit exceeds the applicable payment standard for the family, the family share of the rent may not exceed forty percent of the family's monthly adjusted income (*see Chapter 11 of this Administrative Plan, "Owner Rents, Rent Reasonableness and Payment Standards"*).

Disapproval of Request for Tenancy Approval

If the PHA determines that the request cannot be approved for any reason, the owner and the family will be notified in writing. The PHA will instruct the owner and family of the steps that are necessary to approve the request.

The owner will be given no more than fifteen business days to submit an approvable RTA from the date of disapproval.

When, for any reason, an RTA is not approved, the PHA will furnish another RTA form to the family along with the notice of disapproval so that the family can continue to search for eligible housing.

B. ELIGIBLE TYPES OF HOUSING [§ 24 CFR 982.353]

The PHA will approve any of the following types of housing in the voucher program:

1. All approved structure types can be utilized.

2. Manufactured homes where the tenant leases the mobile home and the pad.

3. Manufactured homes where the tenant owns the mobile home and leases the pad.

A family can own a rental unit but cannot reside in it while being assisted, except in the case when the tenant owns the mobile home and leases the pad.

The PHA may not permit a voucher holder to lease a unit that is receiving project-based Section 8 assistance or any other duplicative rental subsidies.

C. LEASE REVIEW [§ 24 CFR 982.308]

The PHA will review the lease, particularly noting *whether any optional charges are approvable and* whether it complies with regulations and state/local law. The tenant also must have legal capacity to enter into a lease under state and local law. Responsibility for utilities, appliances and optional services must correspond to those provided on the request for tenancy approval.

The terms and conditions of the owner's lease must be consistent with state and local law.

The lease must specify:

1. The names of the owner and all tenants and

2. The address of the unit rented (*including apartment number, if any*) and

3. The amount of the monthly rent to owner and

4. The utilities and appliances to be supplied by the owner and

5. The utilities and appliances to be supplied by the family.

The HUD-prescribed tenancy addendum must be included in the lease word-for-word before the lease is executed.

The owner's lease must include the lead warning statement and disclosure information required by § 24 CFR 35.92(b).

The lease must provide that drug-related criminal activity engaged in by the tenant, any household member or any guest, on or near the premises, or any person under the tenant's control on the premises is grounds to terminate tenancy.

The lease must also provide that the owner may evict family when the owner determines that:

1. Any household member is illegally using a drug; or

2. A pattern of illegal use of drug by any household member exists that interferes with the health, safety or right to peaceful enjoyment of the premises by other residents.

The lease must also provide that the following types of criminal activity by a "covered person" are grounds to terminate tenancy:

1. Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises by other residents (*including property management staff residing on the premises*);

2. Any criminal activity that threatens the health, safety or right to peaceful enjoyment of their residences by persons residing in the immediate vicinity of the premises; or

3. Any violent criminal activity on or near the premises by a tenant, household member or guest; or

4. Any violent criminal activity on the premises by any other person under the tenant's control.

The lease must provide that the owner may terminate tenancy if a tenant is:

1. Fleeing to avoid prosecution or custody or confinement after conviction for a crime or attempt to commit a crime that is a felony under the laws of the place from that the individual flees; or

2. Violating a condition of probation or parole imposed under federal or state law.

House rules of the owner may be attached to the lease as an addendum, provided they are approved by the PHA to ensure they do not violate any fair housing provisions and do not conflict with the lease addendum.

Actions Before Lease Term

All of the following must be completed before the beginning of the initial term of the lease for a unit:

1. The PHA has inspected the unit and has determined that the unit satisfies the HQS;

2. The owner and tenant have executed the lease; and

3. The PHA has approved leasing of the unit in accordance with program requirements.

D. SEPARATE AGREEMENTS

Separate agreements between the tenant and the owner are legal unless they require additional rent or are for items normally included in the rent of unassisted families or for items not shown on the approved lease.

The family is not liable under the lease for unpaid charges for items covered by separate agreements and nonpayment of these agreements cannot be cause for eviction.

Owners and families may execute separate agreements for services, appliances (*other than range and refrigerator*) and other items that are not included in the lease if the agreement is in writing and approved by the PHA.

Any appliances, services or other items that are routinely provided to unassisted families as part of the lease (*such as air conditioning, dishwasher or garage*) or are permanently installed in the unit, cannot be put under separate agreement and must be included in the lease. For there to be a separate agreement, the family must have the option of not utilizing the service, appliance or other item.

If the family and owner have come to a written agreement on the amount of allowable charges for a specific item, so long as those charges are reasonable and not a substitute for higher rent, they will be allowed.

All agreements for special items or services must be attached to the lease approved by the PHA. If agreements are entered into later, they must be approved by the PHA and attached to the lease.

E. INITIAL INSPECTIONS [§ 24 CFR 982.305(a) & (b)]

See Chapter 10 of this Administrative Plan, "Housing Quality Standards and Inspections."

F. RENT LIMITATIONS [§ 24 CFR 982.507]

The PHA will make a determination as to the reasonableness of the proposed rent in relation to comparable units available for lease on the private unassisted market and the rent charged by the owner for a comparable unassisted unit in the building or premises.

By accepting each monthly housing assistance payment from the PHA, the owner certifies that the rent to owner is not more than rent charged by the owner for comparable unassisted units in the premises. The owner is required to provide the PHA with information requested on rents charged by the owner on the premises or elsewhere.

At all times during tenancy, the rent to owner may not be more than the most current reasonable rent as determined by the PHA.

G. DISAPPROVAL OF PROPOSED RENT [§ 24 CFR 982.502]

In any of the programs, if the proposed gross rent is not reasonable, at the family's request, the PHA will negotiate with the owner to reduce the rent to a reasonable rent. If the rent is not affordable because the family share would be more than forty percent of the family's monthly-adjusted income, the PHA will negotiate with the owner to reduce the rent to an affordable rent for the family.

At the family's request, the PHA will negotiate with the owner to reduce the rent or include some or all of the utilities in the rent to owner.

If the rent can be approved by negotiations with the owner, the PHA will continue processing the request for tenancy approval and lease. If the revised rent involves a change in the provision of utilities, a new request for tenancy approval must be submitted by the owner.

If the owner does not agree on the rent to owner after the PHA has tried and failed to negotiate a revised rent, the PHA will inform the family and owner that the lease/tenancy is disapproved.

H. INFORMATION TO OWNERS [§ 24 CFR 982.307(b), 982.54(d)(7)]

In accordance with HUD requirements, the PHA will furnish prospective owners with the family's current address as shown in the PHA's records and, if known to the PHA, the name and address of the owner at the family's current and prior address.

The PHA will make an exception to this requirement if the family's whereabouts must be protected due to domestic abuse or witness protection.

The PHA will inform owners that it is the responsibility of the owner to determine the suitability of prospective tenants. Owners will be encouraged to screen applicants for rent payment history, eviction history, damage to units and other factors related to the family's suitability as a tenant.

A statement of the PHA's policy on release of information to prospective owners will be included in the briefing packet that is provided to the family.

The PHA will provide documented information regarding the family's tenancy history for the past two years, if available, to prospective owners upon written request from the owner.

The PHA will provide the following information based on documentation in its possession:

1. Eviction history (*documenting the disposition of the eviction*).

2. Damage to rental units, including independent verification.

The information will be provided for the past two years.

The information will be provided in writing.

Only the housing supervisor may provide this information. The PHA's policy on providing information to owners is included in the briefing packet and will apply uniformly to all families and owners.

I. OWNER DISAPPROVAL [§ 24 CFR 982.306]

See Chapter 16 of this Administrative Plan, "Owner Disapproval and Restriction."

J. CHANGE IN TOTAL TENANT PAYMENT (TTP) BEFORE HAP EFFECTIVE DATE

When the family reports changes in factors that will affect the total tenant payment (TTP) before the effective date of the HAP contract at admission, the information will be verified and the TTP will be re-calculated. If the family does not report any change, the PHA need not obtain new verifications before signing the HAP contract, unless verifications are more than sixty calendar days old.

K. CONTRACT EXECUTION PROCESS [§ 24 CFR 982.305(c)]

The PHA prepares the housing assistance payment (HAP) contract and lease for execution. The family and the owner will execute the lease and the owner and the PHA will execute the HAP contract. Copies of these documents will be furnished to the parties who signed the respective documents. The PHA will retain a copy of all signed documents.

The PHA will make every effort to execute the HAP contract before the commencement of the lease term. The HAP contract may not be executed more than sixty calendar days after commencement of the lease term and no payments will be made until the contract is executed.

The following PHA representative is authorized to execute a contract on behalf of the PHA:

The Commissioner of the Department of Housing or his or her designee.

Owners must provide the current street address of their residence (*not a post office box*). If families lease properties owned by relatives, the owner's current address will be compared to the address of the subsidized unit.

An owner must provide his or her social security number.

The owner must provide a business or home telephone number.

Unless their lease was effective before June 17, 1998, a family may not lease a property owned by a parent, child, grandparent, grandchild, sister or brother of any family member. The PHA will waive this restriction as a reasonable accommodation for a family member who is a person with a disability.

L. PROOF OF OWNERSHIP

Owners must also submit proof of ownership of the property, such as a property deed, tax bill, online printout from city/town assessor's office or a mortgage statement (*include the volume and page number from the most recent transaction in the municipal land records*) and a copy of the management agreement if the property is managed by a management agent.

M. CHANGE IN OWNERSHIP

See Chapter 16 of this Administrative Plan, "Owner Disapproval and Restriction."

Chapter 10 HOUSING QUALITY STANDARDS AND INSPECTIONS [§ 24 CFR 982.401]

INTRODUCTION

Housing Quality Standards (HQS) are the HUD-required minimum standards of quality for tenant-based programs. Rental units must meet HQS both at initial occupancy and during the term of the lease. HQS apply to the building and premises, as well as to the unit. All units must pass the HQS inspection on or before the beginning date of the assisted lease and HAP contract.

The PHA will inspect each unit under contract at least annually. Annually, the PHA will also have an inspection supervisor perform quality control inspections on the number of files required for file sampling by SEMAP. The purpose of the inspections is to insure that the required standards of the PHA are maintained and to assure consistency in the program of the PHA. This chapter describes the PHA's procedures for performing HQS inspections and PHA standards for the timeliness of repairs. It also explains the responsibilities of the owner and the family and the consequences of noncompliance with HQS requirements for both families and owners. The use of the term "HQS" in this Administrative Plan refers to the combination of both HUD and PHA requirements.

A. GUIDELINES/TYPES OF INSPECTIONS [§ 24 CFR 982.401(a), 982.405]

Efforts will be made at all times to encourage owners to provide housing above HQS minimum standards.

All utilities must be in service before the effective date of the HAP contract. If the utilities are not in service at the time of inspection, the HQS inspector will notify the owner or the tenant (*whoever is responsible for the utilities, according to the RTA*) to have the utilities turned on.

The inspector will either schedule or conduct a re-inspection or the owner and the tenant shall both certify that the utilities are in service**.**

If the tenant is responsible for supplying the stove and/or the refrigerator, the PHA will allow the stove and/or the refrigerator to be placed in the unit after the inspection if, after the unit has passed all other HQS, the owner and the tenant certify that the appliances are in the unit and working according to HQS. The PHA will not conduct a re-inspection that event.

There are four types of inspections the PHA will perform:

1. Initial/Move-in – Conducted when the Request For Tenancy Approval has been received and accepted. Inspection must not be over thirty calendar days old.

2. Annual – Must be conducted within 1 year of last annual inspection.

3. Special/Complaint – At request of owner, family or an agency or third party.

4. Quality Control – to maintain quality standards within the program.

B. INITIAL HQS INSPECTION [§ 24 CFR 982.401(a), 982.305(b)(2)]

Timely Initial HQS Inspection

The PHA will inspect the unit, determine whether the unit satisfies HQS and notify the owner and the tenant of the determination within a reasonable amount of time.

The PHA will conduct initial HQS inspections for the owner and the tenant within ten business days of receipt of the RTA.

The initial inspection will be conducted to:

1. Determine if the unit and property meet the HQS defined in this plan.

2. Document the current condition of the unit in order to assist in future evaluations of whether the condition of the unit exceeds normal wear and tear.

3. Document the information to be used for determination of rent-reasonableness.

If the unit fails the initial HQS inspection, the owner and the tenant will be advised to notify the PHA once repairs are completed.

A notice will be forwarded to the owner listing the failures and a copy of that notice will be forwarded to the tenant.

On an initial inspection, the owner will be given up to thirty calendar days to correct the items noted as failing HQS unless, at the inspector's discretion and depending on the amount and complexity of work to be done, additional time will be given.

The owner will be allowed up to two re-inspections for repair work to be completed. The PHA may choose to afford the owner additional opportunities to comply based on mitigating circumstances.

If unit fails an initial inspection due to deteriorated paint surfaces, the tenant will not be allowed to move in until corrective action has been taken and the apartment has passed inspection.

If the time-period given by the inspector to correct the repairs has elapsed or if the maximum number of failed re-inspections has occurred, the tenant must select another unit.

C. ANNUAL HQS INSPECTIONS [§ 24 CFR 982.405(a)]

The PHA conducts an inspection in accordance with HQS annually within, at least one year of the last annual inspection. Special inspections may be scheduled between anniversary dates.

HQS deficiencies that are the cause of a unit failure must be corrected by the owner unless it is a failure that the tenant is responsible.

The tenant must allow the PHA to inspect the unit at reasonable times with reasonable notice. [§ 24 CFR 982.551 (d)]

The PHA will work with the tenant to accommodate the tenant's schedule.

The PHA will notify the tenant in writing at least five business days before the inspection.

Inspection – The tenant is notified of the date and time of the inspection appointment by mail. If the tenant is unable to be present, he or she must reschedule the appointment so that the inspection is completed within fourteen business days.

In the case of a no entry, the inspection company will reschedule the next inspection within fourteen business days of that event.

If the tenant does not contact the PHA to reschedule the inspection or if the tenant misses two inspection appointments without good cause such as emergency, illness or disability, the PHA will consider the tenant to have violated a family obligation and his or her assistance will be terminated in accordance with the termination procedures in the administrative plan. The PHA may choose to afford the tenant additional opportunities to comply based on mitigating circumstances.

Time Standards for Repairs

1. Emergency items that endanger the family's health or safety must be corrected by the owner or tenant within twenty-four hours of notification.

2. For non-emergency items, repairs must be made within thirty calendar days.

3. For major repairs, the director may approve an extension beyond thirty calendar days.

Rent Increases

Increases in the rent paid to the owner may not be approved if the unit is in a failed condition.

D. SPECIAL/COMPLAINT INSPECTIONS [§ 24 CFR 982.405(c)]

If at any time, the family or owner notifies the PHA that the unit does not meet HQS, the PHA will conduct an inspection.

The PHA may also conduct a special inspection based on information from third parties such as neighbors or public officials.

The PHA will inspect only the items that were reported, but if the inspector notices additional deficiencies that would cause the unit to fail HQS, the responsible party will be required to make the necessary repairs.

If the anniversary date is within one-hundred twenty calendar days of a special inspection, the special inspection will be categorized as annual and all annual procedures will be followed.

E. QUALITY CONTROL INSPECTIONS [§ 24 CFR 982.405(b)]

Quality control inspections will be performed by the supervisor on the number of files required by SEMAP. The purpose of quality control inspections is to ascertain that each inspector is conducting accurate and complete inspections and to ensure that there is consistency among inspectors in the application of the HQS.

The sampling of files chosen for quality control will include recently completed inspections (*conducted within the prior three months*), a cross-section of neighborhoods and a cross-section of inspectors.

F. ACCEPTABILITY CRITERIA AND EXCEPTIONS TO HQS [§ 24 CFR 982.401 (a)]

The PHA adheres to the acceptability criteria in the program regulations and HUD inspection booklet with the additions described below:

Security

1. If window security bars or security screens are present on emergency exit windows, they must be equipped with a quick release system. The owner is responsible for ensuring that the family is instructed on the use of the quick release system.

2. Owners are responsible for providing batteries and for replacing (*old*) non-functioning batteries for battery-powered (*units*) smoke detectors or fire detectors. Tenants will be instructed not to tamper with smoke detectors or remove batteries under penalty of law (*§53a-117a. of the Connecticut General Statutes, Criminal Mischief in the fourth degree, a Class C misdemeanor*).

3. Smoke detectors or fire detectors are required in attics or crawl spaces if heating or cooling equipment is located in the attic or crawl space.

4. Ground Fault Circuit Interrupters (GFCI) are required for all receptacles located within six feet of a water source in the kitchen or bathroom (*with the exception of electrical outlets located on medicine cabinets*).

Bedrooms

1. A room for sleeping of at least seventy square feet in size.

2. Rooms for sleeping with emergency exit capability.

3. Rooms for sleeping with two electrical outlets or one electrical outlet and one light fixture.

4. Rooms for sleeping with a door or other partition that affords the space privacy from the rest of the unit.

5. Rooms for sleeping not in basements or attics unless they meet local code requirements.

6. Rope ladders or similar devices will not be accepted as a secondary means of egress. Units approved for occupancy prior to effective date (effective July 1, 2015) shall be deemed acceptable.

Modifications

Modifications or adaptations made to a unit (*due*) to accommodate a person with a disability must meet all applicable HQS and building codes.

Admittance to Basement

Owners are required to allow the inspector access to the basement to inspect the heating system. If the owner does not allow access, he or she may instead present a safety inspection certificate from a local public agency or evidence that the heating equipment was serviced recently and is in good working order. The safety inspection certificate or evidence of recent service must not be over one year old.

G. EMERGENCY REPAIR ITEMS [§ 24 CFR 982.404(a)]

The following items are considered to be of an emergency nature and must be corrected by the owner or tenant (*whoever is responsible*) within twenty-four hours of notice by the inspector:

1. Lack of security for the unit

2. Waterlogged ceiling in imminent danger of falling

3. Major plumbing leaks or flooding

4. Natural gas leak or fumes

5. Electrical problem that could result in shock or fire

6. No heat between November 1st and April 1st

7. Lack of functioning toilet

8. Non-operational smoke detector

Failures will be identified at the inspection if the owner is present or the owner will be notified by fax, email or telephone where possible. A letter marked urgent with an attachment listing unit failures will also be sent to the owner.

1. The attachment will identify whether the failure is a twenty-hour emergency repair item or a thirty-day repair item.

2. The letter will inform owners that items marked "24 hour emergency repair" must be addressed immediately and the owner must fax or call the inspection firm within twenty hours verifying the repair has been completed.

3. The PHA will re-inspect the unit within ten business days after notification by the owner if only twenty-four hour repairs were required.

4. If other non-emergency repairs were also required, the PHA will re-inspect when the owner indicates the remaining repairs have been completed.

The PHA may give a short extension (*not more than forty-eight additional hours*) whenever the responsible party cannot be notified or if it is impossible to effect the repair within the twenty-four-hour period.

In those cases where there is leaking gas, potential of fire or some other threat to public safety and the responsible party cannot be notified, or it is impossible to make the repair, the PHA will notify the proper authorities.

If the emergency repair item(s) is not corrected in the period required by the PHA and the owner is responsible, the housing assistance payment will be abated.

If the emergency repair item(s) is not corrected in the period required by the PHA and it is an HQS violation caused by a breach of a family obligation, the PHA will terminate the assistance to the family.

H. CONSEQUENCES IF OWNER IS RESPONSIBLE (NON-EMERGENCY ITEMS) [§ 24 CFR 982.405, 982.453]

When it has been determined that a unit on the program fails to meet Housing Quality Standards and the owner is responsible for completing the necessary repair(s), he or she will be notified in writing of the HQS violation(s). If the owner does not make the corrections in the period specified by the PHA, the assistance payment to the owner will be abated.

Suspension of Housing Assistance Payments

A notice of suspension will be sent to the owner and abatement will be effective as of the first of the following month.

The PHA will inspect units under suspension within ten business days of the owner's notification that the work has been completed.

If the owner makes repairs during the abatement period, payment will resume on the day the unit passes inspection. This pro-rated portion of the HAP will be included with the next month's payment.

The family will be notified of the re-inspection date.

No retroactive payments will be made to the owner for the period of time during which the rent was abated and the unit did not comply with HQS. The notice of suspension will state that the tenant is not responsible for the PHA's portion of the rent that is abated.

Extension of Time to Complete Repairs

The PHA will grant an extension in lieu of abatement in the following cases:

1. The owner has a good history of HQS compliance.

2. There is an unavoidable delay in completing repairs due to difficulties in obtaining parts or contracting for services.

3. The repairs are expensive (*such as exterior painting or roof repair*) and the owner needs time to obtain the funds.

4. The repairs must be delayed due to climate conditions.

The extension will be made for a period to be determined by the PHA. At the end of that time, if the work is not completed, the PHA will begin the abatement.

Termination of Contract

If the owner is responsible for repairs and fails to correct all the deficiencies cited before the end of the suspension period, the owner will be sent a HAP Contract Proposed Termination Notice. Before the effective date of the termination, the suspension will remain in effect.

If repairs are completed before the effective termination date, the termination will be rescinded by the PHA if the tenant chooses to remain in the unit. Only one Housing Quality Standards inspection will be conducted after the termination notice is issued.

I. DETERMINATION OF RESPONSIBILITY [§ 24 CFR 982.404]

Certain HQS deficiencies are considered the responsibility of the family:

1. Utilities paid by the tenant that are not in service.

2. Failure to provide or maintain family-supplied appliances.

3. Damage to the unit or premises caused by a household member or guest beyond normal wear and tear. "Normal wear and tear" is defined as items that could not be charged against the tenant's security deposit under state law or court practice.

The owner is responsible for all other HQS violations.

The owner is responsible for vermin infestation even if caused by the family's living habits. However, if such infestation is serious and repeated, it may be considered a lease violation and the owner may evict for serious or repeated violation of the lease. The PHA may terminate the family's assistance that basis.

If the family is responsible but the owner carries out the repairs, the owner will be encouraged to bill the family for the cost of the repairs and the issue will be noted in the family's file.

J. CONSEQUENCES IF FAMILY IS RESPONSIBLE [§ 24 CFR 982.404(b)]

If emergency or non-emergency violations of HQS are determined to be the responsibility of the family, the PHA will require the family make any repair(s) or corrections within thirty calendar days of notice for non-emergency violations and within twenty-four hours of notice for emergency violations. If the repair(s) or correction(s) is not made in this period, the PHA will terminate assistance to the family. Extensions of the time limits in these cases must be approved by a supervisor. The owner's rent will not be abated for items that are the family's responsibility.

If the tenant is responsible and corrections are not made, the HAP Contract will terminate when assistance is terminated. The owner will be notified forty-five calendar days before termination.

K. CHILD WITH AN ELEVATED BLOOD LEAD LEVEL - LEAD SAFE HOUSING RULE [§ 24 CFR 35.1225]

(a) Within 15 days after being notified by the Department of Public Health ("DPH") that a child of less than 6 years of age living in an assisted dwelling unit has been identified as having a blood lead level of 5 micrograms per deciliter or greater, living in a pre-1978 subsidized funded dwelling unit, the PHA shall complete a risk assessment of the dwelling unit in which the child lived at the time the blood was last sampled and of the common areas servicing the dwelling unit. The risk assessment shall be conducted in accordance with § 35.1320(b). When the risk assessment is complete, the PHA shall immediately provide the report of the risk assessment to the owner of the dwelling unit. If the child identified as having a blood lead level of 5 micrograms per deciliter or greater is no longer living in the unit when the PHA receives notification from DPH, but another household receiving tenant-based rental assistance is living in the unit or is planning to live there, the requirements of this section apply just as they do if the child still lives in the unit. If a local public health department has already conducted an evaluation of the dwelling unit, or the PHA conducted a risk assessment of the unit and common areas servicing the unit between the date the child's blood was last sampled and the date when the PHA received the notification of a child identified as having a blood lead level of 5 micrograms per deciliter or greater, the requirements of this section shall not apply.

(b) Hazard reduction. Within 30 days after receiving the risk assessment report from the PHA, the owner shall complete the reduction of identified lead-based paint hazards in accordance with § 35.1325 or § 35.1330. Hazard reduction is considered complete when clearance is achieved in accordance with § 35.1340 and the clearance report states that all lead-based paint hazards identified in the risk assessment have been treated with interim controls or abatement or when the public health department certifies that the lead-based paint hazard reduction is complete. If the owner does not complete the hazard reduction required by this section, the dwelling unit is in violation of Housing Quality Standards (HQS) and the PHA shall take appropriate action in accordance with Chapter XX of this Plan.

(c) Notice of evaluation and hazard reduction. The owner shall notify building residents of any evaluation or hazard reduction activities in accordance with § 35.125.

Chapter 11 OWNER RENTS, RENT REASONABLENESS AND PAYMENT STANDARDS [§ 24 CFR, 982.503, 982.504, 982.505, 982.507]

INTRODUCTION

The policies in this chapter reflect the amendments to the HUD regulations that were implemented by the Quality Housing and Work Responsibility Act of 1998 for the Section 8 Tenant Based Assistance Program. These amendments became effective on October 1, 1999 that is referred to as the "merger date". These amendments complete the merging of the Section 8 Certificate and Voucher Programs into one program, called the Housing Choice Voucher (HCV) Program.

All Section 8 participant families have been transitioned to the HCV Program. Rent calculation methods for the HCV are described at § 24 CFR 982.505. The rent calculation formula is specific and is not subject to interpretation.

The PHA will determine rent reasonableness in accordance with § 24 CFR 982.507(a). It is the responsibility of the PHA to ensure that rents charged by the owners of units occupied by HCV participants are reasonable based upon a comparison with rents charged by the owners of comparable unassisted units in the rental market, using the criteria specified in § 24 CFR 982.507(b).

This chapter explains the PHA's procedures for determination of rent reasonableness, payments to owners, adjustments to the payment standards and rent adjustments.

A. RENT TO OWNER IN THE HOUSING CHOICE VOUCHER PROGRAM

The amount of rent paid to an owner (*i.e., the rent to owner or the contract rent*) is limited only by rent reasonableness. The PHA must demonstrate that the rent to owner is reasonable in comparison to rent for other comparable unassisted units.

The only other limitation on rent to owner is the maximum rent standard (*i.e., the payment standard*) at initial occupancy (*§ 24 CFR 982.508*). At the time when a family initially receives tenant based assistance for occupancy of a *particular* dwelling unit, whether that family is a new admission to the HCV or is assisted through a move to a different unit than that that they previously occupied, if the gross rent (*i.e., the contract rent plus the amount of the utility allowance*) for the unit exceeds the applicable payment standard for the family, the family share may not exceed forty percent of the family's monthly adjusted income.

During the initial term of the lease, the owner may not request an increase in the rent to owner.

B. MAKING PAYMENTS TO OWNERS [§ 24 CFR 982.451]

Once the HAP contract is executed, the PHA begins to process a monthly housing assistance payment (HAP) to the owner. The effective date and the amount of the HAP are communicated

by letter to both owner and tenant. A HAP register will be used as the basis for monitoring the accuracy and timeliness of payments. Changes are made to the HAP register effective the following month. Checks are disbursed by the PHA to the owner each month.

Checks that are not received will not be replaced until a written request has been received from the payee and a stop payment order has been put on the check.

Excess Payments

The total of rent paid by the tenant plus the housing assistance payment made by the PHA to the owner may not be more than the rent to owner. The owner must immediately return any excess payment to the PHA.

Owners who do not return excess payments will be subject to penalties as outlined in Chapter 17 of this Administrative Plan, "Owner or Family Debts to the PHA."

Late Payments to Owners

The PHA will not be obligated to pay any late payment penalty if HUD determines that late payment is due to factors beyond the control of the PHA, such as a delay in the receipt of program funds from HUD. The PHA will use administrative fee income or the administrative fee reserve as its only source for any late payment penalty paid to an owner. The PHA will not use any program funds for the payment of late payment penalties to the owner.

C. RENT REASONABLENESS DETERMINATIONS [§ 24 CFR 982.507]

The PHA will determine and document on a case-by-case basis that the rent approved for a unit is reasonable in comparison with rent charged for other comparable unassisted units in the market. This applies to all programs.

The PHA will not approve tenancy until it determines that the initial rent to owner is a reasonable rent. The PHA must re determine the reasonable rent before any increase in the rent to owner. The PHA must also re determine the reasonable rent if there is a five percent decrease in the published fair market rent (FMR**)** for the unit size rented by the family that goes into effect sixty business days before the contract anniversary, as compared with the FMR in effect one year before the contract anniversary.

The PHA must re determine rent reasonableness if directed to do so by HUD and/or if based on a need identified by the PHA's auditing system. The PHA may elect to re determine rent reasonableness at any other time. At all times during the assisted tenancy, the rent to owner may not exceed the reasonable rent as most recently determined or re determined by the PHA

The owner will be advised that by accepting each monthly housing assistance payment she or he will be certifying that the rent to owner is not more than rent charged by the owner for comparable unassisted units in the premises.

If requested, the owner must give the PHA information on rents charged by the owner for other units in the premises or elsewhere. The data for other unassisted units will be gathered from newspapers, realtors, professional associations, inquiries to owners, market surveys and other available sources.

Because the PHA's jurisdiction covers the entire State of Connecticut, the market areas for rent reasonableness are defined sectors with that jurisdiction that include boroughs, villages, districts and neighborhoods. Subject units within a defined housing market area will be compared to similar units within the same area.

The following items will be used for rent reasonableness documentation:

1. Size (*number of bedrooms/square footage*)
2. Location
3. Quality
4. Age of unit
5. Unit type
6. Utilities
7. Amenities

Rent Reasonableness Methodology

Information is gathered on rental units throughout the state by defined market areas and each unit is rated, using the PHA's rent reasonableness system. The average rents are identified for units of like size and type within the same market area. Each defined factor of the items listed above on the unit to be assisted will be compared to those of comparable unassisted units in the database.

The PHA has contracted for or purchased a statewide rental housing market database and rent reasonableness system. The system will incorporate and address all of the above factors.

D. PAYMENT STANDARDS FOR THE VOUCHER PROGRAM [§ 24 CFR 982.503]

The payment standard is used to calculate the housing assistance payment for a family. In accordance with HUD regulations, the PHA has set the voucher payment standard amount between one-hundred and one-hundred ten percent of the fair market rents (FMR) published by HUD. The PHA reviews the appropriateness of the payment standard annually when the FMR is published. In determining whether a change is needed, the PHA will ensure that the payment standard is always within the basic range of ninety percent to one-hundred ten percent of the new FMR, unless an exception payment standard has been approved by HUD.

The PHA will establish a single voucher payment standard amount for each FMR area in the PHA jurisdiction. For each FMR area, the PHA will establish payment standard amounts for each unit size (as determined by the number of bedrooms in a unit). The PHA may have a higher payment standard within the its jurisdiction if that is needed to expand housing opportunities outside areas of minority or poverty concentration, as long as the payment standard is within the range of ninety to one-hundred ten percent of FMR, as funding permits.

The PHA may approve a higher payment standard within the basic range, if required as a reasonable accommodation for a family that includes a person with a disability or disabilities.

E. ADJUSTMENTS TO PAYMENT STANDARDS [§ 24 CFR 982.503]

Payment standards may be adjusted, within HUD regulatory limitations, to increase housing assistance payments in order to keep families' rents affordable. The PHA will not raise payment standards solely to make “high end” units available to voucher holders. The PHA may use some or all of the measures noted below in making its determination as to whether an adjustment should be made to the payment standards.

Assisted Families' Rent Burdens

The PHA will review its voucher payment standard amounts at least annually to determine whether more than forty percent of families in a particular unit size are paying more than thirty percent of their annual adjusted income for rent.

If it is determined that particular unit sizes in the PHA’s jurisdiction have payment standard amounts that are creating rent burdens for families, the PHA will modify its payment standards for those particular unit sizes.

The PHA will establish a separate voucher payment standard, within the basic range, for designated parts of its jurisdiction if it determines that a higher payment standard is needed in these designated areas to provide families with quality housing choices and to give families an opportunity to move outside areas of concentration of high poverty and low-income.

Quality of Units Selected

The PHA will review the quality of units selected by participant families when making the determination of the proportion of their income that families are paying for housing, in order to ensure that payment standard increases are only made when they are needed to reach the mid-range of the market.

PHA Decision Point

The PHA will review the average proportion of their income that HCV participant families are paying for rent. If more than thirty-five percent of families are paying more than thirty percent of monthly-adjusted income for a particular unit size, the PHA will determine whether families

are renting units larger than their voucher size and whether families are renting units that exceed HUD's HQS and any additional standards added by the PHA in this Administrative Plan.

If families are paying more than thirty percent of their income for rent due to the selection of larger bedroom size units or luxury units, the PHA may decline to increase the payment standard. If these are not the primary factors for families paying higher rents, the PHA will continue (*increasing/to increase*) the payment standard.

Rent to Owner Increases

The PHA may review a sample of unassisted units to determine both:

1. how often owners are increasing rents and

2. the average percent of increase by bedroom size.

Time to Locate Housing

The PHA may also consider the average time-period for families to lease up under the HCV. If more than twenty-five percent of voucher holders are unable to locate suitable housing within the initial term of the voucher and the PHA determines that this is due to rents in the jurisdiction being unaffordable for families, even those with an HCV voucher, the payment standard may be adjusted. The PHA will maintain records of those families who were unsuccessful in finding units within the period allowed by the PHA.

Lowering of the Payment Standard

Lowering the FMR may require an adjustment of the payment standard. Additionally, statistical analysis may reveal that the payment standard should be lowered. In any case, the payment standard will not be set below ninety percent of the FMR without authorization from HUD.

Financial Feasibility

Before increasing the payment standard, the PHA will review the budget to determine the impact that projected subsidy increases would have on the funding available for the program and on the number of families served.

For this purpose, the PHA will compare the number of families who could be served under a higher payment standard with the number assisted under the payment standard currently in place.

File Documentation

The PHA will retain a file for at least three years in order to document the analysis and findings used to justify whether or not the payment standard was changed.

F. EXCEPTION PAYMENT STANDARDS

If the dwelling unit is located in an exception area, the PHA must use the appropriate payment standard amount established by the PHA for the exception area in accordance with regulation § 24 CFR 982.503(c).

G. OWNER PAYMENT IN THE HOUSING CHOICE VOUCHER PROGRAM [(§ 24 CFR 982.308(g)]

The owner is required to notify the PHA in writing at least sixty calendar days before any change in the rent amount to the owner is scheduled to go into effect. Any requested change in rent to owner will be subject to rent reasonableness requirements. See § 24 CFR 982.503.

Chapter 12 RE-EXAMINATIONS [§ 24 CFR, 982.516]

INTRODUCTION

In accordance with HUD requirements, the PHA will re-examine the income and household composition of all families at least annually. Families will be provided with accurate annual and interim rent adjustments. Re-examinations and interim examinations will be processed in a manner that ensures families are given reasonable notice of rent increases. All annual activities will be coordinated in accordance with HUD regulations. It is a HUD requirement that families report all changes in household composition. This chapter defines the PHA's policy for conducting annual re-examinations and coordinating annual activities. It also explains the interim reporting requirements for families and the standards for timely reporting of changes.

A. ANNUAL ACTIVITIES [§ 24 CFR 982.516, 982.405]

The PHA must conduct two activities on an annual basis. These activities will be coordinated around the anniversary date of the HAP contract:

1. Re-examination of income and family composition

2. HQS inspection

The PHA produces a monthly listing of assisted units under contract to ensure that timely reviews of housing quality and of factors related to total tenant payment and family share can be made.

Re-examination of the family's income and composition must be conducted at least annually.

Annual inspections – see Chapter 10 of this Administrative Plan, "Housing Quality Standards and Inspections."

Rent Adjustments – see Chapter 11 of this Administrative Plan, "Owner Rents, Rent Reasonableness and Payment Standards."

B. ANNUAL RE-EXAMINATION [§ 24 CFR 982.516]

Families are required to be re-examined at least annually.

Moves Between Re-examinations

When families move to another dwelling unit, an annual re-examination will be scheduled (*unless a re-examination has occurred in the last one-hundred twenty calendar days*) and the anniversary date will be changed.

Income limits are not used as a test for continued eligibility at re-examination.

Re-examination Notice to the Family

The PHA will maintain a re-examination tracking system and the household will be notified by mail of the date and time for their interview at least one-hundred twenty calendar days in advance of the anniversary date. If requested as a reasonable accommodation by a person with a disability, the PHA will provide the notice in an accessible format. The PHA will also mail the notice to a third party, if requested as a reasonable accommodation for a person with disabilities. These accommodations will be granted upon verification that they meet the need presented by the disability.

Procedure

The PHA's procedure for conducting an annual re-examination will be to schedule the date and time of appointment(s) and mail notification to the family.

Completion of Annual Re-examination

The PHA will have all re-examination for families completed before the anniversary date. This includes notifying the family of any changes in rent at least thirty calendar days before the scheduled date of the change in family rent.

Persons with Disabilities

Persons with disabilities who are unable to come to the PHA's office will be granted an accommodation by conducting the interview at the person's home or by mail**,** upon verification that the accommodation requested meets the need presented by the disability.

Collection of Information [§ 24 CFR 982.516(f)]

The PHA has established appropriate re-examination procedures necessary to ensure that the income data provided by families is complete and accurate.

The PHA will require the family to complete a personal declaration form before all re-examination interviews. The family will be given no more than thirty business days to complete this form and return it in the return-addressed envelope provided. Before the interview, the PHA will run an EIV, EMS-CAP and DOL report for comparison to the personal declaration form.

Requirements to Attend

Only the head or co-head of household will be required to attend the re-examination interview. If the head of household is unable to attend the interview, the appointment will be re-scheduled.

Failure to Respond to Notification of Re-examination

The written notification must state that family member is required to attend the interview. The family may call to request another appointment date up to forty-eight hours before the interview.

If the family does not appear for the re-examination interview and has not re-scheduled or made prior arrangements with the PHA**,** the PHA will re-schedule a second appointment.

If the family fails to appear for the second appointment and has not re-scheduled or made other prior arrangements, the PHA will send the family notice of termination and offer them an informal hearing

Exceptions to this policy may be made if the family is able to document:

1. an emergency situation that prevented it from canceling or attending the appointment or

2. if requested as a reasonable accommodation for a person with a disability.

Documents Required From the Family

In the notification letter to the family, the PHA will include instructions for the family to bring documentation of all liquid and non-liquid assets to the re-examination, as well as any additional information that may affect the family's re-examination status. All information brought to the PHA in person (*excluding third party*), will be date stamped and copies of the date stamped verification will be returned to the tenant.

Verification of Information

The PHA will follow the verification procedures and guidelines described in this plan. Verifications for re-examinations must be less than one-hundred twenty calendar days old.

Tenant Rent Increase

If the tenant rent increases, a thirty-calendar day notice is mailed to the family before the annual re-examination date.

If less than thirty calendar days are remaining before the scheduled effective date of the annual re-examination, the tenant rent increase will be effective on the first of the month following the thirty-day notice.

If there has been a misrepresentation or a material omission by the family or if the family causes a delay in the re-examination processing, there will be a retroactive increase in rent to the anniversary date.

Tenant Rent Decreases

If the tenant rent decreases because of an annual re-examination, it will be effective on the anniversary date or on the first day of the month following completion of the re-examination process, whichever is sooner.

If the family causes a delay so that the processing of the re-examination is not complete by the anniversary date, the rent change will be effective on the first day of the month following completion of the re-examination processing by the PHA.

C. REPORTING INTERIM CHANGES [§ 24 CFR 982.516]

Program participants must report all changes in household composition to the PHA between annual re-examinations within 30 calendar days of the change.. This includes additions due to birth, adoption and court-awarded custody. The family must obtain PHA approval before all other additions to the household.

If any new family member is added, family income must include any income of the new family member. Participant requests to remove members from the household must be accompanied by proof of the new residence. The PHA will conduct a reexamination to determine any resulting changes to the household income and will make the appropriate adjustments in the housing assistance payment and family unit size.

The U. S. citizenship/eligible immigrant status of additional family members must be declared and verified as required at the first interim or regular re-examination after moving into the unit.

Interim Reexamination Policy

Families will be required to report all changes in income or assets within 30 calendar days or be subject to repayment or termination (*See Chapter 17 of this Administrative Plan, "Owner or Family Debts to the PHA"*).

The PHA will process interim re-examinations when families have an increase or decrease in their monthly gross income totaling at least one hundred dollars per month.

The PHA shall compare the last income documentation on file from the family (or family's annualized monthly income previously calculated) to the currently provided income documentation to determine whether an adjustment to the tenant's rental share shall be made.

PHA Errors

If the PHA makes a calculation error at admission to the program or at an annual re-examination, an interim re-examination will be conducted, if necessary, to correct the error, but the family will not be charged retroactively. Families will be given decreases, when applicable**;** retroactive to when the decrease for the change would have been effective if calculated correctly.

D. OTHER INTERIM REPORTING ISSUES

An interim re-examination does not affect the date of the annual re-examination.

An interim re-examination will be scheduled and conducted for families with zero income every 180 calendar days.

If there is a change in family income from welfare benefit income solely to include both welfare benefit and employment income or employment income only and the income change is reported as required by this plan, the PHA will defer the family's rent increase for six months or until the family's next annual re-examination, whichever comes first. Failure to report the change will cause the employment income to be counted as regular income without benefit of the deferral. The purpose delaying the family's rent increase is to encourage families to move to self-sufficiency. This incentive will be provided only once to any family member and will not be provided to persons who work seasonally.

In the following circumstances, the PHA may conduct the interim re-examination by mail:

1. Changes that will not result in a change in tenant rent or voucher size.

2. Changes to income that are normal for the family, such as seasonal employment.

As a reasonable accommodation when requested, (*see Chapter 1 of this Administrative Plan, "Statement of Policies and Objectives"*).

Any changes reported by participants other than those listed in this section will be noted in the file by the staff person but will not be processed between regularly scheduled annual re-examinations.

E. NOTIFICATION OF RESULTS OF RE-EXAMINATION [HUD Notice PIH 98-6]

The HUD Form 50058 will be completed and transmitted as required by HUD.

The notice of rent adjustment is mailed to the owner and the tenant**.** Signatures are not required by the PHA. If the family disagrees with the rent adjustment, they may request an informal hearing.

F. TIMELY REPORTING OF CHANGES IN INCOME AND ASSETS [§ 24 CFR 982.516(c)]

Standard for Timely Reporting of Changes

The PHA requires that families report interim changes in writing to the PHA within thirty calendar days of when the change occurs. Any information, document or signature that is needed to verify the change, must be provided within this period.

If the change is not reported within the required time-period or if the family fails to provide documentation or signatures, it will be considered untimely reporting.

Procedures when the Change is Reported in a Timely Manner

The PHA will notify the family and the owner of any change in the HAP to be effective according to the following guidelines:

1. increases in the tenant rent are effective on the first of the month following at least thirty business days' notice.

2. decreases in the tenant rent are effective the first of the month following that that the change is reported. However, no rent reductions will be processed until all the facts have been verified, even if a retroactive adjustment results.

Procedures when the Change is Not Reported by the Tenant in a Timely Manner

If the family does not report the change as described under "Timely Reporting of Changes in Income and Assets," above, the family will have caused an unreasonable delay in the interim re-examination processing and the following guidelines will apply:

1. an increase in tenant rent will be effective retroactive to the date that it would have been effective had it been reported on a timely basis. The family will be liable for any overpaid housing assistance and may be required to sign a repayment agreement or make a lump sum repayment.

2. a decrease in tenant rent will be effective on the first of the month following the month that the change was reported.

Procedures when the Change is Not Processed by the PHA in a Timely Manner

"Processed in a timely manner" means that the change goes into effect on the date it should when the family reports the change in a timely manner, as described above. If the change is not made effective that date, the change is not processed by the PHA in a timely manner.

In this case, an increase will be effective after the required thirty business days' notice before the first of the month after completion of processing by the PHA.

If the change resulted in a decrease, the overpayment by the family will be calculated retroactively to the date it should have been effective and the family will be credited for the amount.

G. CHANGES IN VOUCHER SIZE BECAUSE OF CHANGES IN FAMILY COMPOSITION [§ 24 CFR 982.516(c)]

See Chapter 5 of this Administrative Plan, "Subsidy Standards."

H. CONTINUANCE OF ASSISTANCE FOR "MIXED" FAMILIES [§ 24 CFR 5.518]

Under the non-citizens rule, "mixed" families are families that include at least one citizen or eligible immigrant and any number of ineligible members.

"Mixed" families who were participants as of June 19, 1995 shall continue receiving full assistance if they meet all of the following criteria:

1. The PHA implemented the non-citizens rule before November 29, 1996 and

2. The head of household or spouse is a U. S. citizen or has eligible immigrant status and

3. All members of the family other than the head, the spouse, parents of the head or the spouse and children of the head or spouse are citizens or eligible immigrants. The family may make a change in who is designated as the head of household in order to qualify under this provision.

I. MISREPRESENTATION OF FAMILY CIRCUMSTANCES

If any participant deliberately misrepresents the information that eligibility or tenant rent is established, the PHA may terminate assistance and may refer the family file to the proper authorities for appropriate disposition. (*See Chapter 21, "Program Integrity Addendum"*)

Chapter 13 MOVES WITH CONTINUED ASSISTANCE (PORTABILITY) [24 CFR 982.314, 982.353, 982.355(a)]

INTRODUCTION

HUD regulations permit families to move with continued assistance to another unit within the PHA's jurisdiction or, under portability procedures, to a unit outside of the PHA's jurisdiction. The regulations also allow the PHA the discretion to develop policies that define any limitations or restrictions on moves. This chapter defines the procedures for moves both within and outside of the PHA's jurisdiction. It also outlines the policies for restrictions and limitations on moves.

A. ALLOWABLE MOVES

A family may move to a new unit with continued assistance if:

The assisted lease for the old unit has terminated because the PHA has terminated the HAP contract for owner breach or because the lease was terminated by mutual agreement of the owner and the family.

The owner has given the family a notice to vacate or has commenced an action to evict the tenant or has obtained a court judgment or begun another process allowing the owner to evict the family (*unless assistance to the family will be terminated*).

The family has given proper notice of lease termination (*if the family has a right to terminate the lease on notice to owner*) for owner breach or otherwise.

B. RESTRICTIONS ON MOVES [§ 24 CFR 982.314, 982.552(a)]

Families will not be permitted to move within the PHA's jurisdiction during the initial term of assisted occupancy.

Families will not be permitted to move outside the PHA's jurisdiction under portability procedures during the initial term of assisted occupancy.

Families will not be permitted to move more than once in a twelve-month period.

The PHA will deny permission to move if there is insufficient funding for continued assistance.

The PHA will deny permission to move to if:

1. The family has violated a family obligation.

2. The family owes the (*or any*) PHA money.

3. The family has moved or been issued a voucher within the last twelve months.

The housing director may make exceptions to these restrictions if there is an emergency reason or other good cause for the move over that the participant has no control.

C. PROCEDURE FOR MOVES [§ 24 CFR 982.314]

Issuance of Voucher

Subject to the restrictions on moves, if the family has not been re-examined within the last one-hundred twenty calendar days, the PHA will issue the voucher to move as soon as the family requests the move.

If the family does not locate a new unit, the family will not lose its assistance and may remain in the current unit so long as the owner permits and there is a HAP contract in place.

The annual re-examination date will be changed to coincide with the new lease-up date.

Notice Requirements

Briefing sessions shall emphasize the family's responsibility to give the owner and the PHA proper written notice of any intent to move.

The family must give the owner the required number of day's written notice of intent to vacate as specified in the lease and must give a copy of the notice of intent to vacate to the PHA simultaneously.

Time of Contract Change

A move within the same building or project or between buildings owned by the same owner, will be processed like any other move except that there will be no overlapping assistance.

In a move, assistance at the old unit stops at the end of the month that the tenant ceased to occupy the unit, unless proper notice was given to end a lease mid-month. Assistance will start at the new unit on the effective date of the lease and contract. Assistance payments may overlap for the month that the family moves.

D. PORTABILITY [§ 24 CFR 982.353]

Portability provisions apply to families moving out of or into the PHA's jurisdiction within the United States and its territories.

E. OUTGOING PORTABILITY [§ 24 CFR 982.353, 982.355]

Within the limitations of the regulations and this policy, a participant family has the right to receive tenant-based voucher assistance to lease a unit outside the PHA's jurisdiction, anywhere in the United States, in the jurisdiction of a receiving PHA with a tenant-based program. When a

family requests to move outside of the PHA's jurisdiction, the request must specify the area to that the family wants to move.

If there is more than one PHA in the area that the family has selected a unit, the initial PHA will choose the receiving PHA.

Restrictions on Portability

Applicants

If neither the head nor the spouse had a domicile (*i.e., a legal residence*) in the PHA's jurisdiction at the date of their initial application for assistance, the family will not be permitted to exercise portability upon issuance of a voucher.

For a portable family that was not already receiving assistance in the PHA's tenant-based programs, the PHA must determine whether the family is eligible for admission under the receiving PHA's program.

Participants

After an applicant has leased-up in the jurisdiction of the initial PHA, they cannot exercise portability during the first year of assisted occupancy, except in the following circumstances:

1. the receiving and initial PHA agree to allow the move and
2. the family's move relates to an opportunity for education, job training or employment.

The PHA will not permit families to exercise portability:

1. If the family is in violation of a family obligation.
2. If the family owes money to the PHA.
3. If the family has moved out of its assisted unit in violation of the lease.

Receiving PHAs will be required to submit a copy of any hearing determination to the initial PHA within sixty business days.

F. INCOMING PORTABILITY [§ 24 CFR 982.354, 982.355]

Absorption or Administration

The PHA will accept a family with a valid voucher from another jurisdiction and will either administer or absorb the voucher.

If the receiving PHA administers the voucher, the family will be issued a voucher by the receiving PHA. The term of the voucher issued by the receiving PHA will not expire before the expiration date of any voucher issued by the initial PHA. The family must submit a request for tenancy approval for an eligible unit to the receiving PHA during the term of the voucher issued by the receiving PHA.

The receiving PHA may grant extensions in accordance with this Administrative Plan. However, if the family decides not to lease-up in the jurisdiction of the receiving PHA, they must contact the initial PHA to request an extension.

The PHA may absorb vouchers if the number of such absorptions does not exceed fifty percent of households assisted by the PHA.

When the PHA does not absorb the incoming voucher, it will administer the initial PHA's voucher and the receiving PHA's policies will prevail.

For admission to the program, a family must be income-eligible in the area where the family initially leases a unit with assistance under the program.

The receiving PHA does not re-determine Section 8 eligibility for a family exercising portability when that family was already receiving assistance in the initial PHA's HCV program.

The PHA will issue a voucher according to its own subsidy standards. If the family experiences a change in family composition that would change the voucher size, the PHA will issue a voucher of the proper size based on its own subsidy standards.

Income and Total Tenant Payment of Incoming Portables [982.353(d)]

The receiving PHA will conduct a re-examination interview but will only verify the information provided if documents are missing or are over one-hundred twenty calendar days old, whichever is applicable, or there has been a change in the family's circumstances**.**

If the PHA conducts a re-examination of the family, it will not cause a delay in the issuance of a voucher.

If the family's income is such that a zero dollar subsidy amount is determined before lease-up in the PHA's jurisdiction, the PHA will refuse to enter into a contract on behalf of the family at zero dollar assistance.

Requests for Tenancy Approval

A briefing will be mandatory for all portability families.

When the family submits an RTA, it will be processed using the PHA's policies. If the family does not submit an RTA or does not execute a lease, the initial PHA will be notified before the expiration of the voucher.

If the family leases up successfully, the receiving PHA will notify the initial PHA within sixty business days and the billing process will commence.

The receiving PHA will notify the initial PHA if the family fails to submit an RTA for an eligible unit within the term of the voucher.

If the PHA denies assistance to the family, the receiving PHA will notify the initial PHA within sixty calendar days and the family will be offered a review or hearing.

The receiving PHA will notify the family of its responsibility to contact the initial PHA if the family wishes to move outside the receiving PHA's jurisdiction under continued portability.

Regular Program Functions

The receiving PHA will perform all program functions applicable the tenant-based assistance program, such as:

1. Annual re-examinations of family income and composition;

2. Annual HQS inspection of the unit; and

3. Interim examinations when requested or deemed necessary by the receiving PHA.

Terminations

The receiving PHA will notify the initial PHA in writing of any termination of assistance within thirty calendar days of the termination. If an informal hearing is required and requested by the family, the hearing will be conducted by the receiving PHA, using the regular hearing procedures included in this plan. A copy of the hearing decision will be furnished to the initial PHA.

The initial PHA will be responsible for collecting amounts owed by the family for claims paid and for monitoring repayment. If the initial PHA notifies the receiving PHA that the family is in arrears or the family has refused to sign a repayment agreement, the receiving PHA will terminate assistance to the family.

Required Documents

As the receiving PHA, this PHA will require the documents listed on the HUD portability billing form from the initial PHA.

Billing Procedures

As the receiving PHA, this PHA will bill the initial PHA quarterly for housing assistance payments. The billing cycle for other amounts including administrative fees and special claims will also be quarterly, unless otherwise requested by the initial PHA.

As receiving PHA, this PHA will bill one-hundred percent of the housing assistance payment, one-hundred percent of special claims and eighty percent of the initial PHA's administrative fee as indicated in the Federal Register's Annual Factors for Determining PHA Ongoing Fees, for each "portability" voucher leased as of the first day of the month.

As receiving PHA, this PHA will notify the initial PHA of changes in subsidy amounts and will expect the initial PHA to notify the receiving PHA of changes in the administrative fee amount to be billed.

Chapter 14 CONTRACT TERMINATIONS [§ 24 CFR 982.311, 982.314]

INTRODUCTION

The housing assistance payments (HAP) contract is the contract between the owner and the PHA that defines the responsibilities of both parties. This chapter describes the circumstances under which the contract can be terminated by the PHA and/or the owner and the policies and procedures for such terminations.

A. CONTRACT TERMINATION [§ 24 CFR 982.311]

The term of the HAP contract shall be the same as the term of the lease. The HAP contract between the owner and the PHA may be terminated by the action of the PHA or it may be terminated by the owner or tenant terminating the lease.

No future subsidy payments on behalf of the family will be made by the PHA to the owner after the month that the HAP contract is terminated. The owner must reimburse the PHA for any subsidies paid in error by the PHA for any period after the contract termination date.

After a contract termination, if the family meets the criteria for a move with continued assistance, the family may lease-up in another unit. The contract for the new unit may begin during the month that the family moved from the old unit.

B. TERMINATION BY THE FAMILY: MOVES [§ 24 CFR 982.314(c)(2)]

Family termination of the lease must be in accordance with the terms of the lease.

C. TERMINATION OF TENANCY BY THE OWNER: EVICTIONS [§ 24 CFR 982.310, 982.455]

If the owner wishes to terminate the lease, the owner must provide proper notice as stated in the lease.

During the term of the lease, the owner may not terminate tenancy except for the grounds stated in the HUD regulations.

During the term of the lease, the owner may only evict for:

1. Serious or repeated violations of the lease, including but not limited to failure to pay rent or other amounts due under the lease or repeated violation of the terms and conditions of the lease;

2. Violations of federal, state or local law that imposes obligations on the tenant in connection with the occupancy or use of the premises; or criminal activity by the tenant, any member of the household, a guest or another person under the tenant's control that threatens the health, safety or right to peaceful enjoyment of the premises by the other

residents or persons residing in the immediate vicinity of the premises or any drug-related criminal activity on or near the premises.

3. Other good cause.

During the initial term of the lease, the owner may not terminate the tenancy for "other good cause" unless the owner is terminating the tenancy because of something the family did or failed to do.

Evidence of Criminal Activity

The owner may terminate tenancy and evict a family by judicial action for criminal activity by a covered person if the owner determines that the covered person has engaged in the criminal activity:

1. Regardless of arrest or conviction

2. Without satisfying the standard of proof used for a criminal conviction.

Termination of Tenancy Decisions

If the law and regulation permit the owner to take an action but do not require action to be taken, the owner can decide whether to take the action. Relevant circumstances for consideration include:

1. The seriousness of the offense

2. The effect on the community

3. The extent of participation by household members

4. The effect on uninvolved household members

5. The demand for assisted housing by families who will adhere to responsibilities

6. The extent to that the leaseholder has shown personal responsibility and taken all reasonable steps to prevent or mitigate the offending action

7. The effect on the integrity of the program.

Exclusion of Culpable Household Member

The owner may require a tenant to exclude a household member in order to continue to reside in the assisted unit.

Consideration of Rehabilitation

When determining whether to terminate tenancy for illegal drug use or alcohol abuse, the owner may consider whether the member:

1. Is no longer participating in the activity

2. Has successfully completed a supervised drug or alcohol rehabilitation program

3. Has otherwise been successfully rehabilitated

The owner may require the tenant to submit evidence of any of the three actions listed above. Termination by the owner must be consistent with fair housing and equal opportunities as stated in § 24 CFR 5.105.

The owner must provide the tenant with a written notice specifying the grounds for termination of tenancy, at or before the commencement of the eviction action. The notice may be included in or may be combined with, any owner eviction notice to the tenant.

The owner eviction notice means a notice to vacate, a complaint, or other initial pleading used under state or local law to commence an eviction action.

Housing assistance payments are paid to the owner under the terms of the HAP contract. If the owner has begun eviction and the family continues to reside in the unit, the PHA must continue to make housing assistance payments to the owner until the owner has obtained a court judgment or other process allowing the owner to evict the tenant.

The PHA must continue making housing assistance payments to the owner in accordance with the contract as long as the tenant continues to occupy the unit and the contract is not violated. By endorsing the monthly check from the PHA, the owner certifies that the tenant is still in the unit that the rent is reasonable and that the tenant complies with the contract.

If an eviction is not due to a serious or repeated violation of the lease and if the PHA has no other grounds for termination of assistance, the PHA may issue a new voucher so that the family can move with continued assistance.

D. TERMINATION OF THE CONTRACT BY PHA [§ 24 CFR 982.404(a), 982.453, 982.454, 982.552(a)(3), 982.455]

The term of the HAP contract terminates when the lease terminates, when the PHA terminates program assistance for the family or when the owner has breached the HAP contract (*see Chapter 16 of this Administrative Plan, "Owner Disapproval and Restriction"*).

Termination Due to Abatement of Unit

The PHA will terminate the HAP contract thirty calendar days after the unit goes into abatement and the tenant will be issued a voucher to move. If the owner makes the required repairs after the HAP contract has been terminated, a new HAP contract and lease will be required for the family to remain.

The PHA may also terminate the contract if:

1. The family is required to move from a unit when the unit does not meet the HQS space standards because of an increase in family size or a change in family composition.

2. Funding is no longer available under the ACC.

The contract will terminate automatically if one-hundred eighty calendar days have passed since the last housing assistance payment has been made to the owner.

Termination of Assistance Due to Lack of Funding

The PHA may terminate the HAP contract in accordance with HUD requirements, if the PHA determines that funding under the consolidated ACC is insufficient to support continued assistance for families in the program (*§ 24 CFR 982.454*)

When funding under the consolidated ACC is insufficient, the PHA may take the following steps:

1. The PHA will determine if there are any other non-Section 8 Housing Assistance Payment (*HAP*) financial resources available to continue housing assistance on behalf of families currently subsidized and whether those resources should be utilized.

2. In the event ACC funding is insufficient and other financial resources are not available or a decision has been made not to utilize them,

    a. the PHA will determine the number of families that must be terminated using a "last on, first off" methodology.

    b. Households selected will receive a minimum of a thirty-calendar day notice of termination of assistance.

    c. Terminated families will be returned to the HCV waiting list in reverse order to that that they were removed. These families will receive first preference for vouchers from the waiting list.

When Section 8 funding becomes sufficient, families receiving subsidy through non-Section 8 funding will be reinstated first, before any assistance being offered to applicants on the waiting list.

Notice of Termination

When the PHA terminates the HAP contract under the violation of HQS space standards, the PHA will provide the owner and family written notice of termination of the contract and the HAP contract terminates at the end of the calendar month that follows the calendar month that the PHA gives such notice to the owner.

Chapter 15 DENIAL OR TERMINATION OF ASSISTANCE [§ 24 CFR 5.902, 5.903, 5.905, 982.4, 982.54, 982.552, 982.553]

INTRODUCTION

The PHA may deny or terminate assistance for a family because of the family's action or failure to act. The PHA will provide families with a written description of the family obligations under the program, the grounds under which the PHA can deny or terminate assistance and the PHA's informal hearing procedures. This chapter describes when the PHA is required to deny or terminate assistance and the PHA's policies for the denial of a new commitment of assistance and the grounds for termination of assistance under an outstanding HAP contract.

A. GROUNDS FOR DENIAL OR TERMINATION [§ 24 CFR 982.54, 982.552, 982.553 982.455]

If denial or termination is based on behavior resulting from a disability, the PHA may delay the denial or termination in order to determine if there is an accommodation that would negate the behavior resulting from the disability upon written request.

Form of Denial or Termination

Denial of assistance for an applicant may include any or all of the following:

1. Denial of placement on the PHA waiting list;
2. Denying or withdrawing a voucher;
3. Refusing to enter into a HAP contract or approve tenancy;
4. Refusing to process or provide assistance under portability procedures.

Termination of assistance for a participant may include any or all of the following:

1. Refusing to enter into a HAP contract or approve tenancy;
2. Terminating housing assistance payments under an outstanding HAP contract; and
3. Refusing to process or provide assistance under portability procedures.

Mandatory Denial and Termination [§ 24 CFR 982.54(d), 982.552(b), 982.553(a), 982.553(b)]

The PHA must deny assistance to applicants and terminate assistance to program participants convicted of manufacturing or producing methamphetamine on the premises of federally assisted housing.

The PHA must deny admission to the program for applicants and terminate assistance for program participants if the PHA determines that any household member is currently engaging in illegal use of a drug. (*See Section B of this Chapter for the PHA's established standards*.)

The PHA must deny admission to the program for applicants and terminate assistance for program participants if the PHA determines that it has reasonable cause to believe that a household member's illegal drug use or a pattern of illegal drug use may threaten the health, safety or right to peaceful enjoyment of the premises by other residents (*see Section B of this Chapter for the PHA's established standards*).

The PHA must deny admission to the program for applicants if the PHA determines that any member of the household is on a governmental sex offender registry (*see Section B of this Chapter for the PHA's established standards regarding criminal background investigation and determining whether a member of the household is on a governmental sex offender registry*)**.**

The PHA must terminate program assistance for a family evicted from housing assisted under the voucher program for serious violation of the lease.

The PHA must deny admission to the program for an applicant or terminate assistance for a program participant if any member of the family fails to sign and submit consent forms for obtaining information in accordance with Part 5, subparts B and F.

The PHA must deny admission to the program for applicants or terminate program assistance when required under the regulations to establish citizenship or eligible immigration status.

Grounds for Denial or Termination of Assistance [§ 24 CFR 982.552(c)]

The PHA may deny program assistance for an applicant or terminate program assistance for a participant for any of the following reasons:

1. The family violates any family obligation under the program as listed in § 24 CFR 982.551.

2. Any family member violates the family obligation under § 24 CFR 982.551 not to engage in any drug-related activity.

3. Any family member violates the family obligation under § 24 CFR 982.551 not to engage in any violent criminal activity (*See Chapter 21 of this Administrative Plan, "Program Integrity Addendum", for specific procedure*).

4. Any family member has been evicted from federally assisted housing or a federal housing assistance program in the last three years.

5. Any PHA has ever terminated assistance under the program for any member of the family.

6. Any family member commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program.

7. The family refuses to enter into a repayment agreement because of monies owed due to a program violation.

8. The family currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.

9. The family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease.

10. The family breaches an agreement with a PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA. At its discretion, the PHA may offer the family the opportunity to enter into a repayment agreement. The PHA will prescribe the terms of the agreement (*see Chapter 17 of this administrative plan, "Owner or Family Debts to the PHA"*).

11. The family participating in an FSS program fails to comply, without good cause, with the family's FSS contract of participation.

12. Any member of the family engages in drug or alcohol abuse that interferes with the health, safety or peaceful enjoyment of other residents (*see section B of this chapter*).

13. Any member of the family commits drug-related criminal activity or violent criminal activity (see section B of this chapter and 982.553 of the regulations).

14. The family has threatened or engaged in abusive or violent behavior toward PHA personnel. "Threatening" refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence. "Abusive or violent behavior towards PHA personnel" includes verbal as well as physical abuse or violence. Use of expletives that are generally considered insulting, racial epithets, or other language, written or oral, that is customarily used to insult or intimidate may be cause for termination or denial.

15. Actual physical abuse or violence of PHA personnel is cause for termination.

Refer to Chapter 2 of this administrative plan, "Eligibility for Admission," at section F, "Other Criteria for Admissions," for further information

B. SCREENING AND TERMINATION FOR DRUG ABUSE AND OTHER CRIMINAL ACTIVITY

Purpose

All federally assisted housing is intended to provide a place to live and raise families, not a place to commit crime, to use or sell drugs or terrorize neighbors. It is the intention of the State of Connecticut Department of Housing to fully endorse and implement a policy that is designed to:

1. Help create and maintain a safe and drug-free community;

2. Keep our program participants free from threats to their personal and family safety;

3. Support parental efforts to instill values of personal responsibility and hard work;

4. Help maintain an environment where children can live safely, learn and grow up to be productive citizens; and

5. Assist families in their vocational/educational goals in the pursuit of self-sufficiency.

Administration

All screening procedures shall be administered fairly and in such a way as to not violate rights to privacy or discriminate based on race, color, nationality, religion, familial status, disability, gender or other legally protected groups.

This policy will be posted on the PHA's bulletin board and copies made readily available to applicants and participants upon request.

Screening of Applicants

In an effort to prevent future drug-related and other criminal activity, as well as other patterns of behavior that pose a threat to the health, safety or right to peaceful enjoyment of the premises by other residents and as required by Notice 96-27, the PHA will endeavor to screen applicants as thoroughly and fairly as possible.

Such screening will apply to any member of the household who is 18 years of age or older or who is an emancipated minor.

HUD Definitions

Covered person, for purposes of § 24 CFR Part 982 and this chapter, means a tenant, any member of the tenant's household, a guest or another person under the tenant's control.

Drug means a controlled substance as defined in section 102 of the Controlled Substances Act (*21 U.S.C. 802*).

Drug-related criminal activity means the illegal manufacture, sale, distribution or use of a drug or the possession of a drug with intent to manufacture, sell, distribute or use the drug.

Guest, for purposes of this Chapter and § 24 CFR part 5, subpart A and § 24 CFR Part 982, means a person temporarily staying in the unit with the consent of a tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant. The requirements of part 982 apply to a guest as so defined.

Household, for the purposes of § 24 CFR Part 982 and this chapter, means the family and any PHA-approved live-in aide(s).

Other person under the tenant's control, for the purposes of the definition of covered person, for § 24 CFR Parts 5 and 982 and for this chapter, means that the person, although not staying as a guest (*as defined in this chapter*) in the unit, is (*or was at the time of the activity in question*) on the premises because of an invitation from the tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant. Absent evidence to the contrary, a person temporarily and infrequently on the premises solely for legitimate commercial purposes is not under the tenant's control.

Violent criminal activity means any criminal activity that has as one of its elements the use, attempted use or threatened use of physical force substantial enough to cause or be reasonably likely to cause, serious bodily injury or property damage.

Standard for Violation

The PHA will deny participation in the program to applicants and terminate assistance to participants in cases where the PHA determines there is probable cause to believe that a household member is illegally using a drug or if the person abuses alcohol in a way that may interfere with the health, safety or right to peaceful enjoyment of the premises by other residents, including cases where the PHA determines that there is a pattern of illegal use of a drug or a pattern of alcohol abuse.

Engaged in or engaging in violent criminal activity means any act within the past three years by an applicant or participant or household member that involved criminal activity that has as one of its elements the use, attempted use or threatened use of physical force substantial enough to cause or be reasonably likely to cause, serious bodily injury or property damage that resulted in the conviction of the applicant, participant or household member.

In evaluating evidence of negative past behavior, the PHA will give fair consideration to the seriousness of the activity with respect to how it would affect other residents and/or the likelihood of favorable conduct in the future that could be supported by evidence of rehabilitation.

Denial of Assistance to Applicants

The PHA shall deny program assistance for an applicant due to a variety of reasons.

Applicants and their household members with a criminal history may not participate in the Housing Choice Voucher Program for the following time frames because of information obtained through criminal history reports:

1. Denied admission for a minimum of three (3) years from the date of a court ordered sentence/fine, including probation, if applicable or court ordered or voluntary rehabilitation program as evidenced by proper certification:

    a. Persons evicted or terminated from any federally-funded housing because of a drug related criminal activity for personal use or possession from the date of such eviction/termination;

    b. Persons applying for assisted housing who have been involved in drug-related criminal activity for the personal use or possession for personal use (exclusive of the illegal manufacture, sale, distribution, or possession with intent to manufacture, sell and distribute) from the date of such activity;

2. Denied admission for a minimum of five (5) years from the date of a court ordered sentence/fine, including probation, if applicable or court ordered or voluntary rehabilitation program as evidenced by proper certification:

    a. Intentionally misrepresenting income

    b. Intentionally misrepresenting family composition

    c. Any other intentional misrepresentation of information that affects eligibility.

    d. Violent criminal activity

    e. Any violent criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against a person or property, and the activity if being engaging in by any family member.

    f. Persons evicted or terminated from any federally-funded housing because of drug –related criminal activity for the illegal manufacture, sale, distribution or possession with the intent to manufacture, sell, or distribute.

    g. Persons who have been convicted or have a history of drug-related criminal activity for the illegal manufacture, sale, distribution, or possession with the intent to manufacture, sell or distribute.

3. Denied admission for a minimum of ten (10) years from the date of conviction for

    a. Acts that would constitute fraud in connection with any State or Federal Assistance programs.

b. Criminal activity involving crimes of violence against people (*e.g. murder, battery, assault*).

4. Permanent denial of admission:

a. Previous conviction of any family member for manufacture or production of methamphetamine (speed) on the premises of an assisted housing project in violation of any Federal or State law.

b. No family member may be subject to a governmentally imposed lifetime sex offender registration requirement.

Exceptions to the Drug-Related Criminal Activity admission denials

Ineligibility for Admission if Evicted for Drug-Related Activity

Persons evicted from federally assisted housing because of drug-related criminal activity are ineligible for admission to the Section 8 program for a three year period beginning on the date of such eviction.

However, the household may be admitted if, after considering the individual circumstances of the household, the PHA determines that:

1. The evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program approved by the PHA, or

2. The circumstances leading to eviction no longer exist because the criminal household member has died or is imprisoned.

Denial of Assistance for Sex Offenders

The PHA will deny admission if any member of the household is on a governmental sex offender registry. In screening applicants, the PHA will perform criminal history background checks to determine whether any household member is on a governmental sex offender registry.

Disputes or conflicts concerning the applicability of a member of the household being on a governmental sex offender registry must be resolved by the family.

Termination of Assistance for Participants

Termination of Assistance for Drug-Related Criminal Activity or Violent Criminal Activity:

Under the family obligations listed at § 24 CFR 982.551, the members of the household must not engage in drug-related criminal activity or violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises. HUD regulations at § 24 CFR 982.553(b) requires the PHA to establish standards for termination of assistance when this family obligation is violated. The PHA has established the following standards for termination of assistance for the family when a household member has violated the family obligation to refrain from participating in drug-related or violent criminal activity:

1. Assistance will be terminated for participants who have been engaged in/ or convicted of drug-related or violent criminal activity during participation in the program or who have been evicted from a unit assisted under any federally assisted housing program within the last three years before the date of the notice to terminate assistance.

2. If any member of the household violates the family obligations by engaging in drug-related or violent criminal activity, the PHA will terminate assistance.

3. In appropriate cases, the PHA may permit the family to continue receiving assistance if family members determined to have engaged in the proscribed activities will not reside in the unit. If the violating member is a minor, the PHA may consider individual circumstances with the advice of juvenile court officials.

4. The PHA will waive the requirement regarding drug-related criminal activity if the person demonstrates successful completion of a credible rehabilitation program approved by the PHA or the circumstances leading to the violation no longer exist because the person who engaged in drug-related criminal activity or violent criminal activity is no longer in the household due to death or incarceration.

Participation in illegal drug or violent criminal activity.

Termination for other than criminal conviction.

If the PHA moves to terminate for a violation of this nature the following evidence and testimony must presented by the PHA at the hearing.

1. A detailed police report outlining the nature of the arrest

2. The direct testimony of the arresting officer or any officer who was a party to the arrest and/or

3. Direct testimony by another party who was witness to the violation, (*i.e., owner, neighbor, etc.*) who can corroborate the specific violation in relation to the arrest.

4. Any other evidence to substantiate the violation.

Termination for conviction.

If the PHA moves to terminate for a violation of this nature one or more of the following should be presented at the hearing.

1. A court document outlining the specific offense and resulting conviction.

2. Department of Corrections incarceration record indicating the nature of the offense that resulted in incarceration and/ or probation.

3. Any other documentation that can attest to the conviction.

Terminating Assistance for Alcohol Abuse by Household Members

Under the family obligations listed at § 24 CFR 982.551, the members of the household must not abuse alcohol in a way that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises. Assistance will be terminated due to violation of a family obligation if the PHA determines that a member of the household has demonstrated a pattern of alcohol abuse that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises.

In appropriate cases, the PHA may permit the family to continue receiving assistance if household members determined to have engaged in the proscribed activities will not reside in the unit. If the violating member is a minor, the PHA may consider individual circumstances with the advice of juvenile court officials.

Required Evidence (Standard of Proof)

Preponderance of evidence is defined as evidence that is of greater weight or more convincing than the evidence that is offered in opposition to it; that is, evidence that as a whole shows that the fact sought to be proved is proven more probable than not. The intent is not to prove criminal liability, but to establish that the act(s) occurred. Preponderance of evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Credible evidence may be obtained from police and/or court records. Testimony from neighbors, when combined with other factual evidence, can be considered credible evidence. Other credible evidence includes documentation of arrest warrants and/or drug raids.

Confidentiality of Criminal Records

The PHA will ensure that any criminal record received is maintained confidentially, not misused or improperly disseminated and destroyed once the purpose that it was requested is accomplished.

C. FAMILY OBLIGATIONS [§ 24 CFR 982.551]

The family must supply any information that the PHA or HUD determines is necessary in the administration of the program, including submission of required evidence of citizenship or eligible immigration status (*as provided by § 24 CFR 982.551*). "Information" includes any requested certification, release or other documentation.

1. The family must supply any information requested by the PHA or HUD for use in a regularly scheduled re-examination or interim re-examination of family income and composition in accordance with HUD requirements.

2. The family must disclose and verify Social Security numbers (*as provided by § 24 CFR 5.216*) and must sign and submit consent forms for obtaining information in accordance with § 24 CFR 5.230.

3. All information supplied by the family must be true and complete.

4. The family is responsible for an HQS breach caused by the family as described in 982.404(b).

5. The family must allow the PHA to inspect the unit at reasonable times and after reasonable notice.

6. The family may not commit any serious or repeated violations of the lease.

7. The family must notify the owner and, at the same time, notify the PHA before the family moves out of the unit or terminates the lease upon notice to the owner.

8. The family must give the PHA a copy of any owner eviction notice within thirty calendar days of its receipt.

9. The family must use the assisted unit for residence by the family. The unit must be the family's only residence.

10. The composition of the assisted family residing in the unit must be approved by the PHA. The family must inform the PHA of the birth, adoption or court-awarded custody of a child within thirty calendar days. The family must request PHA approval to add any other family member as an occupant of the unit.

11. The family must notify the PHA if any family member no longer resides in the unit within thirty calendar days.

12. If the PHA has given approval, a foster child or a live-in aide may reside in the unit. If the family does not request approval or PHA approval is denied, the family may not allow a foster child or live-in aide to reside with the assisted family.

13. Members of the household may engage in legal profit-making activities in the unit, but only if such activities are incidental to primary use of the unit as a residence by members of the family.

14. The family must not sublease or let the unit.

15. The family must not assign the lease or transfer the unit.

16. The family must supply any information or certification requested by the PHA to verify that the family is living in the unit or relating to family absence from the unit, including any PHA-requested information or certification on the purposes of family absences. The family must cooperate with the PHA for this purpose. The family must notify the PHA of absence from the unit within thirty calendar days.

17. The family must not own or have any interest in the unit.

18. The members of the family must not commit fraud, bribery or any other corrupt or criminal act in connection with the Section 8 HCV program.

19. The household members may not engage in drug-related criminal activity or violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises.

20. The members of the household must not abuse alcohol in a way that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises.

21. An assisted family or members of the family may not receive Section 8 tenant-based assistance while receiving another housing subsidy, for the same unit or for a different unit, under any federal, state or local housing assistance program determined by HUD or in accordance with HUD requirements to be duplicative.

Housing Authority Discretion [§ 24 CFR 982.552(c)]

In deciding whether to deny or terminate assistance because of action or failure to act by members of the family, the PHA has discretion to consider all of the circumstances in each case, including the seriousness of the case. The PHA may use its discretion in reviewing the extent of participation or culpability of individual family members and the length of time since the violation occurred. The PHA may also review the family's recent history and record of compliance and the effects of denial or termination of assistance on other family members who were not involved in the action or failure to act.

The PHA may impose, as a condition of continued assistance for other family members, a requirement that family members who participated in or were culpable for the action or failure

to act will not reside in the unit. The PHA may permit the other members of a family to continue in the program.

Enforcing Family Obligations – Explanation and Terms

Denial or termination of assistance is always optional except where this plan or the regulations state otherwise.

HQS Breach: The PHA will determine if an HQS breach as identified in § 24 CFR 982.404 (b) is the responsibility of the family. Families may be given extensions by the PHA to cure HQS breaches**.**

Lease Violations: The following criteria will be used to decide if a serious or repeated violation of the lease has occurred that will result in termination of assistance:

1. If the owner terminates tenancy through court action for serious or repeated violation of the lease.

2. If there are police reports, neighborhood complaints or other third party information that has been verified by the PHA.

Proposed Additions to the Family: The PHA will deny a family's request to add additional family members who are:

1. Persons who have been evicted from public housing within the past three years.

2. Persons who have previously violated a family obligation listed in § 24 CFR 982.551 of the HUD regulations.

3. Persons who have committed drug-related criminal activity or violent criminal activity within the past three years.

4. Persons who commit fraud, bribery or any other corrupt or criminal act in connection with any federal housing program.

5. Persons who currently owe rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.

6. Persons who have engaged in or threatened abusive or violent behavior toward PHA personnel.

Family Members Move Out: Families are required to notify the PHA if any family member leaves the assisted household. When the family notifies the PHA, they must furnish the following information.

1. The date the family member moved out.

2. The new address, if known, of the family member.

3. A statement as to whether the family member is temporarily or permanently absent.

Limitation on Profit-Making Activity in Unit:

1. If the business activity area results in the inability of the family to use any of the critical living areas, such as a bedroom (*utilized for a business*) that is not available for sleeping, it will be considered a violation.

2. If the PHA determines that the use of the unit as a business is not incidental to its use as a dwelling unit, it will be considered a violation.

3. If the PHA determines the business is not legal, it will be considered a violation.

Interest in Unit: The owner may not reside in the assisted unit regardless of whether she or he is a member of the assisted family, unless the family owns the mobile home and rents the pad under the voucher program.

Fraud: In each case, the PHA will consider that family members were involved, the circumstances and any hardship that might be caused to innocent members.

Use of Social Media: Evidence of a violation of family obligations obtained solely from social media sources, without further corroboration, shall not be used as sole grounds for termination. If information is obtained from social media, it should be confirmed and supported by further additional evidence.

In the event of false citizenship claims (*refer to section D, below*)

D. PROCEDURES FOR NON-CITIZENS [§ 24 CFR 5.514, 5.516, 5.518]

Denial or Termination due to Ineligible Immigrant Status

Applicant or participant families that all members are neither U. S. citizens nor eligible immigrants are not eligible for assistance and must have their assistance terminated. The PHA must offer the family an opportunity for a hearing (*see Chapter 2 of this Administrative Plan, "Eligibility for Admissions," at section E, "Citizenship/Eligible Immigration Status"*).

Assistance may not be terminated while verification of the participant family's eligible immigration status is pending.

False or Incomplete Information

If the individual is unable to verify his or her citizenship, the PHA will give him/her an opportunity to provide a new declaration as an eligible immigrant or an opportunity to elect not to contend his or her status.

The PHA will then verify eligible status, deny, terminate or pro-rate as applicable**.**

The PHA will deny or terminate assistance based on the submission of false information or on misrepresentation.

Procedure for Denial or Termination

If the family (*or any member*) claimed eligible immigrant status and the CIS primary and secondary verifications failed to document the family status, the family may make an appeal to the CIS and request a hearing with the PHA either after the CIS appeal or in lieu of the CIS appeal.

After the PHA has made a determination of ineligibility, the family will be notified of the determination and the reasons and informed of the option for pro-rated assistance (*if applicable*).

E. ZERO ASSISTANCE TENANCIES

HAP Contracts On or After 10/2/95 [§ 24 CFR 982.455 (a)]

The family may remain in the unit at zero assistance for up to one-hundred eighty calendar days after the last HAP payment. If the family is still in the unit after one-hundred eighty calendar days, the assistance will be terminated. If, within the one-hundred eighty calendar day period, an owner rent increase or a decrease in the total tenant payment causes the family to be eligible for a housing assistance payment, the PHA will resume assistance payments for the family.

In order for a family to move to another unit during the one-hundred eighty calendar days, the rent for the unit would have to be high enough to necessitate a housing assistance payment.

F. MISSED APPOINTMENTS AND DEADLINES [§ 24 CFR 982.551, 982.552 (c)]

It is a family obligation to supply information, documentation and certification as needed for the PHA to fulfill its responsibilities. The PHA schedules appointments and sets deadlines in order to obtain the required information. The obligations also require that the family allow the PHA to inspect the unit and appointments are made for this purpose.

An applicant or participant who fails to keep an appointment or fails to supply information required by a deadline without notifying the PHA may be sent a notice of denial or termination of assistance for failure to allow the PHA to inspect the unit or for failure to provide required information.

The family will be given information about the requirement to keep appointments and the number of times appointments will be re-scheduled, as specified in this plan.

Appointments will be scheduled and time requirements will be imposed for the following events and circumstances:

1. Eligibility for Admissions;

2. Verification Procedures;

3. Voucher Issuance and Briefings;

4. Housing Quality Standards and Inspections;

5. Re-examinations; and

6. Appeals.

Acceptable reasons for missing appointments or failing to provide information by deadlines are:

1. Medical emergency;

2. Incarceration;

3. Family emergency; and

4. Work resulting from training obligations.

Procedure When Inspection Appointments Are Missed or Information Is Not Provided

For most purposes in this plan, the family will be given two opportunities to keep an inspection appointment or to provide inspection related information before being issued a notice of termination or denial for breach of a family obligation.

An inspection appointment shall be considered "missed" when the family has not contacted the PHA or its designee at least two hours before the proposed start time of the appointment. If contact is made within the prescribed time, then the missed appointment shall be considered rescheduled. A family will be allowed to reschedule twice. When a family reschedules a third time, it shall be considered a missed appointment. After two missed appointments, a notice of termination or denial for breach of a family obligation shall be issued.

After issuance of the termination notice, if the family corrects the breach within the time allowed for requesting a hearing, the notice will be rescinded if the family subsequently fulfills the attendance requirement for an inspection appointment or provides inspection-related information and the family does not have a history of non-compliance

Chapter 16 OWNER DISAPPROVAL AND RESTRICTION [§ 24 CFR 982.54, 982.453]

INTRODUCTION

It is the policy of the PHA to recruit owners to participate in the voucher program. The PHA will provide owners with prompt and professional service in order to maintain an adequate supply of available housing throughout the jurisdiction of the PHA. The regulations define when the PHA must disallow owner participation in the program and they provide the PHA discretion to disapprove or otherwise restrict the participation of owners in certain categories. This chapter describes the criteria for owner disapproval and the various penalties for owner violations.

A. DISAPPROVAL OF OWNER [§ 24 CFR 982.306, 982.54(d)(8)]

The owner does not have a right to participate in the program. For purposes of this section, the term "owner" includes a principal or other interested party.

The PHA will disapprove the owner for the following reasons:

1. HUD or another agency directly related has informed the PHA that the owner has been disbarred, suspended or subject to a limited denial of participation under § 24 CFR part 24.

2. HUD has informed the PHA that the federal government has instituted an administrative or judicial action against the owner for violation of the Fair Housing Act or other federal equal opportunity requirements and that such action is pending.

3. HUD has informed the PHA that a court or an administrative agency has determined that the owner violated the Fair Housing Act or other federal equal opportunity requirements.

4. Unless their lease was effective before June 17, 1998, the owner may not be a parent, child, grandparent, grandchild, sister or brother of any family member. The PHA will waive this requirement as a reasonable accommodation for a family member who is a person with a disability.

5. In cases where the owner and tenant bear the same last name, the PHA at its discretion, may require the family and/or the owner to certify whether they are related to each other in any way.

6. The owner has violated obligations under a housing assistance payments contract under Section 8 of the 1937 Act (*42 U.S.C. 1437f*).

7. The owner has violated any obligation under the HAP contract for the dwelling unit, including the owner's obligations to maintain the unit to HQS, including any standards the PHA has adopted in this policy.

8. The owner has committed fraud, bribery or any other corrupt act in connection with any federal housing program.

9. The owner has engaged in drug-related criminal activity or any violent criminal activity.

10. The owner has a history or practice of non-compliance with the HQS for units leased under the tenant-based programs or with applicable housing standards for units leased with project-based Section 8 assistance or leased under any other federal housing program.

11. The owner has a history or practice of renting units that fail to meet state or local housing codes.

12. The owner has failed to comply with regulations, the mortgage, note or the regulatory agreement for projects with mortgages insured by HUD or loans made by HUD.

B. OWNER RESTRICTIONS AND PENALTIES [§ 24 CFR 982.453]

If an owner commits or has committed fraud, abuse or is guilty of frequent or serious contract violations, the PHA will restrict the owner from future participation in the program for a period commensurate with the seriousness of the offense. The PHA may also terminate some or all contracts with the owner.

Before imposing any penalty against an owner, the PHA will review all relevant factors pertaining to the case and will consider such factors as the owner's record of compliance and the number of violations.

See the Program Integrity Addendum for guidance as to how owner fraud will be handled.

C. CHANGE IN OWNERSHIP

A change in ownership does not require the execution of a new contract however, a new HAP contract and lease must be executed upon the tenant's reexamination date.

The PHA will process a change of ownership only upon the written request of the new owner and only if accompanied by a copy of the escrow statement or other document showing the transfer of title and the Federal Employee Identification Number or Social Security Number of the new owner.

If the new owner does not want an assignment of the contract, the PHA will terminate the HAP contract with the old owner, since she or he is no longer the owner. The new owner may offer the family a new assisted lease. The family may elect to enter into the new lease or move to another unit.

Chapter 17 OWNER OR FAMILY DEBTS TO THE PHA [§ 24 CFR 982.552]

INTRODUCTION

This chapter describes the PHA's policies for the recovery of monies that have been overpaid to owners on behalf of families. It describes the methods that will be utilized for the collection of monies and the guidelines for different types of debts. It is the PHA's policy to meet the informational needs of owners and families and to communicate the program rules in order to avoid an owner or a family incurring debt due to PHA overpayment. Before a debt is assessed against a family or owner, the family file must contain documentation to support the PHA's claim that the debt is owed. The file must further contain written documentation of the method of calculation, in a clear format for review by the owner, the family or other interested parties.

When families or owners owe money to the PHA, the PHA will make every effort to collect the debt. The PHA will use a variety of collection tools to recover debts including, but not limited to:

1. Requests for lump sum repayments;
2. Repayment agreements;
3. Suspensions of housing assistance payments;
4. Reductions of housing assistance payments;
5. Referral to the Department of Housing that may employ the following additional collection tools
    a. Credit agency reporting
    b. Seizure of personal assets accounts
    c. Lien of personal property

A. REPAYMENT AGREEMENT FOR FAMILIES [§ 24 CFR 982.552 (c)(v-vii)]

A repayment agreement as used in this plan is a document signed by both parties outlining an agreement entered into between the PHA and a person who owes a debt to the PHA. It is similar to a promissory note, but contains more details regarding the nature of the debt, the terms of repayment, any special provisions of the agreement and the remedies available to the PHA upon default of the agreement.

The terms of this repayment agreement will not exceed 60 months.

Only two repayment agreements within a rolling sixty months will be permitted.

If a third incident occurs that requires a third repayment, the family must repay the entire amount due or a notice of termination or denial for breach of a family obligation shall be issued.

B. DEBTS DUE TO PROGRAM FRAUD AND ABUSE [§ 24 CFR 982.163]

Program fraud and abuse is defined as a single act or a pattern of actions that constitutes false statement, omission or concealment of a substantive fact, made with intent to deceive or mislead and that results in overpayment of Section 8 Program funds.

The PHA will enter into a repayment agreement with the family (*see Section E*) if the HAP overpayment is under five-thousand dollars. Program assistance will be terminated for families when the HAP overpayment exceeds five-thousand dollars**.** The PHA will use the following collection tools to attempt to recover debts including but not limited to:

1. Requests for lump sum repayments

2. Repayment agreements

HAP overpayments in excess of five-thousand dollars will be referred to the Department of Housing for collection. That department will use a variety of collection methods to collect the debt or may allow for execution of a repayment agreement.

C. DEBTS DUE TO MINIMUM RENT TEMPORARY HARDSHIP

If the family owes the PHA money for rent arrearages incurred during the minimum rent period, the PHA will calculate the total amount owed to arrive at a reasonable payback amount that the family will be required to pay to the PHA monthly in addition to the family's regular monthly rent repayment to the owner. The family will be required to pay the increased amount until the arrearage is paid in full to the PHA.

The term of this repayment agreement will not exceed 60 months.

If the family defaults on a repayment agreement during a minimum rent period, the PHA will re-evaluate the family's financial situation and determine whether the family has the ability to pay the increased rent amount and, if not, restructure the existing repayment agreement.

D. GUIDELINES FOR REPAYMENT AGREEMENTS [§ 24 CFR 982.552 (c)(v-vii)]

The PHA shall use its judgment and shall negotiate individual agreements with families. The negotiated agreement shall include a mutually acceptable initial payment, all subsequent payments and a term of repayment that may not exceed 60 months (*five years*). As a standard, the length of repayment agreements shall reflect the amount to be repaid and, when possible, shall not cause the family to pay more than forty-five percent of its income in rent and repayment.

Repayment agreements will only be executed between the PHA and the head of household or another household member who is at least eighteen years of age.

Repayments may only be made by money order, cashier's check and personal check. The PHA has the right to refuse personal checks for cause.

A repayment will be considered to be in arrears if the payment is not received within ten business days after the due date.

If the family has an existing indebtedness to the PHA and incurs an additional debt to the PHA, the additional indebtedness will be consolidated with the existing indebtedness and a new repayment agreement shall be executed.

If the family requests a move to another unit and has a repayment agreement in place and the repayment agreement is not in arrears, the family will be permitted to move.

If the family requests a move to another unit and is in arrears on a repayment agreement, they will be permitted to move, if they pay the past due amount.

The amount of the monthly repayments may be decreased in cases of family hardship if requested with reasonable notice from the family, verification of the hardship and the approval of the PHA**.**

Any monthly repayment amounts that are deferred, for a financial hardship, shall extend the repayment agreement for an equivalent number of months. Only in this instance may the repayment agreement be extended beyond the 60 month maximum period.

E. OWNER DEBTS TO THE PHA [§ 24 CFR 982.453(b)]

If the PHA determines that the owner has retained housing assistance or repayments to that the owner is not entitled, the PHA may reclaim the amounts from future housing assistance repayments owed to the owner for any unit or units under contract.

If future housing assistance or repayments are insufficient to reclaim the amount owed, the PHA will:

1. Enter into a repayment agreement with the owner for the amount owed or

2. Restrict the owner from future participation.

F. WRITING OFF DEBTS

Debts will be written off in the following manner:

1. For debts under two-thousand dollars,

a. The debtor's whereabouts are unknown, and

b. the debt is more than three years old, or

2. For debts of two-thousand dollars but less than five-thousand dollars,

a. The debtor's whereabouts are unknown, and

b. The debt is more than five years old, or

3. For debts of five-thousand dollars but less than ten-thousand dollars,

a. The debtor's whereabouts are unknown, and

b. The debt is more than seven years old

Debts, regardless of amount, shall be written off if the debtor is deceased.

All outstanding debts owed by an applicant, or any member of the applicant's household, shall be fully discharged before they may be selected for a voucher.

Chapter 18 COMPLAINTS AND APPEALS

INTRODUCTION

The informal hearing requirements defined in HUD regulations are applicable to participating families who disagree with an action, decision or inaction of the PHA (*note that the terms "hearing" and "informal hearing" shall be used interchangeably throughout this chapter*). This chapter describes the policies, procedures and standards to be used when families disagree with a PHA decision. The procedures and requirements for preference denial meetings, informal reviews and hearings are explained. It is the policy of the PHA to ensure that all families have the benefit of all protections due them under the law.

A. COMPLAINTS TO THE PHA

The PHA will respond to complaints from families, owners, employees and members of the public in thirty calendar days. All complaints will be documented. The PHA may require that complaints other than HQS violations/those concerning housing quality standards or HQS be put in writing. HQS complaints may be reported by telephone.

Categories of Complaints

1. Complaints from families:

    a. If a family disagrees with an action or inaction of the PHA or owner.

    b. Complaints from families will be referred to the supervisor.

2. Complaints from owners:

    a. If an owner disagrees with an action or inaction of the PHA or a family.

    b. Complaints from owners will be referred to the supervisor.

3. Complaints from the public:

    a. Complaints or referrals from persons in the community with regard to the PHA, a family or an owner.

    b. Complaints from the public will be referred to the supervisor.

The PHA hearing and complaint procedures will be provided to families in the briefing packet.

B. INFORMAL REVIEW PROCEDURES FOR APPLICANTS [§ 24 CFR 982.54(d)(12), 982.554]

Informal reviews are provided for applicants who are denied assistance before the effective date of the HAP contract. The exception is that when an applicant is denied assistance for citizen or eligible immigrant status, the applicant is entitled to an informal hearing.

An informal review for applicants, as provided for by 24 C.F.R. Section 982.554, is an official proceeding before an impartial review officer who will receive evidence and testimony from the PHA and the applicant, will review the facts and applicable law, and will issue a binding final decision upholding or reversing the applicant's denial from the program. The denial letter and informal review request materials should include this definition/explanation of an informal review.

When the PHA determines that an applicant is ineligible for the program, the family must be notified of their ineligibility in writing. The notice must contain:

1. The reason(s) that they are ineligible,

2. The procedure for requesting an informal review if the applicant does not agree with the decision and

3. The time limit for requesting an informal review.

When denying admission due to engaging in criminal activity by a household member, the PHA will include in the notice a statement that the applicant may request a copy of the criminal record that the decision to deny admission was based.

The PHA must provide applicants with the opportunity for an informal review of decisions denying:

1. Listing on the PHA's waiting list,

2. Issuance of a voucher,

3. Participation in the program or

4. Assistance under portability procedures.

Informal reviews are not required for established policies, procedures and PHA determinations such as:

1. Discretionary administrative determinations by the PHA,

2. General policy issues or class grievances,

3. A determination of the family unit size under the PHA subsidy standards,

4. Refusal to extend or suspend a voucher,

5. Disapproval of a lease,

6. Determination that a unit is not in compliance with HQS or

7. Determination that a unit is not in accordance with HQS due to family size or composition.

Procedure for Informal Review

A request for an informal review must be sent to the assigned hearing officer or another impartial PHA staff member. Applicants should be directed in the informal review request materials to do so. A request for an informal review must be received in writing by the close of business, no later than twenty business days from the date of the PHA's notification of denial of assistance.

The informal review will be scheduled within thirty business days from the date the request is received and notice of such will be sent to the tenant a minimum of twenty-one business days in advance of the hearing. Notice of the informal review shall be sent by the assigned review officer or other impartial employee of the PHA, and not by the caseworker or office proposing the denial.

The informal review may not be conducted by the person who made or approved the decision under review or by a subordinate of such person.

The informal review may be conducted by:

1. A staff person who is at the hearing officer or supervisor level or above or

2. A qualified individual from outside the PHA.

The applicant will be given the option of presenting oral and/or written objections to the decision. Both the PHA and the family may present evidence and witnesses. The family may use an attorney or other representative to assist them at their own expense.

A notice of review findings will be provided in writing to the applicant within twenty-one business days of/after the review. The notice shall include the decision of the review officer and an explanation of the reasons for the decision.

All requests for a review, supporting documentation and a copy of the notice of review findings/final decision will be retained in the family's file.

C. INFORMAL HEARING PROCEDURES [§ 24 CFR 982.555(a-f), 982.54(13)]

When the PHA makes a decision regarding the eligibility and the amount of assistance, applicants and participants must be notified in writing. The PHA will give the family prompt notice of such determinations that will include:

1. The proposed action or decision of the PHA;

2. A brief description of the grounds upon which the PHA's action or decision is based, with reference to the relevant administrative plan provisions and the factual basis for the decision.

3. The date that the proposed action or decision will take place;

4. The family's right to further explanation of the basis for the PHA's decision;

5. The procedure for requesting a hearing if the family disputes the action or decision;

6. The time limit for requesting the hearing; and,

7. To whom the hearing request should be addressed.

When terminating assistance for engaging in criminal activity as shown by a criminal record, the PHA will provide the subject of the record and the tenant/participant/head of household with a copy of the criminal record upon which the decision to terminate was based.

When denying admission for engaging in criminal activity as shown by a criminal record, the PHA will provide the subject of the record and the applicant with a copy of the criminal record upon which the decision to deny was based.

The PHA must provide participants with the opportunity for an informal hearing for decisions related to any of the following PHA determinations:

1. Determination of the family's annual or adjusted income and the computation of the housing assistance payment.

2. Appropriate utility allowance computation from the approved schedule

3. Family unit size determination under PHA subsidy standards.

4. Determination to terminate assistance for any reason.

5. Determination to terminate a family's FSS contract, withhold supportive services or propose forfeiture of the family's escrow account.

The PHA must always provide the opportunity for an informal hearing before termination of assistance. A request for an informal hearing must be submitted to the assigned hearing officer or another impartial PHA staff member. Participants should be directed in the hearing request materials to do so. The request for an informal hearing must be received in writing by the close of the business day no later than twenty business days from the date of the PHA's notification of action. The informal review/hearing will be scheduled within thirty business days from the date the request is received.

An informal hearing for participants, as provided for by 24 C.F.R. Section 982.555, is an official proceeding before an impartial hearing officer who will receive evidence and testimony from the PHA and the participant, will review the facts and applicable law, and will issue a binding final decision upholding or reversing the termination or PHA's decision. The termination letter and informal hearing request materials should include this definition/explanation of an informal hearing.

Informal hearings are not required for established policies, procedures and PHA determinations such as:

1. Discretionary administrative determinations by the PHA.

2. General policy issues or class grievances.

3. Establishment of the PHA schedule of utility allowances for families in the program.

4. A PHA determination not to approve an extension or suspension of a voucher term.

5. A PHA determination not to approve a unit or lease.

6. A PHA Determination that an assisted unit is not in compliance with HQS because of the family size (*the PHA must provide an informal hearing for family breach of HQS because that is a family obligation determination*).

7. A PHA determination either to exercise or not to exercise any right or remedy against the owner under a HAP contract.

Notification of Hearing

It is the PHA's objective to resolve disputes at the lowest level possible and to make every effort to avoid the most severe remedies. However, if this is not possible, the PHA will ensure that applicants and participants will receive all of the protections and rights afforded by the law and the regulations.

Notice of the hearing shall be sent to the participant by the assigned hearing officer or other impartial employee of the PHA, and not by the caseworker or office proposing the termination or other action.

The notification of hearing will contain:

1. The date and time of the hearing;

2. The location where the hearing will be held;

3. The detailed description of the violation(s) that, in detail, should include the exact nature of the violation (*e.g., unreported income of $7,500.00 from Wal-Mart from 01/08 thru*

06/08). Additionally, this notification will include reference to said violation in the administrative plan.

4. The family's right to bring evidence, witnesses and legal or other representation to the hearing at the family's expense;

5. The right to review any documents or evidence in the possession of the PHA that the PHA based the proposed action and, at the family's expense, to obtain a copy of such documents before the hearing. Requests for copies of such documents or evidence must be received no later than two business days before the hearing date; and

6. A notice to the family that the PHA will request a copy of any documents or evidence the family will use at the hearing. Requests for copies of such documents or evidence must be received no later than two business days before the hearing.

7. The PHA will send the notice of hearing a minimum of twenty-one calendar days in advance of the hearing.

The PHA's Hearing Procedures

After a hearing date is agreed upon, the family may request to re-schedule only upon showing "good cause," that is defined as an unavoidable conflict that seriously affects the health, safety or welfare of the family. Such rescheduling requests should be directed to the assigned hearing officer or another impartial PHA staff member.

If a family does not appear at a scheduled hearing and has not re-scheduled the hearing in advance, the family must contact the assigned hearing officer or other impartial PHA staff member within two business days. The hearing will be rescheduled only if the family can show good cause for the failure to appear.

Families have the right to:

1. Present written or oral objections to the PHA's determination;

2. Examine the documents in the file that are the basis for the PHA's action and all documents submitted to the hearing officer;

3. Copy any relevant documents at their expense;

4. Present any information or witnesses pertinent to the issues of the hearing***;***

5. Request that PHA staff be available or present at the hearing to answer questions pertinent to the case; and

6. Be represented by legal counsel, an advocate or another designated representative at the family's own expense.

If a family requests copies of documents relevant to the hearing, the PHA will make the copies for the family and assess a charge of twenty-five cents per page for all copies in excess of twenty. In no case, will the family be permitted to remove the file from the PHA's office.

In addition to other rights contained in this chapter, the PHA has a right to:

1. Present evidence and any information pertinent to the issue of the hearing;

2. Be notified if the family intends to be represented by legal counsel, an advocate or another designated representative;

3. Examine and copy any documents to be used by the family before the hearing;

4. Have its attorney present; and

5. Have staff persons and other witnesses familiar with the case present.

The informal hearing shall be conducted by the hearing officer appointed by the PHA who is neither the person who made or approved the decision, nor a subordinate of that person. The PHA appoints hearing officers who:

1. Are managers from other departments within the PHA;

2. Are managers from other PHAs;

3. Are professional mediators or arbitrators; or

4. A trained hearing officer.

All hearings are to be recorded and such recording is to be maintained electronically by the PHA.

Required Evidence (Standard of Proof)

Preponderance of evidence is defined as evidence that is of greater weight or more convincing than the evidence that is offered in opposition to it; that is, evidence that as a whole shows that the fact sought to be proved is proven more probable than not. The intent is not to prove criminal liability, but to establish that the act(s) occurred. Preponderance of evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Evidence of a violation of family obligations obtained solely from social media sources, without further corroboration, shall not be used as sole grounds for termination. If information is obtained from social media, it should be confirmed and supported by further additional evidence.

Preparation by the PHA staff for the administrative fair hearing will include:

1. A narrative statement of facts for the hearing officer. The summary of which will include a synopsis of the events leading up to the adverse action as well as a listing of all exhibits that will be used to substantiate the allegations.

2. Evidence in support of the HA decision to terminate

3. Any witness(s) to corroborate the HA's position

D. SUBMISSION OF ALL MATERIALS TO THE FAIR HEARING OFFICER AS WELL AS THE APPELLANT FOR REVIEW BEFORE THE INFORMAL REVIEW OR INFORMAL HEARING

The hearing shall concern only the issues that the family has been given the opportunity for a hearing. The hearing and hearing decision will only consider alleged violations or facts included in the termination letter. Evidence presented at the hearing may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

No documents may be presented that have not been provided to the other party before the hearing if these documents have been requested by the other party. "Documents" include records and regulations. If additional documents or materials relevant to the issues addressed at the hearing are provided subsequent to the hearing, such material will be promptly shared with all parties, and the hearing officer may reconvene the hearing if necessary to address such additional materials.

The hearing officer may ask the family for additional information and may adjourn the hearing**,** with the option of reconvening on a future date, before reaching a decision.

If the family misses an appointment or deadline ordered by the hearing officer, the hearing is held, absent the family, and a decision is rendered based on the available evidence presented, and a decision is issued and transmitted to the family, including their right to seek a request for reconsideration.

The hearing officer will determine whether the action, inaction or decision of the PHA is legal in accordance with HUD regulations and this Administrative Plan, based upon the evidence and testimony provided at the hearing or subsequent to the hearing at the direction or request of the hearing officer. Factual determinations relating to the individual circumstances of the family will be based on a preponderance of the evidence presented at the hearing.

A notice of hearing findings shall be provided in writing to the PHA and the family within twenty-one business days and shall include:

1. A clear summary of the decision and the reasons for the decision;

2. An explanation of how the findings of fact related to and support the conclusions of law.

3. If the decision involves money owed, the amount owed; and

4. The date that the decision goes into effect.

The PHA is not bound by hearing decisions of the following sort:

1. those concerning matters that the PHA is not required to provide an opportunity for a hearing;

2. those that conflict with or contradict HUD regulations or requirements;

3. those that conflict with or contradict federal, state or local laws; or

4. those that exceed the authority of the person conducting the hearing.

The PHA shall send a letter to the family within twenty-one business days if it determines that the PHA is not bound by the hearing officer's determination. The letter shall include the PHA's reasons for the decision.

All requests for a hearing, supporting documentation and a copy of the notice of hearing findings will be retained in the family's file.

An aggrieved party may request reconsideration of the PHA's decision (request for a desk review) no later than twenty-one business days from the date of the hearing decision (*notice of such will be included in the termination notification*).

A request for reconsideration must be submitted to the PHA in writing. All requests for desk review must include a reason as to why the decision should be overturned.

Electronic mail is the preferred method of making such a request, and should be sent to DeskReview.IFSP@ct.gov . Paper copy requests will also be accepted and must be sent to:

Director
Individual and Family Support Programs Division
Department of Housing
505 Hudson Street – 2nd Floor
Hartford, CT 06106-7107

The Department of Housing will make its decision on requests for reconsideration based on a review of the hearing materials and the case file. All decisions will be made within twenty-one business days of the date the request is received by the Director. Inquiries regarding the status of a request for reconsideration must also be in writing.

E. MITIGATING CIRCUMSTANCES FOR APPLICANTS/PARTICIPANTS WITH DISABILITIES [§ 24 CFR 982.204, 982.552(c)]

When applicants are denied placement on the waiting list or the PHA is terminating assistance, the presence of a disability may be considered as a mitigating circumstance during the informal hearing or informal review process. Examples of mitigating circumstances include, but are not limited to:

1. A person with a cognitive disorder may not have understood the requirement to report increases in income;

2. A person may not understand the need to make regular repayments on a promissory note;

3. Minor criminal records for public drunkenness may actually be due to medication reactions; or

4. Prior incarcerations for disorderly conduct due to an emotional disorder.

F. HEARING AND APPEAL PROVISIONS FOR "RESTRICTIONS ON ASSISTANCE TO NON-CITIZENS" [§ 24 CFR Part 5, Subpart E]

Assistance to a family may not be terminated or denied while the PHA hearing is pending but assistance to an applicant may be delayed pending the PHA hearing.

CIS Determination of Ineligibility

If a family member claims to be an eligible immigrant and the CIS SAVE system and manual search do not verify the claim, the PHA notifies the applicant or participant within ten business days of their right to appeal to the CIS within thirty business days of notification or to request an informal hearing with the PHA either in lieu of or subsequent to the CIS appeal.

If the family appeals to the CIS, they must give the PHA a copy of the appeal and proof of mailing or the PHA may proceed to deny or terminate. The period to request an appeal may be extended by the PHA for good cause.

The request for a PHA hearing must be made within twenty-one business days of receipt of the notice offering the hearing or, if an appeal was made to the CIS, within twenty-one business days of receipt of that notice.

After receipt of a request for an informal hearing, the hearing is conducted as described in section D of this Chapter for both applicants and participants. If the hearing officer decides the individual is not eligible and there are no other eligible family members, the PHA will either:

1. Deny the applicant family or

2. Defer termination, if the family is a participant and qualifies for deferral or

3. Terminate participation, if the family does not qualify for deferral.

If there are eligible members in the family, the PHA will offer to pro-rate assistance or give the family the option to remove the ineligible member(s).

Regarding all other complaints related to eligible citizen/immigrant status:

1. If any family member fails to provide required documentation or certification regulation, that member is treated as ineligible. If all family members fail to provide documentation or certification, the family will be denied or terminated for failure to provide documentation.

2. Participants whose termination is carried out after temporary deferral may not request a hearing since they had an opportunity for a hearing before the termination.

3. Participants whose assistance is pro-rated (*either based on their statement that some members are ineligible or due to failure to verify eligible immigration status for some members after exercising their appeal and hearing rights described above*) are entitled to a hearing based on the right to a hearing regarding determinations of tenant rent and total tenant payment.

4. Families denied or terminated for fraud in connection with the non-citizens rule are entitled to a review or hearing in the same way as terminations for any other type of fraud.

Chapter 19 SPECIAL HOUSING TYPES [§ 24 CFR 982.601]

INTRODUCTION

The PHA will permit a family to lease a manufactured home and space with assistance under the program. The PHA will also provide assistance for a family that owns a manufactured home and leases only a space. In addition, the PHA will allow HCVs to be used in other special types of housing as a reasonable accommodation for a person with a disability.

A. MANUFACTURED HOMES

Housing Quality Standards [§ 24 CFR 982.621]

A manufactured home must meet all the HQS requirements outlined in Chapter 10 of this Administrative Plan and regulated by § 24 CFR 982.401. In addition, the manufactured home also must meet the following requirements:

A manufactured home must be placed on the site in a stable manner and must be free from hazards such as susceptibility to sliding or wind damage.

A manufactured home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning or sliding due to the action of wind.

Manufactured Home Space Rental [§ 24 CFR 982.622]

The rent to owner for a manufactured home space will include payment for maintenance services that the owner must provide to the tenant under the terms of the lease for the space.

The rent to owner does not include the cost of utilities and trash collection for the manufactured home. However, the owner may charge the family a separate fee for the cost of utilities or trash collection provided by the owner.

Reasonable Rent

During the assisted tenancy, the rent to owner for the manufactured home space may not exceed a reasonable rent as determined by the PHA.

The PHA will not approve a lease for a manufactured home space until the PHA has determined that the initial rent to owner for the space is a reasonable rent. At least annually during the assisted tenancy, the PHA will re-determine that the rent is reasonable. The PHA will determine whether the rent to owner for a manufactured home space is a reasonable rent in comparison to rents for other comparable manufactured home spaces. The PHA will consider the size and location of the space and any services and maintenance provided by the owner in accordance with the terms of the lease.

By accepting each monthly housing assistance payment from the PHA, the owner of the manufactured home space certifies that the rent to owner for the space is not more than rent charged by the owner for the unassisted rental of comparable spaces in the same manufactured home park or elsewhere. If requested by the PHA, the owner must provide the PHA with information on rents for other manufactured home space that the owner has available.

Housing Assistance Payments for Manufactured Home Space [§ 24 CFR 982.623]

HAP for the Voucher

There is a separate FMR for a family renting a manufactured home space. The payment standard is used to calculate the monthly housing assistance payment for a family. The FMR for rental of a manufactured home space is generally forty percent of the published FMR for a two-bedroom unit.

Subsidy Calculation for the Voucher Program

During the term of a voucher tenancy, the amount of the monthly housing assistance payment for a family will equal the lesser of:

1. The payment standard minus the total tenant payment or

2. The rent paid for rental of the real property that the manufactured home owned by the family is located (*i.e., the space rent*) minus the total tenant payment.

The space rent is the sum of the following as determined by the PHA:

1. Rent to owner for the manufactured home space and

2. Owner maintenance and management charges for the space and

3. The utility allowance for tenant-paid utilities.

Amortization Cost

The amortization cost may include debt service to amortize costs (*other than furniture costs*) included in the purchase price of the manufactured home. The debt service includes the payment for principal and interest on the loan. The debt service amount will be reduced by fifteen percent to exclude debt service to amortize the cost of furniture, unless the PHA determines that furniture was not included in the purchase price.

Any debt service due to refinancing the manufactured home after purchase of the home is not included in the amortization costs.

The PHA will not approve as part of the monthly amortization payment any set-up charges to be included in the debt service incurred by a family that relocates its home.

The PHA will not include as part of the monthly amortization payment any set-up charges incurred before the family became an assisted family, if monthly payments are still being made to amortize such charges.

Utility Allowance Schedule for Manufactured Home Space Rental [§ 24 CFR 982.624]

The PHA will establish utility allowances for manufactured home space rental. For the first twelve months of the initial lease term only, the allowances will include a reasonable amount for utility hook-up charges payable by the family, if the family actually incurs the expenses because of a move.

Allowances for utility hook-up charges do not apply to a family that leases a manufactured home space in place.

Utility allowances for manufactured home space will not be applied to cover the costs of digging a well or installation of a septic system.

B. SPECIAL HOUSING TYPES AS REASONABLE ACCOMMODATION

In addition to manufactured housing, the PHA will allow HCVs to be used in the following types of housing as a reasonable accommodation for a person with a disability:

1. Single Room Occupancy (SRO) units

   Defined at CFR 982.605 as a single room with access to a bathroom that contains at least one-hundred ten square feet of floor space.

2. Group homes

   A group home must be licensed, certified or otherwise approved in writing by the state as a group home for elderly persons or persons with disabilities.

3. Congregate housing

   Defined at CFR 982.609 as a single room or multiple rooms (*e.g. sitting room*). The unit must contain a refrigerator and there must be a central kitchen and dining facilities on the premises.

4. Shared housing

   Defined at CFR 982.618, each unit must contain private space for each assisted family, plus appropriate common space for shared use by the residents of the unit. The private space for each family must contain at least one bedroom for each two persons in the family. The number of bedrooms in the private space of as assisted family may not be less than the family size. A zero or one bedroom unit may not be used for shared housing.

Chapter 20 GLOSSARY

A. ACRONYMS USED IN SUBSIDIZED HOUSING

AAF .....Annual Adjustment Factor. A factor published by HUD in the Federal Register that is used to compute annual rent adjustment.

ACC .....Annual Contributions Contract

ADA .....Americans with Disabilities Act of 1990 (*42 U.S.C. 12101 et seq*.).

BMIR.....Below Market Interest Rate

BR .....Bedroom

CDBG .....Community Development Block Grant

CFR .....Code of Federal Regulations. Commonly referred to as "the regulations". The CFR is the compilation of federal rules that are first published in the Federal Register and that defines and implements a statute.

CPI .....Consumer Price Index. The CPI is published monthly by the U. S. Department of Labor as an inflation indicator.

CR .....Contract Rent

DCF .....The Connecticut Department of Children and Families

DMHAS.....The Connecticut Department of Mental Health and Addiction Services

DOH .....The Connecticut Department of Housing

FDIC .....Federal Deposit Insurance Corporation

FHA.....Federal Housing Administration

FICA .....Federal Insurance Contributions Act - Social Security taxes

FmHA.....Farmers Home Administration

FMR .....Fair Market Rent

FY.....Fiscal Year

FYE.....Fiscal Year End

GAO .....Government Accounting Office

GR.....Gross Rent

HAP.....Housing Assistance Payment

HCDA.....Housing and Community Development Act

HQS .....Housing Quality Standards

HUD.....The Department of Housing and Urban Development or its designee.

HURRA.....Housing and Urban/Rural Recovery Act of 1983

IG.....Inspector General

IGR.....Independent Group Residence

IPA .....Independent Public Accountant

IRA .....Individual Retirement Account

MSA.....A Metropolitan Statistical Area established by the U. S. Census Bureau

PHA.....Public Housing Agency

PMSA.....A Primary Metropolitan Statistical Area established by the U. S. Census Bureau

PS.....Payment Standard

QC.....Quality Control

RIGI.....Regional Inspector General for Investigation

RTA .....Request for Tenancy Approval

RFP .....Request for Proposals

RRP .....Rental Rehabilitation Program

SAVE .....Systematic Alien Verification for Entitlements Program

SMSA.....Standard Metropolitan Statistical Area. Note: this term has been replaced by MSA, Metropolitan Statistical Area.

SRO.....Single Room Occupancy

TR .....Tenant Rent

TTP.....Total Tenant Payment

UA.....Utility Allowance

URP.....Utility Reimbursement Payment

B. GLOSSARY OF TERMS USED IN SUBSIDIZED HOUSING

1937 ACT .....The United States Housing Act of 1937 (*42 U.S.C. 1437 et seq*.).

ADMINISTERING AGENCY .....In the event the PHA subcontracts for the management and administration of the program, the subcontractor and any entities with which the subcontractor contracts are the Administering Agency.

ADMINISTRATIVE PLAN .....The HUD-required written policy of the PHA governing its administration of the Section 8 tenant-based programs. The Administrative Plan and any revisions must be approved by the PHA's board and a copy submitted to HUD as a supporting document to the PHA Plan.

ABSORPTION .....In portability, the point at that a receiving PHA stops billing the initial PHA for assistance on behalf of a family exercising portability. The receiving PHA uses funds available under its consolidated ACC.

ACC RESERVE ACCOUNT (formerly PROJECT RESERVE) .....Account established by HUD from amounts that the maximum payment to the PHA under the consolidated ACC (*during a PHA fiscal year*) exceeds the amount actually approved and paid. This account is used as the source of additional payments for the program.

ADJUSTED INCOME .....Annual income after all allowances approved by HUD has been deducted.

ADMINISTRATIVE FEE....The fee paid by HUD to the PHA for administration of the program.

ADMINISTRATIVE FEE RESERVE (*formerly OPERATING RESERVE*) .....Account established by PHA from excess administrative fee income. The administrative fee reserve must be used for housing purposes.

ADMISSION .....The effective date of the first HAP contract for a family (*i.e., the first day of the initial lease term*) in a tenant-based program. This is the point when the family becomes a participant in the program.

ANNUAL BUDGET AUTHORITY .....The maximum annual payment by HUD to a PHA for a funding increment.

ANNUAL CONTRIBUTIONS CONTRACT (*or ACC*) .....A written contract between HUD and a PHA. Under the contract, HUD agrees to provide funding for the operation of the program and the PHA agrees to comply with HUD requirements for the program.

ANNUAL INCOME.....The anticipated total annual income of an eligible family from all sources for the twelve-month period following the date of determination of income, computed in accordance with the regulations.

APPLICANT (*or APPLICANT FAMILY*) .....A family that has applied for admission to a program, but is not yet a participant in the program.

ASSETS (*see NET FAMILY ASSETS*)

ASSISTED TENANT.....A tenant who pays less than the market rent as defined in the regulations. Includes tenants receiving rent supplement, Rental Assistance Payments or Section 8 assistance and all other 236 and 221 (d)(3) BMIR tenants, except those paying the 236 market rent or one-hundred twenty percent of the BMIR rent, respectively.

BUDGET AUTHORITY .....An amount authorized and appropriated by the U. S. Congress for payment to PHAs under the program. For each funding increment in a PHA program, budget authority is the maximum amount that may be paid by HUD to the PHA over the ACC term of the funding increment.

BUSINESS DAYS .....The days, Monday through Friday, except state and federal holidays and closings required by the Governor, when business is conducted.

CHILD CARE EXPENSES ..Amounts paid by the family for the care of minors under 13 years of age where such care is necessary to enable a family member to be employed or for a household member to further his/her education.

CO-HEAD .....An individual in the household who is equally responsible for the lease with the Head of Household. (*A family never has a co-head and a spouse and a co-head is never a dependent*).

COMMON SPACE .....In shared housing, the space available for use by the assisted family and other occupants of the unit.

CONGREGATE HOUSING.....The housing for elderly persons or persons with disabilities that meets the HQS requirement for congregate housing.

CONSOLIDATED ANNUAL CONTRIBUTIONS CONTRACT (*or CONSOLIDATED ACC*).....See § 24 CFR 982.151.

CONTIGUOUS MSA.....In portability, an MSA that shares a common boundary with the MSA that the jurisdiction of the initial PHA is located.

CONTINUOUSLY ASSISTED .....An applicant is assisted continuously under the 1937 Housing Act if the family is already receiving assistance under any 1937 Housing Act program when the family is admitted to the voucher program.

CONTRACT (*see HOUSING ASSISTANCE PAYMENTS CONTRACT*)

CONTRACT RENT .....The total monthly rent to owner for a contract unit, including the tenant rent portion of rent to owner paid by the assisted family.

COOPERATIVE .....Housing, including mutual housing that owned by a nonprofit corporation or association and where a member of the corporation or association has the right to reside in a particular apartment and to participate in the management of the housing. A special housing type: See § 24 CFR 982.619.

COVERED FAMILIES.....Statutory term for families who are required to participate in a welfare agency economic self-sufficiency program and who may be subject to a welfare benefit sanction for noncompliance with this obligation. Includes families who receive welfare assistance or other public assistance under a program that federal, state or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for the assistance.

DEPENDENT.....A member of the family household (*excluding foster children*), other than the family head or spouse, who is under eighteen years of age or is a disabled person or a handicapped person or is a full-time student eighteen years of age or older.

DISABILITY
ASSISTANCE EXPENSE ...Anticipated cost for care attendant(s) and auxiliary apparatus for disabled family members that enable a family member (*including the disabled family member*) to work.

DISABLED FAMILY.....A family whose head, spouse or sole member is a person with disabilities; or two or more persons with disabilities living together; or one or more persons with disabilities living with one or more live-in aides.

DISABLED PERSON (*see PERSON WITH DISABILITIES*)

DISPLACED PERSON
(*or DISPLACED*
FAMILY) .....A person or family displaced by governmental action or a person whose dwelling has been extensively damaged or destroyed because of a disaster declared or otherwise formally recognized under federal disaster relief laws.

DOMICILE .....The legal residence of the household head or spouse as determined in accordance with state and local law.

DRUG-RELATED
CRIMINAL ACTIVITY.....The illegal manufacture, sale, distribution or use of a controlled substance or the possession with intent to manufacture, sell, distribute or use a controlled substance, as defined in Section 102 of the Controlled Substance Act (*21 U.S.C. 802*).

DRUG TRAFFICKING .....The illegal manufacture, sale, distribution or use of a controlled substance or the possession with intent to manufacture, sell, distribute or use a controlled substance, as defined in section 102 of the Controlled Substances Act (*21 U.S.C. 802*).

ECONOMIC
SELF-SUFFICIENCY
PROGRAM .....Any program designed to encourage, assist, train or facilitate the economic independence of assisted families or to provide work for such families. Can include job training, employment counseling, work placement, basic skills training, education, English proficiency, Workfare, financial or household management, apprenticeship or any other program necessary to ready a participant to work (*such as mental health treatment or treatment for drug abuse*). Includes any work activities as defined in the Social Security Act (*42 U.S.C. 607(d)*). Also see § 24 CFR 5.603 (c).

ELDERLY FAMILY.....A family whose head, spouse or sole member is a person who is at least 62 years of age; or two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides.

ELDERLY HOUSEHOLD...A family whose head or spouse or sole member is at least 62 years of age; may include two or more elderly persons living together; or one or more such persons living with another person who is determined to be essential to his/her care and well-being.

ELDERLY PERSON.....A person who is at least 62 years old.

ELIGIBLE FAMILY
(*see FAMILY*).....A family is defined by the PHA in the administrative plan that is approved by HUD.

EXCESS MEDICAL
EXPENSES .....Any medical expenses incurred by elderly or disabled families only in excess of three percent of Annual Income that are not reimbursable from any other source.

EXTREMELY
LOW-INCOME FAMILY...A family whose annual income does not exceed thirty percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than thirty percent of medical income for an area if HUD finds such variations are necessary due to unusually high or low family incomes.

FAIR HOUSING ACT .....Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988 (*42 U.S.C. 3601 et seq*.).

FAIR MARKET
RENT (*or FMR*).....The rent including the cost of utilities (*except telephone*) that would be required to be paid in the housing market area to obtain privately owned existing decent, safe and sanitary rental housing of modest (*non-luxury*) nature with suitable amenities. Fair market rents for existing housing are established by HUD for housing units of varying sizes (*number of bedrooms*) and are published in the *Federal Register.*

FAMILY .....“Family” includes but is not limited to:

1. A family with or without children (*the temporary absence of a child from the home due to placement in foster care shall not be considered in determining family composition and family size*);

2. An elderly family;

3. A near-elderly family;

4. A displaced family;

5. A household;

6. The remaining member of a household; and

7. A single person who is not an elderly or displaced person or a person with disabilities or the remaining member of a household

FAMILY OF VETERAN OR SERVICE PERSON .....A family is a "family of veteran or service person" when:

1. The veteran or service person

   a. is either the head of household or is related to the head of the household; or

   b. is deceased, was related to the head of the household and was a family member at the time of death.

2. The veteran or service person, unless deceased, is living with the family or is only temporarily absent unless s/he was

   a. formerly the head of the household and is permanently absent because of hospitalization, separation or desertion or is divorced; provided, the family contains one or more persons for whose support s/he is legally responsible and the spouse has not remarried; or

   b. not the head of the household but is permanently hospitalized; provided that s/he was a family member at the time of hospitalization and there remain in the family at least two related persons.

FAMILY RENT TO OWNER .....In the voucher program, the portion of the rent to owner paid by the family.

FAMILY SELF-SUFFICIENCY PROGRAM (*or FSS PROGRAM*) .....The program established by a PHA to promote self-sufficiency of assisted families, including the provision of supportive services.

FAMILY SHARE.....The amount calculated by subtracting the housing assistance payment from the gross rent.

FAMILY UNIT SIZE.....The appropriate number of bedrooms for a family, as determined by the PHA, under the PHA's subsidy standards.

FMR/EXCEPTION RENT..The fair market rent published by HUD headquarters. In the pre-merger certificate program the initial contract rent for a dwelling unit plus any utility allowance could not exceed the FMR/exception rent limit (*for the dwelling unit or for the family unit size*). In the voucher program, the PHA adopts a payment standard schedule that is within ninety percent to one-hundred ten percent of the FMR for each bedroom size.

FOSTER CHILD
CARE PAYMENT.....The payment to eligible households by state, local or private agencies appointed by the State, to administer payments for the care of foster children.

FULL-TIME STUDENT.....A person who is attending school or vocational training on a full-time basis (*carrying a subject load that is considered full-time for day students under the standards and practices of the educational institution attended*).

FUNDING INCREMENT ..Each commitment of budget authority by HUD to a PHA under the consolidated annual contributions contract for the PHA program.

GOOD CAUSE.....Is a term used to describe circumstances beyond ones control which reasonably prevent him or her from complying with a program requirement.

GROSS RENT.....The sum of the Rent to Owner and the utility allowance. If there is no utility allowance, Rent to Owner equals Gross Rent.

GROUP HOME .....A dwelling unit that is licensed by a state as a group home for the exclusive residential use of two to twelve persons who are elderly or persons with disabilities (*including any live-in aide or aides*).

HAP CONTRACT (*see HOUSING ASSISTANCE PAYMENTS CONTRACT*)

HEAD OF
HOUSEHOLD.....The head of household is the person who assumes legal and financial responsibility for the household and is listed on the application as the head.

HOMELESS YOUNG FAMILY .....The head of household is aged 18 – 25 at the time of entry on the waiting list, and the household must be exiting permanent supportive housing, non-time-limited supportive housing, transitional housing, or a rapid re-housing program.

HOUSEHOLD…… A household consists of all the people who occupy a housing unit. A house, an apartment or other group of rooms, or a single room, is regarded as a housing unit when it is occupied or intended for occupancy as separate living quarters; that is when the occupants do not live with any other persons in the structure and there is direct access form the outside or through a common hall.

HOUSING AGENCY (*or HA; see PUBLIC HOUSING AGENCY*) A state, county, municipality or other governmental entity or public body (*or agency or instrumentality thereof*) authorized to engage in or assist in the development or operation of low-income housing. (***Note: PHA and HA mean the same thing.***)

HOUSING AND COMMUNITY DEVELOPMENT ACT OF 1974.....The act that the U. S. Housing Act of 1937 (*sometimes referred to as the Act*) was re-codified and that added the Section 8 Programs.

HOUSING ASSISTANCE PAYMENT (*or HAP*).....The monthly assistance payment by a PHA. The total assistance payment consists of:

1. A payment to the owner for rent to owner under the family's lease.

2. An additional payment to the family if the total assistance payment exceeds the rent to owner. The additional payment is called a “utility reimbursement” payment.

HOUSING ASSISTANCE PAYMENTS CONTRACT (*or HAP CONTRACT*) .....A written contract between a PHA and an owner in the form prescribed by HUD headquarters, that the PHA agrees to make housing assistance payments to the owner on behalf of an eligible family.

HOUSING ASSISTANCE PLAN .....1. A Housing Assistance Plan submitted by a local government participating in the Community Development Block Program as part of the block grant application, in accordance with the requirements of 570.303(c) submitted by a local government not participating in the Community Development Block Grant Program and approved by HUD.

2. A Housing Assistance Plan meeting the requirements of 570.303(c) submitted by a local government not participating in the Community Development Block Grant Program and approved by HUD.

HOUSING DIRECTOR……The lead staff person at the PHA, or their designee.

HOUSING QUALITY STANDARDS (*or HQS*) ....The minimum housing quality standards established by HUD for housing assisted under the tenant-based programs.

HUD .....The U. S. Department of Housing and Urban Development.

HUD REQUIREMENTS....HUD requirements for the Section 8 programs. HUD requirements are issued by HUD headquarters as regulations, Federal Register notices or other binding program directives.

IMPUTED ASSET .....An asset disposed of for less than fair market value during two years preceding examination or re-examination.

IMPUTED INCOME .....The passbook interest rate established by HUD, multiplied by the total cash value of assets; this calculation is used when assets exceed five-thousand dollars.

IMPUTED WELFARE INCOME.....An amount of annual income that is not actually received by a family because of a specified welfare benefit reduction, but that is included in the family's annual income and therefore reflected in the family's rental contribution.

INCOME.....The income, from all sources, for each member of the household, as determined in accordance with criteria established by HUD.

INCOME FOR ELIGIBILITY.....Annual Income.

INITIAL PHA .....In portability, the term refers to both:

1. The PHA that originally selected a family that later decides to move out of the jurisdiction of the selecting PHA; and

2. The PHA that absorbed a family that later decides to move out of the jurisdiction of the absorbing PHA.

INITIAL PAYMENT STANDARD .....The payment standard at the beginning of the HAP contract term.

INITIAL RENT
TO OWNER.....The rent to owner at the beginning of the HAP contract term.

INTEREST REDUCTION
SUBSIDIES.....The monthly payments or discounts made by HUD to reduce the debt service payments and, hence, rents required on Section 236 and 221 (d)(3) BMIR projects; this includes monthly interest reduction payments made to mortgagees of Section 236 projects and front-end loan discounts paid on BMIR projects.

JURISDICTION.....The area that the PHA has authority under state and local law to administer the program.

OWNER.....This term means either the owner of the property or his or her representative or the managing agent or his or her representative, as shall be designated by the owner.

LEASE.....A written agreement between an owner and a tenant for the leasing of a dwelling unit to the tenant. The lease establishes the conditions for occupancy of the dwelling unit by a family with housing assistance payments under a HAP contract between the owner and the PHA. In cooperative housing, a written agreement between a cooperative and a member of the cooperative. The agreement establishes the conditions for occupancy of the member's family with housing assistance payments to the cooperative under a HAP contract between the cooperative and the PHA.

LIVE-IN AIDE .....A person who resides with an elderly person or disabled person and who is determined to be essential to the care and well-being of the person, is not obligated for the support of the person and would not be living in the unit except to provide necessary supportive services.

LOCAL PREFERENCE .....A preference used by the PHA to select among applicant families.

LOW-INCOME FAMILY...A family whose annual income does not exceed eighty percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than eighty percent for areas with unusually high or low-income families.

MANUFACTURED
HOME.....A manufactured structure that is built on a permanent chassis, is designed for use as a principal place of residence and meets the HQS. A special housing type. See § 24 CFR 982.620 and 982.621.

MANUFACTURED HOME SPACE.....In manufactured home space rental, a space leased by an owner to a family. A manufactured home owned and occupied by the family is located on the space. See § 24 CFR 982.622 to 982.624

MARKET RENT .....The rent HUD authorizes the owner of FHA insured/subsidized multi-family housing to collect from families ineligible for assistance. For unsubsidized units in an FHA-insured multi-family project that a portion of the total units receive project-based rental assistance, under the Rental Supplement or Section 202/Section 8 Programs, the Market Rate Rent is that rent approved by HUD and is the Contract Rent for a Section 8 certificate holder. For BMIR units, Market Rent varies by whether the project is a rental or cooperative.

MEDICAL EXPENSES .....Those total medical expenses, including medical insurance premiums that are anticipated during the period that annual income is computed and that are not covered by insurance (*A deduction for elderly or disabled families only.*). These allowances are given when calculating adjusted income for medical expenses in excess of three percent of annual income.

MERGER DATE.....October 1, 1999.

MINOR.....A member of the family household (*excluding foster children*), other than the family head or spouse, who is under eighteen years of age.

MIXED FAMILY .....A family with citizens and eligible immigration status and without citizens and eligible immigration status as defined in § 24 CFR 5.504(b)(3)

MONTHLY ADJUSTED INCOME.....One-twelfth (*one-twelfth or eight and one-half percent*) of the annual adjusted income (*i.e., one-twelfth of the income after allowances have been applied*).

MONTHLY INCOME .....One-twelfth (*one-twelfth or eight and one-half percent*) of the annual income.

MUTUAL HOUSING (*see COOPERATIVE*)

NATIONAL .....A person who owes permanent allegiance to the United States, for example, because of birth in a United States territory or possession.

NEAR-ELDERLY FAMILY .....A family whose head, spouse or sole member is a person who is at least fifty years of age but below the age of sixty-two; or two or more persons who are at least fifty years of age but below the age of sixty-two, living

together; or one or more persons who are at least fifty years of age but below the age of sixty-two, living with one or more live-in aides.

NEGATIVE RENT .....Now called Utility Reimbursement. A negative Tenant Rent results in a Utility Reimbursement Payment (URP).

NET FAMILY ASSETS .....Value of equity in savings, checking, IRA and Keogh accounts, real property, stocks, bonds and other forms of capital investment. The value of necessary items of personal property such as furniture and automobiles is excluded from the definition.

NON-CITIZEN .....A person who is neither a citizen nor a national of the United States.

OCCUPANCY STANDARDS (*see SUBSIDY STANDARDS*) .....Standards established by a PHA to determine the appropriate number of bedrooms for families of different sizes and compositions.

OWNER.....Any persons or entity having the legal right to lease or sublease a unit to a participant.

PARTICIPANT .....A family that has been admitted to the PHA's program and is currently assisted in the program. The family becomes a participant on the effective date of the first HAP contract executed by the PHA for the family (*first day of initial lease term*).

PAYMENT STANDARD ...The maximum monthly assistance payment for a family assisted in the voucher program (*before deducting the total tenant payment by the family*).

PERSON WITH DISABILITIES .....A person who has a disability as defined in 42 U.S.C. 423 or a developmental disability as defined in 42 U.S.C. 6001. Also includes a person who is determined, under HUD regulations, to have a physical or mental impairment that is expected to be of long-continued and indefinite duration, substantially impedes the ability to live independently and is of such a nature that the ability to live independently could be improved by more suitable housing conditions. For purposes of reasonable accommodation and program accessibility for persons with disabilities, means an “individual with handicaps” as defined in § 24 CFR 8.3. Definition does not exclude persons who have AIDS or conditions arising from AIDS, but does not include a person whose disability is based solely on drug or alcohol dependence (*for low-income housing eligibility purposes*).

PHA PLAN .....The annual plan and the five-year plan as adopted by the PHA and approved by HUD in accordance with Part 903 of Chapter 9.

PORTABILITY.....Renting a dwelling unit with Section 8 tenant-based assistance outside the jurisdiction of the initial PHA.

PREMISES .....The building or complex that the dwelling unit is located, including common areas and grounds.

PRIVATE SPACE.....In shared housing: The portion of a contract unit that is for the exclusive use of an assisted family.

PROCESSING ENTITY .....The entity responsible for making eligibility determinations and for income reexaminations. In the Section 8 Program, the "processing entity" is the "responsible entity."

PROGRAM .....The Section 8 tenant-based assistance program under § 24 CFR Part 982.

PROGRAM RECEIPTS .....HUD payments to the PHA under the consolidated ACC and any other amounts received by the PHA in connection with the program.

PUBLIC ASSISTANCE .....Welfare or other cash assistance payments to families or individuals, based on need that are made under programs funded, separately or jointly, by Federal, state or local governments.

PUBLIC HOUSING AGENCY (*or PHA; see HOUSING AGENCY; Note: PHA and HA mean the same thing*) ...PHA includes any state, county, municipality or other governmental entity or public body that is authorized to administer the program (*or an agency or instrumentality of such an entity*) or any of the following:

1. A consortia of housing agencies, each of that meets the qualifications in paragraph (1) of this definition that HUD determines has the capacity and capability to efficiently administer the program (*that case, HUD may enter into a consolidated ACC with any legal entity authorized to act as the legal representative of the consortia members*):

2. Any other public or private non-profit entity that was administering a Section 8 tenant-based assistance program pursuant to a contract with the contract administrator of such program (*HUD or a PHA*) on October 21, 1998; or

3. For any area outside the jurisdiction of a PHA that is administering a tenant-based program or where HUD determines that such PHA is not administering the program effectively, a private non-profit entity or a governmental entity or public body that would otherwise lack jurisdiction to administer the program in such area.

REASONABLE RENT .....A rent to owner that is not more than rent charged for comparable units in the private unassisted market, and not more than the rent charged for comparable unassisted units in the premises.

RECEIVING PHA .....In portability: A PHA that receives a family selected for participation in the tenant-based program of another PHA. The receiving PHA issues a voucher and provides program assistance to the family.

RE-EXAMINATION (*formerly RECERTIFICATION*).....The process of securing documentation of total family income used to determine the rent that the tenant will pay for the next twelve months if there are no additional changes to be reported. There are annual and interim re-examinations.

REMAINING MEMBER OF TENANT FAMILY.....Person left in assisted housing after other family members have left and become unassisted.

RENT TO OWNER.....The total monthly rent payable to the owner under the lease for the unit. Rent to owner covers payment for any housing services, maintenance and utilities that the owner is required to provide and pay for.

RESIDENCY PREFERENCE.....A PHA preference for admission of families that reside anywhere in a specified area, including families with a member who works or has been hired to work in the area (*"residency preference area"*).

RESIDENCY PREFERENCE AREA.....The specified area where families must reside to qualify for a residency preference.

RESIDENT ASSISTANT....A person who lives in an Independent Group Residence and provides on a daily basis some or all of the necessary services to elderly, handicapped and disabled individuals receiving Section 8 housing assistance and who is essential to these individuals' care or wellbeing. A Resident Assistant shall not be related by blood, marriage or operation of law to individuals

receiving Section 8 assistance nor contribute to a portion of his/her income or resources towards the expenses of these individuals.

RESPONSIBLE ENTITY ..... For the public housing and Section 8 tenant-based assistance, project-based certificate assistance and moderate rehabilitation program, the responsible entity means the PHA administering the program under an ACC with HUD. For all other Section 8 programs, the responsible entity means the Section 8 owner.

SECRETARY ..... The Secretary of Housing and Urban Development.

SECTION 8 ..... Section 8 of the United States Housing Act of 1937 (*42 U.S.C. 1437f*).

SECURITY DEPOSIT ..... A dollar amount that can be applied to unpaid rent, damages or other amounts to the owner under the lease.

SERVICE PERSON ..... A person in the active military or naval service (including the active reserve) of the United States.

SHARED HOUSING ..... A unit occupied by two or more families. The unit consists of both common space for shared use by the occupants of the unit and separate private space for each assisted family. A special housing type.

SINGLE PERSON ..... A person living alone or intending to live alone.

SPECIAL ADMISSION ..... The admission of an applicant that is not on the PHA waiting list or without considering the applicant's waiting list position.

SPECIAL HOUSING TYPES ..... See Subpart M of § 24 CFR 982 that states the special regulatory requirements for SRO housing, congregate housing, group homes, shared housing, cooperatives (*including mutual housing*) and manufactured homes (*including manufactured home space rental*).

SPECIFIED WELFARE BENEFIT REDUCTION ..... Those reductions of welfare benefits (*for a covered family*) that may not result in a reduction of the family rental contribution. A reduction of welfare benefits because of fraud in connection with the welfare program or because of welfare sanction due to noncompliance with a welfare agency requirement to participate in an economic self-sufficiency program.

SPOUSE ..... The husband or wife of the head of the household.

SUBSIDIZED PROJECT ....A multi-family housing project (*with the exception of a project owned by a cooperative housing mortgage corporation or association*) that receives the benefit of subsidy in the form of:

1. Below-market interest rates pursuant to Section 221(d)(3) and (5) or interest reduction payments pursuant to Section 236 of the National Housing Act; or

2. Rent supplement payments under Section 101 of the Housing and Urban Development Act of 1965; or

3. Direct loans pursuant to Section 202 of the Housing Act of 1959; or

4. Payments under the Section 23 Housing Assistance Payments Program pursuant to Section 23 of the United States Housing Act of 1937 before amendment by the Housing and Community Development Act of 1974; or

5. Payments under the Section 8 Housing Assistance Payments Program pursuant to Section 8 of the United States Housing Act after amendment by the Housing and Community Development Act unless the project is owned by a Public Housing Agency; or

6. A Public Housing Project.

SUBSIDY STANDARDS (*see OCCUPANCY STANDARDS*) .....Standards established by a PHA to determine the appropriate number of bedrooms and amount of subsidy for families of different sizes and compositions.

SUSPENSION/TOLLING ..Stopping the clock on the term of a family's voucher, for such period as determined by the PHA, from the time when the family submits a request for PHA approval to lease a unit, until the time when the PHA approves or denies the request. If the PHA decides to allow extensions or suspensions of the voucher term, the PHA administrative plan must describe how the PHA determines whether to grant extensions or suspensions and how the PHA determines the length of any extension or suspension.

TENANCY ADDENDUM ..For the HCV program, the lease language required by HUD in the lease between the tenant and the owner.

TENANT .....The person or persons (*other than a live-in-aide*) who execute(s) the lease as lessee of the dwelling unit.

TENANT RENT.....The amount payable monthly by the family as rent to the unit owner.

TOTAL TENANT PAYMENT (TTP).....The total amount the HUD rent formula requires the tenant to pay toward gross rent and utility allowance.

TTY/TDD .....Text Telephones (TTY), also known as Telecommunications Device for the Deaf (TDD), are used by the deaf, hard–of–hearing and individuals with speech impairments to communicate.

UNIT .....Residential space for the private use of a family.

UNUSUAL EXPENSES .....Before the change in the 1982 regulations, this was the term applied to the amounts paid by the family for the care of minors under 13 years of age or for the care of disabled or handicapped family household members, but only where such care was necessary to enable a family member to be gainfully employed.

UTILITIES.....Means water, electricity, gas, other heating, refrigeration, cooking fuels, trash collection and sewage services. Telephone service is not included as a utility.

UTILITY ALLOWANCE.....If the cost of utilities (*except telephone*) including range and refrigerator and other housing services for an assisted unit is not included in the Contract Rent but is the responsibility of the family occupying the unit, an amount equal to the estimate made or approved by a PHA or HUD of a reasonable consumption of such utilities and other services for the unit by an energy conservative household of modest circumstances consistent with the requirements of a safe, sanitary and healthy living environment.

UTILITY REIMBURSEMENT .....In the voucher program, the portion of the housing assistance payment that exceeds the amount of the rent to owner.

UTILITY REIMBURSEMENT PAYMENT .....In the pre-merger certificate program, the amount, if any, that the utility allowance for the unit, if applicable, exceeds the total tenant payment for the family occupying the unit.

VACANCY LOSS PAYMENTS .....(*For pre-merger certificate contracts effective before 10/2/95*) When a family vacates its unit in violation of its lease, the owner is eligible for eighty percent of the contract rent for a vacancy period of up to one additional month (*beyond the month that the vacancy occurred*) if s/he

notifies the PHA as soon as s/he learns of the vacancy, makes an effort to advertise the unit and does not reject any eligible applicant except for good cause.

VERY LOW-INCOME FAMILY .....A lower-income family whose annual income does not exceed fifty percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income limits higher or lower than fifty percent of the median income for the area based on its finding that such variations are necessary because of unusually high or low family incomes. This is the income limit for the voucher program.

VETERAN .....A person who has served in the active military or naval service of the United States at any time and who shall have been discharged or released therefrom under conditions other than dishonorable.

VIOLENT CRIMINAL ACTIVITY.....Any illegal criminal activity that has as one of its elements the use, attempted use or threatened use of physical force against the person or property of another.

VOUCHER .....A document issued by a PHA to a family selected for admission to the HCV program. This document describes the program and the procedures for PHA approval of a rental unit selected by the family. The voucher also states the obligations of the family under the HCV program.

VOUCHER HOLDER.....A family holding a voucher with an unexpired term (*search time*).

VOUCHER PROGRAM ....The HCV program.

WAITING LIST .....A list of families organized according to HUD regulations and PHA policy that are waiting for subsidy to become available.

WAITING LIST ADMISSION .....An admission from the PHA waiting list.

WELFARE ASSISTANCE ..Income assistance from federal or state welfare programs, including assistance provided under TANF and general assistance. Does not include assistance directed solely to meeting housing expenses, nor programs that provide health care, child care or other services for working families. FOR THE FSS PROGRAM (984.103(b)), "welfare assistance" only includes cash maintenance payments from Federal or State programs designed to meet a family's ongoing basic needs, but do not include food stamps, emergency rental and utilities assistance,

Supplemental Security Income (SSI), Social Security Disability Income (SSDI) or Social Security.

C. GLOSSARY OF TERMS USED IN THE NON-CITIZENS RULE

CHILD.....A member of the family other than the family head or spouse who is under 18 years of age.

CIS.....The U. S. Citizenship and Immigration Service.

CITIZEN.....A citizen or *(a*) national of the United States.

EVIDENCE OF CITIZENSHIP OR
ELIGIBLE STATUS.....The documents that must be submitted to evidence citizenship or eligible immigration status.

HEAD OF
HOUSEHOLD.....The adult member of the family who is the head of the household for determining income eligibility and rent.

HUD.....The U. S. Department of Housing and Urban Development.

MIXED FAMILY.....A family whose members include those with citizenship or eligible immigration status and those without citizenship or eligible immigration status.

NATIONAL.....A person who owes permanent allegiance to the United States; for example, because of birth in a United States territory or possession.

NON-CITIZEN.....A person who is neither a citizen nor a national of the United States.

PHA.....A housing authority that operates public housing.

RESPONSIBLE ENTITY....The person or entity responsible for administering the restrictions on assisting non-citizens with ineligible immigration status (*i.e. or e.g.,* the PHA).

SECTION 214.....Section 214 restricts HUD from making financial assistance available for non-citizens unless they meet one of the categories of eligible immigration status specified in Section 214 of the Housing and Community Development Act of 1980, as amended (*42 U.S.C. 1436a*).

SPOUSE.....The marriage partner, either a husband or wife, who is the person whom one would need to divorce in order to dissolve the relationship. It

includes the partner in a common-law marriage. It does not cover boyfriends, girlfriends, significant others or “co-heads.”

“Co-head” is a term recognized by some HUD programs, but not by public and Indian housing programs.

Chapter 21 PROGRAM INTEGRITY ADDENDUM [§ 24 CFR 792.101 to 792.204, 982.54]

INTRODUCTION

The U. S. Department of Housing and Urban Development conservatively estimates that six-hundred million dollars is paid annually to program participants who falsify or omit material facts in order to gain more rental assistance than they are entitled to under the law. HUD further estimates that twelve percent of all HUD-assisted families are either totally ineligible or are receiving benefits that exceed their legal entitlement.

The PHA is committed to assuring that the proper level of benefits is paid to all participating families and that housing resources reach only income-eligible families so that program integrity can be maintained.

The PHA will take all steps necessary to prevent fraud, waste and mismanagement so that program resources are utilized judiciously.

This Chapter outlines the PHA's policies for the prevention, detection and investigation of program abuse and fraud.

Consideration of Remedies

In the case of family-caused errors or program abuse, the PHA will take into consideration

1. the seriousness of the offense and the extent of participation or culpability of individual family members, and

2. special circumstances surrounding the case,

3. any mitigating circumstances related to the disability of a family member,

4. the effects of the particular remedy on family members who were not involved in the offense.

In the case of owner-caused errors or program abuse, the PHA will take into consideration

1. the seriousness of the offense,

2. the length of time since the violation has occurred and

3. the effects of a particular remedy on family members who are not involved in the offense.

A. CRITERIA FOR INVESTIGATION OF SUSPECTED ABUSE AND FRAUD

Under no circumstances will the PHA undertake an inquiry or an audit of a participating family arbitrarily. The PHA's expectation is that participating families will comply with HUD

requirements, provisions of the voucher and other program rules. The PHA staff will make every effort (*formally and informally*) to orient and educate all families in order to avoid unintentional violations. However, the PHA has a responsibility to HUD, to the community and to eligible families in need of housing assistance to monitor participants and owners for compliance and, when indicators of possible abuse come to the PHA' s attention, to investigate such claims.

The PHA will initiate an investigation of a participating family only in the event of one or more of the following circumstances:

1. **Referrals, Complaints or Tips**. The PHA will follow up on referrals received by mail, by telephone or in person from other agencies, companies or persons that allege that a family is in non-compliance with or otherwise violating the family obligations or any other program rules. Such follow-up will be made providing that the referral contains at least one item of information that is independently verifiable. A copy of the allegation will be retained in the family's file.

2. **Internal File Review**. A follow-up will be made if PHA staff discovers (*as a function of a certification or recertification, an interim redetermination or a quality control review*), information or facts that conflict with previous file data, the PHA's knowledge of the family or statements made by the family.

3. **Verification of Documentation**. A follow-up will be made if the PHA receives independent verification or documentation that conflicts with representations in the family's file (*such as public record information or reports from credit bureau or other agencies*).

B. STEPS THE PHA WILL TAKE TO PREVENT PROGRAM ABUSE AND FRAUD

The PHA management and staff will utilize various methods and practices (*listed below*) to prevent program abuse, non-compliance and willful violations of program rules by applicants and participating families. This policy objective is to establish confidence and trust in the management by emphasizing education as the primary means to obtain compliance by families.

Things You Should Know (HUD-1140-OIG). This program integrity bulletin (*created by HUD's inspector general*) will be furnished and explained to all applicants to promote understanding of program rules and to clarify the PHA's expectations for cooperation and compliance.

Program Orientation Session. Mandatory orientation sessions will be conducted by the PHA staff for all prospective program participants, either before or upon issuance of a voucher. At the conclusion of all program orientation Sessions, the family representative will be required to sign a “program briefing certificate” to confirm that all rules and pertinent regulations were explained to them.

Resident Counseling. The PHA will routinely provide participant counseling as a part of every recertification interview in order to clarify any confusion pertaining to program rules and requirements.

Review and Explanation of Forms. Staff will explain all required forms and review the contents of all re-certification documents before signature.

Use of Instructive Signs and Warnings. Instructive signs will be conspicuously posted in common areas and interview areas to reinforce compliance with program rules and to warn about penalties for fraud and abuse

Participant Certification. All family representatives will be required to sign a participant certification form.

C. STEPS THE PHA WILL TAKE TO DETECT PROGRAM ABUSE AND FRAUD

The PHA staff will maintain a high level of awareness to indicators of possible abuse and fraud by assisted families.

Quality Control File Reviews. Before initial certification and at the completion of all subsequent re-certifications**,** five percent of the participant file will be reviewed. Such reviews shall include, but are not limited to:

1. Assurance that verification of all income and deductions is present.

2. Changes in reported Social Security Numbers or dates of birth.

3. Authenticity of file documents.

4. Ratio between reported income and expenditures.

5. Review of signatures for consistency with previously signed file documents.

6. All forms are correctly dated and signed.

Observation. The PHA management and occupancy staff (*to include inspection personnel*) will maintain high awareness of circumstances that may indicate program abuse or fraud, such as unauthorized persons residing in the household and unreported income.

Observations will be documented in the family's file.

Public Record Bulletins may be reviewed by management and staff.

State Wage Data Record Keepers. Inquiries to state wage and employment record keeping agencies as authorized under Public Law 100-628, the Stewart B. McKinney Homeless Assistance Amendments Act of 1988, may be made annually in order to detect unreported wages or unemployment compensation benefits

Credit Bureau Inquiries. Credit bureau inquiries may be made (*with proper authorization by the participant*) in the following circumstances:

1. At the time of final eligibility determination

2. When an allegation is received by the PHA wherein unreported income sources are disclosed

D. THE PHA'S HANDLING OF ALLEGATIONS OF POSSIBLE ABUSE AND FRAUD

The PHA staff will encourage all participating families to report suspected abuse to the Housing Director**.** All such referrals, as well as referrals from community members and other agencies, will be thoroughly documented and placed in the participant's file. All allegations, complaints and tips will be carefully evaluated in order to determine if they warrant follow-up. The Housing Director will not follow up on allegations that are vague or otherwise non-specific. They will only review allegations that contain one or more independently verifiable facts.

File Review. An internal file review will be conducted to determine whether the subject of the allegation is a client of the PHA and, if so, to determine whether the information reported has been previously disclosed by the family.

The PHA will then determine whether it is the most appropriate authority to do a follow-up (*more so than police or social services*). Any file documentation of past behavior as well as corroborating complaints will be evaluated.

Conclusion of Preliminary Review. If at the conclusion of the preliminary file review there are facts contained in the allegation that conflict with file data and the fact(s) are independently verifiable, the supervisor will initiate an investigation to determine if the allegation is true or false.

E. OVERPAYMENTS TO OWNERS

If the owner has been overpaid because of fraud, misrepresentation or violation of the HAP contract, the PHA may terminate the contract and arrange for restitution to the PHA and/or family as appropriate.

The PHA will make every effort to recover any overpayments made because of owner fraud or abuse. Payments otherwise due to the owner may be debited in order to repay the PHA or the tenant, as applicable.

F. HOW THE PHA WILL INVESTIGATE ALLEGATIONS OF ABUSE AND FRAUD

If the PHA determines that an allegation or referral warrants follow-up, either the staff person who is responsible for the file or a person designated by the executive director to monitor the program compliance will conduct the investigation. The steps taken will depend upon the nature of the allegation and may include, but are not limited to, the items listed below. In all cases, the

PHA will secure the written authorization from the program participant for the release of information.

Credit Bureau Inquiries. In cases involving previously unreported income sources, a credit bureau inquiry may be made to determine if there is financial activity that conflicts with the reported income of the family.

Verification of Credit. In cases where the financial activity conflicts with file data, a *Verification of Credit* form may be mailed to the creditor in order to determine the unreported income source.

Employers and Ex-Employers. Employers or ex-employers may be contacted to verify wages that may have been previously undisclosed or misreported.

Neighbors/Witnesses. Neighbors and/or other witnesses may be interviewed who are believed to have direct or indirect knowledge of facts pertaining to the PHA's review may be interviewed.

Other Agencies. Investigators, caseworkers or representatives of other benefit agencies may be contacted.

Public Records. If relevant, the PHA will review public records kept in any jurisdictional courthouse. Examples of public records that may be checked are:

1. real estate records,
2. marriage and divorce records,
3. uniform commercial code financing statements,
4. voter registration rolls,
5. judgments,
6. court or police records,
7. state wage records,
8. utility records and
9. postal records.

Interviews with Head of Household or Family Members. The PHA will discuss the allegation (*or details thereof*) with the head of household or family member by scheduling an appointment at the appropriate PHA office. A high standard of courtesy and professionalism will be maintained by the PHA staff person who conducts such interviews. Under no circumstances will inflammatory language, accusation or any unprofessional conduct or language be tolerated by the management. If possible, an additional staff person will attend such interviews.

G. PLACEMENT OF DOCUMENTS, EVIDENCE AND STATEMENTS OBTAINED BY THE PHA

Documents and other evidence obtained by the PHA during the course of an investigation will be considered “work product” and will either be kept in the participant's file or in a separate “work file.” In either case, the participant's file or work file shall be kept in a locked file cabinet. Such cases under review will not be discussed among PHA staff that are involved in the process or have information that may assist in the investigation.

H. CONCLUSION OF THE PHA'S INVESTIGATIVE REVIEW

At the conclusion of the investigative review, the reviewer will report the findings to the executive director or designee. It will then be determined whether the facts are inconclusive and if so, whether a violation has or has not occurred.

I. EVALUATION OF THE FINDINGS

If it is determined that a program violation has occurred, the PHA will review the facts to determine:

1. What type of violation has occurred (*procedural, non-compliance, fraud*)

2. Whether the violation was intentional or unintentional.

3. What amount of money (*if any*) is owed by the family.

4. If the family is eligible for continued occupancy.

J. ACTION PROCEDURES FOR VIOLATIONS THAT HAVE BEEN DOCUMENTED

Once a program violation has been documented, the PHA will propose the most appropriate remedy based upon the type and severity of the violation.

Procedural Non-compliance. This category applies when the family “fails to” observe a procedure or requirement of the PHA , but does not misrepresent a material fact and there is no retroactive assistance payments owed by the family.

Examples of non-compliance violations are:

1. Failure to appear at a pre-scheduled appointment.

2. Failure to return verification in period specified by the PHA.

Warning Notice to the Family.

In such cases, a notice will be sent to the family that contains the following:

1. A description of the non-compliance and the procedure, policy or obligation that was violated.

2. The date that the violation must be corrected or the procedure complied with.

3. The action that will be taken by the PHA if the procedure or obligation is not complied with by the date specified by the PHA.

4. The consequences of repeated (*similar*) violations.

Procedural Non-compliance - Overpaid Assistance. When the family owes money to the PHA for failure to report changes in income or assets, the PHA will issue a notification of overpayment of assistance. This notice will contain the following:

1. A description of the violation and the date(s).

2. Any amounts owed to the PHA.

3. Notification of a ten-calendar day response period.

4. Acknowledgement of the family's right to disagree and to request an informal hearing with instructions for the request of such hearing.

Participant Fails to Comply with PHA's Notice. If the Participant fails to comply with the PHA's notice and a family obligation has been violated, the PHA will initiate termination of assistance.

Participant Complies with PHA's Notice. When a family complies with the PHA's notice, the staff person responsible will meet with him/her to discuss and explain the family obligation or program rule that was violated. The staff person will complete a participant counseling report, give one copy to the family and retain a copy in the family's file.

Intentional Misrepresentations. When a participant falsifies, misstates, omits or otherwise misrepresents a material fact that results (*or would have resulted*) in an overpayment of housing assistance by the PHA, the PHA will evaluate whether or not:

1. The participant had knowledge that his/her actions were wrong and

2. The participant willfully violated the family obligations or the law.

Knowledge. This will be evaluated by determining if the participant was made aware of program requirements and prohibitions. The participant's signature on various certifications, briefing certificate, personal declaration and are adequate to establish knowledge of wrong-doing.

Willful Intent. Any of the following circumstances will be considered adequate to demonstrate willful intent:

1. An admission by the participant of the misrepresentation.

2. Repetition of the misrepresentation.

3. Using a false name or Social Security Number.

4. Admissions of the illegal action or omission by the participant to others.

5. Omission of material facts known to the participant (*e.g., employment of the participant or other household member*).

6. Falsification, forgery or altering documents.

7. Uttering and certifying to statements at an interim re-determination that were later independently verified to be false.

Dispositions of Cases Involving Misrepresentations. In all cases of misrepresentations involving efforts to recover monies owed, the PHA may pursue, depending upon its evaluation of the criteria stated above, one or more of the following actions:

Criminal Prosecution: If the PHA has established criminal intent and the case meets the criteria for prosecution, the PHA will:

Refer the case to the local State's Attorney, notify HUD's Regional Inspector General for Investigation (RIGI) and terminate rental assistance.

Administrative Remedies: The PHA will at its discretion:

1. Terminate assistance and demand payment of restitution in full.

Terminate assistance and execute an administrative repayment agreement in accordance with the PHA's Repayment Policy

2. Terminate assistance and pursue restitution through civil litigation.

MOVING ON
NOV 2017

1. PROJECT BASED VOUCHER PROGRAM

1.1 PROGRAM OVERVIEW AND OBJECTIVE

The Department of Housing and Urban Development Project Based Voucher (PBV) Program regulations allows the City of Hartford (COH) Housing Choice Voucher Program to use a portion of its existing budget authority to attach up to 20% of its Housing Choice Voucher (HCV) Program funding to specific units in buildings. The COH has chosen to implement this option because PBV provides housing that is stable and permanent, and which offers tenants close accessibility to supportive services.

The City of Hartford may implement more than one PBV initiative at any one time. The specific requirements of each initiative will be publically announced.

The PBV program is administered as part of the COH HCV Section 8 program. The COH enters into a Housing Assistance Payments (HAP) contract with an owner for units in existing housing, or in newly constructed or rehabilitated housing. When the PBV housing is new construction or rehabilitation, the housing is developed under an Agreement to enter into a Housing Assistance Payments ("AHAP") contract between the COH and the Owner. During the term of the HAP contract, the COH makes housing assistance payments to the owner for units leased and occupied by eligible families.

The objectives of this program are multi-purpose and include the following goals:

Moving On Pilot Program – PBV Units

- Support for the City of Hartford Commission To End Chronic Homelessness Goals and the Capitol Region's Ten Year Plan to End Homelessness. The Moving On Pilot Program is designed to assist the most vulnerable homeless individuals in accessing supportive housing by expanding the capacity of supportive housing programs with Project Based Vouchers. Moving On focuses on redirecting supportive housing services to target those with higher needs. As individuals successfully stabilize in supportive housing, their need for support services may decline over time but their need for rental assistance remains. Moving On focuses on "unclogging" the system by allowing current, stable tenants of supportive housing that no longer need an intensive level of support services to maintain their permanent housing by providing them with a rental subsidy. Moving On then backfills those supportive housing slots with the most vulnerable long term shelter stayers and high service utilizers in need of the intensive services.

Grand Families Program – PBV Units

- The development and rehabilitation of vacant existing structures designated for grandparents raising grandchildren to including the provision to make available appropriate supportive services for the intended population.

Preserving Low Income Housing – PBV Units

- Incentive for owners/developer to rehab marginal property in key rental market areas in support of overall city housing and development goals. The PBV program rental assistance provides stable rental income to help absorb rehab expense. In addition, the PBV program serves to preserve existing buildings and to help support the rental and maintenance requirements of the properties.

Elderly Program – PBV Units

- To expand housing options for low-income elderly families with special needs and to increase the supply of affordable accessible housing for this particular population. Units are to be designated exclusively for occupancy by persons who are 62 years of age and over.

The COH may expand its PBV program. At that time the COH will announce the availability of additional vouchers for the program and invite owners of residential properties to apply. This notice, called a Request for Proposals (RFP), will describe application procedures, scoring criteria, number of vouchers available, geographic area to be served, population to be served, building type, and unit condition; rehabilitation requirements and amount if any.

1.2 ELIGIBILITY AND SELECTION OF TENANTS

The program is designed to make project-based rental subsidies accessible so interested and eligible families can afford safe, decent and sanitary housing; to provide any and all services with integrity; and to create housing situations which will serve as catalysts for the transformation from dependence to economic self-sufficiency in assisting the targeted population. All participants must meet HUD and COH eligibility requirements.

A. Eligibility for the COH PBV Program

To be eligible for participation in the COH's Housing Choice Voucher Program an applicant must:

1. Be a "family," as defined in the COH Administrative Plan, which must have a head of household or spouse who is at least 18 years of age or an emancipated minor.
2. Be within the appropriate income limits as established annually by HUD.
3. Furnish Social Security Numbers for all family members.
4. Be a United States Citizen or Eligible Non-Citizen. Evidence of Citizenship/Eligible Immigrant Status will be collected and verified before the family's initial lease-up into the program;
5. Not owe any money to the COH or any other housing authority.
6. Complete the application process, and provide truthful and verifiable information about income and personal circumstances.
7. Cooperate in the verification of application information.
8. Meet HUD admission standards.

In addition to the above, the COH must deny admission to the PBV program for families that have been evicted from a federally subsidized unit for illegal drug activity, been convicted of methamphetamine production in federally assisted housing, have a family member who is currently using illegal drugs, have a family member who is a sex offender. In addition, the COH may deny admission if a family has a family member who has a pattern of abuse of alcohol. All members of

the family must meet the COH's criminal history standards and, if they have previously been a resident of any of the COH's programs, must meet the COH's Section 8 participant history standards, and standards outlined in this chapter for admission to the program. See the COH Administrative Plan for detail information on admission criteria to the COH programs.

B. PBV Waiting List

All vacant units from the Project-Based Voucher program will be listed as available to all qualified applicants of the City of Hartford waiting list. Project owners must select applicants from the City of Hartford waiting list (unless the waiting list is exhausted or property owner can demonstrate that waiting list applicants are not sufficiently meeting the property owner's selection criteria). All interested applicants will receive a referral letter to present to the project owner to confirm that they are qualified City of Hartford applicants. The project owner is responsible for screening and selection of tenants for suitability of tenancy. The owner may refuse any family, provided the owner does not unlawfully discriminate.

Moving On Waiting List:

There will be a single waiting list for all Moving On designated PBV units and it will be maintained by the COHHA.

Preference

Federal regulations permit a housing authority to establish a system of preferences for the selection of families admitted to the program. The system must be based on local housing needs and priorities as determined by the PHA.

There will be a preference for a person who has a disability that presents barriers to maintaining housing, who is currently living in permanent supportive housing within the City of Hartford; and has been certified by his/her supportive housing provider that he/she is no longer in need of intensive housing based support services in order to maintain housing stability. Tenants will be afforded the opportunity to participate in a supportive housing services program but will not be required to participate. The City of Hartford's Housing Choice Voucher Program waiting list applicants who meet this preference would be considered first.

Applications received under this preference must be referred by a Permanent Supportive Housing Program in Hartford.

Families will be selected based upon the date and time of the application.

All other applicants applying to the Moving On Waiting List must be able to verify that they are an unaccompanied homeless individual with a disabling condition who has either been continuously homeless for one (1) year or more or has had at least four (4) episodes of homelessness in the past three (3) years. To be considered chronically homeless a person must have been on the streets or in an emergency shelter, (not in transitional housing) during these episodes of homelessness.

Verification of information including current place of residency, is performed to ensure that families are eligible and selected according to the Administrative Plan.

HMIS Sufficient
DV form → option 3 or medical Record
↳ old definition

The HA must select participants from a HA waiting list, unless they are Special Admissions.

Special Admissions

The HA may admit an applicant for participation in the program either as a special admission or as a waiting list admission. If HUD awards special allocations funding that is targeted for families with specific characteristics or families living in specific units, the HA will use the assistance for those families with specific characteristics or living in those units. The HA will maintain records showing that the family was issued a HUD-targeted Voucher and is authorized for priority admission. This priority will not exceed the special allocation of housing vouchers made available by HUD for the HUD stated purposes.

Moving On Waiting List

The HA will also maintain a separate waiting list for the Project-Based Voucher Program for the Moving On pilot initiative (see Project-Based Voucher Program Administrative Plan).

Family Unification Program

The Family Unification Program (FUP) is a targeted program making Housing Choice Vouchers (HCVs) available to FUP-eligible families and or FUP-eligible youths as defined below to provide adequate housing as a means to promote family unification through the FUP.

FUP-eligible families are families for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child, or children, in out-of-home care; or the delay in the discharge of the child, or children, to the family from out-of-home care. FUP-eligible youths are youths at least 18 years old and not more than 21 years old (have not reached their 22nd birthday) who left foster care at age 16 or older and who do not have adequate housing, are also eligible to receive housing assistance under FUP. A FUP voucher issued to such a youth may only be used to provide housing assistance for the youth for a maximum of 18 months.

All FUP-eligible families and FUP-eligible youths must be referred by the State of Connecticut Department of Children and Families (DCF) and have an open case with DCF at the time of referral, selection and when the FUP voucher is issued.

The HA will accept families or youths certified by the DCF as eligible for the FUP.

The HA first reviews its waiting list for any DCF referred FUP-eligible families or youths; these families will be among the first served through FUP assistance in order of their position on the waiting list in accordance with HA admission policies, once they are determined to meet Section 8 criteria.

The HA will determine if any family or youth on the HCV waiting list are living in temporary shelters or on the street and may qualify for the FUP and refer such applicants to DCF.

A separate waiting list will be maintained for the Family Unification Program. Referrals/pre-applications will be placed on the FUP waiting list by the date and time of receipt until further notice. Any new FUP eligible applicants will be placed at the bottom of the FUP waiting list. If found ineligible for the FUP, they will be removed from the FUP wait list, however if they are on the HCV wait list they will retain their position on the HCV wait list.

If there are not enough FUP eligible applicants either on the HCV wait list or the FUP wait list, the HA will advertise the announcement of opening the FUP wait list for FUP eligible applicants only.

When an FUP voucher becomes available a family will be selected from the list. After the family is determined eligible to receive a Section 8 subsidy, the family will be admitted to participate in the program in accordance with HUD regulations and other requirements, and with policies stated in the HA's administrative plan.

All FUP vouchers will be issued to other FUP-eligible applicants upon turnover.

The HA will adhere to the following requirements regarding the FUP program:

- Once a FUP-eligible family or FUP-eligible youth is admitted to the program, the HA will track the family/youth via the HUD-50058, Family Report with the program code "FUPF" on line "2n" of the Family Report. The HA must maintain this code on the form HUD-50058 for the duration of the FUP family/youth's participation in the HCV program.
- A FUP voucher issued to a FUP-eligible youth may only be used to provide housing assistance for the youth for a maximum of 18 months.
- Documentation of a family or youth's eligibility for a FUP voucher must supply a clear audit trail to show the families were admitted to the program according to the applicable program rules and requirements.
- The HA shall administer the funding awarded for the FUP in accordance with the Notice of Funding Availability (NOFA) specifications, program requirements and regulations and the executed Memorandum of Understanding (MOU) between the HA and Department of Children and Families (DCF).

4.2 IDENTIFICATION OF PREFERENCES

The following categories represent preferences on the waiting list:

Chronically Homeless – an individual or family who has been homeless for 12 months continuously or who has had four occasions of homelessness in the past three years and has a disability as defined by HUD in 24 CFR Parts 91 and 578, December 4, 2015 where an individual or family is referred by Journey Home on behalf of the Greater Hartford Coordinated Access Network, a consortium of over 20 different homeless service agencies.

Redevelopment Displacement - to address the displacement of families residing in Bowles Park and Westbrook Village where relocation is triggered by redevelopment through new construction.

Homeless families with children and homeless youth – A family that has at least one adult and at least one child under 18 years old who is experiencing homeless, or an individual who is 18-24 years old or is less than 18 years old and emancipated and experiencing homelessness and as defined by HUD in 24 CFR 578.3: Category 1 or Category 4.

Homeless household – An individual or family who lacks a fixed, regular, and adequate nighttime residence, as defined by HUD in 24 CFR 578.3: Category 1 or Category 4.

Elderly family - A family whose head or spouse (or sole member) is 62 years or older and a family that includes an elderly person(s).

Disabled family - A family whose member(s) include a person(s) who is under a disability as defined in Section 223 of the Social Security Act (42 U.S.C. 423) or has a developmental disability as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(7)).

Handicapped family - A family whose member(s) include a person(s) having a physical or mental impairment that (a) is expected to be of a long-continued and indefinite duration, (b) substantially impedes his or her ability to live independently, and (c) is of such nature that such ability could be improved by more suitable housing.

4.3 RANKING OF THE PREFERENCES

Ranking preferences are identified below by the numeric value next to the preference category (example: a "1" in the space that represents the first priority, a "2" in the box representing the second priority, and so on.) If equal weight is given to one or more of these choices the same number will be next to both.

Preferences

1 Chronically homeless an individual or family who has been homeless for 12 months continuously or who has had four occasions of homelessness in the past three years and has a disability and as defined by HUD in 24 CFR Parts 91 and 578. December 4, 2015. This preference will also include persons transitioning out of permanent supportive

housing programs, who were previously homeless prior to entry into the permanent supportive housing program. All referrals will come from Journey Home on behalf of the Greater Hartford Coordinated Access Network.

2 Redevelopment Displacement – A family currently living in Bowles Park and Westbrook Village who is being displaced by redevelopment due to new construction.

3 Homeless families with children and homeless youth – A family that has at least one adult and at least one child under 18 years old who is experiencing homeless, or an individual who is 18-24 years old or is emancipated and experiencing homelessness and as defined by HUD in 24 CFR 578.3: Category 1 or Category 4.

4 Homeless Households – An individual or family who lacks a fixed, regular, and adequate nighttime residence, as defined by HUD in 24 CFR 578.3: Category 1 or Category 4.

5 Elderly family - A family whose head or spouse (or sole member) is 62 years or older.

6 Disabled family - A family whose member(s) include a person(s) who is under a disability as defined in Section 223 of the Social Security Act (42 U.S.C. 423) or has a developmental; disability as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(7)).

7 Handicapped family - A family whose member(s) include a person(s) having a physical or mental impairment that (a) is expected to be of a long-continued and indefinite duration, (b) substantially impedes his or her ability to live.

8 No Preference - All other qualified applicants with no preference.

4.4 VERIFICATION REQUIREMENTS OF PREFERENCES CATEGORIES

In order to be eligible to apply and to qualify for the preference categories, sufficient documentation must be provided by the applicant prior to admission. Applicants may provide additional documentation while on the waiting list that may improve their ranking.

Chronically Homeless households - verification documentation will be obtained by the Greater Hartford Coordinated Access Network before referrals are made to the HA.

Redevelopment Displacement – documentation must be provided by the Hartford Housing Authority verifying that tenant household is a qualified family in good standing (current lease listing all existing household members) or a current dated written statement from the Hartford Housing Authority indicating that tenant household is in good standing and lists all household members.

- The HA shall administer the funding awarded for the FUP in accordance with the Notice of Funding Availability (NOFA) specifications, program requirements and regulations and the executed Memorandum of Understanding (MOU) between the HA and Department of Children and Families (DCF).

Homeless Wait List

Information from all pre-application forms will be entered into a secure Access Database. A waiting list will be generated for all eligible referrals based on the scoring system. Households with the same prioritization score will be placed onto the waitlist according to the date that the pre-application form was received. Journey Home will refer applicants to the HA as vouchers become available. A physical copy of the waitlist will be timestamped, saved and printed on a monthly basis. Physical copies of all pre-application forms will be securely retained for seven years. Copies of preference and priority verification methods and forms will be submitted with the pre-application at time of referral and made a permanent part of each client's case file.

A printed version of the preference and priority waiting lists reports will be maintained and shared with the HA on a monthly basis for audit trail support and audit requirements needs.

Referrals from the Greater Hartford Coordinated Access Network

The Greater Hartford Coordinated Access Network (GH CAN) currently holds three housing matching meetings, one for families, one for individual re-housing referrals and one for those identified as Chronically Homeless. All households that have been in an emergency shelter for two weeks or more, or have been in a place not meant for human habitation for two weeks are more and are working with an outreach worker, complete a VI-SPDAT assessment, or Next Step Tool for youth, and their names are automatically placed onto the GH CAN "By Name List" in the Homeless Management Information System. This is the centralized list used in the greater Hartford region to make referrals for available housing units and this will be the same list that is used for purposes of determining eligibility for referral under this program. Other potentially eligible households, including those in Department of Social Services or State of CT Department of Children and Families emergency shelters, or those in hotels or motels paid for by government or charity can be added to this list by calling Journey Home and completing a VI-SPDAT or Next Step Tool with them or another CAN provider, and providing evidence that they have been in a hotel/shelter paid for by government or charity for two weeks or more. Being on the By Name List will be the threshold for determining that the household is being referred from the GH CAN.

GH CAN providers will, at the housing matching meetings of families and youth households, assist in determining whether a given individual/family would be a good fit for the Housing Choice Voucher program, though any eligible household who is on the By Name List will be allowed to apply. For households coming from Rapid re-housing programs, they will be required to produce a Rapid Rehousing referral form which

designates that in the professional opinion of the program staff the household will not be able to maintain permanent housing when they are terminated from the rapid re-housing program. Households recently enrolled in Rapid re-housing or households that are believed to "graduate" from rapid rehousing successfully able to afford their housing will not be eligible. Rapid Re-housing staff will be thoroughly trained to understand the preference requirements.

4.2 IDENTIFICATION OF PREFERENCES

The following categories represent preferences on the waiting list:

As with any waiting list and any published added preference, the HA will first review its existing waiting list for any eligible family that would meet the preference criteria in order to give that family, by order of their wait list position, the opportunity to see if they qualify for the specific preference and be able to be among the first served in accordance with HA admission policies, once they are determined to meet Section 8 criteria.

Chronically Homeless – an individual or family who has been homeless for 12 months continuously or who has had four occasions of homelessness in the past three years and has a disability as defined by HUD in 24 CFR Parts 91 and 578, December 4, 2015 where an individual or family is referred by Journey Home on behalf of the Greater Hartford Coordinated Access Network, a consortium of over 20 different homeless service agencies.

Redevelopment Displacement - to address the displacement of families residing in Bowles Park and Westbrook Village where relocation is triggered by redevelopment through new construction.

Homeless Families with children and unaccompanied homeless youth - A family that has at least one adult and at least one child under the age of 18 that is experiencing homelessness, or an individual who is 18-24 years old, or an individual or family where the head of household is under the age of 18 and is legally emancipated that is experiencing homeless as defined by HUD in 24 CFR 578.3: Category 1 or Category 4 for a minimum of at least 30 days, or is unsuccessfully terminating out of a rapid rehousing program and where this individual or family is referred by Journey Home on behalf of the Greater Hartford Coordinated Access Network.

Homeless household – An individual or family who lacks a fixed, regular, and adequate nighttime residence, as defined by HUD in 24 CFR 578.3: Category 1 or Category 4.

Elderly family - A family whose head or spouse (or sole member) is 62 years or older and a family that includes an elderly person(s).

Disabled family - A family whose member(s) include a person(s) who is under a disability as defined in Section 223 of the Social Security Act (42 U.S.C. 423) or has a developmental disability as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(7)).

Handicapped family - A family whose member(s) include a person(s) having a physical or mental impairment that (a) is expected to be of a long-continued and indefinite duration, (b) substantially impedes his or her ability to live independently, and (c) is of such nature that such ability could be improved by more suitable housing.

4.3 RANKING OF THE PREFERENCES

Ranking preferences are identified below by the numeric value next to the preference category (example: a "1" in the space that represents the first priority, a "2" in the box representing the second priority, and so on.) If equal weight is given to one or more of these choices the same number will be next to both.

Preferences

1 Chronically homeless - An individual or family who has been homeless for 12 months continuously or who has had four occasions of homelessness in the past three years and has a disability and as defined by HUD in 24 CFR Parts 91 and 578. December 4, 2015. This preference will also include persons transitioning out of permanent supportive housing programs, who were previously homeless prior to entry into the permanent supportive housing program. All referrals will come from Journey Home on behalf of the Greater Hartford Coordinated Access Network and will be prioritized based on need according to length of time homeless and the VI SPDAT assessment.

2 Redevelopment Displacement – A family currently living in Bowles Park and Westbrook Village who is being displaced by redevelopment due to new construction.

3 Homeless Families with children and unaccompanied homeless youth - A family that has at least one adult and at least one child under the age of 18 that is experiencing homelessness, or an individual who is 18-24 years old, or an individual or family where the head of household is under the age of 18 and is legally emancipated that is experiencing homeless as defined by HUD in 24 CFR 578.3: Category 1 or Category 4 for a minimum of at least 30 days, or is unsuccessfully terminating out of a rapid rehousing program and where this individual or family is referred by Journey Home on behalf of the Greater Hartford Coordinated Access Network. Eligible families and individuals will be referred on a prioritized basis as determined by a point system; described below:

Housing Choice Voucher- Homeless Families and Youth Preference Point System:

Points	Criteria
(+1)	For **each month** of homelessness (in a transitional living program, sleeping outside or place not meant for human habitation, in a shelter, or in a hotel paid for by charity, or in an institution where they have resided for less than 90 days and were in one of the aforementioned locations immediately prior to entering the institution) **that is verified by a third-party provider** (shelter provider, doctor, police, etc.)
(+1)	If the household has any children under the age of 6
(+1)	If the household has a history of involvement with the CT Department of Children and Families
(+1)	If the household's current occasion of homelessness is due to them being kicked out of a parent or guardian's home.
(+1)	If the individual or family is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking or other dangers 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 individuals' or families primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence, and has no other residence, and lacks the resources or support networks, e.g. family, friends and faith-based or other social networks, to obtain other permanent housing.

Within the "Homeless Families and Youth" preference category is a priority point system. One priority point will be awarded for each criteria with the exception of the first listed criteria. In the case of the first criteria one priority point will be awarded for each month of homelessness. The highest number of priority points that an applicant can qualify for with this preference category will determine the top ranked applicants. Ties will be broken by date of application.

Eligibility Screening and the Point System:

Families with children under 18, youth or young adults on the HA current waitlist wishing to be screened for the preference and households referred by the GH CAN will be asked to complete the **City of Hartford Homeless Youth and Family Waiting List Pre-Application Form.** This form and required documentation that must be submitted with the form will collect the information necessary to determine if the household is eligible for the preference as well as to determine the household's level or prioritization.

Households that may be eligible for the preference, but are ineligible for a Housing Choice Voucher because they do not meet the HA's admission standards as outlined in the Administrative Plan, will be denied for the preference.

4 Homeless Households – An individual or family who lacks a fixed, regular, and adequate nighttime residence, as defined by HUD in 24 CFR 578.3: Category 1 or Category 4.

5 Elderly family - A family whose head or spouse (or sole member) is 62 years or older.

6 Disabled family - A family whose member(s) include a person(s) who is under a disability as defined in Section 223 of the Social Security Act (42 U.S.C. 423) or has a developmental; disability as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(7)).

7 Handicapped family - A family whose member(s) include a person(s) having a physical or mental impairment that (a) is expected to be of a long-continued and indefinite duration, (b) substantially impedes his or her ability to live.

8 No Preference - All other qualified applicants with no preference.

4.4 VERIFICATION REQUIREMENTS OF PREFERENCE CATEGORIES

In order to be eligible to apply and to qualify for the preference categories, sufficient documentation must be provided by the applicant prior to admission. Applicants may provide additional documentation while on the waiting list that may improve their ranking.

Chronically Homeless households - verification documentation will be obtained by the Greater Hartford Coordinated Access Network before referrals are made to the HA.

Redevelopment Displacement – documentation must be provided by the Hartford Housing Authority verifying that tenant household is a qualified family in good standing (current lease listing all existing household members) or a current dated written statement from the Hartford Housing Authority indicating that tenant household is in good standing and lists all household members.

Homeless families with children and unaccompanied homeless youth – documentation must be provided to verify that the individual or family qualifies for the preference. The HA may rely on the Greater Hartford Coordinated Access Network or partnering homeless service organizations to verify the individual or family qualifies for the preference before the individual or family is referred to the HA.

Verification Method (priority points)

- Number of months experiencing homelessness – third party verification as outlined in 24 CFR 576.500(b)(1)(2) and (5) as elaborated on in the CoC FAQs at https://www.hudexchange.info/coc/faqs/ for every month of homelessness in order to be awarded a point.

- Household with children under the age of 6 – Birth certificates will be the method used to verify an applicant's ability to meet this priority point however, the self-certification by the head of household on the pre-application form will be sufficient to award this point on the waitlist placement until birth certificates are obtained. Birth certificates must be produced prior to referral to the HA in order to receive this point and confirm the household's priority on the waitlist.

- Household that have a history of involvement with the CT Department of Children and Families – a letter from a DCF employee indicating current or previous history with the Department of Children and Families is the preferred method of verification. Where such a letter cannot be obtained, a letter from another services provider, as defined by HUD, on their letterhead, indicating they knew the client to currently or historically be engaged with DCF may be accepted to qualify for this point.

- Household's current occasion of homelessness is due to being kicked out of a parent or guardian's home – Preferred method of verification is a letter from a service provider, as defined by HUD, on letterhead indicating that they believe the household's homelessness is a result of them being kicked out of the home of a parent or guardian. In the instance where such documentation cannot be obtained, applicant self-certification as indicated by an answer of "yes" to this question on the pre-application form, will be sufficient to be awarded this point.

- Individual or family is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking or other dangers 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 individuals' or families primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence, and has no other residence, and lacks the resources or support networks, e.g. family, friends and faith-based or other social networks, to obtain other permanent housing. – Preferred methods of verification for this include letters from a domestic violence provider or other service provider as defined by HUD, police report or other form of police verification, or a completed HUD Form 5382. Where these documents cannot be obtained an applicant's self-certification as indicated by an answer of "yes" to this question on the pre-application form, will be sufficient to be awarded this point.

Elderly family member(s) – documentation must be provided of birth date or senior citizen/elderly status. A birth certificate, third-party verification or sworn affidavit will constitute sufficient documentation.

The HA must select participants from a HA waiting list, unless they are Special Admissions.

Special Admissions

The HA may admit an applicant for participation in the program either as a special admission or as a waiting list admission. If HUD awards special allocations funding that is targeted for families with specific characteristics or families living in specific units, the HA will use the assistance for those families with specific characteristics or living in those units. The HA will maintain records showing that the family was issued a HUD-targeted Voucher and is authorized for priority admission. This priority will not exceed the special allocation of housing vouchers made available by HUD for the HUD stated purposes.

Moving On Waiting List

The HA will also maintain a separate waiting list for the Project-Based Voucher Program for the Moving On pilot initiative (see Project-Based Voucher Program Administrative Plan).

Family Unification Program

The Family Unification Program (FUP) is a targeted program making Housing Choice Vouchers (HCVs) available to FUP-eligible families and or FUP-eligible youths as defined below to provide adequate housing as a means to promote family unification through the FUP.

FUP-eligible families are families for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child, or children, in out-of-home care; or the delay in the discharge of the child, or children, to the family from out-of-home care. FUP-eligible youths are youths at least 18 years old and not more than 21 years old (have not reached their 22nd birthday) who left foster care at age 16 or older and who do not have adequate housing, are also eligible to receive housing assistance under FUP. A FUP voucher issued to such a youth may only be used to provide housing assistance for the youth for a maximum of 18 months.

All FUP-eligible families and FUP-eligible youths must be referred by the State of Connecticut Department of Children and Families (DCF) and have an open case with DCF at the time of referral, selection and when the FUP voucher is issued.

The HA will accept families or youths certified by the DCF as eligible for the FUP.

The HA first reviews its waiting list for any DCF referred FUP-eligible families or youths; these families will be among the first served through FUP assistance in order of their position on the waiting list in accordance with HA admission policies, once they are determined to meet Section 8 criteria.

The HA will determine if any family or youth on the HCV waiting list are living in temporary shelters or on the street and may qualify for the FUP and refer such applicants to DCF.

A separate waiting list will be maintained for the Family Unification Program. Referrals/pre-applications will be placed on the FUP waiting list by the date and time of receipt until further notice. Any new FUP eligible applicants will be placed at the bottom of the FUP waiting list. If found ineligible for the FUP, they will be removed from the FUP wait list, however if they are on the HCV wait list they will retain their position on the HCV wait list.

If there are not enough FUP eligible applicants either on the HCV wait list or the FUP wait list, the HA will advertise the announcement of opening the FUP wait list for FUP eligible applicants only.

When an FUP voucher becomes available a family will be selected from the list. After the family is determined eligible to receive a Section 8 subsidy, the family will be admitted to participate in the program in accordance with HUD regulations and other requirements, and with policies stated in the HA's administrative plan.

All FUP vouchers will be issued to other FUP-eligible applicants upon turnover.

The HA will adhere to the following requirements regarding the FUP program:

- Once a FUP-eligible family or FUP-eligible youth is admitted to the program, the HA will track the family/youth via the HUD-50058, Family Report with the program code "FUPF" on line "2n" of the Family Report. The HA must maintain this code on the form HUD-50058 for the duration of the FUP family/youth's participation in the HCV program.
- A FUP voucher issued to a FUP-eligible youth may only be used to provide housing assistance for the youth for a maximum of 18 months.
- Documentation of a family or youth's eligibility for a FUP voucher must supply a clear audit trail to show the families were admitted to the program according to the applicable program rules and requirements.
- The HA shall administer the funding awarded for the FUP in accordance with the Notice of Funding Availability (NOFA) specifications, program requirements and regulations and the executed Memorandum of Understanding (MOU) between the HA and Department of Children and Families (DCF).

Homeless Wait List

Information from all pre-application forms will be entered into a secure Access Database. A waiting list will be generated for all eligible referrals based on the scoring system. Households with the same prioritization score will be placed onto the waitlist according to the date that the pre-application form was received. Journey Home will refer applicants to

the HA as vouchers become available. A physical copy of the waitlist will be timestamped, saved and printed on a monthly basis. Physical copies of all pre-application forms will be securely retained for seven years. Copies of preference and priority verification methods and forms will be submitted with the pre-application at time of referral and made a permanent part of each client's case file.

A printed version of the preference and priority waiting lists reports will be maintained and shared with the HA on a monthly basis for audit trail support and audit requirements needs.

Referrals from the Greater Hartford Coordinated Access Network

The Greater Hartford Coordinated Access Network (GH CAN) currently holds three housing matching meetings, one for families, one for individual re-housing referrals and one for those identified as Chronically Homeless. All households that have been in an emergency shelter for two weeks or more, or have been in a place not meant for human habitation for two weeks OR more and are working with an outreach worker, complete a VI-SPDAT assessment, or Next Step Tool for youth, and their names are automatically placed onto the GH CAN "By Name List" in the Homeless Management Information System. This is the centralized list used in the greater Hartford region to make referrals for available housing units and this will be the same list that is used for purposes of determining eligibility for referral under this program. Other potentially eligible households, including those in Department of Social Services or State of CT Department of Children and Families emergency shelters, or those in hotels or motels paid for by government or charity can be added to this list by calling Journey Home and completing a VI-SPDAT or Next Step Tool with them or another CAN provider, and providing evidence that they have been in a hotel/shelter paid for by government or charity for two weeks or more. Being on the By Name List will be the threshold for determining that the household is being referred from the GH CAN.

GH CAN providers will, at the housing matching meetings of families and youth households, assist in determining whether a given individual/family would be a good fit for the Housing Choice Voucher program, though any eligible household who is on the By Name List will be allowed to apply. For households coming from Rapid re-housing programs, they will be required to produce a Rapid Rehousing referral form which designates that in the professional opinion of the program staff the household will not be able to maintain permanent housing when they are terminated from the rapid re-housing program. Households recently enrolled in Rapid re-housing or households that are believed to "graduate" from rapid rehousing successfully able to afford their housing will not be eligible. Rapid Re-housing staff will be thoroughly trained to understand the preference requirements.

4.2 IDENTIFICATION OF PREFERENCES

The following categories represent preferences on the waiting list:

As with any waiting list and any published added preference, the HA will first review its existing waiting list for any eligible family that would meet the preference criteria in order to give that family, by order of their wait list position, the opportunity to see if they qualify for the specific preference and be able to be among the first served in accordance with HA admission policies, once they are determined to meet Section 8 criteria.

Chronically Homeless – an individual or family who has been homeless for 12 months continuously or who has had four occasions of homelessness in the past three years and has a disability as defined by HUD in 24 CFR Parts 91 and 578, December 4, 2015 where an individual or family is referred by Journey Home on behalf of the Greater Hartford Coordinated Access Network, a consortium of over 20 different homeless service agencies.

Redevelopment Displacement - to address the displacement of families residing in Bowles Park and Westbrook Village where relocation is triggered by redevelopment through new construction.

Homeless Families with children and unaccompanied homeless youth - A family that has at least one adult and at least one child under the age of 18 that is experiencing homelessness, or an individual who is 18-24 years old, or an individual or family where the head of household is under the age of 18 and is legally emancipated that is experiencing homeless as defined by HUD in 24 CFR 578.3: Category 1 or Category 4 for a minimum of at least 30 days, or is unsuccessfully terminating out of a rapid rehousing program and where this individual or family is referred by Journey Home on behalf of the Greater Hartford Coordinated Access Network.

Homeless household – An individual or family who lacks a fixed, regular, and adequate nighttime residence, as defined by HUD in 24 CFR 578.3: Category 1 or Category 4.

Elderly family - A family whose head or spouse (or sole member) is 62 years or older and a family that includes an elderly person(s).

Disabled/Handicapped family - A family whose member(s) include a person(s) who is under a disability as defined in Section 223 of the Social Security Act (42 U.S.C. 423) or has a developmental disability as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(7)). *Handicapped family* - A family whose member(s) include a person(s) having a physical or mental impairment that (a) is expected to be of a long-continued and indefinite duration, (b) substantially impedes his or her ability to live independently, and (c) is of such nature that such ability could be improved by more suitable housing.

4.3 RANKING OF THE PREFERENCES

Ranking preferences are identified below by the numeric value next to the preference category (example: a "1" in the space that represents the first priority, a "2" in the box representing the second priority, and so on.) If equal weight is given to one or more of these choices the same number will be next to both.

Preferences

1 Chronically homeless - An individual or family who has been homeless for 12 months continuously or who has had four occasions of homelessness in the past three years and has a disability and as defined by HUD in 24 CFR Parts 91 and 578. December 4, 2015. This preference will also include persons transitioning out of permanent supportive housing programs, who were previously homeless prior to entry into the permanent supportive housing program. All referrals will come from Journey Home on behalf of the Greater Hartford Coordinated Access Network and will be prioritized based on need according to length of time homeless and the VI SPDAT assessment.

2 Redevelopment Displacement – A family currently living in Bowles Park and Westbrook Village who is being displaced by redevelopment due to new construction.

3 Homeless Families with children and unaccompanied homeless youth - A family that has at least one adult and at least one child under the age of 18 that is experiencing homelessness, or an individual who is 18-24 years old, or an individual or family where the head of household is under the age of 18 and is legally emancipated that is experiencing homeless as defined by HUD in 24 CFR 578.3: Category 1 or Category 4 for a minimum of at least 30 days, or is unsuccessfully terminating out of a rapid rehousing program and where this individual or family is referred by Journey Home on behalf of the Greater Hartford Coordinated Access Network. Eligible families and individuals will be referred on a prioritized basis as determined by a point system; described below:

Housing Choice Voucher- Homeless Families and Youth Preference Point System:

Points	Criteria
(+1)	For **each month** of homelessness (in a transitional living program, sleeping outside or place not meant for human habitation, in a shelter, or in a hotel paid for by charity, or in an institution where they have resided for less than 90 days and were in one of the aforementioned locations immediately prior to entering the institution) **that is verified by a third-party provider** (shelter provider, doctor, police, etc.)
(+1)	If the household has any children under the age of 6
(+1)	If the household has a history of involvement with the CT Department of Children and Families

(+1)	If the household's current occasion of homelessness is due to them being kicked out of a parent or guardian's home.
(+1)	If the individual or family is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking or other dangers 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 individuals' or families primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence, and has no other residence, and lacks the resources or support networks, e.g. family, friends and faith-based or other social networks, to obtain other permanent housing.

Within the "Homeless Families and Youth" preference category is a priority point system. One priority point will be awarded for each criteria with the exception of the first listed criteria. In the case of the first criteria one priority point will be awarded for each month of homelessness. The highest number of priority points that an applicant can qualify for with this preference category will determine the top ranked applicants. Ties will be broken by date of application.

Eligibility Screening and the Point System:

Families with children under 18, youth or young adults on the HA current waitlist wishing to be screened for the preference and households referred by the GH CAN will be asked to complete the **City of Hartford Homeless Youth and Family Waiting List Pre-Application Form.** This form and required documentation that must be submitted with the form will collect the information necessary to determine if the household is eligible for the preference as well as to determine the household's level or prioritization.

Households that may be eligible for the preference, but are ineligible for a Housing Choice Voucher because they do not meet the HA's admission standards as outlined in the Administrative Plan, will be denied for the preference.

4 Homeless Households – An individual or family who lacks a fixed, regular, and adequate nighttime residence, as defined by HUD in 24 CFR 578.3: Category 1 or Category 4.

5 Elderly family - A family whose head or spouse (or sole member) is 62 years or older.

6 Disabled/Handicapped family - A family whose member(s) include a person(s) who is under a disability as defined in Section 223 of the Social Security Act (42 U.S.C. 423) or has a developmental; disability as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(7)). Handicapped family – A family whose member(s) include a person(s) having a physical or mental impairment

that (a) is expected to be of a long-continued and indefinite duration, (b) substantially impedes his or her ability to live.

7 No Preference - All other qualified applicants with no preference.

4.4 VERIFICATION REQUIREMENTS OF PREFERENCE CATEGORIES

In order to be eligible to apply and to qualify for the preference categories, sufficient documentation must be provided by the applicant prior to admission. Applicants may provide additional documentation while on the waiting list that may improve their ranking.

Chronically Homeless households - verification documentation will be obtained by the Greater Hartford Coordinated Access Network before referrals are made to the HA.

Redevelopment Displacement – documentation must be provided by the Hartford Housing Authority verifying that tenant household is a qualified family in good standing (current lease listing all existing household members) or a current dated written statement from the Hartford Housing Authority indicating that tenant household is in good standing and lists all household members.

Homeless families with children and unaccompanied homeless youth – documentation must be provided to verify that the individual or family qualifies for the preference. The HA may rely on the Greater Hartford Coordinated Access Network or partnering homeless service organizations to verify the individual or family qualifies for the preference before the individual or family is referred to the HA.

Verification Method (priority points)

- Number of months experiencing homelessness – third party verification as outlined in 24 CFR 576.500(b)(1)(2) and (5) as elaborated on in the CoC FAQs at https://www.hudexchange.info/coc/faqs/ for every month of homelessness in order to be awarded a point.

- Household with children under the age of 6 – Birth certificates will be the method used to verify an applicant's ability to meet this priority point however, the self-certification by the head of household on the pre-application form will be sufficient to award this point on the waitlist placement until birth certificates are obtained. Birth certificates must be produced prior to referral to the HA in order to receive this point and confirm the household's priority on the waitlist.

- Household that have a history of involvement with the CT Department of Children and Families – a letter from a DCF employee indicating current or previous history with the

Department of Children and Families is the preferred method of verification. Where such a letter cannot be obtained, a letter from another services provider, as defined by HUD, on their letterhead, indicating they knew the client to currently or historically be engaged with DCF may be accepted to qualify for this point.

- Household's current occasion of homelessness is due to being kicked out of a parent or guardian's home – Preferred method of verification is a letter from a service provider, as defined by HUD, on letterhead indicating that they believe the household's homelessness is a result of them being kicked out of the home of a parent or guardian. In the instance where such documentation cannot be obtained, applicant self-certification as indicated by an answer of "yes" to this question on the pre-application form, will be sufficient to be awarded this point.

- Individual or family is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking or other dangers 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 individuals' or families primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence, and has no other residence, and lacks the resources or support networks, e.g. family, friends and faith-based or other social networks, to obtain other permanent housing. – Preferred methods of verification for this include letters from a domestic violence provider or other service provider as defined by HUD, police report or other form of police verification, or a completed HUD Form 5382. Where these documents cannot be obtained an applicant's self-certification as indicated by an answer of "yes" to this question on the pre-application form, will be sufficient to be awarded this point.

Elderly family member(s) – documentation must be provided of birth date or senior citizen/elderly status. A birth certificate, third-party verification or sworn affidavit will constitute sufficient documentation.

Disabled/Handicapped family member(s) – documentation must be provided that an applicant family member(s) is disabled or handicapped. A social security disability award letter or a medical letter that supports that the applicants meet the definition will constitute sufficient documentation.

4.5 SELECTION FROM THE WAITING LIST

Families will be selected from the waiting list based on the numerical position assigned by the lottery and above stated preferences. If it is necessary to meet the statutory requirements that 75% of newly admitted families in any fiscal year be families who are extremely low-income, the HA retains the right to skip higher income families on the waiting list to reach extremely low-income families. This measure will only be taken if it appears the goal will not otherwise be met. To ensure that this goal is met, the HA will monitor incomes of newly

Chapter 4

APPLICATIONS, WAITING LIST AND TENANT SELECTION

INTRODUCTION

When a family wishes to reside in public housing, the family must submit an application that provides the PHA with the information needed to determine the family's eligibility. HUD requires the PHA to place all eligible families that apply for public housing on a waiting list. When a unit becomes available, the PHA must select families from the waiting list in accordance with HUD requirements and PHA policies as stated in its Admissions and Continued Occupancy Policy (ACOP) and its annual plan.

The PHA is required to adopt a clear approach to accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or the PHA to receive preferential treatment.

HUD regulations require that the PHA comply with all equal opportunity requirements and it must affirmatively further fair housing goals in the administration of the program [24 CFR 960.103, PH Occ GB p. 13]. Adherence to the selection policies described in this chapter ensures that the PHA will be in compliance with all relevant fair housing requirements, as described in Chapter 2.

This chapter describes HUD and PHA policies for accepting applications, managing the waiting list and selecting families from the waiting list. The PHAs policies for assigning unit size and making unit offers are contained in Chapter 5. Together, Chapters 4 and 5 of the ACOP comprise the PHA's Tenant Selection and Assignment Plan (TSAP).

The policies outlined in this chapter are organized into three sections, as follows:

> Part I: The Application Process. This part provides an overview of the application process, and discusses how applicants can obtain and submit applications. It also specifies how the PHA will handle the applications it receives.
>
> Part II: Managing the Waiting List. This part presents the policies that govern how the PHA's waiting list is structured, when it is opened and closed, and how the public is notified of the opportunity to apply for public housing. It also discusses the process the PHA will use to keep the waiting list current.
>
> Part III: Tenant Selection. This part describes the policies that guide the PHA in selecting families from the waiting list as units become available. It also specifies how in-person interviews will be used to ensure that the PHA has the information needed to make a final eligibility determination.

PART I: THE APPLICATION PROCESS

4-I.A. OVERVIEW

This part describes the policies that guide the PHA's efforts to distribute and accept applications, and to make preliminary determinations of applicant family eligibility that affect placement of the family on the waiting list. This part also describes the PHA's obligation to ensure the accessibility of the application process.

4-I.B. APPLYING FOR ASSISTANCE

Any family that wishes to reside in public housing must apply for admission to the program [24 CFR 1.4(b)(2)(ii), 24 CFR 960.202(a)(2)(iv), and PH Occ GB, p. 68]. HUD permits the PHA to determine the format and content of its applications, as well how such applications will be made available to interested families and how applications will be accepted by the PHA. However, the PHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the PHA's application [Notice PIH 2009-36].

PHA Policy

Depending upon the length of time between the date of application and the availability of housing, the PHA may use a one- or two-step application process.

A one-step process will be used when it is expected that a family will be selected from the waiting list within 60 days of the date of application. At application, the family must provide all of the information necessary to establish family eligibility and the amount of rent the family will pay.

A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and the amount of rent the family will pay when selected from the waiting list.

Families may obtain application forms from the PHA's office during normal business hours. Families may also request – by telephone or by mail – that an application form be sent to the family via first class mail.

Completed applications must be returned to the PHA by mail, by fax, or submitted in person during normal business hours. Applications must be filled out completely in order to be accepted by the PHA for processing. If an application is incomplete, the PHA will notify the family of the additional information required.

4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

The PHA must take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the standard PHA application process.

Disabled Populations [24 CFR 8; PH Occ GB, p. 68]

The PHA must provide reasonable accommodation as needed for persons with disabilities to make the application process fully accessible. The facility where applications are accepted and the application process must be fully accessible, or the PHA must provide an alternate approach that provides equal access to the program. Chapter 2 provides a full discussion of the PHA's policies related to providing reasonable accommodations for people with disabilities.

Limited English Proficiency

PHAs are required to take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency [24 CFR 1]. Chapter 2 provides a full discussion on the PHA's policies related to ensuring access to people with limited English proficiency (LEP).

MOVING ON NOV 2017

1. PROJECT BASED VOUCHER PROGRAM

1.1 PROGRAM OVERVIEW AND OBJECTIVE

The Department of Housing and Urban Development Project Based Voucher (PBV) Program regulations allows the City of Hartford (COH) Housing Choice Voucher Program to use a portion of its existing budget authority to attach up to 20% of its Housing Choice Voucher (HCV) Program funding to specific units in buildings. The COH has chosen to implement this option because PBV provides housing that is stable and permanent, and which offers tenants close accessibility to supportive services.

The City of Hartford may implement more than one PBV initiative at any one time. The specific requirements of each initiative will be publically announced.

The PBV program is administered as part of the COH HCV Section 8 program. The COH enters into a Housing Assistance Payments (HAP) contract with an owner for units in existing housing, or in newly constructed or rehabilitated housing. When the PBV housing is new construction or rehabilitation, the housing is developed under an Agreement to enter into a Housing Assistance Payments ("AHAP") contract between the COH and the Owner. During the term of the HAP contract, the COH makes housing assistance payments to the owner for units leased and occupied by eligible families.

The objectives of this program are multi-purpose and include the following goals:

Moving On Pilot Program – PBV Units

- Support for the City of Hartford Commission To End Chronic Homelessness Goals and the Capitol Region's Ten Year Plan to End Homelessness. The Moving On Pilot Program is designed to assist the most vulnerable homeless individuals in accessing supportive housing by expanding the capacity of supportive housing programs with Project Based Vouchers. Moving On focuses on redirecting supportive housing services to target those with higher needs. As individuals successfully stabilize in supportive housing, their need for support services may decline over time but their need for rental assistance remains. Moving On focuses on "unclogging" the system by allowing current, stable tenants of supportive housing that no longer need an intensive level of support services to maintain their permanent housing by providing them with a rental subsidy. Moving On then backfills those supportive housing slots with the most vulnerable long term shelter stayers and high service utilizers in need of the intensive services.

Grand Families Program – PBV Units

- The development and rehabilitation of vacant existing structures designated for grandparents raising grandchildren to including the provision to make available appropriate supportive services for the intended population.

Preserving Low Income Housing – PBV Units

THE PLAN

for Administration of the U. S. Department of Housing and Urban Development (HUD)

SECTION 8 Housing Choice Voucher Program

Effective JULY 2018

Office of Individual and Family Program

A tool for administering and managing the federal Section 8 voucher programs of the Connecticut Department of Housing. These programs include the Housing Choice Voucher, both tenant-based and project-based, Family Unification, Mainstream Housing Opportunities Program for Persons with Disabilities and the Veterans Affairs Supportive Housing Programs

STATE OF CONNECTICUT

Department of Housing

505 Hudson Street

Hartford, CT 06106-7107

4. To attain and maintain a high level of standards and professionalism in our day-to-day management of all program components.

5. To administer an efficient, high-performing agency through continuous improvement of the PHA's support systems and commitment to our employees and their development

C. PURPOSE OF THE PLAN [§ 24 CFR 982.54]

The purpose of the administrative plan is to establish policies for carrying out the programs in a manner consistent with HUD requirements and local goals and objectives contained in the Agency Plan. The Housing Choice Voucher Program was implemented as of October 1, 1999. The PHA is responsible for complying with all changes in HUD regulations pertaining to these programs. If such changes conflict with this plan, HUD regulations will have precedence. The original plan and any changes must be approved by the Commissioner of DOH, with the pertinent sections included in the Agency Plan and a copy provided to HUD.

Applicable regulations include:

1. § 24 CFR Part 5, General Program Requirements

2. § 24 CFR Part 8, Nondiscrimination Based on Handicap in Federally Assisted Programs

3. § 24 CFR Part 982, Section 8 Tenant-Based Assistance

D. ADMINISTRATIVE FEE RESERVE [§ 24 CFR 982.54(d)(21)]

All expenditures from the administrative fee reserve will be approved by the Commissioner and made in accordance with the approved budget.

E. RULES AND REGULATIONS [§ 24 CFR 982.52]

This administrative plan is set forth to define the PHA's local policies for operation of the housing programs in the context of federal laws and regulations. All issues related to Section 8 not addressed in this document are governed by such federal regulations, HUD memos, notices and guidelines or other applicable law. The policies in this Administrative Plan have been designed to ensure compliance with the consolidated annual contributions contract (ACC) and all HUD-approved applications for program funding.

F. LOCAL PREFERENCE FOR ADMISSION

Homeless Preference for Admission

The PHA will give preference to applicant households meeting all of the following criteria:

1. Are referred to PHA by either a statewide homeless service provider with whom PHA has executed a Memorandum of Understanding (MOU) outlining the provider's

responsibilities with respect to the provision of supportive housing and supportive services for the referred household, or through a DOH-funded homeless service program;

2. Have received a written commitment from the homeless service provider for supportive services to help the household's transition from supportive to permanent housing; and

3. Have received a written commitment from the homeless service provider for supportive services to help the household comply with Housing Choice Voucher program rules.

Persons transitioning out of the Department of Housing and Urban Development Continuum of Care housing programs (formerly Shelter Plus Care/Supportive Housing Programs) and/or any state funded Permanent Supportive Housing programs into permanent housing will be included as a priority group as part of this preference.

This preference shall be limited to applicants who have been certified as meeting the criteria for this preference by the homeless service provider noted above.

This preference shall be limited to two vouchers in three issued by the PHA.

G. TERMINOLOGY

The State of Connecticut Department of Housing and its contract administrator are referred to as the "PHA" or "public housing agency" throughout this document.

1. "Family" is used interchangeably with the words "applicant" or "participant" and can refer to a single person family.

2. "Tenant" is used to refer to participants in terms of their relation to owners.

3. "Disability" is used where "handicap" was formerly used.

4. "Non-citizens rule" refers to the regulation effective June 19, 1995 restricting assistance to U. S. citizens and eligible immigrants.

5. The Section 8 program also is known as the Housing Choice Voucher (HCV) Program.

6. "HQS" means the housing quality standards required by regulations and enhanced by the PHA.

7. "Failure to provide" refers to all requirements in the first Family Obligation. See Chapter 15, "Denial or Termination of Assistance."

8. "Merger date" refers to October 1, 1999 that is the effective date of the merging of the Section 8 Certificate and Voucher program into the Housing Choice Voucher Program.

See Glossary for other terminology.

Service Prioritization Decision Assistance Tool

(SPDAT)

Assessment Tool for Single Adults

VERSION 4.01

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1 (800) 355-0420 info@orgcode.com www.orgcode.com

Welcome to the SPDAT Line of Products

The Service Prioritization Decision Assistance Tool (SPDAT) has been around in various incarnations for over a decade, before being released to the public in 2010. Since its initial release, the use of the SPDAT has been expanding exponentially and is now used in over one thousand communities across the United States, Canada, and Australia.

More communities using the tool means there is an unprecedented demand for versions of the SPDAT, customized for specific client groups or service delivery contexts. With the release of SPDAT V4, there have been more current versions of SPDAT products than ever before.

VI-SPDAT Series

The **Vulnerability Index – Service Prioritization Decision Assistance Tool** (VI-SPDAT) was developed as a pre-screening tool for communities that are very busy and may not have the resources to conduct a full SPDAT assessment for every client. It was made in collaboration with Community Solutions, creators of the Vulnerability Index, as a brief survey that can be conducted to quickly determine whether a client has high, moderate, or low acuity. The use of this survey can help prioritize which clients should be given a full SPDAT assessment first. Because it is a self-reported survey, no special training is required to use the VI-SPDAT.

Current versions available:

- VI-SPDAT V 2.0 for Individuals
- VI-SPDAT V 2.0 for Families
- VI-SPDAT V 1.0 for Youth

All versions are available online at

www.orgcode.com/products/vi-spdat/

SPDAT Series

The **Service Prioritization Decision Assistance Tool** (SPDAT) was developed as an assessment tool for frontline workers at agencies that work with homeless clients to prioritize which of those clients should receive assistance first. It is an in-depth assessment that relies on the assessor's ability to interpret responses and corroborate those with evidence. As a result, this tool may only be used by those who have received proper, up-to-date training provided by OrgCode Consulting, Inc. or an OrgCode certified trainer.

Current versions available:

- SPDAT V 4.0 for Individuals
- SPDAT V 2.0 for Families
- SPDAT V 1.0 for Youth

Information about all versions is available online at

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SPDAT Training Series

To use the SPDAT, training by OrgCode or an OrgCode certified trainer is required. We provide training on a wide variety of topics over a variety of mediums.

The full-day in-person SPDAT Level 1 training provides you the opportunity to bring together as many people as you want to be trained for one low fee. The webinar training allows for a maximum of 15 different computers to be logged into the training at one time. We also offer online courses for individuals that you can do at your own speed.

The training gives you the manual, case studies, application to current practice, a review of each component of the tool, conversation guidance with prospective clients – and more!

Current SPDAT training available:

- Level 0 SPDAT Training: VI-SPDAT for Frontline Workers
- Level 1 SPDAT Training: SPDAT for Frontline Workers
- Level 2 SPDAT Training: SPDAT for Supervisors
- Level 3 SPDAT Training: SPDAT for Trainers

Other related training available:

- Excellence in Housing-Based Case Management
- Coordinated Access & Common Assessment
- Motivational Interviewing
- Objective-Based Interactions

More information about SPDAT training, including pricing, is available online at

http://www.orgcode.com/product-category/training/spdat/

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Terms and Conditions Governing the Use of the SPDAT

SPDAT products have been developed by OrgCode Consulting, Inc. with extensive feedback from key community partners including people with lived experience. The tools are provided free of charge to communities to improve the client centered services dedicated to increasing housing stability and wellness. Training is indeed required for the administration and interpretation of these assessment tools. Use of the SPDAT products without authorized training is strictly prohibited.

By using this tool, you accept and agree to be bound by the terms of this expectation.

No sharing, reproduction, use or duplication of the information herein is permitted without the express written consent of OrgCode Consulting, Inc.

Ownership

The Service Prioritization Decision Assistance Tool ("SPDAT") and accompanying documentation is owned by OrgCode Consulting, Inc.

Training

Although the SPDAT Series is provided free of charge to communities, training by OrgCode Consulting, Inc. or a third party trainer, authorized by OrgCode, must be successfully completed. After meeting the training requirements required to administer and interpret the SPDAT Series, practitioners are permitted to implement the SPDAT in their work with clients.

Restrictions on Use

You may not use or copy the SPDAT prior to successfully completing training on its use, provided by OrgCode Consulting, Inc. or a third-party trainer authorized by OrgCode. You may not share the SPDAT with other individuals not trained on its use. You may not train others on the use of the SPDAT, unless specifically authorized by OrgCode Consulting, Inc.

Restrictions on Alteration

You may not modify the SPDAT or create any derivative work of the SPDAT or its accompanying documentation, without the express written consent of OrgCode Consulting, Inc. Derivative works include but are not limited to translations.

Disclaimer

The management and staff of OrgCode Consulting, Inc. (OrgCode) do not control the way in which the Service Prioritization Decision Assistance Tool (SPDAT) will be used, applied or integrated into related client processes by communities, agency management or frontline workers. OrgCode assumes no legal responsibility or liability for the misuse of the SPDAT, decisions that are made or services that are received in conjunction with the assessment tool.

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A. Mental Health & Wellness & Cognitive Functioning

PROMPTS	CLIENT SCORE:
• *Have you ever received any help with your mental wellness?* • *Do you feel you are getting all the help you need for your mental health or stress?* • *Has a doctor ever prescribed you pills for nerves, anxiety, depression or anything like that?* • *Have you ever gone to an emergency room or stayed in a hospital because you weren't feeling 100% emotionally?* • *Do you have trouble learning or paying attention?* • *Have you ever had testing done to identify learning disabilities?* • *Do you know if, when pregnant with you, your mother did anything that we now know can have negative effects on the baby?* • *Have you ever hurt your brain or head?* • *Do you have any documents or papers about your mental health or brain functioning?* • *Are there other professionals we could speak with that have knowledge of your mental health?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ Serious and persistent mental illness (2+ hospitalizations in a mental health facility or psychiatric ward in the past 2 years) **and** not in a heightened state of recovery currently ☐ Major barriers to performing tasks and functions of daily living or communicating intent because of a brain injury, learning disability or developmental disability
3	**Any** of the following: ☐ Heightened concerns about state of mental health, but fewer than 2 hospitalizations, and/or without knowledge of presence of a diagnosable mental health condition ☐ Diminished ability to perform tasks and functions of daily living or communicating intent because of a brain injury, learning disability or developmental disability
2	While there may be concern for overall mental health or mild impairments to performing tasks and functions of daily living or communicating intent, **all** of the following are true: ☐ No major concerns about safety or ability to be housed without intensive supports to assist with mental health or cognitive functioning ☐ No major concerns for the health and safety of others because of mental health or cognitive functioning ability ☐ No compelling reason for screening by an expert in mental health or cognitive functioning prior to housing to fully understand capacity
1	☐ In a heightened state of recovery, has a Wellness Recovery Action Plan (WRAP) or similar plan for promoting wellness, understands symptoms and strategies for coping with them, **and** is engaged with mental health supports as necessary.
0	☐ No mental health or cognitive functioning issues disclosed, suspected or observed.

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B. Physical Health & Wellness

PROMPTS	CLIENT SCORE:
• *How is your health?* • *Are you getting any help with your health? How often?* • *Do you feel you are getting all the care you need for your health?* • *Any illness like diabetes, HIV, Hep C or anything like that going on?* • *Ever had a doctor tell you that you have problems with blood pressure or heart or lungs or anything like that?* • *When was the last time you saw a doctor? What was that for?* • *Do you have a clinic or doctor that you usually go to?* • *Anything going on right now with your health that you think would prevent you from living a full, healthy, happy life?* • *Are there other professionals we could speak with that have knowledge of your health?* • *Do you have any documents or papers about your health or past stays in hospital because of your health?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ Co-occurring chronic health conditions ☐ Attempting a treatment protocol for a chronic health condition, but the treatment is not improving health ☐ Pallative health condition
3	Presence of a health issue with **any** of the following: ☐ Not connected with professional resources to assist with a real or perceived serious health issue, by choice ☐ Single chronic or serious health concern but does not connect with professional resources because of insufficient community resources (e.g. lack of availability or affordability) ☐ Unable to follow the treatment plan as a direct result of homeless status
2	☐ Presence of a relatively minor physical health issue, which is managed and/or cared for with appropriate professional resources or through informed self-care ☐ Presence of a physical health issue, for which appropriate treatment protocols are followed, but there is still a moderate impact on their daily living
1	Single chronic or serious health condition, but **all** of the following are true: ☐ Able to manage the health issue and live a relatively active and healthy life ☐ Connected to appropriate health supports ☐ Educated and informed on how to manage the health issue, take medication as necessary related to the condition, and consistently follow these requirements.
0	☐ No serious or chronic health condition disclosed, observed, or suspected ☐ If any minor health condition, they are managed appropriately

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C. Medication

PROMPTS	CLIENT SCORE:
• *Have you recently been prescribed any medications by a health care professional?* • *Do you take any medications prescribed to you by a doctor?* • *Have you ever sold some or all of your prescription?* • *Have you ever had a doctor prescribe you medication that you didn't have filled at a pharmacy or didn't take?* • *Were any of your medications changed in the last month? If yes: How did that make you feel?* • *Do other people ever steal your medications?* • *Do you ever share your medications with other people?* • *How do you store your medications and make sure you take the right medication at the right time each day?* • *What do you do if you realize you've forgotten to take your medications?* • *Do you have any papers or documents about the medications you take?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ In the past 30 days, started taking a prescription which **is** having any negative impact on day to day living, socialization or mood ☐ Shares or sells prescription, but keeps **less** than is sold or shared ☐ Regularly misuses medication (e.g. frequently forgets; often takes the wrong dosage; uses some or all of medication to get high) ☐ Has had a medication prescribed in the last 90 days that remains unfilled, for any reason
3	**Any** of the following: ☐ In the past 30 days, started taking a prescription which is **not** having any negative impact on day to day living, socialization or mood ☐ Shares or sells prescription, but keeps **more** than is sold or shared ☐ Requires intensive assistance to manage or take medication (e.g., assistance organizing in a pillbox; working with pharmacist to blister-pack; adapting the living environment to be more conducive to taking medications at the right time for the right purpose, like keeping nighttime medications on the bedside table and morning medications by the coffeemaker) ☐ Medications are stored and distributed by a third-party
2	**Any** of the following: ☐ Fails to take medication at the appropriate time or appropriate dosage, 1-2 times per week ☐ Self-manages medications except for requiring reminders or assistance for refills ☐ Successfully self-managing medication for fewer than 30 consecutive days
1	☐ Successfully self-managing medications for more than 30, but less than 180, consecutive days
0	**Any** of the following: ☐ No medication prescribed to them ☐ Successfully self-managing medication for 181+ consecutive days

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D. Substance Use

PROMPTS	CLIENT SCORE:
• *When was the last time you had a drink or used drugs?* • *Is there anything we should keep in mind related to drugs or alcohol?* • *[If they disclose use of drugs and/or alcohol] How frequently would you say you use [specific substance] in a week?* • *Ever have a doctor tell you that your health may be at risk because you drink or use drugs?* • *Have you engaged with anyone professionally related to your substance use that we could speak with?* • *Ever get into fights, fall down and bang your head, or pass out when drinking or using other drugs?* • *Have you ever used alcohol or other drugs in a way that may be considered less than safe?* • *Do you ever end up doing things you later regret after you have gotten really hammered?* • *Do you ever drink mouthwash or cooking wine or hand sanitizer or anything like that?*	**NOTES**

Note: Consumption thresholds: 2 drinks per day or 14 total drinks in any one week period for men; 2 drinks per day or 9 total drinks in any one week period for women.

	SCORING
4	☐ In a life-threatening health situation as a direct result of substance use, **or**, In the past 30 days, **any** of the following are true... ☐ Substance use is almost daily (21+ times) **and** often to the point of complete inebriation ☐ Binge drinking, non-beverage alcohol use, or inhalant use 4+ times ☐ Substance use resulting in passing out 2+ times
3	☐ Experiencing serious health impacts as a direct result of substance use, though not (yet) in a life-threatening position as a result, **or**, In the past 30 days, **any** of the following are true... ☐ Drug use reached the point of complete inebriation 12+ times ☐ Alcohol use usually exceeded the consumption thresholds (at least 5+ times), but usually not to the point of complete inebriation ☐ Binge drinking, non-beverage alcohol use, or inhalant use occurred 1-3 times
2	In the past 30 days, **any** of the following are true... ☐ Drug use reached the point of complete inebriation fewer than 12 times ☐ Alcohol use exceeded the consumption thresholds fewer than 5 times
1	☐ In the past 365 days, no alcohol use beyond consumption thresholds, **or**, ☐ If making claims to sobriety, no substance use in the past 30 days
0	☐ In the past 365 days, no substance use

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E. Experience of Abuse & Trauma

PROMPTS	CLIENT SCORE:
To avoid re-traumatizing the individual, ask selected approved questions as written. Do not probe for details of the trauma/abuse. This section is entirely self-reported. • *"I don't need you to go into any details, but has there been any point in your life where you experienced emotional, physical, sexual or psychological abuse?"* • *"Are you currently or have you ever received professional assistance to address that abuse?"* • *"Does the experience of abuse or trauma impact your day to day living in any way?"* • *"Does the experience of abuse or trauma impact your ability to hold down a job, maintain housing or engage in meaningful relationships with friends or family?"* • *"Have you ever found yourself feeling or acting in a certain way that you think is caused by a history of abuse or trauma?"* • *"Have you ever become homeless as a direct result of experiencing abuse or trauma?"*	**NOTES**

SCORING	
4	☐ A reported experience of abuse or trauma, believed to be a direct cause of their homelessness
3	☐ The experience of abuse or trauma is **not** believed to be a direct cause of homelessness, but abuse or trauma (experienced before, during, or after homelessness) **is** impacting daily functioning and/or ability to get out of homelessness
2	**Any** of the following: ☐ A reported experience of abuse or trauma, but is not believed to impact daily functioning and/or ability to get out of homelessness ☐ Engaged in therapeutic attempts at recovery, but does not consider self to be recovered
1	☐ A reported experience of abuse or trauma, and considers self to be recovered
0	☐ No reported experience of abuse or trauma

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F. Risk of Harm to Self or Others

PROMPTS	CLIENT SCORE:
• *Do you have thoughts about hurting yourself or anyone else? Have you ever acted on these thoughts? When was the last time?* • *What was occurring when you had these feelings or took these actions?* • *Have you ever received professional help – including maybe a stay at hospital – as a result of thinking about or attempting to hurt yourself or others? How long ago was that? Does that happen often?* • *Have you recently left a situation you felt was abusive or unsafe? How long ago was that?* • *Have you been in any fights recently - whether you started it or someone else did? How long ago was that? How often do you get into fights?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ In the past 90 days, left an abusive situation ☐ In the past 30 days, attempted, threatened, or actually harmed self or others ☐ In the past 30 days, involved in a physical altercation (instigator or participant)
3	**Any** of the following: ☐ In the past 180 days, left an abusive situation, but no exposure to abuse in the past 90 days ☐ Most recently attempted, threatened, or actually harmed self or others in the past 180 days, but not in the past 30 days ☐ In the past 365 days, involved in a physical altercation (instigator or participant), but not in the past 30 days
2	**Any** of the following: ☐ In the past 365 days, left an abusive situation, but no exposure to abuse in the past 180 days ☐ Most recently attempted, threatened, or actually harmed self or others in the past 365 days, but not in the past 180 days ☐ 366+ days ago, 4+ involvements in physical alterations
1	☐ 366+ days ago, 1-3 involvements in physical alterations
0	☐ Reports no instance of harming self, being harmed, or harming others

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G. Involvement in Higher Risk and/or Exploitive Situations

PROMPTS	CLIENT SCORE:
• *[Observe, don't ask] Any abcesses or track marks from injection substance use?* • *Does anybody force or trick you to do something that you don't want to do?* • *Do you ever do stuff that could be considered dangerous like drinking until you pass out outside, or delivering drugs for someone, having sex without a condom with a casual partner, or anything like that?* • *Do you ever find yourself in situations that may be considered at a high risk for violence?* • *Do you ever sleep outside? How do you dress and prepare for that? Where do you tend to sleep?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ In the past 180 days, engaged in 10+ higher risk and/or exploitive events ☐ In the past 90 days, left an abusive situation
3	**Any** of the following: ☐ In the past 180 days, engaged in 4-9 higher risk and/or exploitive events ☐ In the past 180 days, left an abusive situation, but not in the past 90 days
2	**Any** of the following: ☐ In the past 180 days, engaged in 1-3 higher risk and/or exploitive events ☐ 181+ days ago, left an abusive situation
1	☐ Any involvement in higher risk and/or exploitive situations occurred more than 180 days ago but less than 365 days ago
0	☐ In the past 365 days, no involvement in higher risk and/or exploitive events

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H. Interaction with Emergency Services

PROMPTS	CLIENT SCORE:
• *How often do you go to emergency rooms?* • *How many times have you had the police speak to you over the past 180 days?* • *Have you used an ambulance or needed the fire department at any time in the past 180 days?* • *How many times have you called or visited a crisis team or a crisis counselor in the last 180 days?* • *How many times have you been admitted to hospital in the last 180 days? How long did you stay?*	**NOTES**

Note: Emergency service use includes: admittance to emergency room/department; hospitalizations; trips to a hospital in an ambulance; crisis service, distress centers, suicide prevention service, sexual assault crisis service, sex worker crisis service, or similar service; interactions with police for the purpose of law enforcement; interactions with fire service in emergency situations.

SCORING	
4	☐ In the past 180 days, cumulative total of 10+ interactions with emergency services
3	☐ In the past 180 days, cumulative total of 4-9 interactions with emergency services
2	☐ In the past 180 days, cumulative total of 1-3 interactions with emergency services
1	☐ Any interaction with emergency services occurred more than 180 days ago but less than 365 days ago
0	☐ In the past 365 days, no interaction with emergency services

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I. Legal

PROMPTS	CLIENT SCORE:
• *Do you have any "legal stuff" going on?* • *Have you had a lawyer assigned to you by a court?* • *Do you have any upcoming court dates? Do you think there's a chance you will do time?* • *Any involvement with family court or child custody matters?* • *Any outstanding fines?* • *Have you paid any fines in the last 12 months for anything?* • *Have you done any community service in the last 12 months?* • *Is anybody expecting you to do community service for anything right now?* • *Did you have any legal stuff in the last year that got dismissed?* • *Is your housing at risk in any way right now because of legal issues?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ Current outstanding legal issue(s), likely to result in fines of $500+ ☐ Current outstanding legal issue(s), likely to result in incarceration of 3+ months (cumulatively), inclusive of any time held on remand
3	**Any** of the following: ☐ Current outstanding legal issue(s), likely to result in fines less than $500 ☐ Current outstanding legal issue(s), likely to result in incarceration of less than 90 days (cumulatively), inclusive of any time held on remand
2	**Any** of the following: ☐ In the past 365 days, relatively minor legal issue has occurred and was resolved through community service or payment of fine(s) ☐ Currently outstanding relatively minor legal issue that is unlikely to result in incarceration (but may result in community service)
1	☐ There are no current legal issues, **and** any legal issues that have historically occurred have been resolved without community service, payment of fine, or incarceration
0	☐ No legal issues within the past 365 days, **and** currently no conditions of release

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J. Managing Tenancy

PROMPTS	CLIENT SCORE:
• *Are you currently homeless?* • *[If the person is housed] Do you have an eviction notice?* • *[If the person is housed] Do you think that your housing is at risk?* • *How is your relationship with your neighbors?* • *How do you normally get along with landlords?* • *How have you been doing with taking care of your place?*	**NOTES**

Note: Housing matters include: conflict with landlord and/or neighbors, damages to the unit, payment of rent on time and in full. Payment of rent through a third party is <u>not</u> considered to be a short-coming or deficiency in the ability to pay rent.

SCORING	
4	**Any** of the following: ☐ Currently homeless ☐ In the next 30 days, will be re-housed or return to homelessness ☐ In the past 365 days, was re-housed 6+ times ☐ In the past 90 days, support worker(s) have been cumulatively involved 10+ times with housing matters
3	**Any** of the following: ☐ In the next 60 days, will be re-housed or return to homelessness, but not in next 30 days ☐ In the past 365 days, was re-housed 3-5 times ☐ In the past 90 days, support worker(s) have been cumulatively involved 4-9 times with housing matters
2	**Any** of the following: ☐ In the past 365 days, was re-housed 2 times ☐ In the past 180 days, was re-housed 1+ times, but not in the past 60 days ☐ Continuously housed for at least 90 days but not more than 180 days ☐ In the past 90 days, support worker(s) have been cumulatively involved 1-3 times with housing matters
1	**Any** of the following: ☐ In the past 365 days, was re-housed 1 time ☐ Continuously housed, with no assistance on housing matters, for at least 180 days but not more than 365 days
0	☐ Continuously housed, with no assistance on housing matters, for at least 365 days

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K. Personal Administration & Money Management

PROMPTS	CLIENT SCORE:
• *How are you with taking care of money?* • *How are you with paying bills on time and taking care of other financial stuff?* • *Do you have any street debts?* • *Do you have any drug or gambling debts?* • *Is there anybody that thinks you owe them money?* • *Do you budget every single month for every single thing you need? Including cigarettes? Booze? Drugs?* • *Do you try to pay your rent before paying for anything else?* • *Are you behind in any payments like child support or student loans or anything like that?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ Cannot create or follow a budget, regardless of supports provided ☐ Does not comprehend financial obligations ☐ Does not have an income (including formal and informal sources) ☐ Not aware of the full amount spent on substances, if they use substances ☐ Substantial real or perceived debts of $1,000+, past due or requiring monthly payments
3	**Any** of the following: ☐ Requires intensive assistance to create and manage a budget (including any legally mandated guardian/trustee that provides assistance or manages access to money) ☐ Only understands their financial obligations with the assistance of a 3rd party ☐ Not budgeting for substance use, if they are a substance user ☐ Real or perceived debts of $999 or less, past due or requiring monthly payments
2	**Any** of the following: ☐ In the past 365 days, source of income has changed 2+ times ☐ Budgeting to the best of ability (including formal and informal sources), but still short of money every month for essential needs ☐ Voluntarily receives assistance creating and managing a budget or restricts access to their own money (e.g. guardian/trusteeship) ☐ Has been self-managing financial resources and taking care of associated administrative tasks for less than 90 days
1	☐ Has been self-managing financial resources and taking care of associated administrative tasks for at least 90 days, but for less than 180 days
0	☐ Has been self-managing financial resources and taking care of associated administrative tasks for at least 180 days

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L. Social Relationships & Networks

PROMPTS	CLIENT SCORE:
• *Tell me about your friends, family or other people in your life.* • *How often do you get together or chat?* • *When you go to doctor's appointments or meet with other professionals like that, what is that like?* • *Are there any people in your life that you feel are just using you?* • *Are there any of your closer friends that you feel are always asking you for money, smokes, drugs, food or anything like that?* • *Have you ever had people crash at your place that you did not want staying there?* • *Have you ever been threatened with an eviction or lost a place because of something that friends or family did in your apartment?* • *Have you ever been concerned about not following your lease agreement because of your friends or family?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ In the past 90 days, left an exploitive, abusive or dependent relationship ☐ Friends, family or other people are placing security of housing at imminent risk, **or** impacting life, wellness, or safety ☐ No friends or family and demonstrates no ability to follow social norms ☐ Currently homeless and would classify most of friends and family as homeless
3	**Any** of the following: ☐ In the past 90-180 days, left an exploitive, abusive or dependent relationship ☐ Friends, family or other people are having some negative consequences on wellness or housing stability ☐ No friends or family but demonstrating ability to follow social norms ☐ Meeting new people with an intention of forming friendships ☐ Reconnecting with previous friends or family members, but experiencing difficulty advancing the relationship ☐ Currently homeless, and would classify some of friends and family as being housed, while others are homeless
2	**Any** of the following: ☐ More than 180 days ago, left an exploitive, abusive or dependent relationship ☐ Developing relationships with new people but not yet fully trusting them ☐ Currently homeless, and would classify friends and family as being housed
1	☐ Has been housed for less than 180 days, **and** is engaged with friends or family, who are having no negative consequences on the individual's housing stability
0	☐ Has been housed for at least 180 days, **and** is engaged with friends or family, who are having no negative consequences on the individual's housing stability

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M. Self Care & Daily Living Skills

PROMPTS	CLIENT SCORE:
• *Do you have any worries about taking care of yourself?* • *Do you have any concerns about cooking, cleaning, laundry or anything like that?* • *Do you ever need reminders to do things like shower or clean up?* • *Describe your last apartment.* • *Do you know how to shop for nutritious food on a budget?* • *Do you know how to make low cost meals that can result in leftovers to freeze or save for another day?* • *Do you tend to keep all of your clothes clean?* • *Have you ever had a problem with mice or other bugs like cockroaches as a result of a dirty apartment?* • *When you have had a place where you have made a meal, do you tend to clean up dishes and the like before they get crusty?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ No insight into how to care for themselves, their apartment or their surroundings ☐ Currently homeless and relies upon others to meet basic needs (e.g. access to shelter, showers, toilet, laundry, food, and/or clothing) on an almost daily basis ☐ Engaged in hoarding or collecting behavior and is not aware that it is an issue in her/his life
3	**Any** of the following: ☐ Has insight into some areas of how to care for themselves, their apartment or their surroundings, but misses other areas because of lack of insight ☐ In the past 180 days, relied upon others to meet basic needs (e.g. access to shelter, showers, toilet, laundry, food, and/or clothing), 14+ days in any 30-day period ☐ Engaged in hoarding or collecting behavior and is aware that it is an issue in her/his life
2	**Any** of the following: ☐ Fully aware and has insight in all that is required to take care of themselves, their apartment and their surroundings, but has not yet mastered the skills or time management to fully execute this on a regular basis ☐ In the past 180 days, relied upon others to meet basic needs (e.g. access to shelter, showers, toilet, laundry, food, and/or clothing), fewer than 14 days in every 30-day period
1	☐ In the past 365 days, accessed community resources 4 or fewer times, **and** is fully taking care of all their daily needs
0	☐ For the past 365+ days, fully taking care of all their daily needs independently

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N. Meaningful Daily Activity

PROMPTS	CLIENT SCORE:
• *How do you spend your day?* • *How do you spend your free time?* • *Does that make you feel happy/fulfilled?* • *How many days a week would you say you have things to do that make you feel happy/fulfilled?* • *How much time in a week would you say you are totally bored?* • *When you wake up in the morning, do you tend to have an idea of what you plan to do that day?* • *How much time in a week would you say you spend doing stuff to fill up the time rather than doing things that you love?* • *Are there any things that get in the way of you doing the sorts of activities you would like to be doing?*	**NOTES**

SCORING	
4	☐ No planned, legal activities described as providing fulfillment or happiness
3	☐ Discussing, exploring, signing up for and/or preparing for new activities or to re-engage with planned, legal activities that used to provide fulfillment or happiness
2	☐ Attempting new or re-engaging with planned, legal activities that used to provide fulfillment or happiness, but uncertain that activities selected are currently providing fulfillment or happiness, **or** the individual is not fully committed to continuing the activities.
1	☐ Has planned, legal activities described as providing fulfillment or happiness 1-3 days per week
0	☐ Has planned, legal activities described as providing fulfillment or happiness 4+ days per week

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O. History of Homelessness & Housing

PROMPTS	CLIENT SCORE:
• *How long have you been homeless?* • *How many times have you been homeless in your life other than this most recent time?* • *Have you spent any time sleeping on a friend's couch or floor? And if so, during those times did you consider that to be your permanent address?* • *Have you ever spent time sleeping in a car or alleyway or garage or barn or bus shelter or anything like that?* • *Have you ever spent time sleeping in an abandoned building?* • *Were you ever in hospital or jail for a period of time when you didn't have a permanent address to go to when you got out?*	**NOTES**

SCORING	
4	☐ Over the past 10 years, cumulative total of 5+ years of homelessness
3	☐ Over the past 10 years, cumulative total of 2+ years but fewer than 5 years of homelessness
2	☐ Over the past 4 years, cumulative total of 30+ days but fewer than 2 years of homelessness
1	☐ Over the past 4 years, cumulative total of 7+ days but fewer than 30 days of homelessness
0	☐ Over the past 4 years, cumulative total of 7 or fewer days of homelessness

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Client:	Worker:	Version:	Date:

COMPONENT	SCORE	COMMENTS
MENTAL HEALTH & WELLNESS AND COGNITIVE FUNCTIONING		
PHYSICAL HEALTH & WELLNESS		
MEDICATION		
SUBSTANCE USE		
EXPERIENCE OF ABUSE AND/OR TRAUMA		
RISK OF HARM TO SELF OR OTHERS		
INVOLVEMENT IN HIGHER RISK AND/OR EXPLOITIVE SITUATIONS		
INTERACTION WITH EMERGENCY SERVICES		

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Client:	Worker:	Version:	Date:

COMPONENT	SCORE	COMMENTS
LEGAL INVOLVEMENT		
MANAGING TENANCY		
PERSONAL ADMINISTRATION & MONEY MANAGEMENT		
SOCIAL RELATIONSHIPS & NETWORKS		
SELF-CARE & DAILY LIVING SKILLS		
MEANINGFUL DAILY ACTIVITIES		
HISTORY OF HOUSING & HOMELESSNESS		
TOTAL		**Score: Recommendation:** 0-19: No housing intervention 20-34: Rapid Re-Housing 35-60: Permanent Supportive Housing/Housing First

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Appendix A: About the SPDAT

OrgCode Consulting, Inc. is pleased to announce the release of Version 4 of the Service Prioritization Decision Assistance Tool (SPDAT). Since its release in 2010, the SPDAT has been used with over 10,000 unique individuals in over 100 communities across North America and in select locations around the world.

Originally designed as a tool to help prioritize housing services for homeless individuals based upon their acuity, the SPDAT has been successfully adapted to other fields of practice, including: discharge planning from hospitals, work with youth, survivors of domestic violence, health research, planning supports for consumer survivors of psychiatric care systems, and in work supporting people with fetal alcohol spectrum disorders. We are encouraged that so many service providers and communities are expanding the use of this tool, and OrgCode will continue to support the innovative use of the SPDAT to meet local needs.

SPDAT Design

The SPDAT is designed to:

- Help prioritize which clients should receive what type of housing assistance intervention, and assist in determining the intensity of case management services
- Prioritize the sequence of clients receiving those services
- Help prioritize the time and resources of Frontline Workers
- Allow Team Leaders and program supervisors to better match client needs to the strengths of specific Frontline Workers on their team
- Assist Team Leaders and program supervisors to support Frontline Workers and establish service priorities across their team
- Provide assistance with case planning and encourage reflection on the prioritization of different elements within a case plan
- Track the depth of need and service responses to clients over time

The SPDAT is NOT designed to:

- Provide a diagnosis
- Assess current risk or be a predictive index for future risk
- Take the place of other valid and reliable instruments used in clinical research and care

The SPDAT is only used with those clients who meet program eligibility criteria. For example, if there is an eligibility criterion that requires prospective clients to be homeless at time of intake to be eligible for Housing First, then the pre-condition must be met before pursuing the application of the SPDAT. For that reason, we have also created the VI-SPDAT as an initial screening tool.

The SPDAT is not intended to replace clinical expertise or clinical assessment tools. The tool complements existing clinical approaches by incorporating a wide array of components that provide both a global and detailed picture of a client's acuity. Certain components of the SPDAT relate to clinical concerns, and it is expected that intake professionals and clinicians will work together to ensure the accurate assessment of these issues. In fact, many organizations and communities have found the SPDAT to be a useful method for bridging the gap between housing, social services and clinical services.

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Version 4

The SPDAT has been influenced by the experience of practitioners in its use, persons with lived experience that have had the SPDAT implemented with them, as well as a number of other excellent tools such as (but not limited to) the Outcome Star, Health of the Nation Outcome Scale, Denver Acuity Scale, Camberwell Assessment of Needs, Vulnerability Index, and Transition Aged Youth Triage Tool.

In preparing SPDAT v4, we have adopted a comprehensive and collaborative approach to changing and improving the SPDAT. Communities that have used the tool for three months or more have provided us with their feedback. OrgCode staff have observed the tool in operation to better understand its implementation in the field. An independent committee composed of service practitioners and academics review enhancements to the SPDAT. Furthermore, we continue to test the validity of SPDAT results through the use of control groups. Overall, we consistently see that groups assessed with the SPDAT have better long-term housing and life stability outcomes than those assessed with other tools, or no tools at all.

OrgCode intends to continue working with communities and persons with lived experience to make future versions of the SPDAT even better. We hope all those communities and agencies that choose to use this tool will remain committed to collaborating with us to make those improvements over time.

Version 4 builds upon the success of Version 3 of the SPDAT with some refinements. Starting in August 2014, a survey was launched of existing SPDAT users to get their input on what should be amended, improved, or maintained in the tool. Analysis was completed across all of these responses. Further research was conducted. Questions were tested and refined over several months, again including the direct voice of persons with lived experience and frontline practitioners. Input was also gathered from senior government officials that create policy and programs to help ensure alignment with guidelines and funding requirements.

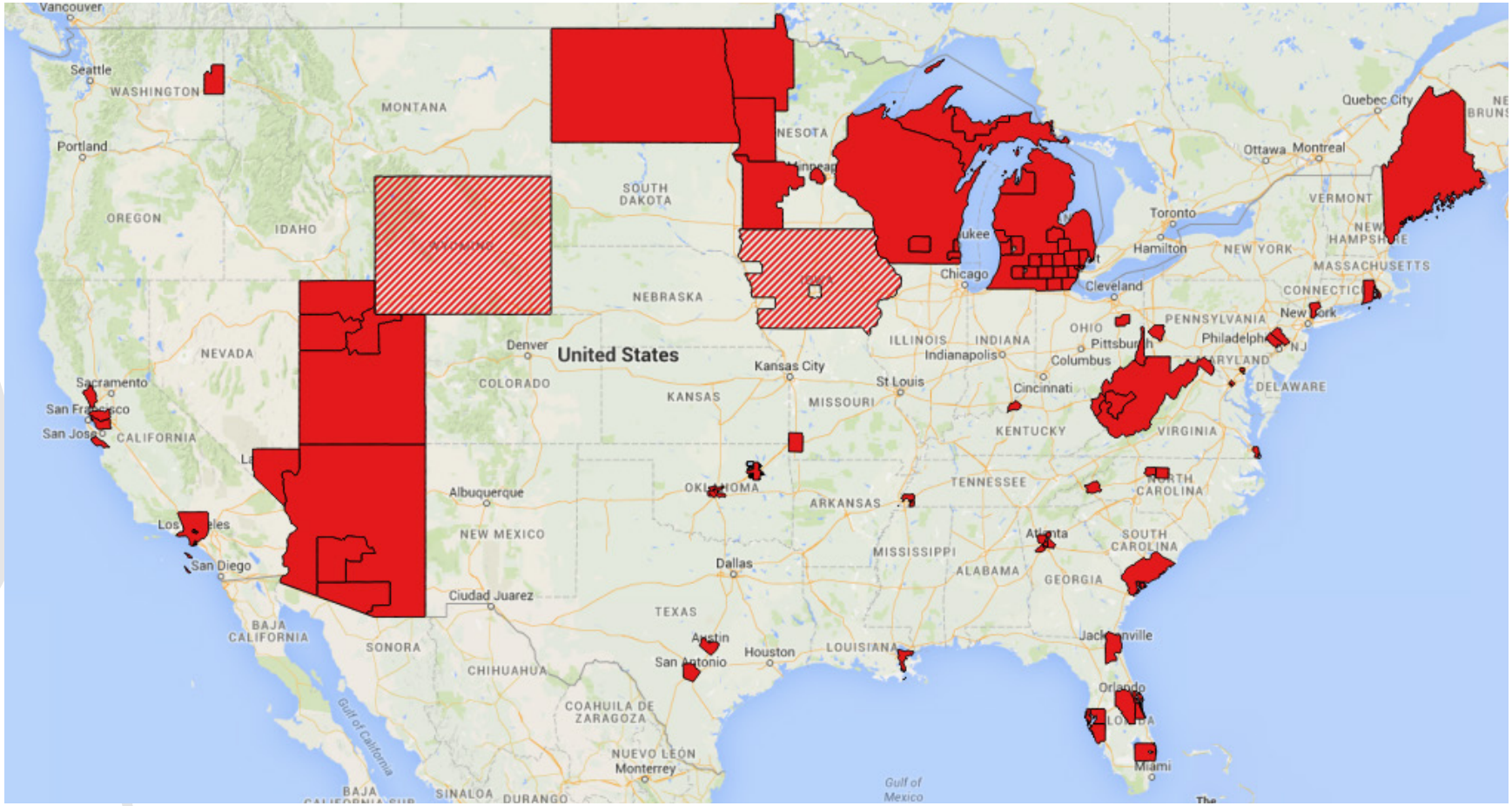
The major differences from Version 3 to Version 4 include:

- The structure of the tools is the same: four domains (five for families) with components aligned to specific domains. The names of the domains and the components remain unchanged.
- The scoring of the tools is the same: 60 points for singles, and 80 points for families.
- The scoring tables used to run from 0 through to 4. They are now reversed with each table starting at 4 and working their way down to 0. This increases the speed of assessment.
- The order of the tools has changed, grouped together by domain.
- Language has been simplified.
- Days are used rather than months to provide greater clarification and alignment to how most databases capture periods of time in service.
- Greater specificity has been provided in some components such as amount of debts.

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Appendix B: Where the SPDAT is being used (as of May 2015)

United States of America



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Arizona
- Statewide

California
- Oakland/Alameda County CoC
- Richmond/Contra Costa County CoC
- Watsonville/Santa Cruz City & County CoC
- Napa City & County CoC
- Los Angeles City & County CoC
- Pasadena CoC
- Glendale CoC

District of Columbia
- District of Columbia CoC

Florida
- Sarasota/Bradenton/Manatee, Sarasota Counties CoC
- Tampa/Hillsborough County CoC
- St. Petersburg/Clearwater/Largo/Pinellas County CoC
- Orlando/Orange, Osceola, Seminole Counties CoC
- Jacksonville-Duval, Clay Counties CoC
- Palm Bay/Melbourne/Brevard County CoC
- West Palm Beach/Palm Beach County CoC

Georgia
- Atlanta County CoC
- Fulton County CoC
- Marietta/Cobb County CoC
- DeKalb County CoC

Iowa
- Parts of Iowa Balance of State CoC

Kentucky
- Louisville/Jefferson County CoC

Louisiana
- New Orleans/Jefferson Parish CoC

Maryland
- Baltimore City CoC

Maine
- Statewide

Michigan
- Statewide

Minnesota
- Minneapolis/Hennepin County CoC
- Northwest Minnesota CoC
- Moorhead/West Central Minnesota CoC
- Southwest Minnesota CoC

Missouri
- Joplin/Jasper, Newton Counties CoC

North Carolina
- Winston Salem/Forsyth County CoC
- Asheville/Buncombe County CoC
- Greensboro/High Point CoC

North Dakota
- Statewide

Nevada
- Las Vegas/Clark County CoC

New York
- Yonkers/Mount Vernon/New Rochelle/Westchester County CoC

Ohio
- Canton/Massillon/Alliance/Stark County CoC
- Toledo/Lucas County CoC

Oklahoma
- Tulsa City & County/Broken Arrow CoC
- Oklahoma City CoC

Pennsylvania
- Lower Marion/Norristown/Abington/Montgomery County CoC
- Bristol/Bensalem/Bucks County CoC
- Pittsburgh/McKeesport/Penn Hills/Allegheny County CoC

Rhode Island
- Statewide

South Carolina
- Charleston/Low Country CoC

Tennessee
- Memphis/Shelby County CoC

Texas
- San Antonio/Bexar County CoC
- Austin/Travis County CoC

Utah
- Salt Lake City & County CoC
- Utah Balance of State CoC
- Provo/Mountainland CoC

Virginia
- Virginia Beach CoC
- Arlington County CoC

Washington
- Spokane City & County CoC

Wisconsin
- Statewide

West Virginia
- Statewide

Wyoming
- Wyoming is in the process of implementing statewide

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Canada

Alberta
- Province-wide

Manitoba
- City of Winnipeg

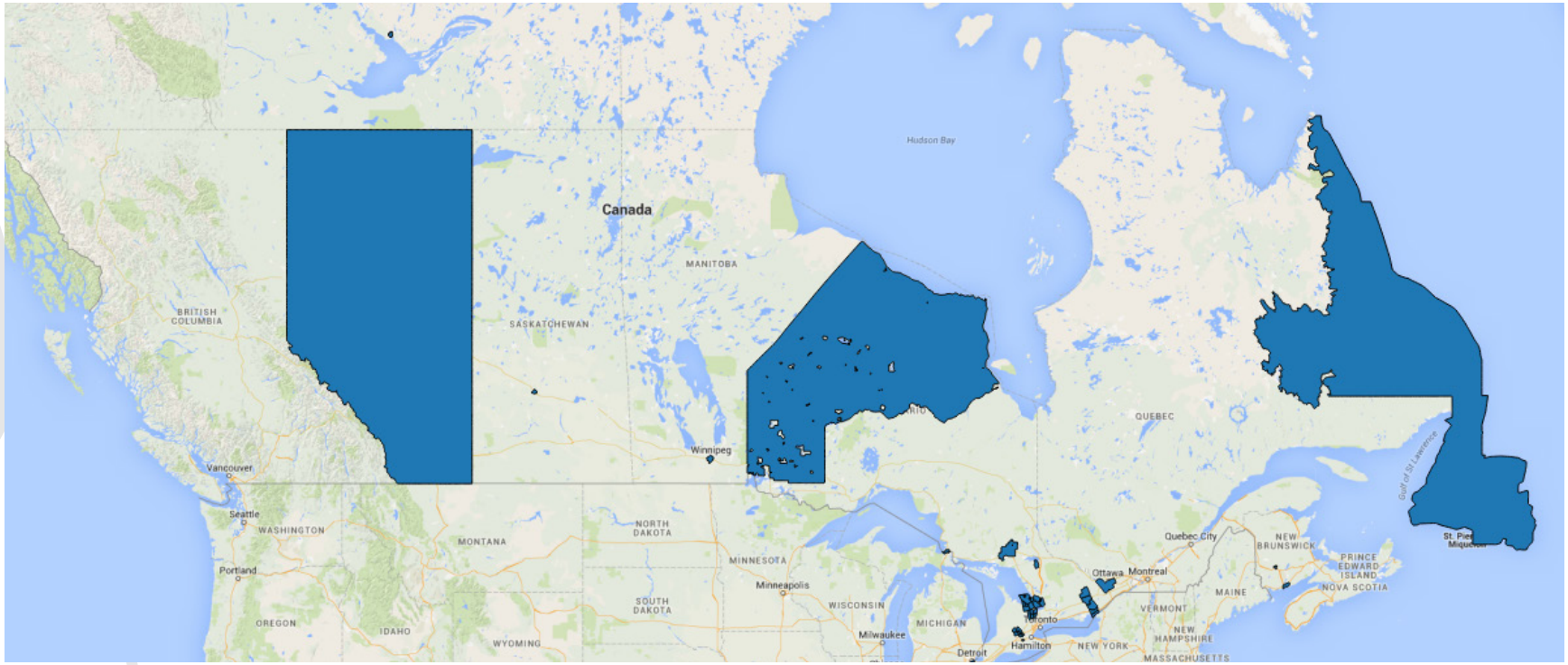
New Brunswick
- City of Fredericton
- City of Saint John

Newfoundland and Labrador
- Province-wide

Northwest Territories
- City of Yellowknife

Ontario
- City of Barrie/Simcoe County
- City of Brantford/Brant County
- City of Greater Sudbury
- City of Kingston/Frontenac County
- City of Ottawa
- City of Windsor
- District of Kenora
- District of Parry Sound
- District of Sault Ste Marie
- Regional Municipality of Waterloo
- Regional Municipality of York

Saskatchewan
- Saskatoon



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Australia

Queensland
- Brisbane



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Family Service Prioritization Decision Assistance Tool

(F-SPDAT)

Assessment Tool for Families

VERSION 2.01

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Welcome to the SPDAT Line of Products

The Service Prioritization Decision Assistance Tool (SPDAT) has been around in various incarnations for over a decade, before being released to the public in 2010. Since its initial release, the use of the SPDAT has been expanding exponentially and is now used in over one thousand communities across the United States, Canada, and Australia.

More communities using the tool means there is an unprecedented demand for versions of the SPDAT, customized for specific client groups or service delivery contexts. With the release of SPDAT V4, there have been more current versions of SPDAT products than ever before.

VI-SPDAT Series

The **Vulnerability Index – Service Prioritization Decision Assistance Tool** (VI-SPDAT) was developed as a pre-screening tool for communities that are very busy and may not have the resources to conduct a full SPDAT assessment for every client. It was made in collaboration with Community Solutions, creators of the Vulnerability Index, as a brief survey that can be conducted to quickly determine whether a client has high, moderate, or low acuity. The use of this survey can help prioritize which clients should be given a full SPDAT assessment first. Because it is a self-reported survey, no special training is required to use the VI-SPDAT.

Current versions available:

- VI-SPDAT V 2.0 for Individuals
- VI-SPDAT V 2.0 for Families
- VI-SPDAT V 1.0 for Youth

All versions are available online at

www.orgcode.com/products/vi-spdat/

SPDAT Series

The **Service Prioritization Decision Assistance Tool** (SPDAT) was developed as an assessment tool for frontline workers at agencies that work with homeless clients to prioritize which of those clients should receive assistance first. It is an in-depth assessment that relies on the assessor's ability to interpret responses and corroborate those with evidence. As a result, this tool may only be used by those who have received proper, up-to-date training provided by OrgCode Consulting, Inc. or an OrgCode certified trainer.

Current versions available:

- SPDAT V 4.0 for Individuals
- SPDAT V 2.0 for Families
- SPDAT V 1.0 for Youth

Information about all versions is available online at

www.orgcode.com/products/spdat/

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SPDAT Training Series

To use the SPDAT, training by OrgCode or an OrgCode certified trainer is required. We provide training on a wide variety of topics over a variety of mediums.

The full-day in-person SPDAT Level 1 training provides you the opportunity to bring together as many people as you want to be trained for one low fee. The webinar training allows for a maximum of 15 different computers to be logged into the training at one time. We also offer online courses for individuals that you can do at your own speed.

The training gives you the manual, case studies, application to current practice, a review of each component of the tool, conversation guidance with prospective clients – and more!

Current SPDAT training available:

- Level 0 SPDAT Training: VI-SPDAT for Frontline Workers
- Level 1 SPDAT Training: SPDAT for Frontline Workers
- Level 2 SPDAT Training: SPDAT for Supervisors
- Level 3 SPDAT Training: SPDAT for Trainers

Other related training available:

- Excellence in Housing-Based Case Management
- Coordinated Access & Common Assessment
- Motivational Interviewing
- Objective-Based Interactions

More information about SPDAT training, including pricing, is available online at

http://www.orgcode.com/product-category/training/spdat/

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Terms and Conditions Governing the Use of the SPDAT

SPDAT products have been developed by OrgCode Consulting, Inc. with extensive feedback from key community partners including people with lived experience. The tools are provided free of charge to communities to improve the client centered services dedicated to increasing housing stability and wellness. Training is indeed required for the administration and interpretation of these assessment tools. Use of the SPDAT products without authorized training is strictly prohibited.

By using this tool, you accept and agree to be bound by the terms of this expectation.

No sharing, reproduction, use or duplication of the information herein is permitted without the express written consent of OrgCode Consulting, Inc.

Ownership

The Service Prioritization Decision Assistance Tool ("SPDAT") and accompanying documentation is owned by OrgCode Consulting, Inc.

Training

Although the SPDAT Series is provided free of charge to communities, training by OrgCode Consulting, Inc. or a third party trainer, authorized by OrgCode, must be successfully completed. After meeting the training requirements required to administer and interpret the SPDAT Series, practitioners are permitted to implement the SPDAT in their work with clients.

Restrictions on Use

You may not use or copy the SPDAT prior to successfully completing training on its use, provided by OrgCode Consulting, Inc. or a third-party trainer authorized by OrgCode. You may not share the SPDAT with other individuals not trained on its use. You may not train others on the use of the SPDAT, unless specifically authorized by OrgCode Consulting, Inc.

Restrictions on Alteration

You may not modify the SPDAT or create any derivative work of the SPDAT or its accompanying documentation, without the express written consent of OrgCode Consulting, Inc. Derivative works include but are not limited to translations.

Disclaimer

The management and staff of OrgCode Consulting, Inc. (OrgCode) do not control the way in which the Service Prioritization Decision Assistance Tool (SPDAT) will be used, applied or integrated into related client processes by communities, agency management or frontline workers. OrgCode assumes no legal responsibility or liability for the misuse of the SPDAT, decisions that are made or services that are received in conjunction with the assessment tool.

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A. Mental Health & Wellness & Cognitive Functioning

PROMPTS	CLIENT SCORE:
• *Has anyone in your family ever received any help with their mental wellness?* • *Do you feel that every member in your family is getting all the help they need for their mental health or stress?* • *Has a doctor ever prescribed anyone in your family pills for nerves, anxiety, depression or anything like that?* • *Has anyone in your family ever gone to an emergency room or stayed in a hospital because they weren't feeling 100% emotionally?* • *Does anyone in your family have trouble learning or paying attention, or been tested for learning disabilities?* • *Do you know if, when pregnant with you, your mother did anything that we now know can have negative effects on the baby? What about when you were pregnant?* • *Has anyone in your family ever hurt their brain or head?* • *Do you have any documents or papers about your family's mental health or brain functioning?* • *Are there other professionals we could speak with that have knowledge of your family's mental health?*	**NOTES**

	SCORING
4	**Any** of the following among any family member: ☐ Serious and persistent mental illness (2+ hospitalizations in a mental health facility or psychiatric ward in the past 2 years) **and** not in a heightened state of recovery currently ☐ Major barriers to performing tasks and functions of daily living or communicating intent because of a brain injury, learning disability or developmental disability
3	**Any** of the following among any family member: ☐ Heightened concerns about state of mental health, but fewer than 2 hospitalizations, and/or without knowledge of presence of a diagnosable mental health condition ☐ Diminished ability to perform tasks and functions of daily living or communicating intent because of a brain injury, learning disability or developmental disability
2	While there may be concern for overall mental health or mild impairments to performing tasks and functions of daily living or communicating intent, **all** of the following are true: ☐ No major concerns about the family's safety or ability to be housed without intensive supports to assist with mental health or cognitive functioning ☐ No major concerns for the health and safety of others because of mental health or cognitive functioning ability ☐ No compelling reason for any member of the family to be screened by an expert in mental health or cognitive functioning prior to housing to fully understand capacity
1	☐ All members of the family are in a heightened state of recovery, have a Wellness Recovery Action Plan (WRAP) or similar plan for promoting wellness, understands symptoms and strategies for coping with them, **and** are engaged with mental health supports as necessary.
0	☐ No mental health or cognitive functioning issues disclosed, suspected or observed.

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B. Physical Health & Wellness

PROMPTS	CLIENT SCORE:
• *How is your family's health?* • *Are you getting any help with your health? How often?* • *Do you feel you are getting all the care you need for your family's health?* • *Any illnesses like diabetes, HIV, Hep C or anything like that going on in any member of your family?* • *Ever had a doctor tell anyone in your family that they have problems with blood pressure or heart or lungs or anything like that?* • *When was the last time anyone in your family saw a doctor? What was that for?* • *Do you have a clinic or doctor that you usually go to?* • *Anything going on right now with your family's health that you think would prevent them from living a full, healthy, happy life?* • *Are there other professionals we could speak with that have knowledge of your family's health?* • *Do you have any documents or papers about your family's health or past stays in hospital because of your health?*	**NOTES**

SCORING	
4	**Any** of the following for any member of the family: ☐ Co-occurring chronic health conditions ☐ Attempting a treatment protocol for a chronic health condition, but the treatment is not improving health ☐ Pallative health condition
3	Presence of a health issue among any family member with **any** of the following: ☐ Not connected with professional resources to assist with a real or perceived serious health issue, by choice ☐ Single chronic or serious health concern but does not connect with professional resources because of insufficient community resources (e.g. lack of availability or affordability) ☐ Unable to follow the treatment plan as a direct result of homeless status
2	☐ Presence of a relatively minor physical health issue, which is managed and/or cared for with appropriate professional resources or through informed self-care ☐ Presence of a physical health issue, for which appropriate treatment protocols are followed, but there is still a moderate impact on their daily living
1	Single chronic or serious health condition in a family member, but **all** of the following are true: ☐ Able to manage the health issue and live a relatively active and healthy life ☐ Connected to appropriate health supports ☐ Educated and informed on how to manage the health issue, take medication as necessary related to the condition, and consistently follow these requirements.
0	☐ No serious or chronic health condition ☐ If any minor health condition, they are managed appropriately

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C. Medication

PROMPTS	CLIENT SCORE:
• *Has anyone in your family recently been prescribed any medications by a health care professional?* • *Does anyone in your family take any medication, prescribed to them by a doctor?* • *Has anyone in your family ever had a doctor prescribe them a medication that wasn't filled or they didn't take?* • *Were any of your family's medications changed in the last month? Whose? How did that make them feel?* • *Do other people ever steal your family's medications?* • *Does anyone in your family ever sell or share their medications with other people it wasn't prescribed to?* • *How does your family store their medication and make sure they take the right medication at the right time each day?* • *What do you do if you realize someone has forgotten to take their medications?* • *Do you have any papers or documents about the medications your family takes?*	**NOTES**

SCORING	
4	**Any** of the following for any family member: ☐ In the past 30 days, started taking a prescription which **is** having any negative impact on day to day living, socialization or mood ☐ Shares or sells prescription, but keeps **less** than is sold or shared ☐ Regularly misuses medication (e.g. frequently forgets; often takes the wrong dosage; uses some or all of medication to get high) ☐ Has had a medication prescribed in the last 90 days that remains unfilled, for any reason.
3	**Any** of the following for any family member: ☐ In the past 30 days, started taking a prescription which is **not** having any negative impact on day to day living, socialization or mood ☐ Shares or sells prescription, but keeps **more** than is sold or shared ☐ Requires intensive assistance to manage or take medication (e.g., assistance organizing in a pillbox; working with pharmacist to blister-pack; adapting the living environment to be more conducive to taking medications at the right time for the right purpose, like keeping nighttime medications on the bedside table and morning medications by the coffeemaker) ☐ Medications are stored and distributed by a third-party
2	**Any** of the following for any family member: ☐ Fails to take medication at the appropriate time or appropriate dosage, 1-2 times per week ☐ Self-manages medications except for requiring reminders or assistance for refills ☐ Successfully self-managing medication for fewer than 30 consecutive days
1	☐ Successfully self-managing medications for more than 30, but less than 180, consecutive days
0	**Any** of the following is true for **every** family member: ☐ No medication prescribed to them ☐ Successfully self-managing medication for 181+ consecutive days

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D. Substance Use

PROMPTS	CLIENT SCORE:
• *When was the last time you had a drink or used drugs? What about the other members of your family?* • *Anything we should keep in mind related to drugs/alcohol?* • *How often would you say you use [substance] in a week?* • *Ever have a doctor tell you that your health may be at risk because you drink or use drugs?* • *Have you engaged with anyone professionally related to your substance use that we could speak with?* • *Ever get into fights, fall down and bang your head, do things you regret later, or pass out when drinking or using other drugs?* • *Have you ever used alcohol or other drugs in a way that may be considered less than safe?* • *Do you ever drink mouthwash or cooking wine or hand sanitizer or anything like that?*	**NOTES**

Note: Consumption thresholds: 2 drinks per day or 14 total drinks in any one week period for men; 2 drinks per day or 9 total drinks in any one week period for women.

SCORING	
4	☐ An adult is in a life-threatening health situation as a direct result of substance use, **or**, ☐ Any family member is under the legal age but over 15 and would score a 3+, **or**, ☐ Any family member is under 15 and would score a 2+, **or** who first used drugs prior to age 12, **or**, In the past 30 days, **any** of the following are true for any adult in the family... ☐ Substance use is almost daily (21+ times) **and** often to the point of complete inebriation ☐ Binge drinking, non-beverage alcohol use, or inhalant use 4+ times ☐ Substance use resulting in passing out 2+ times
3	☐ An adult is experiencing serious health impacts as a direct result of substance use, though not (yet) in a life-threatening position as a result, **or**, ☐ Any family member is under the legal age but over 15 and would score a 2, **or**, ☐ Any family member is under 15 and would score a 1, **or** who first used drugs at age 13-15, **or**, In the past 30 days, **any** of the following are true for any adult in the family... ☐ Drug use reached the point of complete inebriation 12+ times ☐ Alcohol use usually exceeded the consumption thresholds (at least 5+ times), but usually not to the point of complete inebriation ☐ Binge drinking, non-beverage alcohol use, or inhalant use occurred 1-3 times
2	☐ Any family member is under the legal age but over 15 and would otherwise score 1, **or**, In the past 30 days, **any** of the following are true for any adult in the family... ☐ Drug use reached the point of complete inebriation fewer than 12 times ☐ Alcohol use exceeded the consumption thresholds fewer than 5 times
1	☐ In the past 365 days, no alcohol use beyond consumption thresholds, **or**, ☐ If making claims to sobriety, no substance use in the past 30 days
0	☐ In the past 365 days, no substance use

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E. Experience of Abuse & Trauma of Parents

PROMPTS	CLIENT SCORE:
To avoid re-traumatizing the individual, ask selected approved questions as written. Do not probe for details of the trauma/abuse. This section is entirely self-reported. ***Because this section is self-reported, if there are more than one parent present, they should each be asked individually.*** • *"I don't need you to go into any details, but has there been any point in your life where you experienced emotional, physical, sexual or psychological abuse?"* • *"Are you currently or have you ever received professional assistance to address that abuse?"* • *"Does the experience of abuse or trauma impact your day to day living in any way?"* • *"Does the experience of abuse or trauma impact your ability to hold down a job, maintain housing or engage in meaningful relationships with friends or family?"* • *"Have you ever found yourself feeling or acting in a certain way that you think is caused by a history of abuse or trauma?"* • *"Have you ever become homeless as a direct result of experiencing abuse or trauma?"*	**NOTES**

SCORING	
4	☐ A reported experience of abuse or trauma, believed to be a direct cause of their homelessness
3	☐ The experience of abuse or trauma is **not** believed to be a direct cause of homelessness, but abuse or trauma (experienced before, during, or after homelessness) **is** impacting daily functioning and/or ability to get out of homelessness
2	**Any** of the following: ☐ A reported experience of abuse or trauma, but is not believed to impact daily functioning and/or ability to get out of homelessness ☐ Engaged in therapeutic attempts at recovery, but does not consider self to be recovered
1	☐ A reported experience of abuse or trauma, and considers self to be recovered
0	☐ No reported experience of abuse or trauma

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F. Risk of Harm to Self or Others

PROMPTS	CLIENT SCORE:
• *Does anyone in your family have thoughts about hurting themselves or anyone else? Have they ever acted on these thoughts? When was the last time? What was occurring when that happened?* • *Has anyone in your family ever received professional help – including maybe a stay at hospital – as a result of thinking about or attempting to hurt themself or others? How long ago was that? Does that happen often?* • *Has anyone in your family recently left a situation you felt was abusive or unsafe? How long ago was that?* • *Has anyone in your family been in any fights recently – whether they started it or someone else did? How long ago was that? How often do they get into fights?*	**NOTES**

SCORING	
4	**Any** of the following for any family member: ☐ In the past 90 days, left an abusive situation ☐ In the past 30 days, attempted, threatened, or actually harmed self or others ☐ In the past 30 days, involved in a physical altercation (instigator or participant)
3	**Any** of the following for any family member: ☐ In the past 180 days, left an abusive situation, but no exposure to abuse in the past 90 days ☐ Most recently attempted, threatened, or actually harmed self or others in the past 180 days, but not in the past 30 days ☐ In the past 365 days, involved in a physical altercation (instigator or participant), but not in the past 30 days
2	**Any** of the following for any family member: ☐ In the past 365 days, left an abusive situation, but no exposure to abuse in the past 180 days ☐ Most recently attempted, threatened, or actually harmed self or others in the past 365 days, but not in the past 180 days ☐ 366+ days ago, 4+ involvements in physical alterations
1	☐ 366+ days ago, a family member had 1-3 involvements in physical alterations
0	☐ Whole family reports no instance of harming self, being harmed, or harming others

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G. Involvement in Higher Risk and/or Exploitive Situations

PROMPTS	CLIENT SCORE:
• *[Observe, don't ask] Any abcesses or track marks from injection substance use?* • *Does anybody force or trick people in your family to do things that they don't want to do?* • *Do you or anyone in your family ever do stuff that could be considered dangerous like drinking until they pass out outside, or delivering drugs for someone, having sex without a condom with a casual partner, or anything like that?* • *Does anyone in your family ever find themselves in situations that may be considered at a high risk for violence?* • *Does your family ever sleep outside? How do you dress and prepare for that? Where do you tend to sleep?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ In the past 180 days, family engaged in a total of 10+ higher risk and/or exploitive events ☐ In the past 90 days, any member of the family left an abusive situation
3	**Any** of the following: ☐ In the past 180 days, family engaged in a total of 4-9 higher risk and/or exploitive events ☐ In the past 180 days, any member of the family left an abusive situation, but not in the past 90 days
2	**Any** of the following: ☐ In the past 180 days, family engaged in a total of 1-3 higher risk and/or exploitive events ☐ 181+ days ago, any member of the family left an abusive situation
1	☐ Any involvement in higher risk and/or exploitive situations by any member of the family occurred more than 180 days ago but less than 365 days ago
0	☐ In the past 365 days, no involvement by any family member in higher risk and/or exploitive events

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H. Interaction with Emergency Services

PROMPTS	CLIENT SCORE:
• *How often does your family go to emergency rooms?* • *How many times have you had the police speak to members of your family over the past 180 days?* • *Has anyone in your family used an ambulance or needed the fire department at any time in the past 180 days?* • *How many times have members of your family called or visited a crisis team or a crisis counselor in the last 180 days?* • *How many times have you or anyone in your family been admitted to hospital in the last 180 days? How long did they stay?*	**NOTES**

Note: Emergency service use includes: admittance to emergency room/department; hospitalizations; trips to a hospital in an ambulance; crisis service, distress centers, suicide prevention service, sexual assault crisis service, sex worker crisis service, or similar service; interactions with police for the purpose of law enforcement; interactions with fire service in emergency situations.

SCORING	
4	☐ In the past 180 days, cumulative family total of 10+ interactions with emergency services
3	☐ In the past 180 days, cumulative family total of 4-9 interactions with emergency services
2	☐ In the past 180 days, cumulative family total of 1-3 interactions with emergency services
1	☐ Any interaction with emergency services by family members occurred more than 180 days ago but less than 365 days ago
0	☐ In the past 365 days, no interaction with emergency services

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I. Legal

PROMPTS	CLIENT SCORE:
• *Does your family have any "legal stuff" going on?* • *Has anyone in your family had a lawyer assigned to them by a court?* • *Does anyone in your family have any upcoming court dates? Do you think there's a chance someone in your family will do time?* • *Any outstanding fines?* • *Has anyone in your family paid any fines in the last 12 months for anything?* • *Has anyone in your family done any community service in the last 12 months?* • *Is anybody expecting someone in your family to do community service for anything right now?* • *Did your family have any legal stuff in the last year that got dismissed?* • *Is your family's housing at risk in any way right now because of legal issues?*	**NOTES**

SCORING	
4	**Any** of the following among any family member: ☐ Current outstanding legal issue(s), likely to result in fines of $500+ ☐ Current outstanding legal issue(s), likely to result in incarceration of 3+ months (cumulatively), inclusive of any time held on remand
3	**Any** of the following among any family member: ☐ Current outstanding legal issue(s), likely to result in fines less than $500 ☐ Current outstanding legal issue(s), likely to result in incarceration of less than 90 days (cumulatively), inclusive of any time held on remand
2	**Any** of the following among any family member: ☐ In the past 365 days, relatively minor legal issue has occurred and was resolved through community service or payment of fine(s) ☐ Currently outstanding relatively minor legal issue that is unlikely to result in incarceration (but may result in community service)
1	☐ There are no current legal issues among family members, **and** any legal issues that have historically occurred have been resolved without community service, payment of fine, or incarceration
0	☐ No family member has had any legal issues within the past 365 days, **and** currently no conditions of release

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J. Managing Tenancy

PROMPTS	CLIENT SCORE:
• *Is your family currently homeless?* • *[If the family is housed] Does your family have an eviction notice?* • *[If the family is housed] Do you think that your family's housing is at risk?* • *How is your family's relationship with your neighbors?* • *How does your family normally get along with landlords?* • *How has your family been doing with taking care of your place?*	**NOTES**

Note: Housing matters include: conflict with landlord and/or neighbors, damages to the unit, payment of rent on time and in full. Payment of rent through a third party is <u>not</u> considered to be a short-coming or deficiency in the ability to pay rent.

	SCORING
4	**Any** of the following: ☐ Currently homeless ☐ In the next 30 days, will be re-housed or return to homelessness ☐ In the past 365 days, was re-housed 6+ times ☐ In the past 90 days, support worker(s) have been cumulatively involved 10+ times with housing matters
3	**Any** of the following: ☐ In the next 60 days, will be re-housed or return to homelessness, but not in next 30 days ☐ In the past 365 days, was re-housed 3-5 times ☐ In the past 90 days, support worker(s) have been cumulatively involved 4-9 times with housing matters
2	**Any** of the following: ☐ In the past 365 days, was re-housed 2 times ☐ In the past 180 days, was re-housed 1+ times, but not in the past 60 days ☐ Continuously housed for at least 90 days but not more than 180 days ☐ In the past 90 days, support worker(s) have been cumulatively involved 1-3 times with housing matters
1	**Any** of the following: ☐ In the past 365 days, was re-housed 1 time ☐ Continuously housed, with no assistance on housing matters, for at least 180 days but not more than 365 days
0	☐ Continuously housed, with no assistance on housing matters, for at least 365 days

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K. Personal Administration & Money Management

PROMPTS	CLIENT SCORE:
• *How are you and your family with taking care of money?* • *How are you and your family with paying bills on time and taking care of other financial stuff?* • *Does anyone in your family have any street debts or drug or gambling debts?* • *Is there anybody that thinks anyone in your family owes them money?* • *Do you budget every single month for every single thing your family needs? Including cigarettes? Booze? Drugs?* • *Does your family try to pay your rent before paying for anything else?* • *Is anyone in your family behind in any payments like child support or student loans or anything like that?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ No family income (including formal and informal sources) ☐ Substantial real or perceived debts of $1,000+, past due or requiring monthly payments **Or**, for the person who normally handles the household's finances, **any** of the following: ☐ Cannot create or follow a budget, regardless of supports provided ☐ Does not comprehend financial obligations ☐ Not aware of the full amount spent on substances, if the household includes a substance user
3	☐ Real or perceived debts of $999 or less, past due or requiring monthly payments, **or** For the person who normally handles the household's finances, **any** of the following: ☐ Requires intensive assistance to create and manage a budget (including any legally mandated guardian/trustee that provides assistance or manages access to money) ☐ Only understands their financial obligations with the assistance of a 3rd party ☐ Not budgeting for substance use, if the household includes a substance user
2	☐ In the past 365 days, source of family income has changed 2+ times, **or** For the person who normally handles the household's finances, **any** of the following: ☐ Budgeting to the best of ability (including formal and informal sources), but still short of money every month for essential needs ☐ Voluntarily receives assistance creating and managing a budget or restricts access to their own money (e.g. guardian/trusteeship) ☐ Self-managing financial resources and taking care of associated administrative tasks for less than 90 days
1	☐ The person who normally handles the household's finances has been self-managing financial resources and taking care of associated administrative tasks for at least 90 days, but for less than 180 days
0	☐ The person who normally handles the household's finances has been self-managing financial resources and taking care of associated administrative tasks for at least 180 days

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L. Social Relationships & Networks

PROMPTS	CLIENT SCORE:
• *Tell me about your family's friends, extended family or other people in your life.* • *How often do you get together or chat with family friends?* • *When your family goes to doctor's appointments or meet with other professionals like that, what is that like?* • *Are there any people in your life that you feel are just using you, or someone else in your family?* • *Are there any of your family's closer friends that you feel are always asking you for money, smokes, drugs, food or anything like that?* • *Have you ever had people crash at your place that you did not want staying there?* • *Have you ever been threatened with an eviction or lost a place because of something that friends or extended family did in your apartment?* • *Have you ever been concerned about not following your lease agreement because of friends or extended family?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ Currently homeless and would classify most of friends and family as homeless ☐ Friends, family or other people are placing security of housing at imminent risk, **or** impacting life, wellness, or safety ☐ In the past 90 days, left an exploitive, abusive or dependent relationship ☐ No friends or family and any family member demonstrates an inability to follow social norms
3	**Any** of the following: ☐ Currently homeless, and would classify some of friends as housed, while some are homeless ☐ In the past 90-180 days, left an exploitive, abusive or dependent relationship ☐ Friends, family or other people are having some negative consequences on wellness or housing stability ☐ No friends or family but all family members demonstrate ability to follow social norms ☐ Any family member is meeting new people with an intention of forming friendships ☐ Any family member is reconnecting with previous friends or family members, but experiencing difficulty advancing the relationship
2	**Any** of the following: ☐ Currently homeless, and would classify friends and family as being housed ☐ More than 180 days ago, left an exploitive, abusive or dependent relationship ☐ Any family member is developing relationships with new people but not yet fully trusting them
1	☐ Has been housed for less than 180 days, **and** family is engaged with friends or family, who are having no negative consequences on the individual's housing stability
0	☐ Has been housed for at least 180 days, **and** family is engaged with friends or family, who are having no negative consequences on the individual's housing stability

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M. Self Care & Daily Living Skills of Family Head

PROMPTS	CLIENT SCORE:
• *Do you have any worries about taking care of yourself or your family?* • *Do you have any concerns about cooking, cleaning, laundry or anything like that?* • *Does anyone in your family ever need reminders to do things like shower or clean up?* • *Describe your family's last apartment.* • *Do you know how to shop for nutritious food on a budget?* • *Do you know how to make low cost meals that can result in leftovers to freeze or save for another day?* • *Do you tend to keep all of your family's clothes clean?* • *Have you ever had a problem with mice or other bugs like cockroaches as a result of a dirty apartment?* • *When you have had a place where you have made a meal, do you tend to clean up dishes and the like before they get crusty?*	**NOTES**

SCORING	
4	**Any** of the following for head(s) of household: ☐ No insight into how to care for themselves, their apartment or their surroundings ☐ Currently homeless and relies upon others to meet basic needs (e.g. access to shelter, showers, toilet, laundry, food, and/or clothing) on an almost daily basis ☐ Engaged in hoarding or collecting behavior and is not aware that it is an issue in her/his life
3	**Any** of the following for head(s) of household: ☐ Has insight into some areas of how to care for themselves, their apartment or their surroundings, but misses other areas because of lack of insight ☐ In the past 180 days, relied upon others to meet basic needs (e.g. access to shelter, showers, toilet, laundry, food, and/or clothing), 14+ days in any 30-day period ☐ Engaged in hoarding or collecting behavior and is aware that it is an issue in her/his life
2	**Any** of the following for head(s) of household: ☐ Fully aware and has insight in all that is required to take care of themselves, their apartment and their surroundings, but has not yet mastered the skills or time management to fully execute this on a regular basis ☐ In the past 180 days, relied upon others to meet basic needs (e.g. access to shelter, showers, toilet, laundry, food, and/or clothing), fewer than 14 days in every 30-day period
1	☐ In the past 365 days, family accessed community resources 4 or fewer times, **and** head of household is fully taking care of all the family's daily needs
0	☐ For the past 365+ days, fully taking care of all the family's daily needs independently

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N. Meaningful Daily Activity

PROMPTS	CLIENT SCORE:
• *How does your family spend their days?* • *How does your family spend their free time?* • *Do these things make your family feel happy/fulfilled?* • *How many days a week would you say members of your family have things to do that make them feel happy/fulfilled?* • *How much time in a week would you or members of your family say they are totally bored?* • *When people in your family wake up in the morning, do they tend to have an idea of what they plan to do that day?* • *How much time in a week would you say members of your family spend doing stuff to fill up the time rather than doing things that they love?* • *Are there any things that get in the way of your family doing the sorts of activities they would like to be doing?*	**NOTES**

SCORING	
4	☐ Any member of the family has no planned, legal activities described as providing fulfillment or happiness
3	☐ Any member of the family is discussing, exploring, signing up for and/or preparing for new activities or to re-engage with planned, legal activities that used to provide fulfillment or happiness
2	☐ Some members of the family are attempting new or re-engaging with planned, legal activities that used to provide fulfillment or happiness, but uncertain that activities selected are currently providing fulfillment or happiness, **or** they are not fully committed to continuing the activities.
1	☐ Each family member has planned, legal activities described as providing fulfillment or happiness 1-3 days per week
0	☐ Each family member has planned, legal activities described as providing fulfillment or happiness 4+ days per week

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O. History of Homelessness & Housing

PROMPTS	CLIENT SCORE:
• *How long has your family been homeless?* • *How many times has your family experienced homelessness other than this most recent time?* • *Has your family spent any time sleeping on a friend's couch or floor? And if so, during those times did you consider that to be your family's permanent address?* • *Has your family ever spent time sleeping in a car, alleyway , garage, barn, bus shelter, or anything like that?* • *Has your family ever spent time sleeping in an abandoned building?* • *Was anyone in your family ever been in hospital or jail for a period of time when they didn't have a permanent address to go to when they got out?*	**NOTES**

SCORING	
4	☐ Over the past 10 years, cumulative total of 5+ years of family homelessness
3	☐ Over the past 10 years, cumulative total of 2+ years but fewer than 5 years of family homelessness
2	☐ Over the past 4 years, cumulative total of 30+ days but fewer than 2 years of family homelessness
1	☐ Over the past 4 years, cumulative total of 7+ days but fewer than 30 days of family homelessness
0	☐ Over the past 4 years, cumulative total of 7 or fewer days of family homelessness

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P. Parental Engagement

PROMPTS	CLIENT SCORE:
• *Walk me through a typical evening after school in your family.* • *Tell me about what role, if any, the older kids have with the younger kids. Do they babysit? Walk them to school? Bathe or put the younger kids to bed?* • *Does your family have play time together? What kinds of things do you do and how often do you do it?* • *Let's pick a day like a Saturday...do you know where your kids are the entire day and whom they are out with all day?*	**NOTES**

Note: In this section, a child is considered "supervised" when the parent has knowledge of the child's whereabouts, the child is in an age-appropriate environment, and the child is engaged with the parent or another responsible adult. "Caretaking tasks" are tasks that may be expected by a parent/caregiver such as getting children to/from school, preparing meals, bathing children, putting children to bed, etc.

SCORING	
4	☐ No sense of parental attachment and responsibility ☐ No meaningful family time together ☐ Children 12 and younger are unsupervised 3+ hours each day ☐ Children 13 and older are unsupervised 4+ hours each day ☐ In families with 2+ children, the older child performs caretaking tasks 5+ days/week
3	☐ Weak sense of parental attachment and responsibility ☐ Meaningful family activities occur 1-4 times in a month ☐ Children 12 and younger are unsupervised 1-3 hours each day ☐ Children 13 and older are unsupervised 2-4 hours each day ☐ In families with 2+ children, the older child performs caretaking tasks 3-4 days/week
2	☐ Sense of parental attachment and responsibility, but not consistently applied ☐ Meaningful family activities occur 1-2 days per week ☐ Children 12 and younger are unsupervised fewer than 1 hour each day ☐ Children 13 and older are unsupervised 1-2 hours each day ☐ In families with 2+ children, the older child performs caretaking tasks fewer than 2 days/week
1	☐ Strong sense of parental attachment and responsibility towards their children ☐ Meaningful family activities occur 3-6 days of the week ☐ Children 12 and younger are never unsupervised ☐ Children 13 and older are unsupervised no more than an hour each day
0	☐ Strong sense of attachment and responsibility towards their children ☐ Meaningful family activities occur daily ☐ Children are never unsupervised

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Q. Stability/Resiliency of the Family Unit

PROMPTS	CLIENT SCORE:
• *Over the past year have there been any different adults staying with the family like a family friend, grandparent, aunt or that sort of thing? If so, can you tell me when and for how long and the changes that have occurred?* • *Other than kids being taken into care, have there been any instances where any child has gone to stay with another family member or family friend for any length of time? Can you tell me how many times, when and for how long that happened?*	**NOTES**

SCORING	
4	In the past 365 days, **any** of the following have occurred: ☐ Parental arrangements and/or other adult relative within the family have changed 4+ times ☐ Children have left or returned to the family 4+ times
3	In the past 365 days, **any** of the following have occurred: ☐ Parental arrangements and/or other adult relatives within the family have changed 3 times ☐ Children have left or returned to the family 3 times
2	In the past 365 days, **any** of the following have occurred: ☐ Parental arrangements and/or other adult relatives within the family have changed 2 times ☐ Children have left or returned to the family 2 times
1	In the past 365 days, **any** of the following have occurred: ☐ Parental arrangements and/or other adult relatives within the family have changed 1 time ☐ Children have left or returned to the family 1 time
0	In the past 365 days, **any** of the following have occurred: ☐ No change in parental arrangements and/or other adult relatives within the family ☐ Children have not left or returned to the family

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R. Needs of Children

PROMPTS	CLIENT SCORE:
• *Please tell me about the attendance at school of your school-aged children.* • *Any health issues with your children?* • *Any times of separation between your children and parents?* • *Without going into detail, have any of your children experienced or witnessed emotional, physical, sexual or psychological abuse?* • *Have your children ever accessed professional assistance to address that abuse?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ In the last 90 days, children needed to live with friends or family for 15+ days in any month ☐ School-aged children are not currently enrolled in school ☐ Any member of the family, including children, is currently escaping an abusive situation ☐ The family is homeless
3	**Any** of the following: ☐ In the last 90 days, children needed to live with friends or family for 7-14 days in any month ☐ School-aged children typically miss 3+ days of school per week for reasons other than illness ☐ In the last 180 days, any child(ren) in the family has experienced an abusive situation that has since ended
2	**Any** of the following: ☐ In the last 90 days, children needed to live with friends or family for 1-6 days in any month ☐ School-aged children typically miss 2 days of school per week for reasons other than illness ☐ In the past 365 days, any child(ren) in the family has experienced an abusive situation that has ended more than 180 days ago
1	**Any** of the following: ☐ In the last 365 days, children needed to live with friends or family for 7+ days in any month, but not in the last 90 days ☐ School-aged children typically miss 1 day of school per week for reasons other than illness
0	**All** of the following: ☐ In the last 365 days, children needed to live with friends or family for fewer than 7 days in every month ☐ School-aged children maintain consistent attendance at school ☐ There is no evidence of children in the home having experienced or witnessed abuse ☐ The family is housed

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S. Size of Family Unit

PROMPTS	CLIENT SCORE:
• *I just want to make sure I understand how many kids there are, the gender of each and their age. Can you take me through that again?* • *Is anyone in the family currently pregnant?*	NOTES

SCORING	FOR ONE-PARENT FAMILIES:	FOR TWO-PARENT FAMILIES:
4	**Any** of the following: ☐ A pregnancy in the family ☐ At least one child aged 0-6 ☐ Three or more children of any age	**Any** of the following: ☐ A pregnancy in the family ☐ Four or more children of any age
3	**Any** of the following: ☐ At least one child aged 7-11 ☐ Two children of any age	**Any** of the following: ☐ At least one child aged 0-6 ☐ Three children of any age
2	☐ At least one child aged 12–15.	**Any** of the following: ☐ At least one child aged 7-11 ☐ Two children of any age
1	☐ At least one child aged 16 or older.	☐ At least one child aged 12 or older
0	☐ Children have been permanently removed from the family and the household is transitioning to services for singles or couples without children	

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T. Interaction with Child Protective Services and/or Family Court

PROMPTS	CLIENT SCORE:
• *Any matters being considered by a judge right now as it pertains to any member of your family?* • *Have any of your children spent time in care? When was that? For how long were they in care? When did you get them back?* • *Has there ever been an investigation by someone in child welfare into the matters of your family?*	**NOTES**

SCORING	
4	**Any** of the following: ☐ In the past 90 days, interactions with child protective services have occurred ☐ In the past 365 days, one or more children have been removed from parent's custody that have **not** been reunited with the family at least four days per week ☐ There are issues still be decided or considered within family court
3	In the past 180 days, **any** of the following have occurred: ☐ Interactions with child protective services have occurred, but not within the past 90 days ☐ One or more children have been removed from parent's custody through child protective services (non-voluntary) **and** the child(ren) has been reunited with the family four or more days per week; ☐ Issues have been resolved in family court
2	☐ In the past 365 days, interactions with child protective services have occurred, but not within the past 180 days, and there are no active issues, concerns or investigations
1	☐ No interactions with child protective services have occurred, within the past 365 days, and there are no active issues, concerns or investigations.
0	☐ There have been no serious interactions with child protective services because of parenting concerns

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Client:	Worker:	Version:	Date:

COMPONENT	SCORE	COMMENTS
MENTAL HEALTH & WELLNESS AND COGNITIVE FUNCTIONING		
PHYSICAL HEALTH & WELLNESS		
MEDICATION		
SUBSTANCE USE		
EXPERIENCE OF ABUSE AND/ OR TRAUMA		
RISK OF HARM TO SELF OR OTHERS		
INVOLVEMENT IN HIGHER RISK AND/OR EXPLOITIVE SITUATIONS		
INTERACTION WITH EMERGENCY SERVICES		

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Client:	Worker:	Version:	Date:

COMPONENT	SCORE	COMMENTS
LEGAL INVOLVEMENT		
MANAGING TENANCY		
PERSONAL ADMINISTRATION & MONEY MANAGEMENT		
SOCIAL RELATIONSHIPS & NETWORKS		
SELF-CARE & DAILY LIVING SKILLS		
MEANINGFUL DAILY ACTIVITIES		
HISTORY OF HOUSING & HOMELESSNESS		

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Client:	Worker:	Version:	Date:

COMPONENT	SCORE	COMMENTS
PARENTAL ENGAGEMENT		
STABILITY/RESILIENCY OF THE FAMILY UNIT		
NEEDS OF CHILDREN		
SIZE OF FAMILY		
INTERACTION WITH CHILD PROTECTIVE SERVICES AND/ OR FAMILY COURT		
TOTAL		**Score: Recommendation:** 0-26: No housing intervention 27-53: Rapid Re-Housing 54-80: Permanent Supportive Housing/Housing First

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Appendix A: About the SPDAT

OrgCode Consulting, Inc. is pleased to announce the release of Version 4 of the Service Prioritization Decision Assistance Tool (SPDAT). Since its release in 2010, the SPDAT has been used with over 10,000 unique individuals in over 100 communities across North America and in select locations around the world.

Originally designed as a tool to help prioritize housing services for homeless individuals based upon their acuity, the SPDAT has been successfully adapted to other fields of practice, including: discharge planning from hospitals, work with youth, survivors of domestic violence, health research, planning supports for consumer survivors of psychiatric care systems, and in work supporting people with fetal alcohol spectrum disorders. We are encouraged that so many service providers and communities are expanding the use of this tool, and OrgCode will continue to support the innovative use of the SPDAT to meet local needs.

SPDAT Design

The SPDAT is designed to:

- Help prioritize which clients should receive what type of housing assistance intervention, and assist in determining the intensity of case management services
- Prioritize the sequence of clients receiving those services
- Help prioritize the time and resources of Frontline Workers
- Allow Team Leaders and program supervisors to better match client needs to the strengths of specific Frontline Workers on their team
- Assist Team Leaders and program supervisors to support Frontline Workers and establish service priorities across their team
- Provide assistance with case planning and encourage reflection on the prioritization of different elements within a case plan
- Track the depth of need and service responses to clients over time

The SPDAT is NOT designed to:

- Provide a diagnosis
- Assess current risk or be a predictive index for future risk
- Take the place of other valid and reliable instruments used in clinical research and care

The SPDAT is only used with those clients who meet program eligibility criteria. For example, if there is an eligibility criterion that requires prospective clients to be homeless at time of intake to be eligible for Housing First, then the pre-condition must be met before pursuing the application of the SPDAT. For that reason, we have also created the VI-SPDAT as an initial screening tool.

The SPDAT is not intended to replace clinical expertise or clinical assessment tools. The tool complements existing clinical approaches by incorporating a wide array of components that provide both a global and detailed picture of a client's acuity. Certain components of the SPDAT relate to clinical concerns, and it is expected that intake professionals and clinicians will work together to ensure the accurate assessment of these issues. In fact, many organizations and communities have found the SPDAT to be a useful method for bridging the gap between housing, social services and clinical services.

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Family SPDAT

Upon the release of SPDAT Version 3, a special version was released - the Family SPDAT Version 1. This tool introduced five new components that specifically address the unique challenges to housing stability faced by homeless families. In addition, the tool has a focus on households throughout.

SPDAT Version 4/Family SPDAT Version 2

The SPDAT has been influenced by the experience of practitioners in its use, persons with lived experience that have had the SPDAT implemented with them, as well as a number of other excellent tools such as (but not limited to) the Outcome Star, Health of the Nation Outcome Scale, Denver Acuity Scale, Camberwell Assessment of Needs, Vulnerability Index, and Transition Aged Youth Triage Tool.

In preparing SPDAT v4 and F-SPDAT v2, we have adopted a comprehensive and collaborative approach to changing and improving the SPDAT. Communities that have used the tool for three months or more have provided us with their feedback. OrgCode staff have observed the tool in operation to better understand its implementation in the field. An independent committee composed of service practitioners and academics review enhancements to the SPDAT. Furthermore, we continue to test the validity of SPDAT results through the use of control groups. Overall, we consistently see that groups assessed with the SPDAT have better long-term housing and life stability outcomes than those assessed with other tools, or no tools at all.

OrgCode intends to continue working with communities and persons with lived experience to make future versions of the SPDAT even better. We hope all those communities and agencies that choose to use this tool will remain committed to collaborating with us to make those improvements over time.

The new versions build upon the success of previous versions of the SPDAT products with some refinements. Starting in August 2014, a survey was launched of existing SPDAT and F-SPDAT users to get their input on what should be amended, improved, or maintained in the tool. Analysis was completed across all of these responses. Further research was conducted. Questions were tested and refined over several months, again including the direct voice of persons with lived experience and frontline practitioners. Input was also gathered from senior government officials that create policy and programs to help ensure alignment with guidelines and funding requirements.

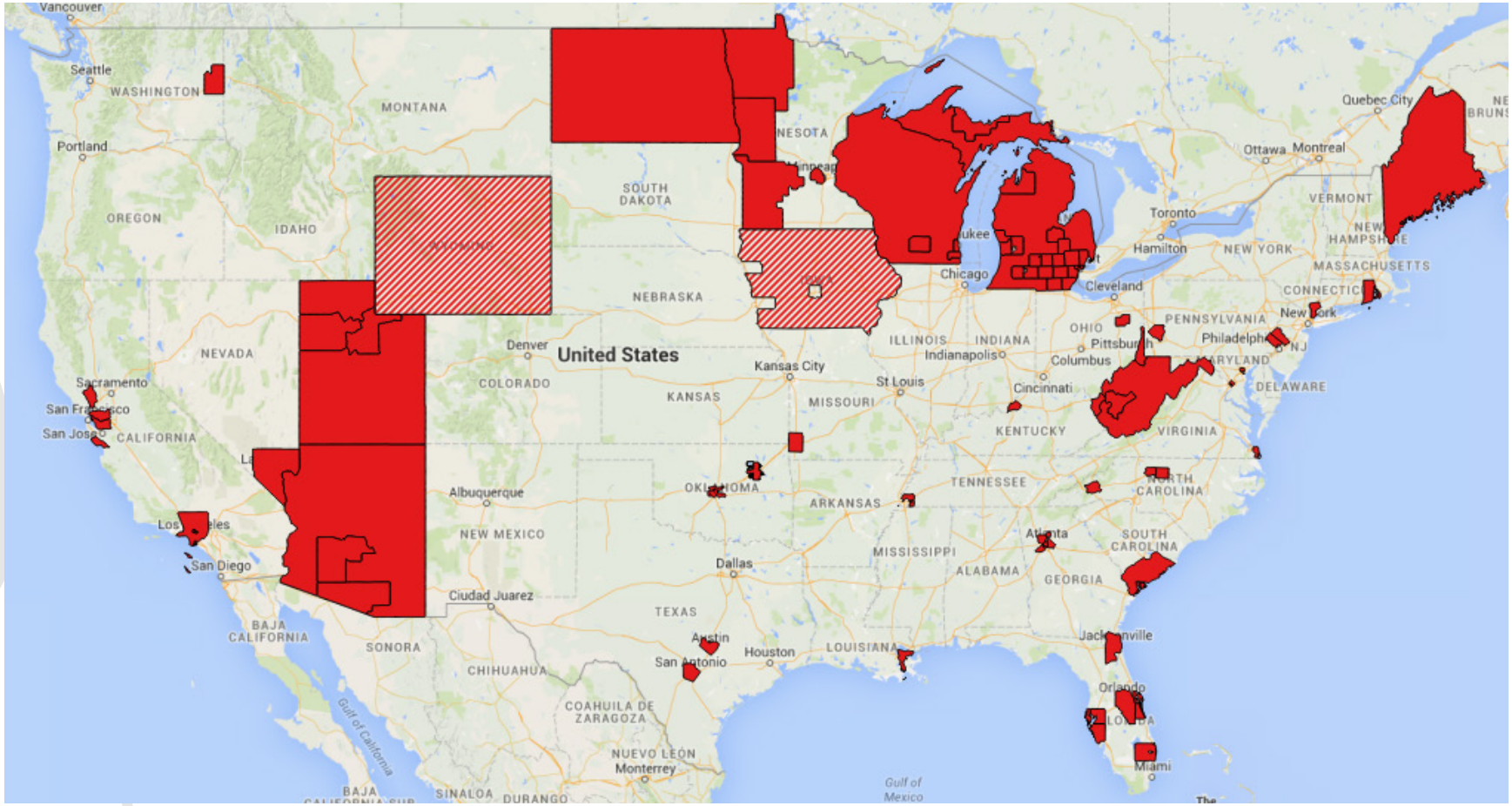
The major differences from F-SPDAT Version 1 to Version 2 include:

- The structure of the tools is the same: four domains (five for families) with components aligned to specific domains. The names of the domains and the components remain unchanged.
- The scoring of the tools is the same: 60 points for singles, and 80 points for families.
- The scoring tables used to run from 0 through to 4. They are now reversed with each table starting at 4 and working their way down to 0. This increases the speed of assessment.
- The order of the tools has changed, grouped together by domain.
- Language has been simplified.
- Days are used rather than months to provide greater clarification and alignment to how most databases capture periods of time in service.
- Greater specificity has been provided in some components such as amount of debts.

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Appendix B: Where the SPDAT is being used (as of May 2015)

United States of America



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Arizona
- Statewide

California
- Oakland/Alameda County CoC
- Richmond/Contra Costa County CoC
- Watsonville/Santa Cruz City & County CoC
- Napa City & County CoC
- Los Angeles City & County CoC
- Pasadena CoC
- Glendale CoC

District of Columbia
- District of Columbia CoC

Florida
- Sarasota/Bradenton/Manatee, Sarasota Counties CoC
- Tampa/Hillsborough County CoC
- St. Petersburg/Clearwater/Largo/Pinellas County CoC
- Orlando/Orange, Osceola, Seminole Counties CoC
- Jacksonville-Duval, Clay Counties CoC
- Palm Bay/Melbourne/Brevard County CoC
- West Palm Beach/Palm Beach County CoC

Georgia
- Atlanta County CoC
- Fulton County CoC
- Marietta/Cobb County CoC
- DeKalb County CoC

Iowa
- Parts of Iowa Balance of State CoC

Kentucky
- Louisville/Jefferson County CoC

Louisiana
- New Orleans/Jefferson Parish CoC

Maryland
- Baltimore City CoC

Maine
- Statewide

Michigan
- Statewide

Minnesota
- Minneapolis/Hennepin County CoC
- Northwest Minnesota CoC
- Moorhead/West Central Minnesota CoC
- Southwest Minnesota CoC

Missouri
- Joplin/Jasper, Newton Counties CoC

North Carolina
- Winston Salem/Forsyth County CoC
- Asheville/Buncombe County CoC
- Greensboro/High Point CoC

North Dakota
- Statewide

Nevada
- Las Vegas/Clark County CoC

New York
- Yonkers/Mount Vernon/New Rochelle/Westchester County CoC

Ohio
- Canton/Massillon/Alliance/Stark County CoC
- Toledo/Lucas County CoC

Oklahoma
- Tulsa City & County/Broken Arrow CoC
- Oklahoma City CoC

Pennsylvania
- Lower Marion/Norristown/Abington/Montgomery County CoC
- Bristol/Bensalem/Bucks County CoC
- Pittsburgh/McKeesport/Penn Hills/Allegheny County CoC

Rhode Island
- Statewide

South Carolina
- Charleston/Low Country CoC

Tennessee
- Memphis/Shelby County CoC

Texas
- San Antonio/Bexar County CoC
- Austin/Travis County CoC

Utah
- Salt Lake City & County CoC
- Utah Balance of State CoC
- Provo/Mountainland CoC

Virginia
- Virginia Beach CoC
- Arlington County CoC

Washington
- Spokane City & County CoC

Wisconsin
- Statewide

West Virginia
- Statewide

Wyoming
- Wyoming is in the process of implementing statewide

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Canada

Alberta
- Province-wide

Manitoba
- City of Winnipeg

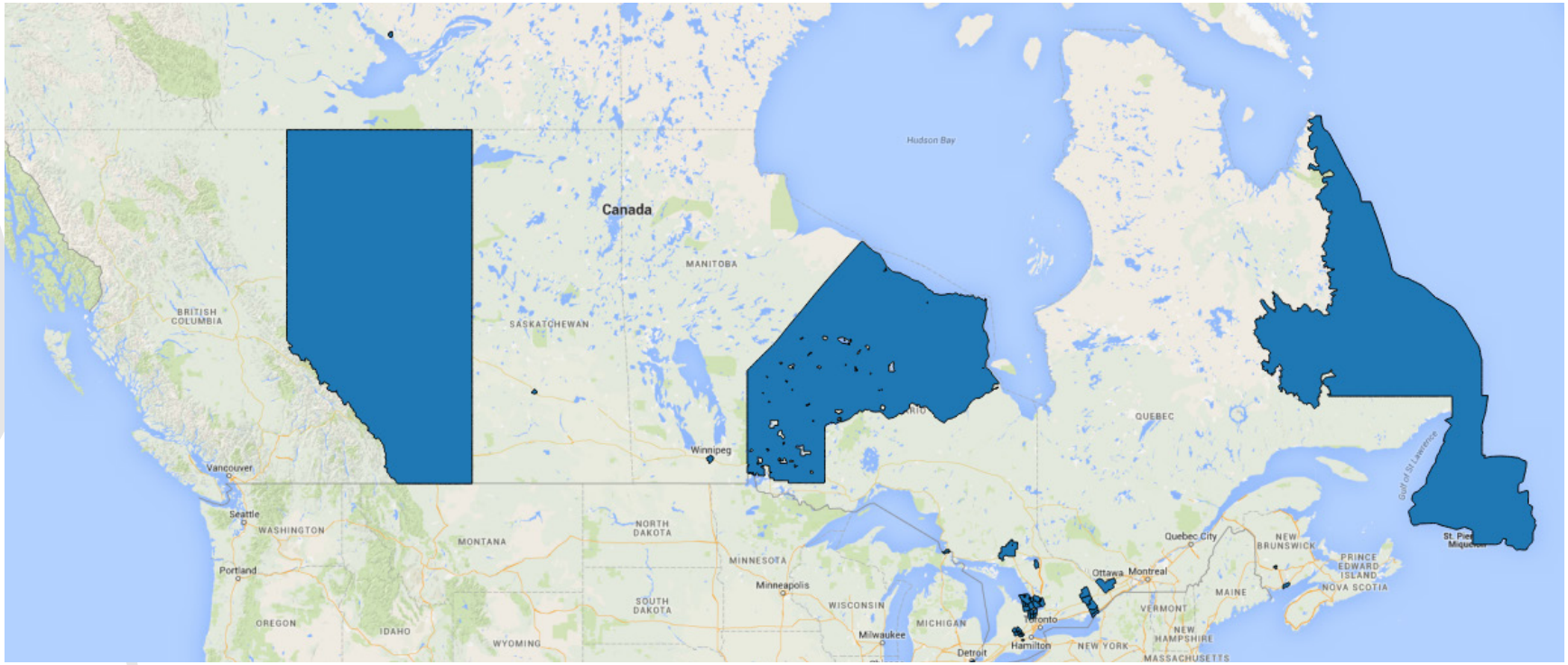
New Brunswick
- City of Fredericton
- City of Saint John

Newfoundland and Labrador
- Province-wide

Northwest Territories
- City of Yellowknife

Ontario
- City of Barrie/Simcoe County
- City of Brantford/Brant County
- City of Greater Sudbury
- City of Kingston/Frontenac County
- City of Ottawa
- City of Windsor
- District of Kenora
- District of Parry Sound
- District of Sault Ste Marie
- Regional Municipality of Waterloo
- Regional Municipality of York

Saskatchewan
- Saskatoon



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Australia

Queensland
- Brisbane



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Transition Age Youth -

Vulnerability Index -

Service Prioritization Decision Assistance Tool

(TAY-VI-SPDAT)

"Next Step Tool for Homeless Youth"

AMERICAN VERSION 1.0

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Eric Rice, PhD

COMMUNITY SOLUTIONS

CSH

USC SCHOOL OF SOCIAL WORK

ORG CODE

Welcome to the SPDAT Line of Products

The Service Prioritization Decision Assistance Tool (SPDAT) has been around in various incarnations for over a decade, before being released to the public in 2010. Since its initial release, the use of the SPDAT has been expanding exponentially and is now used in over one thousand communities across the United States, Canada, and Australia.

More communities using the tool means there is an unprecedented demand for versions of the SPDAT, customized for specific client groups or types of users. With the release of SPDAT V4, there have been more current versions of SPDAT products than ever before.

VI-SPDAT Series

The Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) was developed as a pre-screening tool for communities that are very busy and do not have the resources to conduct a full SPDAT assessment for every client. It was made in collaboration with Community Solutions, creators of the Vulnerability Index, as a brief survey that can be conducted to quickly determine whether a client has high, moderate, or low acuity. The use of this survey can help prioritize which clients should be given a full SPDAT assessment first. Because it is a self-reported survey, no special training is required to use the VI-SPDAT.

Current versions available:

- VI-SPDAT V 2.0
- Family VI-SPDAT V 2.0
- Next Step Tool for Homeless Youth V 1.0

All versions are available online at

www.orgcode.com/products/vi-spdat/

SPDAT Series

The Service Prioritization Decision Assistance Tool (SPDAT) was developed as an assessment tool for front-line workers at agencies that work with homeless clients to prioritize which of those clients should receive assistance first. The SPDAT tools are also designed to help guide case management and improve housing stability outcomes. They provide an in-depth assessment that relies on the assessor's ability to interpret responses and corroborate those with evidence. As a result, this tool may only be used by those who have received proper, up-to-date training provided by OrgCode Consulting, Inc. or an OrgCode certified trainer.

Current versions available:

- SPDAT V 4.0 for Individuals
- F-SPDAT V 2.0 for Families
- Y-SPDAT V 1.0 for Youth

Information about all versions is available online at

www.orgcode.com/products/spdat/

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SPDAT Training Series

To use the SPDAT assessment product, training by OrgCode or an OrgCode certified trainer is required. We provide training on a wide variety of topics over a variety of mediums.

The full-day in-person SPDAT Level 1 training provides you the opportunity to bring together as many people as you want to be trained for one low fee. The webinar training allows for a maximum of 15 different computers to be logged into the training at one time. We also offer online courses for individuals that you can do at your own speed.

The training gives you the manual, case studies, application to current practice, a review of each component of the tool, conversation guidance with prospective clients – and more!

Current SPDAT training available:

- Level 0 SPDAT Training: VI-SPDAT for Frontline Workers
- Level 1 SPDAT Training: SPDAT for Frontline Workers
- Level 2 SPDAT Training: SPDAT for Supervisors
- Level 3 SPDAT Training: SPDAT for Trainers

Other related training available:

- Excellence in Housing-Based Case Management
- Coordinated Access & Common Assessment
- Motivational Interviewing
- Objective-Based Interactions

More information about SPDAT training, including pricing, is available online at

http://www.orgcode.com/product-category/training/spdat/

The TAY-VI-SPDAT – The Next Step Tool for Homeless Youth

OrgCode Consulting, Inc. and Community Solutions joined forces with the Corporation for Supportive Housing (CSH) to combine the best parts of products and expertise to create one streamlined triage tool designed specifically for youth aged 24 or younger.

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Administration

Interviewer's Name	**Agency**	☐ Team ☐ Staff ☐ Volunteer
_____	_____	
Survey Date	**Survey Time**	**Survey Location**
DD/MM/YYYY ____/____/_____	__ __ : __ __ AM/PM	_____

Opening Script

Every assessor in your community regardless of organization completing the VI-SPDAT should use the same introductory script. In that script you should highlight the following information:

- the name of the assessor and their affiliation (organization that employs them, volunteer as part of a Point in Time Count, etc.)
- the purpose of the VI-SPDAT being completed
- that it usually takes less than 7 minutes to complete
- that only "Yes," "No," or one-word answers are being sought
- that any question can be skipped or refused
- where the information is going to be stored
- that if the participant does not understand a question that clarification can be provided
- the importance of relaying accurate information to the assessor and not feeling that there is a correct or preferred answer that they need to provide, nor information they need to conceal

Basic Information

First Name	**Nickname**	**Last Name**
_____	_____	_____

In what language do you feel best able to express yourself? _____

Date of Birth	**Age**	**Social Security Number**	**Consent to participate**	
DD/MM/YYYY ____/____/_____	_____	_____	☐ Yes	☐ No

IF THE PERSON IS 17 YEARS OF AGE OR LESS, THEN SCORE 1.

SCORE:

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A. History of Housing and Homelessness

1. Where do you sleep most frequently? (check one)

☐ Shelters	☐ **Couch surfing**	☐ **Other (specify):**
☐ Transitional Housing	☐ **Outdoors**	_____
☐ Safe Haven	☐ **Refused**	

IF THE PERSON ANSWERS ANYTHING OTHER THAN "SHELTER", "TRANSITIONAL HOUSING", OR "SAFE HAVEN", THEN SCORE 1.	**SCORE:**

2. How long has it been since you lived in permanent stable housing? _____ ☐ Refused

3. In the last three years, how many times have you been homeless? _____ ☐ Refused

IF THE PERSON HAS EXPERIENCED 1 OR MORE CONSECUTIVE YEARS OF HOMELESSNESS, AND/OR 4+ EPISODES OF HOMELESSNESS, THEN SCORE 1.	**SCORE:**

B. Risks

4. In the past six months, how many times have you...

a) Received health care at an emergency department/room? ____ ☐ Refused

b) Taken an ambulance to the hospital? ____ ☐ Refused

c) Been hospitalized as an inpatient? ____ ☐ Refused

d) Used a crisis service, including sexual assault crisis, mental health crisis, family/intimate violence, distress centers and suicide prevention hotlines? ____ ☐ Refused

e) Talked to police because you witnessed a crime, were the victim of a crime, or the alleged perpetrator of a crime or because the police told you that you must move along? ____ ☐ Refused

f) Stayed one or more nights in a holding cell, jail, prison or juvenile detention, whether it was a short-term stay like the drunk tank, a longer stay for a more serious offence, or anything in between? ____ ☐ Refused

IF THE TOTAL NUMBER OF INTERACTIONS EQUALS 4 OR MORE, THEN SCORE 1 FOR **EMERGENCY SERVICE USE.**	**SCORE:**

5. Have you been attacked or beaten up since you've become homeless? ☐ **Y** ☐ N ☐ Refused

6. Have you threatened to or tried to harm yourself or anyone else in the last year? ☐ **Y** ☐ N ☐ Refused

IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR **RISK OF HARM.**	**SCORE:**

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7.	Do you have any legal stuff going on right now that may result in you being locked up, having to pay fines, or that make it more difficult to rent a place to live?	☐ **Y**	☐ N	☐ Refused
8.	Were you ever incarcerated when younger than age 18?	☐ **Y**	☐ N	☐ Refused

IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR **LEGAL ISSUES.** **SCORE:**

9.	Does anybody force or trick you to do things that you do not want to do?	☐ **Y**	☐ N	☐ Refused
10.	Do you ever do things that may be considered to be risky like exchange sex for money, food, drugs, or a place to stay, run drugs for someone, have unprotected sex with someone you don't know, share a needle, or anything like that?	☐ **Y**	☐ N	☐ Refused

IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR **RISK OF EXPLOITATION.** **SCORE:**

C. Socialization & Daily Functioning

11.	Is there any person, past landlord, business, bookie, dealer, or government group like the IRS that thinks you owe them money?	☐ **Y**	☐ N	☐ Refused
12.	Do you get any money from the government, an inheritance, an allowance, working under the table, a regular job, or anything like that?	☐ Y	☐ **N**	☐ Refused

IF "YES" TO QUESTION 11 OR "NO" TO QUESTION 12, THEN SCORE 1 FOR **MONEY MANAGEMENT.** **SCORE:**

13.	Do you have planned activities, other than just surviving, that make you feel happy and fulfilled?	☐ Y	☐ **N**	☐ Refused

IF "NO," THEN SCORE 1 FOR **MEANINGFUL DAILY ACTIVITY.** **SCORE:**

14.	Are you currently able to take care of basic needs like bathing, changing clothes, using a restroom, getting food and clean water and other things like that?	☐ Y	☐ **N**	☐ Refused

IF "NO," THEN SCORE 1 FOR **SELF-CARE.** **SCORE:**

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15. Is your current lack of stable housing...

a) Because you ran away from your family home, a group home or a foster home?	☐ **Y**	☐ N	☐ Refused
b) Because of a difference in religious or cultural beliefs from your parents, guardians or caregivers?	☐ **Y**	☐ N	☐ Refused
c) Because your family or friends caused you to become homeless?	☐ **Y**	☐ N	☐ Refused
d) Because of conflicts around gender identity or sexual orientation?	☐ **Y**	☐ N	☐ Refused

IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR **SOCIAL RELATIONSHIPS.** **SCORE:**

e) Because of violence at home between family members?	☐ **Y**	☐ N	☐ Refused
f) Because of an unhealthy or abusive relationship, either at home or elsewhere?	☐ **Y**	☐ N	☐ Refused

IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR **ABUSE/TRAUMA.** **SCORE:**

D. Wellness

16. Have you ever had to leave an apartment, shelter program, or other place you were staying because of your physical health?	☐ **Y**	☐ N	☐ Refused
17. Do you have any chronic health issues with your liver, kidneys, stomach, lungs or heart?	☐ **Y**	☐ N	☐ Refused
18. If there was space available in a program that specifically assists people that live with HIV or AIDS, would that be of interest to you?	☐ **Y**	☐ N	☐ Refused
19. Do you have any physical disabilities that would limit the type of housing you could access, or would make it hard to live independently because you'd need help?	☐ **Y**	☐ N	☐ Refused
20. When you are sick or not feeling well, do you avoid getting medical help?	☐ **Y**	☐ N	☐ Refused
21. Are you currently pregnant, have you ever been pregnant, or have you ever gotten someone pregnant?	☐ **Y**	☐ N	☐ Refused

IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR **PHYSICAL HEALTH.** **SCORE:**

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22. Has your drinking or drug use led you to being kicked out of an apartment or program where you were staying in the past? ☐ **Y** ☐ N ☐ Refused

23. Will drinking or drug use make it difficult for you to stay housed or afford your housing? ☐ **Y** ☐ N ☐ Refused

24. If you've ever used marijuana, did you ever try it at age 12 or younger? ☐ **Y** ☐ N ☐ Refused

IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR **SUBSTANCE USE.** **SCORE:**

25. Have you ever had trouble maintaining your housing, or been kicked out of an apartment, shelter program or other place you were staying, because of:

a) A mental health issue or concern? ☐ **Y** ☐ N ☐ Refused

b) A past head injury? ☐ **Y** ☐ N ☐ Refused

c) A learning disability, developmental disability, or other impairment? ☐ **Y** ☐ N ☐ Refused

26. Do you have any mental health or brain issues that would make it hard for you to live independently because you'd need help? ☐ **Y** ☐ N ☐ Refused

IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR **MENTAL HEALTH.** **SCORE:**

IF THE RESPONENT SCORED 1 FOR **PHYSICAL HEALTH** AND 1 FOR **SUBSTANCE USE** AND 1 FOR **MENTAL HEALTH**, SCORE 1 FOR **TRI-MORBIDITY**. **SCORE:**

27. Are there any medications that a doctor said you should be taking that, for whatever reason, you are not taking? ☐ **Y** ☐ N ☐ Refused

28. Are there any medications like painkillers that you don't take the way the doctor prescribed or where you sell the medication? ☐ **Y** ☐ N ☐ Refused

IF "YES" TO ANY OF THE ABOVE, SCORE 1 FOR **MEDICATIONS.** **SCORE:**

Scoring Summary

DOMAIN	SUBTOTAL
PRE-SURVEY	/1
A. HISTORY OF HOUSING & HOMELESSNESS	/2
B. RISKS	/4
C. SOCIALIZATION & DAILY FUNCTIONS	/5
D. WELLNESS	/5
GRAND TOTAL:	/17

RESULTS	
Score:	**Recommendation:**
0-3:	no moderate or high intensity services be provided at this time
4-7:	assessment for time-limited supports with moderate intensity
8+:	assessment for long-term housing with high service intensity

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Follow-Up Questions

On a regular day, where is it easiest to find you and what time of day is easiest to do so?	place: _____ time: ___ : ____ or Morning/Afternoon/Evening/Night
Is there a phone number and/or email where someone can get in touch with you or leave you a message?	phone: (_____) _____ - _____ email: _____
Ok, now I'd like to take your picture so that it is easier to find you and confirm your identity in the future. May I do so?	☐ Yes ☐ No ☐ Refused

Communities are encouraged to think of additional questions that may be relevant to the programs being operated or your specific local context. This may include questions related to:

- military service and nature of discharge
- ageing out of care
- mobility issues
- legal status in country
- income and source of it
- current restrictions on where a person can legally reside
- children that may reside with the youth at some point in the future
- safety planning

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Appendix A: About the TAY-VI-SPDAT

The HEARTH Act and federal regulations require communities to have an assessment tool for coordinated entry - and the VI-SPDAT and SPDAT meet these requirements. Many communities have struggled to comply with this requirement, which demands an investment of considerable time, resources and expertise. Others are making it up as they go along, using "gut instincts" in lieu of solid evidence. Communities need practical, evidence-informed tools that enhance their ability to to satisfy federal regulations and quickly implement an effective approach to access and assessment. The VI-SPDAT is a first-of-its-kind tool designed to fill this need, helping communities end homelessness in a quick, strategic fashion.

The VI-SPDAT

The VI-SPDAT was initially created by combining the elements of the Vulnerability Index which was created and implemented by Community Solutions broadly in the 100,000 Homes Campaign, and the SPDAT Prescreen Instrument that was part of the Service Prioritization Decision Assistance Tool. The combination of these two instruments was performed through extensive research and development, and testing. The development process included the direct voice of hundreds of persons with lived experience.

The VI-SPDAT examines factors of current vulnerability and future housing stability. It follows the structure of the SPDAT assessment tool, and is informed by the same research backbone that supports the SPDAT - almost 300 peer reviewed published journal articles, government reports, clinical and quasi-clinical assessment tools, and large data sets. The SPDAT has been independently tested, as well as internally reviewed. The data overwhelmingly shows that when the SPDAT is used properly, housing outcomes are better than when no assessment tool is used.

The VI-SPDAT is a triage tool. It highlights areas of higher acuity, thereby helping to inform the type of support and housing intervention that may be most beneficial to improve long term housing outcomes. It also helps inform the order - or priority - in which people should be served. The VI-SPDAT does not make decisions; it informs decisions. The VI-SPDAT provides data that communities, service providers, and people experiencing homelessness can use to help determine the best course of action next.

The Youth – Transition Age Youth Tool from CSH

Released in May 2013, the Corporation for Supportive Housing (CSH) partnered with Dr. Eric Rice, Assistant Professor at the University of Southern California (USC) School of Social Work, to develop a triage tool that targets homeless Transition Age Youth (TAY) for permanent supportive housing. It consists of six items associated with long-term homelessness (five or more years) among transition-aged youth (age 18-24).

Version 2 of the VI-SPDAT

Version 2 builds upon the success of Version 1 of the VI-SPDAT with some refinements. Starting in August 2014, a survey was launched of existing VI-SPDAT users to get their input on what should be amended, improved, or maintained in the tool.

Analysis was completed across all of these responses. Further research was conducted. Questions were tested and refined over several months, again including the direct voice of persons with lived experience and frontline practitioners. Input was also gathered from senior government officials that create policy and programs to help ensure alignment with guidelines and funding requirements.

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The TAY-VI-SPDAT – The Next Step Tool for Homeless Youth

One piece of feedback was the growing concern that youth tended to score lower on the VI-SPDAT, since the Vulnerability Index assesses risk of mortality which is less prevalent among younger populations. So, in version 2 of the VI-SPDAT, OrgCode Consulting, Inc. and Community Solutions joined forces with CSH to combine the best parts of the TAY, the VI, and the SPDAT to create one streamlined triage tool designed specifically for youth aged 24 or younger.

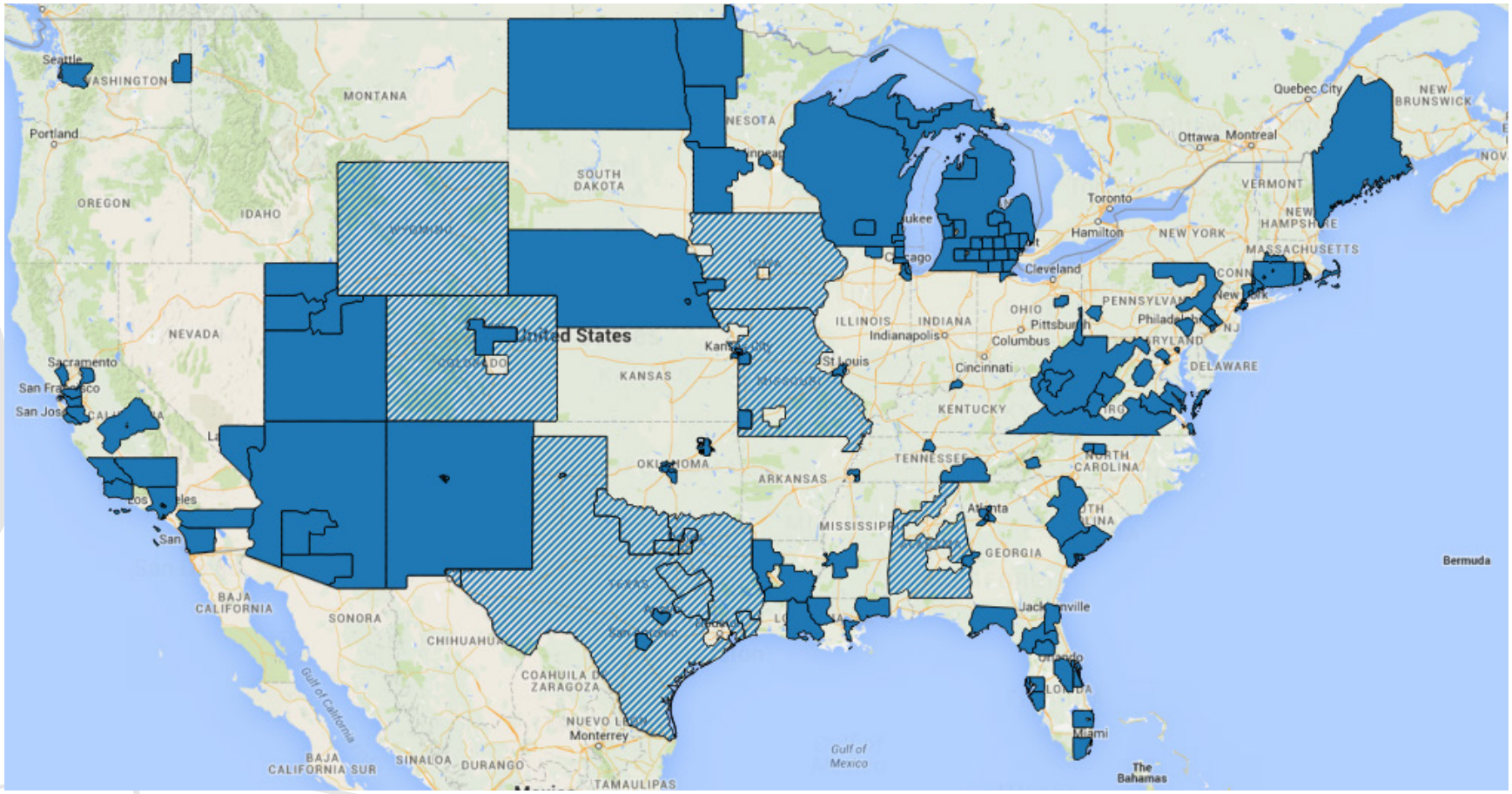
If you are familiar with the VI-SPDAT, you will notice some differences in the TAY-VI-SPDAT compared to VI-SPDAT version 1. Namely:

- it is shorter, usually taking less than 7 minutes to complete;
- subjective elements through observation are now gone, which means the exact same instrument can be used over the phone or in-person;
- medical, substance use, and mental health questions are all refined;
- you can now explicitly see which component of the full SPDAT each VI-SPDAT question links to; and,
- the scoring range is slightly different (Don't worry, we can provide instructions on how these relate to results from Version 1).

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Appendix B: Where the VI-SPDAT is being used in the United States

Since the VI-SPDAT is provided completely free of charge, and no training is required, any community is able to use the VI-SPDAT without the explicit permission of Community Solutions or OrgCode Consulting, Inc. As a result, the VI-SPDAT is being used in more communities than we know of. It is also being used in Canada and Australia.



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A partial list of continua of care (CoCs) in the US where we know the VI-SPDAT is being used includes:

Alabama
- Parts of Alabama Balance of State

Arizona
- Statewide

California
- San Jose/Santa Clara City & County
- San Francisco
- Oakland/Alameda County
- Sacramento City & County
- Richmond/Contra Costa County
- Watsonville/Santa Cruz City & County
- Fresno/Madera County
- Napa City & County
- Los Angeles City & County
- San Diego
- Santa Maria/Santa Barbara County
- Bakersfield/Kern County
- Pasadena
- Riverside City & County
- Glendale
- San Luis Obispo County

Colorado
- Metropolitan Denver Homeless Initiative
- Parts of Colorado Balance of State

Connecticut
- Hartford
- Bridgeport/Stratford/Fairfield
- Connecticut Balance of State
- Norwalk/Fairfield County
- Stamford/Greenwich
- City of Waterbury

District of Columbia
- District of Columbia

Florida
- Sarasota/Bradenton/Manatee, Sarasota Counties
- Tampa/Hillsborough County
- St. Petersburg/Clearwater/Largo/Pinellas County
- Tallahassee/Leon County
- Orlando/Orange, Osceola, Seminole Counties
- Gainesville/Alachua, Putnam Counties
- Jacksonville-Duval, Clay Counties
- Palm Bay/Melbourne/Brevard County
- Ocala/Marion County
- Miami/Dade County
- West Palm Beach/Palm Beach County

Georgia
- Atlanta County
- Fulton County
- Columbus-Muscogee/Russell County
- Marietta/Cobb County
- DeKalb County

Hawaii
- Honolulu

Illinois
- Rockford/Winnebago, Boone Counties
- Waukegan/North Chicago/Lake County
- Chicago
- Cook County

Iowa
- Parts of Iowa Balance of State

Kansas
- Kansas City/Wyandotte County

Kentucky
- Louisville/Jefferson County

Louisiana
- Lafayette/Acadiana
- Shreveport/Bossier/Northwest
- New Orleans/Jefferson Parish
- Baton Rouge
- Alexandria/Central Louisiana CoC

Massachusetts
- Cape Cod Islands
- Springfield/Holyoke/Chicopee/Westfield/Hampden County

Maryland
- Baltimore City
- Montgomery County

Maine
- Statewide

Michigan
- Statewide

Minnesota
- Minneapolis/Hennepin County
- Northwest Minnesota
- Moorhead/West Central Minnesota
- Southwest Minnesota

Missouri
- St. Louis County
- St. Louis City
- Joplin/Jasper, Newton Counties
- Kansas City/Independence/Lee's Summit/Jackson County
- Parts of Missouri Balance of State

Mississippi
- Jackson/Rankin, Madison Counties
- Gulf Port/Gulf Coast Regional

North Carolina
- Winston Salem/Forsyth County
- Asheville/Buncombe County
- Greensboro/High Point

North Dakota
- Statewide

Nebraska
- Statewide

New Mexico
- Statewide

Nevada
- Las Vegas/Clark County

New York
- New York City
- Yonkers/Mount Vernon/New Rochelle/Westchester County

Ohio
- Toledo/Lucas County
- Canton/Massillon/Alliance/Stark County

Oklahoma
- Tulsa City & County/Broken Arrow
- Oklahoma City
- Norman/Cleveland County

Pennsylvania
- Philadelphia
- Lower Marion/Norristown/Abington/Montgomery County
- Allentown/Northeast Pennsylvania
- Lancaster City & County
- Bristol/Bensalem/Bucks County
- Pittsburgh/McKeesport/Penn Hills/Allegheny County

Rhode Island
- Statewide

South Carolina
- Charleston/Low Country
- Columbia/Midlands

Tennessee
- Chattanooga/Southeast Tennessee
- Memphis/Shelby County
- Nashville/Davidson County

Texas
- San Antonio/Bexar County
- Austin/Travis County
- Dallas City & County/Irving
- Fort Worth/Arlington/Tarrant County
- El Paso City and County
- Waco/McLennan County
- Texas Balance of State
- Amarillo
- Wichita Falls/Wise, Palo Pinto, Wichita, Archer Counties
- Bryan/College Station/Brazos Valley
- Beaumont/Port Arthur/South East Texas

Utah
- Statewide

Virginia
- Richmond/Henrico, Chesterfield, Hanover Counties
- Roanoke City & County/Salem
- Virginia Beach
- Portsmouth
- Virginia Balance of State
- Arlington County

Washington
- Seattle/King County
- Spokane City & County

Wisconsin
- Statewide

West Virginia
- Statewide

Wyoming
- Wyoming Statewide is in the process of implementing

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This document serves as evidence of use of objective criteria & factors related to positive housing outcomes for project review, ranking & selection for renewal projects. Specific methods for evaluating projects submitted by victim services and promoting safety also noted

Throughout notes in red indicate where the reviewer can find the required evidence.

Connecticut Balance of State (BOS) CoC

2018 Program Performance Evaluation Standards - adopted 11/17/17

Evaluation Criteria	2018 Benchmark / Standard	2018 Points
PERFORMANCE		
Efficient Use of Resources This column contains evidence of objective criteria.		
Spending on last year's HUD grant [1]	95% and less than $50k left unspent	10
Eligibility		
At least one Adult Participant per household with previous residence that indicates qualified literal homelessness	100%	10
Participant Income/Resources		
Non-Youth Programs only: Percentage of adult participants who increased EARNED INCOME from entry to exit/follow-up (leavers and stayers)[2 & 3]	25% PSH 25% RRH 40% TH	5
Percentage of adult participants who increased OTHER INCOME (NON-EARNED) from entry to exit/follow-up (leavers and stayers)[3]	35% PSH 35% RRH 45% TH	10
All adult participants with NON-CASH benefits excluding health insurance (leavers and stayers) [3]	95%*	10
Length of Stay (LOS)		
TH Only (Non-DV): LOS for participants is 1 year or less	85%	5
TH Only (DV Projects): LOS is 2 years or less Specific method for evaluating projects submitted by victim services	75%	5
RRH Only: LOS for participants is 6 months or less	60%	5
Housing Stability Factors below are related to achieving positive housing outcome.		
PSH Only: Percentage of participants who remain in PSH or exited to permanent housing [4]	95%	10
RRH and TH Only: Percentage of leavers who exited to Permanent Housing [4]	90%	10
Percentage of leavers who exited to homeless shelter, DV shelter, streets or unknown [5]	Less than or equal to 10%	10
CONSUMER SURVEYS		
Consumer Surveys - Response Rate	35%	5
Consumer Surveys - Results	50 Points	5

Evaluation Criteria	2018 Benchmark / Standard	2018 Points
COMPLIANCE		
Enviromental Review Documentation within 5 years	Less than or equal to 5 years	5
Percentage of participants accepted into the program from the by-name list between October 1, 2016 and September 30, 2017[5]	100%	15
Lateness Penalty: 10 points deducted for each document submitted late including Paper Consumer Surveys, Project Data Form, Agency Data Form, and/or Paper APR	N/A	minus 10
Total Scores: PSH = 95, TH and RRH = 100. For comparison purposes, all scores will be converted to a percentage by dividing total score by maximum points available.		
CORRECTIVE ACTION (CA) THRESHOLD CRITERIA		
Occupancy based on quarterly unit utilization[1]	90%	N/A

[*] 2017 Rate of receipt of all Non-Cash Benefits, Health Insurance is now tracked separately from other benefits in SAGA APR.

[1] Excludes SROs and new projects.

[2] Excludes Youth Programs.

[3] Excludes Participants who are not yet required to have an annual assessment

[4] Excludes deceased participants and programs with only one exit resulting in a negative outcome. Also excludes participants who exit a project to a shelter for safety purposes; agencies should report this as a "transfer" rather than an "exit to shelter" for the purposes of this evaluation.

[5] Excludes DV programs. Specific method for evaluating projects submitted by victim services and promotes safety as DV survivors might need to go to DV shelter to stay safe

BASELINE DATA TO BE COLLECTED AND NOT SCORED
All adult participants with Health Insurance (leavers and stayers)
Youth Programs only: Percentage of adult participants who increased EARNED INCOME from entry to exit/follow-up (leavers and stayers)
PSH Only: At least one participant per household has a disability
Match equals or exceeds statutory requirement
HUD Drawdowns
HMIS Universal Data Elements null or unknown

Program Name: _____ Evaluator: _____

This document serves as evidence of use of objective criteria and factors related to positive housing outcomes for project review, ranking and selection for new projects

2018 Balance of State Continuum of Care
Scoring Sheet for NEW Permanent Housing Project Applications

Applicant Organization Name: _____

Proposed Project Name: _____

Project Location (town(s)): _____

Relevant CAN: _____

Type of Project (select one)**:** ☐ PSH w/new units ☐ PSH new services only
☐ RRH w/new units ☐ RRH new services only

Reviewer's Name: _____

SCORES

Section 1 - Applicant Experience: _____ **of 10**
Section 2 – Prioritizing Need (PSH) or Effective Outreach System (RRH) _____
_____ **of 10**
Section 3 – Housing First _____ **of 10**
Section 4 – Supportive Service _____ **of 20**
Bonus Points _____ **of 5**

FINAL TOTAL SCORE: _____

Program Name: _____ Evaluator: _____

Section 1 - Organizational Experience and Capacity - 10 points OBJECTIVE CRITERIA	
Overall experience and organizational capacity (5 points) • **See Questions 13 - A, B, C, D, and E** o Does the organization(s) appear to have the experience to operate HUD funded permanent housing program for homeless persons? o Does the organization have experience operating a Housing First program? o Does the organization have experience linkinging participants to Medicaid and other mainstream services? o Is there a clear organizational structure for coordinating among departments within the agency and with partner organizations and an adequate financial accounting system? o Does the organization have experience using federal funds and leveraging other federal, state, local and private funds?	**Score**
Compliance with HUD/CoC Requirements (5 points) • **See Questions 13- F, G, H, I , J and K** o Has the organization provided appropriate corrective actions to resolve any HUD monitoring findings? o Does the organization have significant amounts of unspent funding over last two years and have they described appropriate actions to resolve any underspending? o Does the organization conduct quarterly HUD drawdowns and have they described appropriate actions to resolve any drawdown issues? o Did the organization submit APRs over last two years on time and have they described appropriate actions to resolve any issues with APR timeliness?	**Score**
Questions/Comments:	**Total**

Program Name: _____ Evaluator: _____

Section 2 – RRH-Effective outreach system and CAN coordination - 10 points
OBJECTIVE CRITERIA
PSH – Prioritizing Highest Need – 10 points

RRH-Effective outreach system and CAN coordination	Score
See Question 10 d,e, f "Project Description – Question 14" & "Outreach for Participants - Questions 15A & 15B " in Application **Extent to which the applicant:** o Clearly describes a specific plan for how the project will participate in the CoC's coordinated assessment system; if the application proposes to create only new services (i.e., not new units) for participants in one or more existing projects, that the project agrees to serve only participants in accordance with established CAN priorities and the application demonstrates that the additional services are essential **(4 points)** o Clearly describes the outreach process used to engage eligible homeless persons living on the streets and in shelter. **(3 points)** o Clearly describes a plan for obtaining referrals that will ensure the project operates at full capacity and serves only eligible people **(3 points)** **Questions to consider:** • Does the applicant describe a specific and viable plan for how the project coordinate with and will participate in the relevant CAN? • Does the applicant describe a plan for an outreach process to engage those persons that is that is adequate and likely to identify those most in need of the services? • Does the applicant identify specific and appropriate programs (street outreach, shelters, and/or local CAN) from which it obtains referrals of potential eligible program participants that will ensure the project operates at full capacity and that only eligible persons are served?	

Program Name: _____ Evaluator: _____

PSH – Prioritizing Highest Need	Total
See "Project Description **Extent to which the applicant:** o Demonstrates that they will first serve the chronically homeless and then prioritize as outlined *in CT BOS Policy: Adoption of HUD Notice CPD 16-11.* **(4 points)** o Clearly describes the system it currently uses to determine severity of need for the chronically homeless. **(2 points)** o Clearly describes its process for prioritizing persons with the most severe needs. **(2 points)** o Clearly describes the outreach process used to engage chronically homeless persons living on the streets and in shelter. **(2 points)** **Questions to consider:** • Does the applicant demonstrate a clear understanding of the order of priority established in *CT BOS Policy: Adoption of HUD Notice CPD 16-11* • Does the applicant describe a specific plan for how the project will participate in the CoC's coordinated assessment system? • Does the applicant describe a plan for an outreach process to engage those persons that is that is adequate and consistent with the Notice? Does the applicant identify specific and appropriate programs (street outreach, shelters, safe havens, and/or local CAN) from which it obtains referrals of potential eligible program participants that will ensure the project operates at full capacity and that eligible persons are served with the most severe needs are served?	

Program Name: _____ Evaluator: _____

Section 3 – Housing First – 10 points **OBJECTIVE CRITERIA**	
See "Project Experience – 13A," "Project Description – 14A" QUESTIONs 14D and 11C **Extent to which the applicant:** o Demonstrates significant and long-standing experience in operating a housing first program. **(2 points)** o Demonstrates success of the existing housing first program(s) it operates. **(2 points)** o Clearly describe a program design that is consistent with a Housing First approach (i.e., A model of housing assistance that is offered without preconditions, such as sobriety or a minimum income threshold, or service participation requirements, and rapid placement and stabilization in permanent housing are primary goals) **(6 points)** **Questions to consider:** • Does the applicant clearly demonstrate a model that offers initial access to housing without preconditions, such as sobriety, income requirements and service participation? • Does the applicant clearly demonstrate a model in which continuation of housing is not contingent on service participation requirements or compliance with treatment or rules other than as established in a lease? • Does the applicant clearly demonstrate that rapid placement and stabilization in permanent housing are primary goals of the project? • Does the applicant clearly describe a project design that is adequate to accomplish those goals?	**Score**

Program Name: _____ Evaluator: _____

Comments:

Program Name: _____ Evaluator: _____

Section 4- Supportive Services (20 points) **Factors below are related to achieving positive housing outcome** **See Questions 11 A-F & 7**	
Obtain/Retain permanent housing and Assist w/ability to live independently (5 points) • Is there a clear description of how eligible participants obtain housing? • Does the organization clearly explain how participants will be assisted to maintain their housing unit? • Does the organization describe a sound plan for promoting independence for participants?	**Score**
Assistance with obtaining mainstream benefits (5 points) • Is there a clear plan to ensuring that participants are given an opportunity to secure mainstream benefits and other services?	**Score**
Assistance with increasing income/employment (5 points) • Is there a clear plan to assist households in increasing their income from any source and/or increase income through employment?	**Score**
Service cost per household (5 points) • Is the project proposing annual service costs that exceed $7,000 per household (See Question 7)? • If so, do they adequately describe why this level of costs is necessary?	**Score**
Questions/ Comments:	**Total**

Program Name: _____ Evaluator: _____

Bonus Points (5 points)	
Bonus points for projects that provide information on their coordinated effort with mainstream employment organizations (including examples).	**Score**
Comments:	

Process for Reallocation
2018 CoC Program Competition

The Connecticut Balance of State (CT BOS) CoC has implemented a comprehensive reallocation process that uses performance data to determine how efficiently and effectively expend available CoC program resources to improve system performance and end homelessness within the CoC. The CoC has reallocated projects in every annual competition since 2013. The 2018 reallocation process is described below.

CoC History of Reallocation

- The CoC has reallocated over $4 million since 2014.
- Competitive application process through the years has funded new Permanent Supportive Housing units that are 100% dedicated to chronically homeless persons.
- The CoC reallocates funds to new projects whenever reallocation would improve outcomes, result in more efficient use of resources and/or reduce homelessness.
- The CoC has reallocated funds each year from projects that were under performing, using outdated program models, under spending and/or had high costs.
- Projects have always had the option to voluntarily reallocate to make better use of CoC resources, provided the new project met CoC priorities and had a viable model and quality program design.

CoC conducts a transparent, comprehensive project review annually.

- The CoC Steering Committee, with input from a broad range of stakeholders, establishes a methodology to comprehensively review project quality, performance and cost effectiveness annually. That process is disseminated widely via email and posted to the web.
- That methodology uses objective, performance-based scoring criteria and selection priorities that are approved by the Steering Committee to determine the extent to which each project is improving CoC Systems Performance, successfully helping homeless people to quickly obtain and retain housing without unnecessary barriers and to increase their income.
- The CoC also considers factors including, efficient use of resources, including how much each project spends to serve and house an individual or family as compared to other projects serving similar populations and the extent to which the project is fully expending its award.

The CoC offers providers education & technical assistance regarding reallocation.

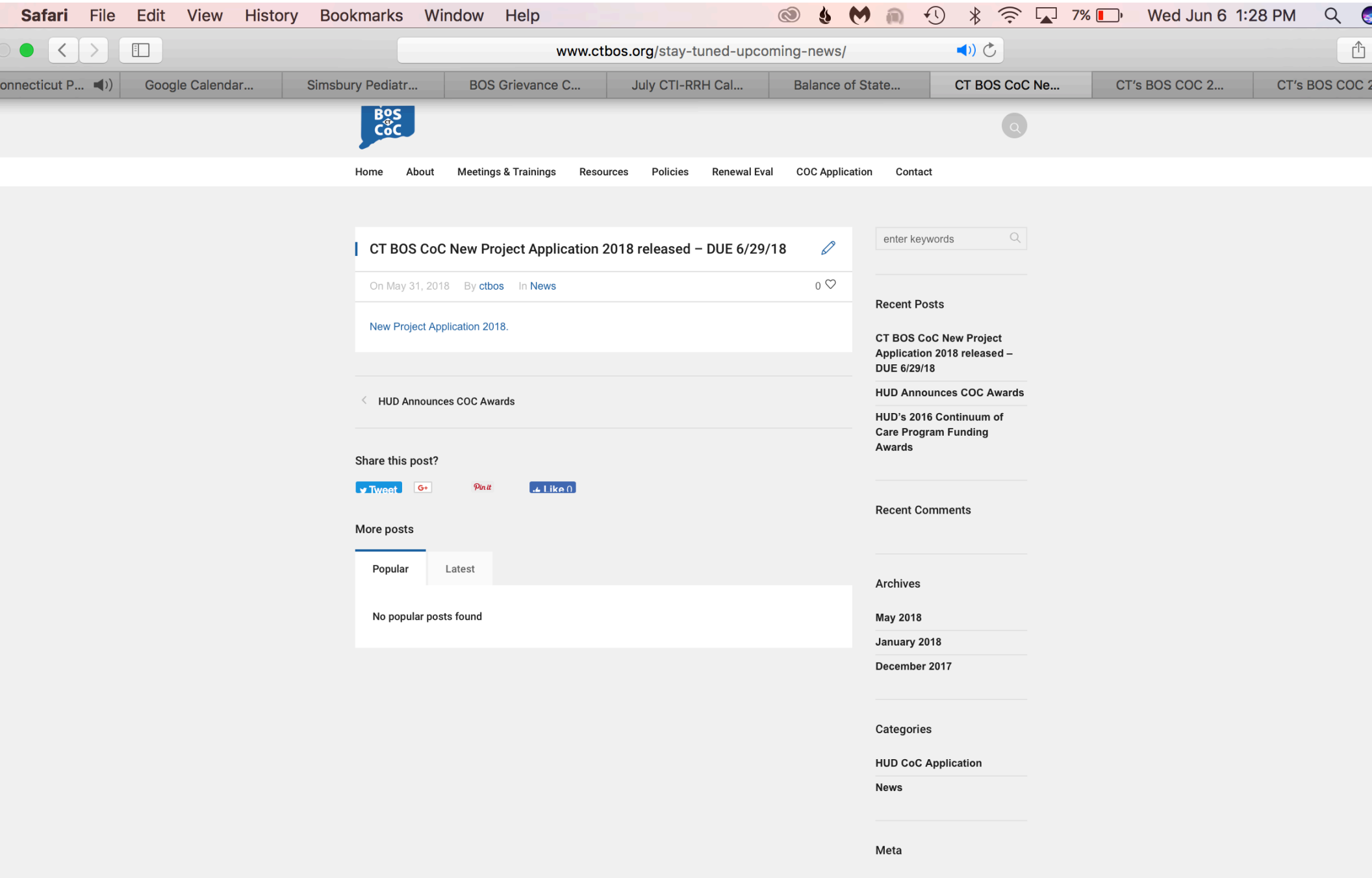
- Information on review criteria, reallocation opportunities and requirements is shared at Steering Committee meetings and disseminated to the CoC membership via SubCoCs, semi-annual public meetings and minutes.
- The CoC consultants provide technical assistance to providers interested in voluntary reallocation and those selected for reallocation by the Steering Committee.

.

The CoC solicits New Project Applications for reallocated funds.

- The CoC welcomes and solicits new project applications from all eligible organizations (including those that have never received CoC Program funds) as follows - See evidence included as Attachment 1:
  - CoC posts new project application publicly on CoC website
  - CoC sends information about the RFP opportunity out to its email list, which includes more than 400 individuals.
  - CoC partners widely distribute information about the RFP opportunity to their email lists, which include dozens of organizations that do not currently receive and have never received CoC program funds.

Attachment 1



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Connecticut's Balance of State Continuum of Care

2018 Project Application Released – DUE 6/29/18

CT Balance of State Continuum of Care (CT BOS) is requesting applications for Rapid Re-Housing and Permanent Supportive Housing (PSH) projects funded through HUD CoC using both permanent housing bonus and/or any available reallocation funds. Applications are due 6/29/18. Application can be found: www.ctbos.org/stay-tuned-upcoming-news/

The following types of new projects will be considered:

- New permanent supportive housing (PSH) projects that create new units to serve 100 percent chronically homeless individuals and families including youth/young adults experiencing chronic homelessness, as defined in the appendix of this RFP.
- New permanent supportive housing (PSH) projects that will not create new units but will provide additional services to participants in one or more existing PSH projects. Additional services funded through this RFP must be used to serve 100 percent chronically homeless individuals and families including youth/young adults experiencing chronic homelessness, as defined in the appendix of this RFP.
- New rapid rehousing (RRH) projects that will create new units to serve homeless individuals and families, including youth, coming directly from the streets or emergency shelters, or meeting the criteria of paragraph (4) of the HUD definition of homeless. (See Appendix for Definition of Category 4 – fleeing domestic violence, dating violence, sexual assault, stalking or other dangerous situations).
- New rapid rehousing (RRH) projects that will not create new units but will provide additional services to participants in one or more existing RRH projects. Additional services funded through this RFP must be used to serve homeless individuals and families, including youth, coming directly from the streets or emergency shelters, or meeting the criteria of paragraph (4) of the HUD definition of homeless. (See Appendix for Definition of Category 4 – fleeing domestic violence)

Please note that the CoC is seeking applications that will not create new units but will provide additional services to participants in one or more existing PSH or RRH project only in order to fill critical gaps as identified by the applicable Coordinated Access Network(s) (CAN)[1]. Such applications will be considered only where the applicable CAN(s) has determined that the additional services proposed are essential to assist eligible participants in one or more existing projects to obtain and/or retain permanent housing.

HUD allows project applicants to apply for a new expansion project under the reallocation process or bonus in order to expand projects that will increase the number of units in the project or allow the recipient to serve additional persons. HUD has clarified that the component type for the existing project and the new expansion project must be identical (e.g., an existing PSH project may only apply for a PSH expansion, an existing RRH project may only apply for a RRH expansion). Projects may not apply for an

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CT BOS Seeks Applications for New Housing Projects

June 05, 2018

CT Balance of State Continuum of Care

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The CT Balance of State Continuum of Care (CT BOS) has published a Request for Proposals for rapid rehousing (RRH) and permanent supportive housing (PSH) projects funded through HUD CoC using both permanent housing bonus and/or any available reallocation funds.

The following types of new projects will be considered:

- New permanent supportive housing (PSH) projects that create new units to serve 100 percent chronically homeless individuals and families including youth/young adults experiencing chronic homelessness.
- New permanent supportive housing (PSH) projects that will not create new units but will provide additional services to participants in one or more existing PSH projects.
- New rapid rehousing (RRH) projects that will create new units to serve homeless individuals and families, including youth, coming directly from the streets or emergency shelters, or meeting the criteria of paragraph (4) of the HUD definition of homeless.
- New rapid rehousing (RRH) projects that will not create new units but will provide additional services to participants in one or more existing RRH projects.

The CoC is seeking applications that will not create new units but will provide additional services to participants in one or more existing PSH or RRH project only in order to fill critical gaps as identified by the applicable Coordinated Access Network(s) (CAN). Such applications will be considered only where the applicable

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June 11 ·

CT Balance of State Continuum of Care (CT BOS) is requesting applications for Rapid Re-Housing and Permanent Supportive Housing (PSH) projects funded through HUD CoC using both permanent housing bonus and/or any available reallocation funds. Applications are due 6/29/18.

CCEH.ORG

CT's BOS COC 2018 Project Application Released | Connecticut Coalition to End Homelessness

Connecticut's Balance of State Continuum of Care 2018 Project Application Released – DUE 6/29/18 CT Balance of State Continuum of Care...

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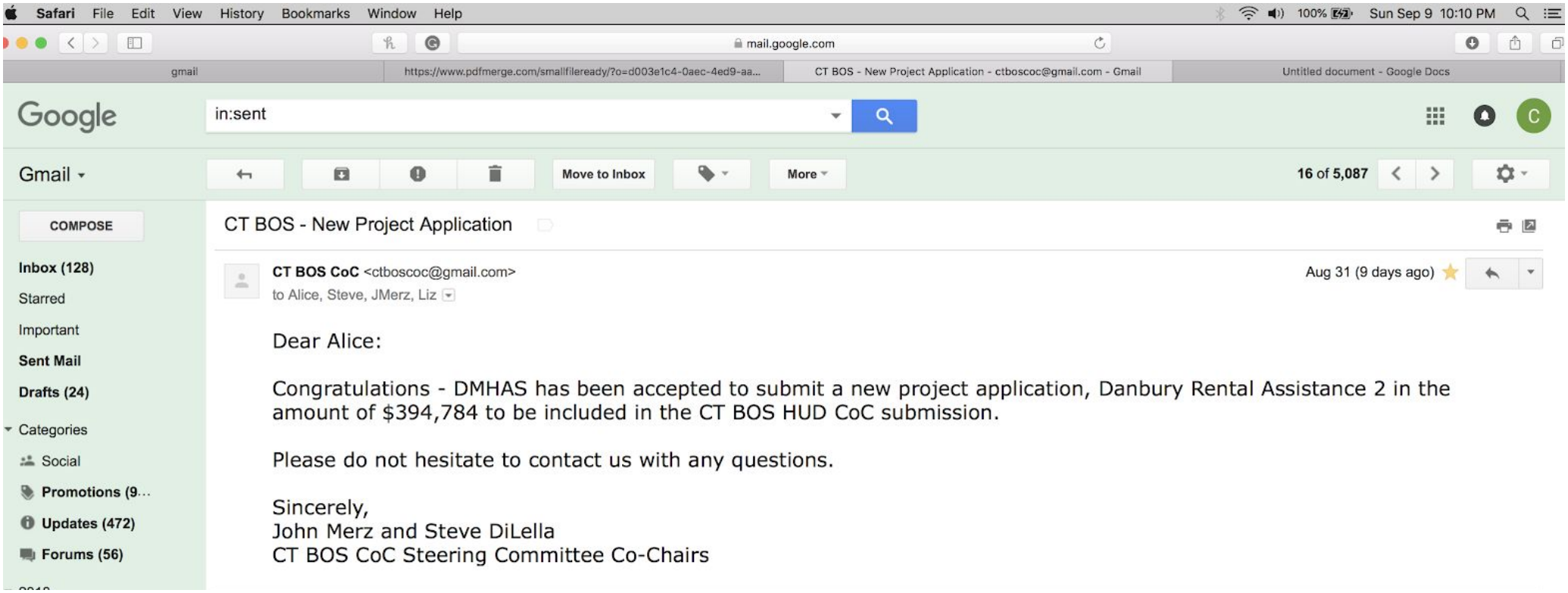
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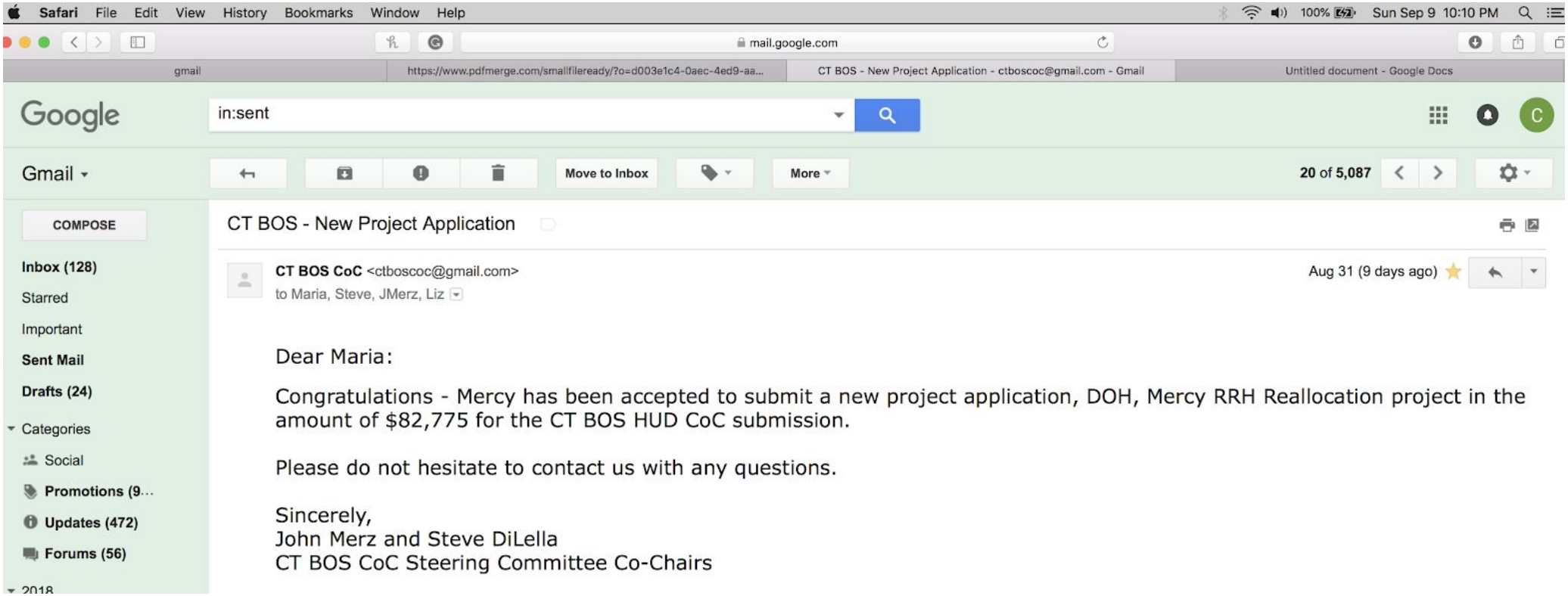


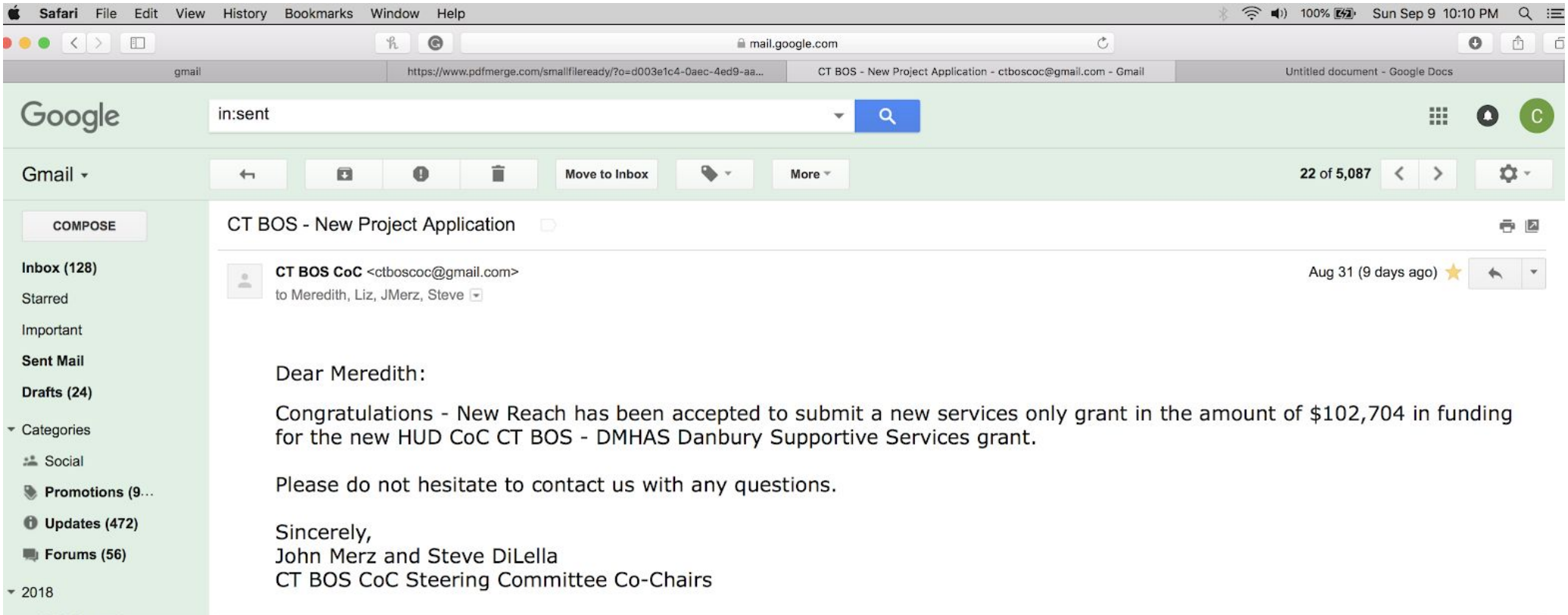
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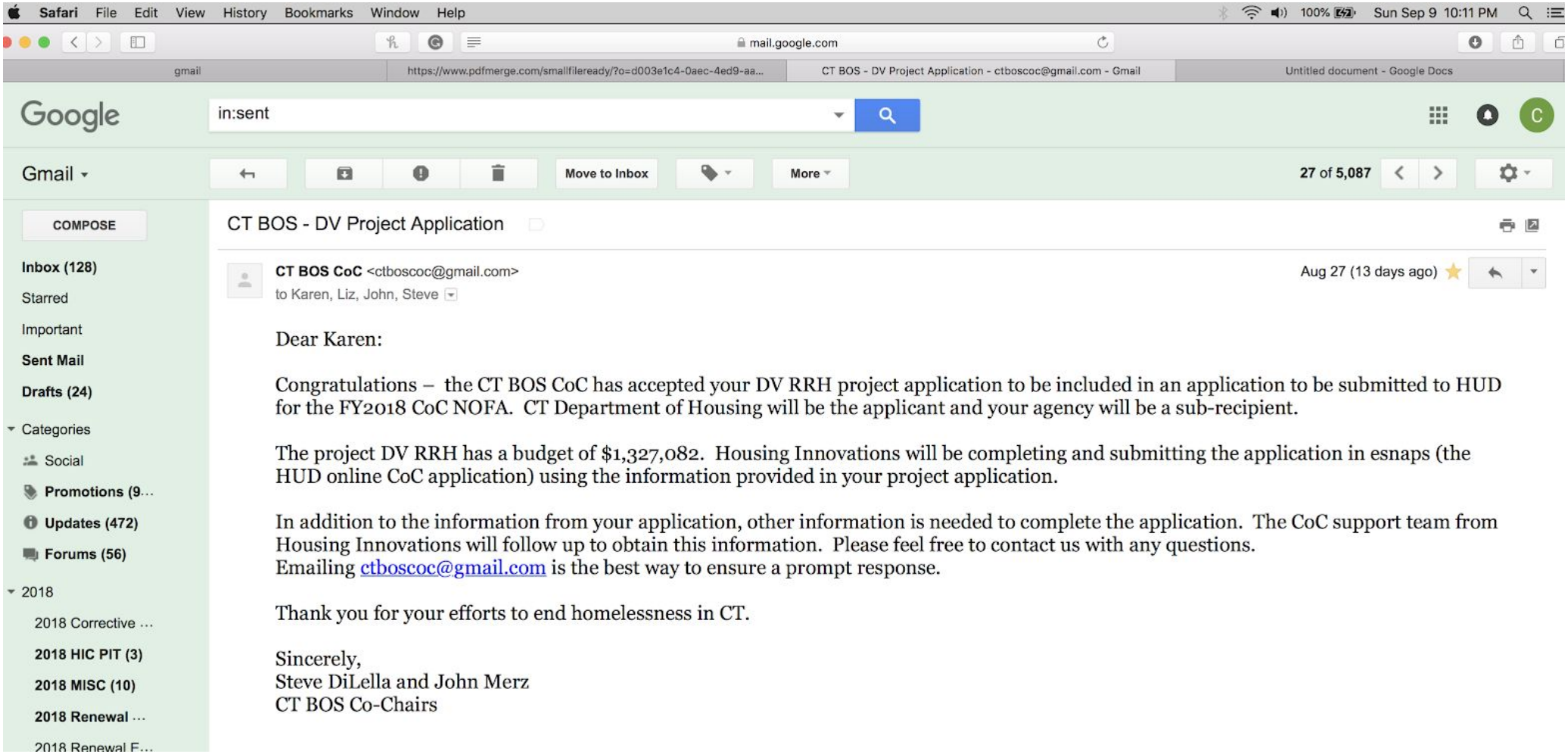
CT Coalition to End Homelessness @CCEHtweets · Jun 12

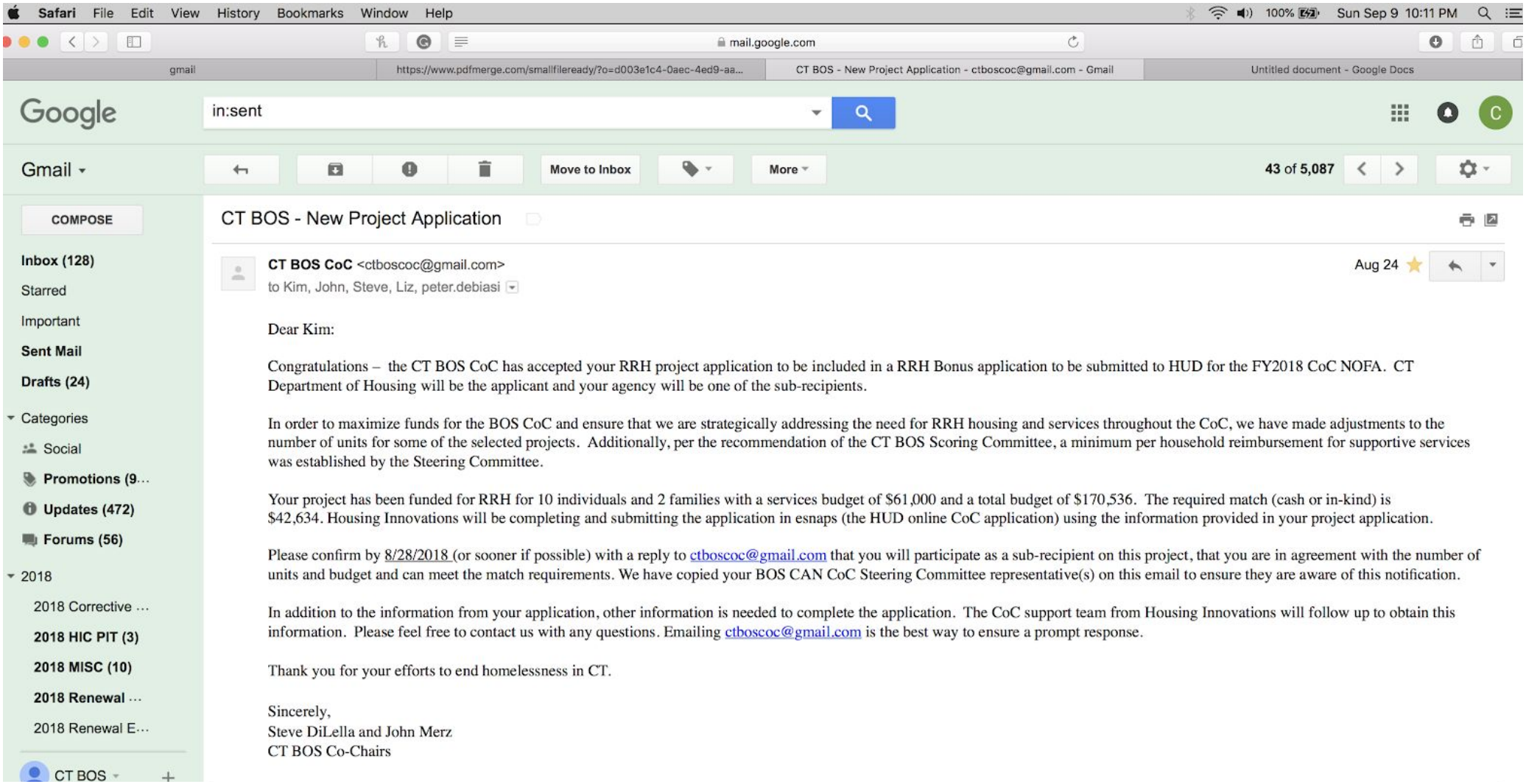
CT Balance of State Continuum of Care (CT BOS) is requesting applications for Rapid Re-Housing and Permanent Supportive Housing (PSH) projects funded through HUD CoC. Applications are due 6/29/18. More info here: tinyurl.com/ydgzuutb

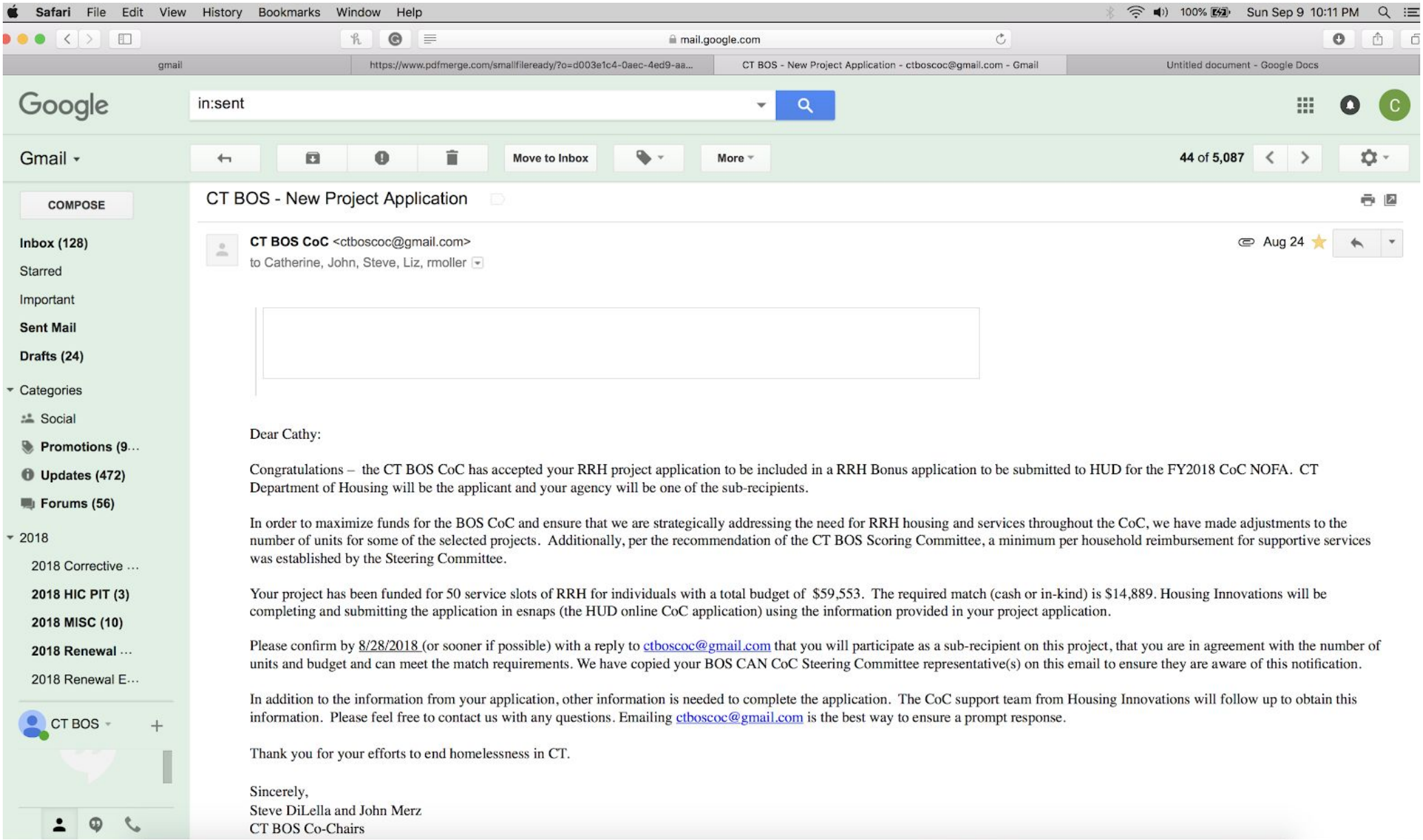

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CT BOS - New Project Application
CT BOS CoC <ctboscoc@gmail.com>
to Alice, Steve, JMerz, Liz
Aug 31 (9 days ago)
Dear Alice:
Congratulations - DMHAS has been accepted to submit a new project application, Danbury Rental Assistance 2 in the amount of $394,784 to be included in the CT BOS HUD CoC submission.
Please do not hesitate to contact us with any questions.
Sincerely,
John Merz and Steve DiLella
CT BOS CoC Steering Committee Co-Chairs

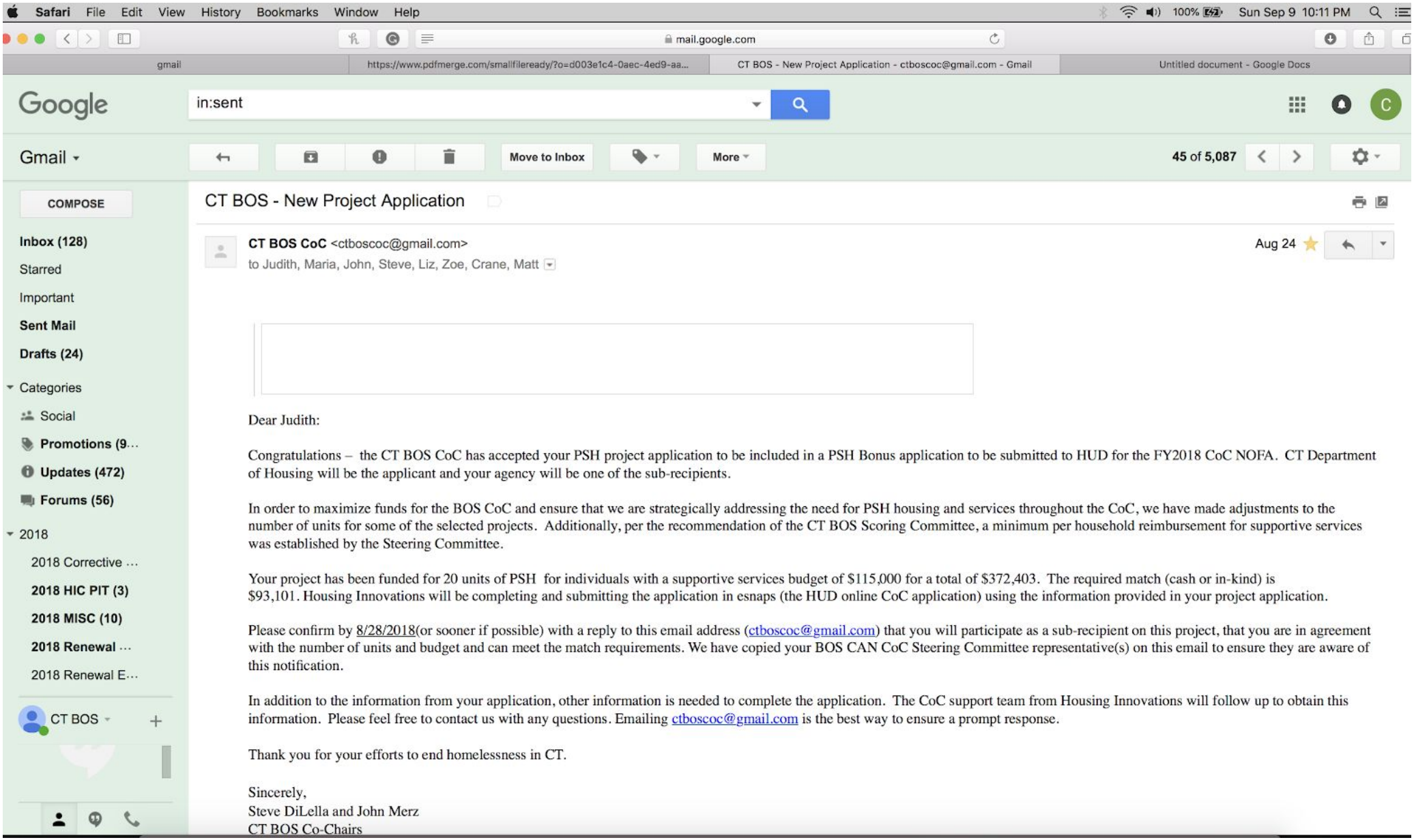

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CT BOS - New Project Application
CT BOS CoC <ctboscoc@gmail.com>
to Maria, Steve, JMerz, Liz
Aug 31 (9 days ago)
Dear Maria:
Congratulations - Mercy has been accepted to submit a new project application, DOH, Mercy RRH Reallocation project in the amount of $82,775 for the CT BOS HUD CoC submission.
Please do not hesitate to contact us with any questions.
Sincerely,
John Merz and Steve DiLella
CT BOS CoC Steering Committee Co-Chairs

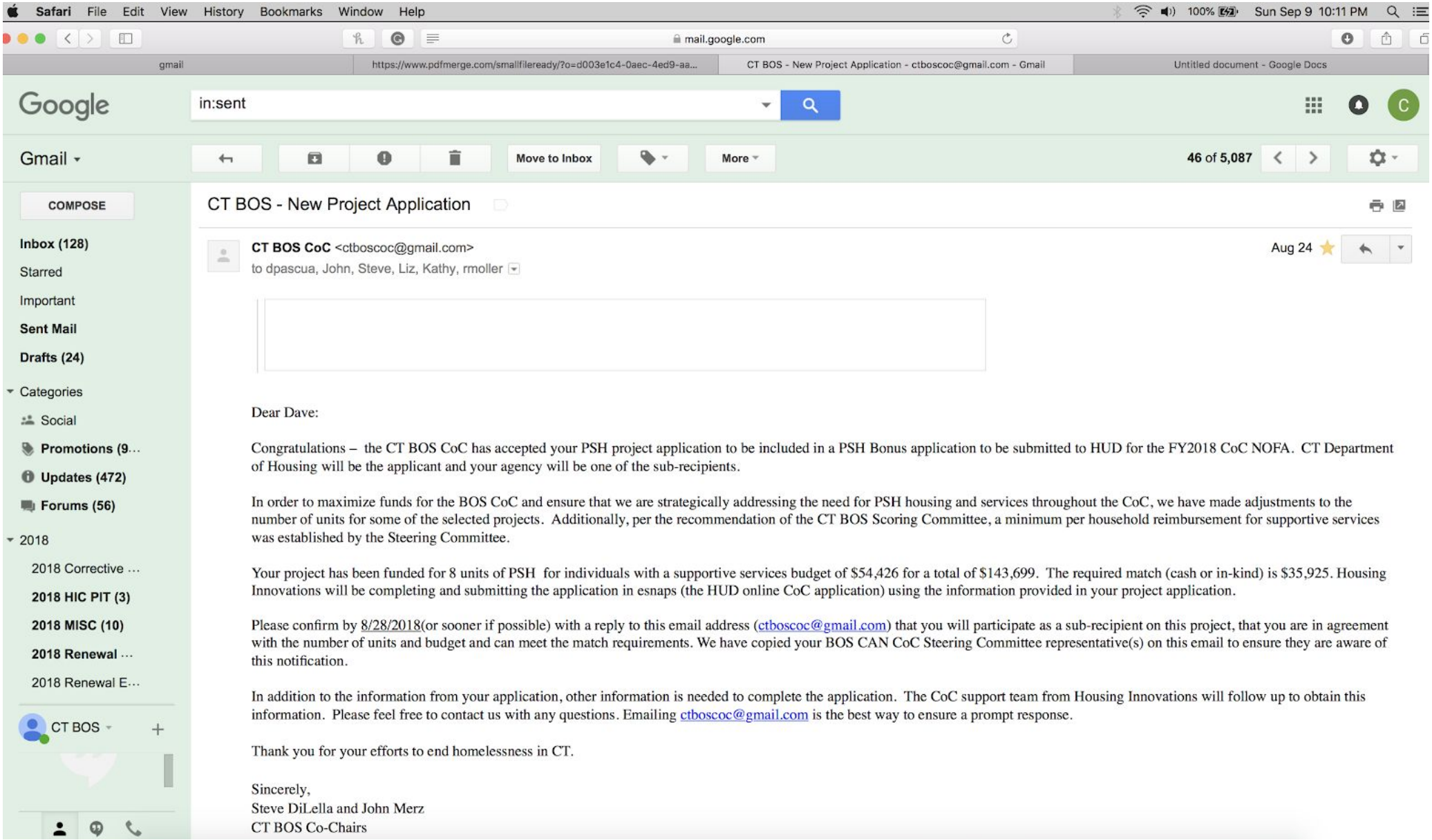

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CT BOS - New Project Application
CT BOS CoC <ctboscoc@gmail.com>
to Meredith, Liz, JMerz, Steve
Aug 31 (9 days ago)
Dear Meredith:
Congratulations - New Reach has been accepted to submit a new services only grant in the amount of $102,704 in funding for the new HUD CoC CT BOS - DMHAS Danbury Supportive Services grant.
Please do not hesitate to contact us with any questions.
Sincerely,
John Merz and Steve DiLella
CT BOS CoC Steering Committee Co-Chairs

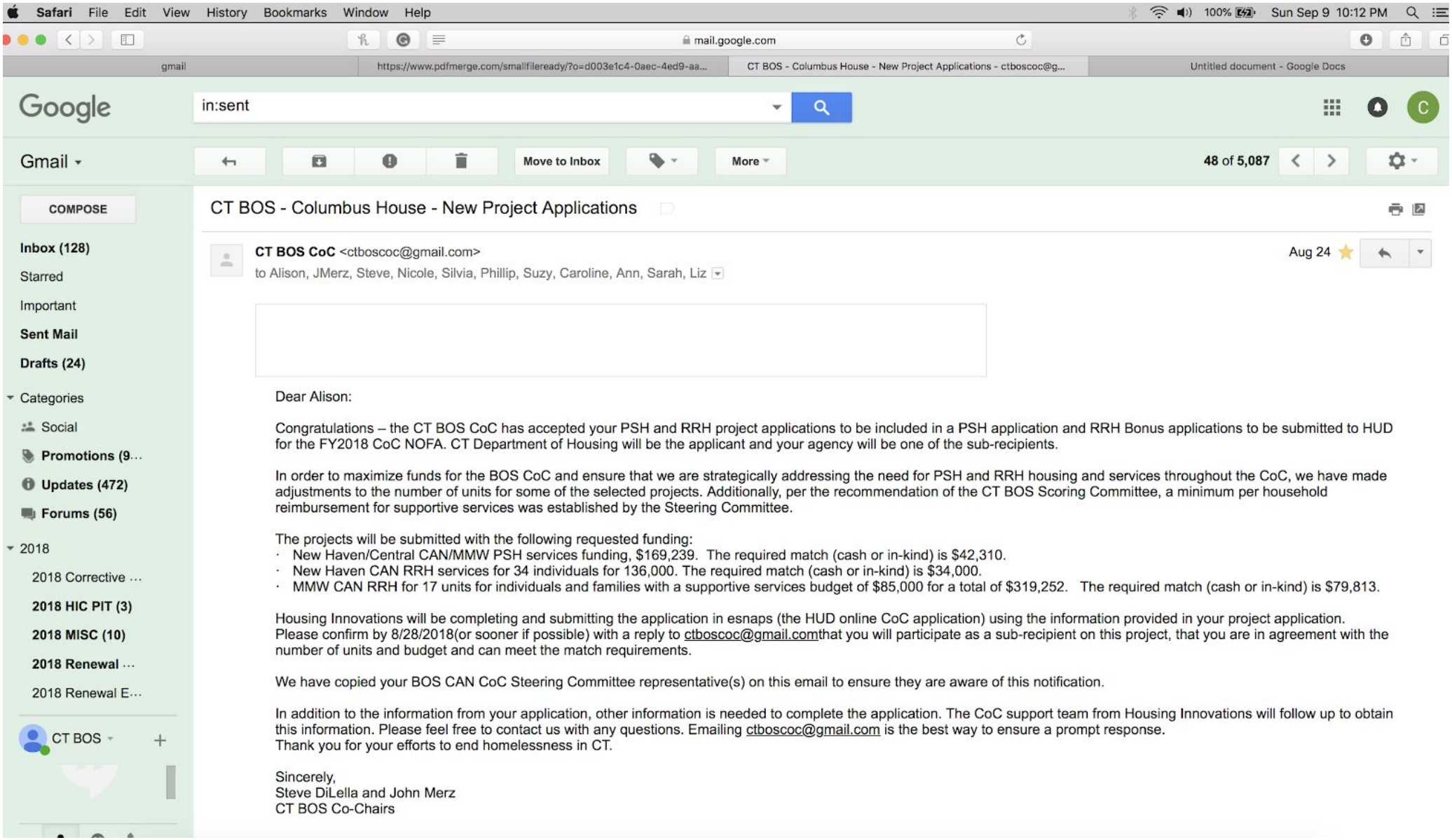

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CT BOS CoC <ctboscoc@gmail.com>
to Karen, Liz, John, Steve
Aug 27 (13 days ago)
Dear Karen:
Congratulations – the CT BOS CoC has accepted your DV RRH project application to be included in an application to be submitted to HUD for the FY2018 CoC NOFA. CT Department of Housing will be the applicant and your agency will be a sub-recipient.
The project DV RRH has a budget of $1,327,082. Housing Innovations will be completing and submitting the application in esnaps (the HUD online CoC application) using the information provided in your project application.
In addition to the information from your application, other information is needed to complete the application. The CoC support team from Housing Innovations will follow up to obtain this information. Please feel free to contact us with any questions.
Emailing ctboscoc@gmail.com is the best way to ensure a prompt response.
Thank you for your efforts to end homelessness in CT.
Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs


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CT BOS - New Project Application
CT BOS CoC <ctboscoc@gmail.com>
to Kim, John, Steve, Liz, peter.debiasi
Aug 24
Dear Kim:
Congratulations – the CT BOS CoC has accepted your RRH project application to be included in a RRH Bonus application to be submitted to HUD for the FY2018 CoC NOFA. CT Department of Housing will be the applicant and your agency will be one of the sub-recipients.
In order to maximize funds for the BOS CoC and ensure that we are strategically addressing the need for RRH housing and services throughout the CoC, we have made adjustments to the number of units for some of the selected projects. Additionally, per the recommendation of the CT BOS Scoring Committee, a minimum per household reimbursement for supportive services was established by the Steering Committee.
Your project has been funded for RRH for 10 individuals and 2 families with a services budget of $61,000 and a total budget of $170,536. The required match (cash or in-kind) is $42,634. Housing Innovations will be completing and submitting the application in esnaps (the HUD online CoC application) using the information provided in your project application.
Please confirm by 8/28/2018 (or sooner if possible) with a reply to ctboscoc@gmail.com that you will participate as a sub-recipient on this project, that you are in agreement with the number of units and budget and can meet the match requirements. We have copied your BOS CAN CoC Steering Committee representative(s) on this email to ensure they are aware of this notification.
In addition to the information from your application, other information is needed to complete the application. The CoC support team from Housing Innovations will follow up to obtain this information. Please feel free to contact us with any questions. Emailing ctboscoc@gmail.com is the best way to ensure a prompt response.
Thank you for your efforts to end homelessness in CT.
Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs


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CT BOS - New Project Application
CT BOS CoC <ctboscoc@gmail.com>
to Catherine, John, Steve, Liz, rmoller
Aug 24
Dear Cathy:
Congratulations – the CT BOS CoC has accepted your RRH project application to be included in a RRH Bonus application to be submitted to HUD for the FY2018 CoC NOFA. CT Department of Housing will be the applicant and your agency will be one of the sub-recipients.
In order to maximize funds for the BOS CoC and ensure that we are strategically addressing the need for RRH housing and services throughout the CoC, we have made adjustments to the number of units for some of the selected projects. Additionally, per the recommendation of the CT BOS Scoring Committee, a minimum per household reimbursement for supportive services was established by the Steering Committee.
Your project has been funded for 50 service slots of RRH for individuals with a total budget of $59,553. The required match (cash or in-kind) is $14,889. Housing Innovations will be completing and submitting the application in esnaps (the HUD online CoC application) using the information provided in your project application.
Please confirm by 8/28/2018 (or sooner if possible) with a reply to ctboscoc@gmail.com that you will participate as a sub-recipient on this project, that you are in agreement with the number of units and budget and can meet the match requirements. We have copied your BOS CAN CoC Steering Committee representative(s) on this email to ensure they are aware of this notification.
In addition to the information from your application, other information is needed to complete the application. The CoC support team from Housing Innovations will follow up to obtain this information. Please feel free to contact us with any questions. Emailing ctboscoc@gmail.com is the best way to ensure a prompt response.
Thank you for your efforts to end homelessness in CT.
Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs


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CT BOS - New Project Application
CT BOS CoC <ctboscoc@gmail.com>
to Judith, Maria, John, Steve, Liz, Zoe, Crane, Matt
Aug 24
Dear Judith:
Congratulations – the CT BOS CoC has accepted your PSH project application to be included in a PSH Bonus application to be submitted to HUD for the FY2018 CoC NOFA. CT Department of Housing will be the applicant and your agency will be one of the sub-recipients.
In order to maximize funds for the BOS CoC and ensure that we are strategically addressing the need for PSH housing and services throughout the CoC, we have made adjustments to the number of units for some of the selected projects. Additionally, per the recommendation of the CT BOS Scoring Committee, a minimum per household reimbursement for supportive services was established by the Steering Committee.
Your project has been funded for 20 units of PSH for individuals with a supportive services budget of $115,000 for a total of $372,403. The required match (cash or in-kind) is $93,101. Housing Innovations will be completing and submitting the application in esnaps (the HUD online CoC application) using the information provided in your project application.
Please confirm by 8/28/2018(or sooner if possible) with a reply to this email address (ctboscoc@gmail.com) that you will participate as a sub-recipient on this project, that you are in agreement with the number of units and budget and can meet the match requirements. We have copied your BOS CAN CoC Steering Committee representative(s) on this email to ensure they are aware of this notification.
In addition to the information from your application, other information is needed to complete the application. The CoC support team from Housing Innovations will follow up to obtain this information. Please feel free to contact us with any questions. Emailing ctboscoc@gmail.com is the best way to ensure a prompt response.
Thank you for your efforts to end homelessness in CT.
Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs


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CT BOS
CT BOS - New Project Application
CT BOS CoC <ctboscoc@gmail.com>
to dpascua, John, Steve, Liz, Kathy, rmoller
Aug 24
Dear Dave:
Congratulations – the CT BOS CoC has accepted your PSH project application to be included in a PSH Bonus application to be submitted to HUD for the FY2018 CoC NOFA. CT Department of Housing will be the applicant and your agency will be one of the sub-recipients.
In order to maximize funds for the BOS CoC and ensure that we are strategically addressing the need for PSH housing and services throughout the CoC, we have made adjustments to the number of units for some of the selected projects. Additionally, per the recommendation of the CT BOS Scoring Committee, a minimum per household reimbursement for supportive services was established by the Steering Committee.
Your project has been funded for 8 units of PSH for individuals with a supportive services budget of $54,426 for a total of $143,699. The required match (cash or in-kind) is $35,925. Housing Innovations will be completing and submitting the application in esnaps (the HUD online CoC application) using the information provided in your project application.
Please confirm by 8/28/2018(or sooner if possible) with a reply to this email address (ctboscoc@gmail.com) that you will participate as a sub-recipient on this project, that you are in agreement with the number of units and budget and can meet the match requirements. We have copied your BOS CAN CoC Steering Committee representative(s) on this email to ensure they are aware of this notification.
In addition to the information from your application, other information is needed to complete the application. The CoC support team from Housing Innovations will follow up to obtain this information. Please feel free to contact us with any questions. Emailing ctboscoc@gmail.com is the best way to ensure a prompt response.
Thank you for your efforts to end homelessness in CT.
Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs


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CT BOS - Columbus House - New Project Applications
CT BOS CoC <ctboscoc@gmail.com>
to Alison, JMerz, Steve, Nicole, Silvia, Phillip, Suzy, Caroline, Ann, Sarah, Liz
Aug 24
Dear Alison:
Congratulations – the CT BOS CoC has accepted your PSH and RRH project applications to be included in a PSH application and RRH Bonus applications to be submitted to HUD for the FY2018 CoC NOFA. CT Department of Housing will be the applicant and your agency will be one of the sub-recipients.
In order to maximize funds for the BOS CoC and ensure that we are strategically addressing the need for PSH and RRH housing and services throughout the CoC, we have made adjustments to the number of units for some of the selected projects. Additionally, per the recommendation of the CT BOS Scoring Committee, a minimum per household reimbursement for supportive services was established by the Steering Committee.
The projects will be submitted with the following requested funding:
· New Haven/Central CAN/MMW PSH services funding, $169,239. The required match (cash or in-kind) is $42,310.
· New Haven CAN RRH services for 34 individuals for 136,000. The required match (cash or in-kind) is $34,000.
· MMW CAN RRH for 17 units for individuals and families with a supportive services budget of $85,000 for a total of $319,252. The required match (cash or in-kind) is $79,813.
Housing Innovations will be completing and submitting the application in esnaps (the HUD online CoC application) using the information provided in your project application. Please confirm by 8/28/2018(or sooner if possible) with a reply to ctboscoc@gmail.comthat you will participate as a sub-recipient on this project, that you are in agreement with the number of units and budget and can meet the match requirements.
We have copied your BOS CAN CoC Steering Committee representative(s) on this email to ensure they are aware of this notification.
In addition to the information from your application, other information is needed to complete the application. The CoC support team from Housing Innovations will follow up to obtain this information. Please feel free to contact us with any questions. Emailing ctboscoc@gmail.com is the best way to ensure a prompt response.
Thank you for your efforts to end homelessness in CT.
Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs

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CT BOS CoC <ctboscoc@gmail.com> — Aug 23
to Liz

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Date: Fri, Sep 8, 2017 at 5:31 PM
Subject: CT BOS CoC -- FY 2017 CoC Program Competition Projects
To: <dreamhomes@arcforpeace.org>, La Keisha Kinsey <lkinsey@safefuturesct.org>, <nzitto@tvcca.org>, Phyllis J. Leopold <pjl@arcforpeace.org>, Alice Minervino <alice.minervino@ct.gov>, Alison Cunningham <acunningham@columbushouse.org>, Allison Ponce <allison.ponce@yale.edu>, Andrea Hachey <andreah@columbushouse.org>, Andrea Hakian, LCSW <AHakian@chrhealth.org>, Andrea Harnois <aharnois@chrhealth.org>, Andrea Hunter <ahunter@theconnectioninc.org>, Ashley Cianci <acianci@mhconn.org>, Ashley Hinman <AHinman@chd.org>, Beatrice Perez <beatrice.perez@ct.gov>, Belinda Arce-Lopez <BArcel.opez@chd.org>, Betsy Cronin <bcronin@theconnectioninc.org>, Beverly Arcaro <barcaro@sistersplacect.org>, Bobbi Jo Evans <bevans@bhcare.org>, Bonnie Reilein <bonnie@holyfamilywillimantic.org>, Brian Baker <bbaker@southparkinn.org>, Brian Roccapriore <Broccapriore@cceh.org>, Brittney Gibson <brittney.gibson@gmail.com>, Brittney Gibson <brittney.gibson@yale.edu>, Bruce Mochan <bmcchan@nwcty.org>, Carole Shomo <cshomo@youthcontinuum.org>, Catherine Damato <damatoc@crtct.org>, Catherine Zall <czall@snet.net>, Catherine Zeiner <Catherinez@ywcahartford.org>, Cathy Zeiner <czeiner@safefuturesct.org>, Chris McCluskey <mccluskeyc@crtct.org>, Cindy Carloni <Cynthia.Carloni@ct.gov>, Claire Silva <Claires@bethsaidact.org>, Clarissa Garcia <cgarcia@immacare.org>, Clasina Jones <Clasinaj@ywcahartford.org>, Claudia Sweeney <csweeney@thact.org>, Colleen Harrington <colleen.harrington@ct.gov>, Crane Cesario <Crane.cesario@ct.gov>, Cynthia Watson <cwatson@ccahelping.org>, Dan Tammaro <dtammaro@newhavenct.gov>, Dana Serra <dana.serra@waterburyha.org>, Daria Keyes <dkeyes@cmhacc.org>, David L. Gonzalez Rice <d.l.gonz.rice@gmail.com>, David Martineau <dmartineau@mercyhousingct.org>, David Shadbegian <david.shadbegian@accessagency.org>, Dawn Parker <dmparker@theconnectioninc.org>, Deanna Bencivengo <Deanna.Bencivengo@hhchealth.org>, Deborah Ullman <deborahu@ywcahartford.org>, Denice Calabrese <dcalabrese@theconnectioninc.org>, Denise Ozanne <Denise.Ozanne@ct.gov>, Desiree McKay-Rogers <dmckay-rogers@immacare.org>, Diane Albini <DAlbini@chd.org>, Diane Paige'Blondet <dpaige-blondet@sistersplacect.org>, Donna Bergin <dbergin@friendshipservicecenter.org>, Eileen Krause <Eileen.Krause@libertycs.org>, Elaine Matt <ematt@bhcare.org>, Ellen Brotherton <ellen.brotherton@ct.gov>, Emily Grillo <pointofentry@arcforpeace.org>, Erik Clevenger <erik.clevenger@ct.gov>, Floranne Roswolle <floranne@holyfamilywillimantic.org>, Frank Silva <fsilva@allianceforliving.org>, Fred Morton <Fred.Morton@ct.gov>, Gary Beaulieu <st.vincent.de.paul@snet.net>, Greg Brisco <Gbrisco@nwcty.org>, Gregory Pike <gpike@intercommunityct.org>, Higgins, Eileen M <Eileen.Higgins@ct.gov>, Jacqueline Elam <Jelam@hacdct.org>, Janice Connor <jconnor@nwcty.org>, Jason Martinez <jmartinez@uwgnh.org>, Jeff Rouleau <jrouleau@newopportunitiesinc.org>, Jeffrey Beadle <jeffrey.beadle@wrccinc.org>, Jennifer Delaney (jdelaney@hacdct.org) <jdelaney@hacdct.org>, Jennifer Hunter Smith <jhuntersmith@mhconn.org>, Jessica Ortega <jortega@chrysaliscenterct.org>, Jim Farrales <jfarrales@continuumct.org>, Jim Tackett <jim.tackett@ct.gov>, John Ferrucci <jferrucci@southparkinn.org>, John Lynch <JLynch@chrysaliscenterct.org>, Jon-Paul Mandelburg <jmandelburg@tvcca.org>, Julie Ackerman <ackermanj@crtct.org>, Kara Capobiano <Kara.Capobianco@ct.gov>, Kara Capone <KCapone@newreach.org>, Katherine Verano <KVerano@safefuturesct.org>, Kathleen Durand <Kathleen.durand@ct.gov>, Kathleen Shaw <kathleens@sistersplacect.org>, Kathryn Crees <kathy.crees@accessagency.org>, Kathy Allen <kathya@trfp.org>, Kelley Traister <ktraister@newreach.org>, Kelly Thompson <kthompson@allianceforliving.org>, Kellyann Day <kday@newreach.org>, Kendall Eshenfelder <kendall.eshenfelder@ct.gov>, Kerry Callaghan <kcallaghan@tvcca.org>, Kim Jakowski <kim.jakowski@wrccinc.org>, Kitty Dudley <kdudley@manchesterct.gov>, Lauren Pareti <lpareti@housinginnovations.us>, Lazarski, Barbara <blazarski@friendshipservicecenter.org>, Letticia Brown-Gambino <lbrowngambino@columbushouse.org>, Linda Filipetti <lfilipetti@cmhacc.org>, Linda Kerr <bksvdp@comcast.net>, Lisa Callahan <lisa.callahan@ct.gov>, Lisa Tepper Bates <ltbates@cceh.org>, Liz Isaacs <episaf@comcast.net>, Lori Behling <wlikbehling@usmhs.org>, Lorraine Gauthier <lgauthier@prudencecrandall.org>, Louis Gilbert <lgilbert@immacare.org>, M. Gill <mgill@newoppinc.org>, M. Williams <mwilliams@chd.org>, Manssour Hanne <mhanne@cmhacc.org>, Margaret Soussloff <MSoussloff@safefuturesct.org>, Maria Gomes <mgomes@mercyhousingct.org>, Marie Mormile-Mehlerme <mmormile@cmhacc.org>, Marshall Gaines <marshallgaines@intercommunityct.org>, Mary Ann Haley <mhaley@cceh.org>, Mary Gillette <mgillette@mercyhousingct.org>, Mary Ives <mary.ives@ct.gov>, Mary Jane DeFilippo <MJDefilippo@cceh.org>, Mary Lou Underwood <munderwood@tvcca.org>, Mary Lusso <mlusso@southparkinn.org>, Maryann Picciarelli <killingly.housing@snet.net>, Maryellen Shuckerow <mshuckerow@chrysaliscenterct.org>, Meredith Damboise <mdamboise@newreach.org>, Michael Culmo <mculmo@mhact.org>, Michael Hall <michael.hall@libertycs.org>, Mike Van Vlaenderen <mvanvlaenderen@reliancehouse.org>, Milena Sangut <Milena.Sangut@ct.gov>, Myles J. Wensek <mylesw@housinginnovations.us>, Myrka Laffitte-Guillen <myrka.laffitte-guillen@ct.gov>, N. Cooke <NCooke@chrysaliscenterct.org>, N. Zawrocki <nzawrocki@bhcare.org>, Nancy J. Cannavo <NCannavo@hungerford.org>, Pam Walsh <pwalsh@chd.org>, Patricia Kupec <Patricia.kupec@ct.gov>, Paul Goodfield <st.vds@comcast.net>, Paul Kosowsky <pkosowsky@youthcontinuum.org>, pha24@snet.net <pha24@snet.net>, Phillip Lysiak <edsvdp@comcast.net>, Ralph Despres <RDespres@bhcare.org>, Rebekah Ohlsen <rohlsen@columbushouse.org>, Renee Grabert <wlragrabert@usmhs.org>, Renee Rosenbluh <rosenbluh@newreach.org>, Renold J Adu <radu@chd.org>, Rev. Bonita Grubbs <bgrubbs@ccahelping.org>, Rich Baraglia <rbaraglia@stphilliphouse.org>, Robert G. Dorr <bobcva4064@aol.com>, Ron Krom <ron@svdmiddletown.org>, S. Duke <sduke@newoppinc.org>, S. Plotkin <SPlotkin@youthcontinuum.org>, Sharon Castelli <scastelli@chrysaliscenterct.org>, Shellina Toure <stoure@ccahelping.org>, Silvia Moscariello <silvia.moscariello@libertycs.org>, Sofia <wcanpc@gmail.com>, Sonia Brown <browns@crtct.org>, Sorimar Vazquez <svazquez@cceh.org>, St. Vincent DePaul of Waterbury <st.vincent.depaul@snet.net>, Stacie Nicholas <snicholas@southparkinn.org>, Stephenie R. Guess <Stephenie.Guess@ct.gov>, Steve DiLella <Steve.DiLella@ct.gov>, Steve MacHattie <smachattie@immacare.org>, Subrena D. Winfield <subrena.winfield@libertycs.org>, Susan Scott <sscott@bhcare.org>, Suzanne Wagner <swagner@housinginnovations.us>, Suzy Rivera <srivera@friendshipservicecenter.org>, Teddi L. Creel <teddi.creel@ct.gov>, Tenesha Grant <tgrant@mercyhousingct.org>, Teresa Ferraro <tferraro@theconnectioninc.org>, Thomas Styron <thomas.styron@yale.edu>, Tina Ortiz <ortizt@crtct.org>, Tomiko Grant <tomiko.grant@use.salvationarmy.org>, Trudy Higgins <THiggins@bhcare.org>, Willa Bloch <blochw@crtct.org>, William Rybczyk <wrybczyk@newopportunitiesinc.org>, William Tuthill <wtuthill@newoppinc.org>, Yolanda Potter <Ypotter@mercyhousingct.org>

Dear CT BOS CoC Grantees:

You are receiving this e-mail because your CT BOS project (listed in the attached document) has been accepted and ranked on the Priority Listing for submission to FY 2017 HUD CoC Program Competition.

Thank you for your work on the applications.

Sincerely,
CT BOS Team

2 Attachments





CT BOS HUD Co...

2018 CT BOS Projects to be submitted to HUD

Applicant and Project Information			
Applicant Name	**Project Name**	**Grant Number**	**TOTAL**
Housing Authority of the City of Danbury	HACD/WCMHN 2017 CT0003	CT0003L1E051710	$134,605
Connecticut Department of Mental Health and Addiction Service	CT0011 New Haven Columbus House Sojourners	CT0011L1E051710	$220,101
Connecticut Department of Mental Health and Addiction Service	CT0012 New Haven Lucht Hall	CT0012L1E051710	$135,419
Connecticut Department of Mental Health and Addiction Service	CT0013 New Haven Cedar Hill	CT0013L1E051710	$159,875
Liberty Community Services, Inc.	Safe Haven	CT0015L1E051710	$771,748
ImmaCare Inc.	CDF-Combo 1-4 FY2017	CT0019L1E051710	$796,327
Connecticut Department of Mental Health and Addiction Service	CT0022 Greater Hartford Rental Assistance	CT0022L1E051710	$2,269,530
Connecticut Department of Mental Health and Addiction Service	CT0023 Hartford Mary Seymour Place	CT0023L1E051710	$185,477
YWCA of the Hartford Region, Inc.	Soromundi Commons Supportive Housing	CT0028L1E051710	$181,707
Connecticut Department of Mental Health and Addiction Service	CT0052 Middletown Liberty Commons	CT0052L1E051710	$190,353
Connecticut Department of Mental Health and Addiction Service	CT0053 Middletown The Connection	CT0053L1E051710	$166,685
Connecticut Department of Mental Health and Addiction Service	CT0054 Middletown Rental Assistance	CT0054L1E051710	$266,768
Community Renewal Team, Inc. (CRT)	BOS Consolidated PSH 2018-2019	CT0059L1E051710	$595,295
Connecticut Department of Mental Health and Addiction Service	CT0061 Intercommunity Casa Hope	CT0061L1E051710	$283,027
Connecticut Department of Mental Health and Addiction Service	CT0062 BHCare Rental Assistance 1	CT0062L1E051710	$341,708
Connecticut Coalition to End Homelessness	CT HMIS-BOS 2017 (CT0063)	CT0063L1E051710	$145,891
Chrysalis Center, Inc.	Family Matters CT0064	CT0064L1E051710	$217,012
Connecticut Department of Mental Health and Addiction Service	CT0066 Greater Hartford Chrysalis Rental Assistance	CT0066L1E051710	$1,034,839
Holy Family Home and Shelter, Inc	Homes Plus	CT0067L1E051710	$130,349
Torrington Community Housing Corporation	HOPE I & II 2017	CT0068L1E051710	$96,969
New Opportunities, Inc.	Meriden SHP	CT0069L1E051710	$41,604
Connecticut Department of Mental Health and Addiction Service	CT0070 Meriden Wallingford Rushford Rental Assistance	CT0070L1E051710	$538,772
Torrington Housing Authority	Pilots I (CT0072)	CT0072L1E051710	$74,100
Connecticut Department of Mental Health and Addiction Service	CT0073 Manchester CHR Rental Assistance	CT0073L1E051710	$323,982
Windham Regional Community Council	Project Home	CT0074L1E051710	$287,225
Connecticut Department of Mental Health and Addiction Service	CT0076 Windham United Services Rental Assistance	CT0076L1E051710	$88,406
Connecticut Department of Mental Health and Addiction Service	CT0077 Windham United Services Brick Row	CT0077L1E051710	$106,431
Bethsaida Community, Inc.	Flora O'Neil Apartments	CT0087L1E051710	$90,978
Connecticut Department of Mental Health and Addiction Service	CT0089 Norwich New London Rental Assistance	CT0089L1E051710	$452,152
Safe Futures, Inc.	Phoenix House Transitional Housing Program	CT0092L1E051710	$51,596
Thames River Community Service Inc.	Thames River Family Program	CT0093L1E051710	$195,983
Thames Valley Council for Community Action, Inc.	Homeless Collaborative Network	CT0094L1E051710	$696,464
Friendship Service Center, Inc.	PEAK	CT0111L1E051710	$548,776
Friendship Service Center, Inc.	TLP	CT0114L1E051710	$210,007
New Opportunities, Inc.	Freedom Walk	CT0120L1E051710	$402,235
Housing Authority of the City of Waterbury	Pilots II	CT0121L1E051710	$218,524
Housing Authority of the City of Waterbury	Pilots I	CT0122L1E051710	$250,022
St. Vincent DePaul Mission of Waterbury, Inc.	Society of Support (SOS)	CT0123L1E051710	$315,197
Housing Authority of the City of Danbury	HACD/CHD PILOT 2017 Renewal	CT0128L1E051709	$201,907
Connecticut Department of Mental Health and Addiction Service	CT0129 New Haven Safe Haven	CT0129L1E051709	$163,157
Connecticut Department of Mental Health and Addiction Service	CT0131 Hartford Hudson View Commons	CT0131L1E051709	$134,711
Connecticut Department of Mental Health and Addiction Service	CT0135 Hartford Chrysalis Soromundi Commons	CT0135L1E051709	$197,843
St. Vincent DePaul Place, Middletown	SVD Middletown SHP	CT0137L1E051709	$153,726
Connecticut Department of Mental Health and Addiction Service	CT0139 Hartford Chrysalis Supportive Housing for Vetera	CT0139L1E051709	$322,500
Windham Regional Community Council	Haven	CT0140L1E051709	$145,879
Torrington Housing Authority	Pilots II (CT0141)	CT0141L1E051709	$158,784
Connecticut Department of Mental Health and Addiction Service	CT0142 Torrington Mental Health CT Rental Assistance	CT0142L1E051709	$148,199
Alliance for Living	Alliance for Living-Supportive Housing Program FY 2017	CT0144L1E051709	$149,964
Prudence Crandall Center, Inc.	Permanent Supportive Housing for Persons with Disabilit	CT0149L1E051709	$152,831
CREDO Housing Development Corporation Inc	1569 Thomaston Avenue	CT0150L1E051709	$60,889
Housing Authority of the City of Waterbury	Waterbury Housing Plus	CT0151L1E051709	$170,840
Liberty Community Services, Inc.	Safe Haven Scattered Site	CT0153L1E051707	$99,032
Connecticut Department of Mental Health and Addiction Service	CT0154 Greater Hartford Mercy Rental Assistance	CT0154L1E051707	$109,585
Connecticut Department of Mental Health and Addiction Service	CT0161 New Britain CMHA Rental Assistance	CT0161L1E051706	$845,589
Housing Authority of the City of Waterbury	Waterbury New Hope	CT0162L1E051703	$24,213
Connecticut Department of Mental Health and Addiction Service	CT0164 New Haven Rental Assistance	CT0164L1E051708	$2,818,393
KILLINGLY HOUSING AUTHORITY	Killingly Wrap Around Housing Program	CT0165L1E051708	$44,282
Prudence Crandall Center, Inc.	Rose Hill Supportive Housing	CT0167L1E051708	$196,961
Prudence Crandall Center, Inc.	Rose Hill Transitional Living	CT0168L1E051708	$184,897
Columbus House, Inc	CHI Consolidated SHP FY 2017	CT0171L1E051705	$853,397
Connecticut Department of Mental Health and Addiction Service	CT0172 Hartford Sue Ann Shay Place	CT0172L1E051705	$110,013
Connecticut Department of Mental Health and Addiction Service	CT0176 Norwich New London Rental Assistance Boswell	CT0176L1E051706	$35,960
Connecticut Department of Mental Health and Addiction Service	CT0185 Manchester Rental Assistance	CT0185L1E051707	$241,311

2018 CT BOS Projects to be submitted to HUD

Applicant and Project Information			
Applicant Name	**Project Name**	**Grant Number**	**TOTAL**
Friendship Service Center, Inc.	Arch Street Housing	CT0186L1E051707	$125,132
KILLINGLY HOUSING AUTHORITY	Putnam Wrap Around Housing Program	CT0188L1E051707	$53,138
St. Philip House	St. Philip House Permanent Housing Program CT0191	CT0191L1E051707	$175,412
Community Renewal Team, Inc. (CRT)	Project Teach Permanent 2018-2019	CT0194L1E051705	$226,505
Connecticut Department of Mental Health and Addiction Service	CT0198 BHCare Rental Assistance 2	CT0198L1E051706	$122,515
Connecticut Department of Mental Health and Addiction Service	CT0200 Torrington Rental Assistance WHO	CT0200L1E051706	$291,554
Connecticut Department of Mental Health and Addiction Service	CT0204 Waterbury Rental Assistance	CT0204L1E051706	$205,374
Connecticut Department of Mental Health and Addiction Service	CT0210 Danbury Rental Assistance	CT0210L1E051706	$555,685
Housing Authority of the City of Waterbury	Waterbury Step Up	CT0211L1E051705	$76,368
Housing Authority of the City of Waterbury	Waterbury Brooklyn Hope	CT0212L1E051706	$134,558
Connecticut Department of Mental Health and Addiction Service	CT0220 New Haven Columbus House Rapid Rehousing	CT0220L1E051705	$40,466
Connecticut Department of Mental Health and Addiction Service	CT0237 Waterbury East Main Street	CT0237L1E051705	$73,746
Housing Authority of the City of Waterbury	Walking Into Wall Street	CT0240L1E051705	$308,278
Connecticut Department of Mental Health and Addiction Service	CT0242 Middlesex Columbus House Rapid Rehousing	CT0242L1E051704	$152,222
Connecticut Department of Mental Health and Addiction Service	CT0243 New Haven New Reach Rapid Rehousing	CT0243L1E051704	$177,605
Connecticut Department of Mental Health and Addiction Service	CT0246 Greater Middletown Mercy Rental Assistance	CT0246L1E051704	$264,182
Liberty Community Services, Inc.	Housing First	CT0249L1E051704	$111,511
Community Renewal Team, Inc. (CRT)	Project Teach 2018-2019	CT0261L1E051703	$492,664
Connecticut Department of Mental Health and Addiction Service	CT0265 BOS DMHAS 2014	CT0265L1E051703	$2,620,957
Community Renewal Team, Inc. (CRT)	H-PASS RRH 2018-2019	CT0272L1E051702	$606,692
Liberty Community Services, Inc.	Rapid Rehousing	CT0277L1E051702	$188,284
Connecticut Department of Housing	Youth Continuum Supportive Housing Project	CT0278L1E051702	$223,640
St. Vincent DePaul Mission of Bristol, Inc.	St. Vincent DePaul Rapid ReHousing	CT0279L1E051702	$362,252
Youth Continuum	Youth Rapid Rehousing.2017application	CT0280L1E051702	$87,360
Liberty Community Services, Inc.	Safe Haven Scattered Site II	CT0281L1E051702	$180,560
Liberty Community Services, Inc.	Rapid Rehousing II	CT0282L1E051702	$109,504
Connecticut Department of Housing	New Reach Rapid Rehousing DOH	CT0283L1E051702	$107,230
Connecticut Department of Mental Health and Addiction Service	CT0286 BOS DMHAS 2015	CT0286L1E051702	$1,842,025
My Sisters' Place, Inc.	Permanent Supportive Housing at MSP	CT0291L1E051701	$252,614
Connecticut Department of Mental Health and Addiction Service	CT0292 Greater Hartford CAN Rental Assistance	CT0292L1E051701	$112,165
Connecticut Coalition to End Homelessness	Greater Hartford HMIS 2017 (CT0293)	CT0293L1E051701	$122,740
Connecticut Department of Housing	CT BOS RRH bonus 2016	CT0294L1E051701	$823,830
Connecticut Department of Housing	Coordinated Access Network SSO	CT0295L1E051701	$98,171
Liberty Community Services, Inc.	Safe Haven Scattered Site III	CT0296L1E051701	$128,244
Connecticut Department of Mental Health and Addiction Service	CT0297 Pendleton PSH	CT0297L1E051701	$192,344
Connecticut Department of Housing	Coordinated Access Network DOH 211	CT0304L1E051700	$289,304
Connecticut Department of Housing	Permanent Supportive Housing 1	CT0306L1E051700	$814,263
New London Homeless Hospitality Center, Inc.	Housing for Health	CT0159L1E051707	$34,797
CT Department of Mental Health and Addiction Services	BOS Planning Grant	n/a - new project	$1,028,111
CT Department of Housing	DOH CCADV BOS RRH Project	n/a - new project	$1,327,082
CT Department of Housing	CT BOS RRH Bonus 2018	n/a - new project	$685,341
Connecticut Department of Housing	CT BOS RRH Bonus 2 2018	n/a - new project	$685,341
CT Department of Housing	CT BOS PSH Bonus 2018	n/a - new project	$685,340
CT Department of Mental Health and Addiction Services	Danbury Supportive Services Project	n/a - new project	$102,704
CT Department of Mental Health and Addiction Services	Danbury Rental Asistance 2	n/a - new project	$394,784
Connecticut Department of Housing	Mercy RRH Reallocation	n/a - new project	$82,775

TOTAL	$38,716,371

Consolidated Grants

Connecticut Department of Mental Health and Addiction Service	CT0022 Greater Hartford Rental Assistance	CT0022L1E051710	$2,381,695
Connecticut Department of Mental Health and Addiction Service	CT0062 BHCare Rental Assistance	CT0062L1E051710	$464,223
Community Renewal Team, Inc. (CRT)	CRT PSH Consolidated	CT0059L1E051710	$821,800

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Fwd: CT BOS - New Project Application - NEW REACH GREATER NEW HAVEN – RRH

CT BOS CoC <ctboscoc@gmail.com>
to Liz

Aug 23

---------- Forwarded message ---------
From: **CT BOS CoC** <ctboscoc@gmail.com>
Date: Tue, Aug 29, 2017 at 5:13 PM
Subject: CT BOS - New Project Application - NEW REACH GREATER NEW HAVEN – RRH
To: Meredith Damboise <mdamboise@newreach.org>
Cc: Liz Isaacs <episaf@comcast.net>

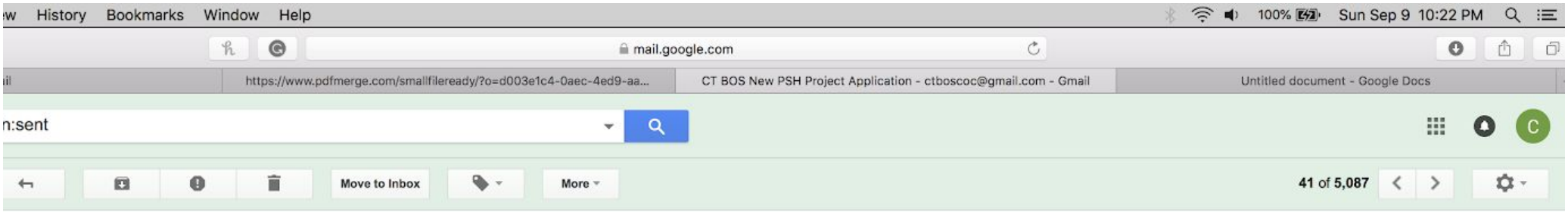
Dear Meredith:

Thank you for submitting your RRH application to the CT BOS CoC for a new project for submission in the FY2017 HUD CoC NOFA. We are writing to inform you that your application will not be included in the 2017 HUD bonus project application.

The Steering Committee decided that this year, the CT BOS CoC will put forth two PSH projects and is not submitting a RRH bonus project. While the CoC values the importance of RRH, the Steering Committee is committed to ensuring that there are enough CH units to house persons on the CT BOS CH by-name list and the units associated with the two PSH projects will help accomplish this goal.

We very much appreciate the time and energy you put into the application and thank you again for your submission and efforts to end homelessness in CT. Please feel free to contact us with any questions.

Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs



CT BOS New PSH Project Application

CT BOS CoC <ctboscoc@gmail.com>
to Belinda, JMerz, Steve, Liz

Aug 27 (13 days ago)

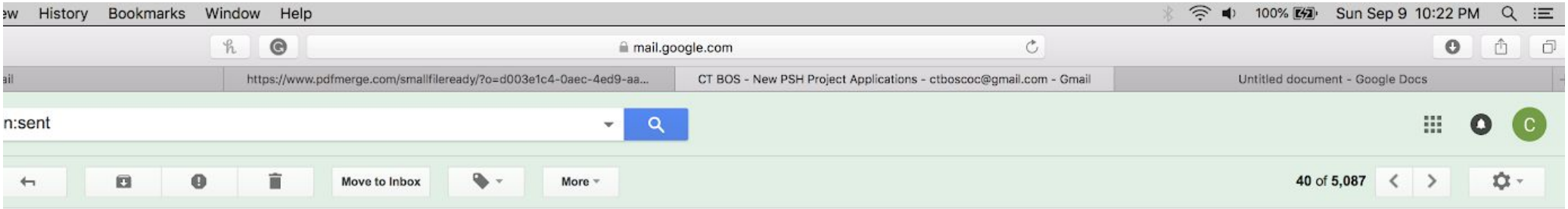
Dear Belinda:

Thank you for submitting your Watebury-Litchfield CAN PSH application to the CT BOS CoC for a new project for submission in the FY2018 HUD CoC NOFA. We are writing to inform you that your application will not be included in the 2018 HUD bonus project application.

This year, CT BOS received more new PSH project applications, in the response to the new project RFP, than could be included in the new project submissions to HUD. The CT BOS Scoring Committee scored each application based on objective criteria, and, based on that score, the committee did not recommend the project for inclusion in the final submission to HUD.

We very much appreciate the time and energy you put into the application and thank you again for your submission. We are grateful for your efforts to end homelessness in CT. Please feel free to contact us with any questions.

Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs



CT BOS - New PSH Project Applications

CT BOS CoC <ctboscoc@gmail.com>
to Letticia, JMerz, Steve, Liz

Aug 27 (13 days ago)

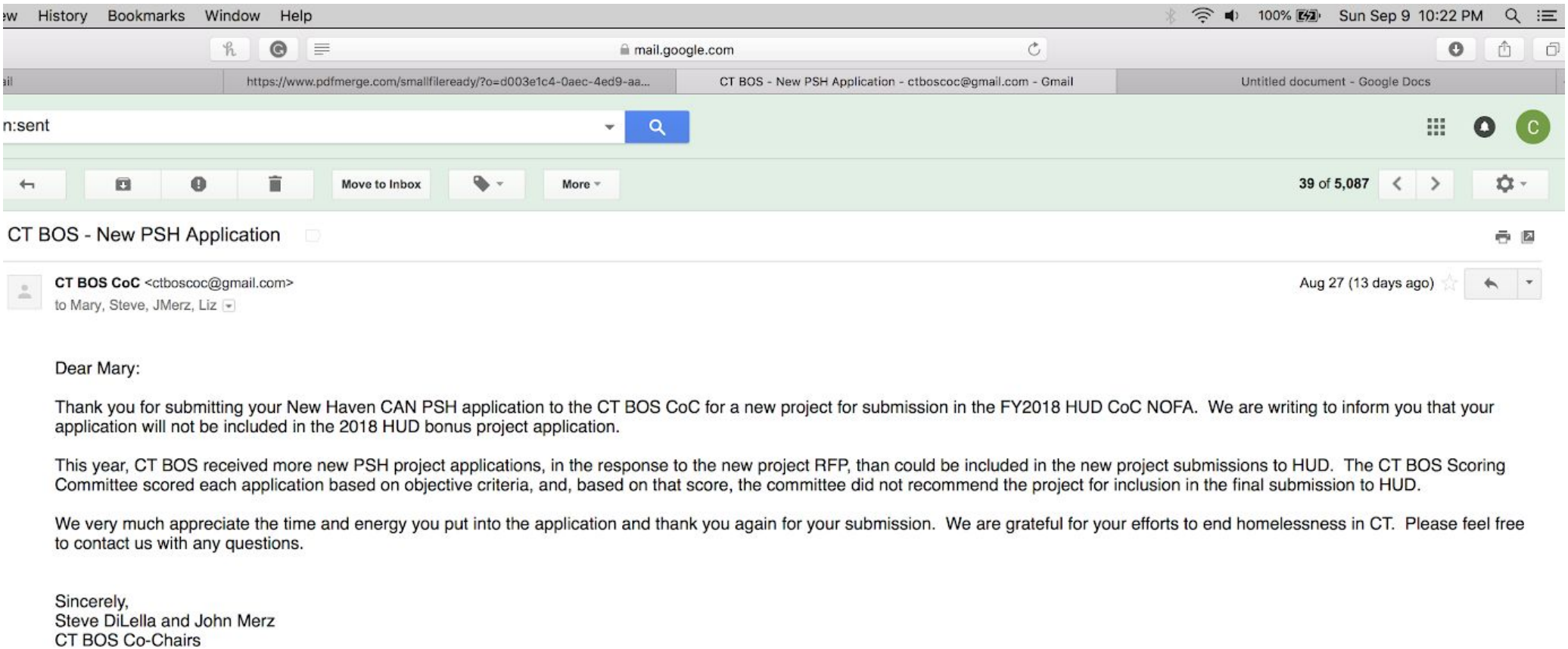
Dear Letticia:

Thank you for submitting your PSH applications for Brass City PSH, MMW CAN PSH and ELMS PSH to the CT BOS CoC for new projects for submission in the FY2018 HUD CoC NOFA. We are writing to inform you that your applications will not be included in the 2018 HUD bonus project application.

This year, CT BOS received more new PSH project applications, in the response to the new project RFP, than could be included in the new project submissions to HUD. The CT BOS Scoring Committee scored each of the applications based on objective criteria, and, based on those scores, the committee did not recommend the projects for inclusion in the final submission to HUD.

We very much appreciate the time and energy you put into the applications and thank you again for your submissions. We are grateful for your efforts to end homelessness in CT. Please feel free to contact us with any questions.

Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs



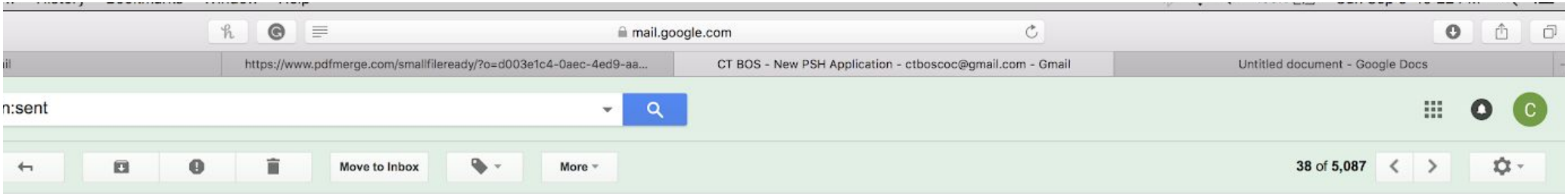
Dear Mary:

Thank you for submitting your New Haven CAN PSH application to the CT BOS CoC for a new project for submission in the FY2018 HUD CoC NOFA. We are writing to inform you that your application will not be included in the 2018 HUD bonus project application.

This year, CT BOS received more new PSH project applications, in the response to the new project RFP, than could be included in the new project submissions to HUD. The CT BOS Scoring Committee scored each application based on objective criteria, and, based on that score, the committee did not recommend the project for inclusion in the final submission to HUD.

We very much appreciate the time and energy you put into the application and thank you again for your submission. We are grateful for your efforts to end homelessness in CT. Please feel free to contact us with any questions.

Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs



CT BOS - New PSH Application

CT BOS CoC <ctboscoc@gmail.com>
to Grants, Steve, JMerz, Liz, Kellyann

Aug 27 (13 days ago)

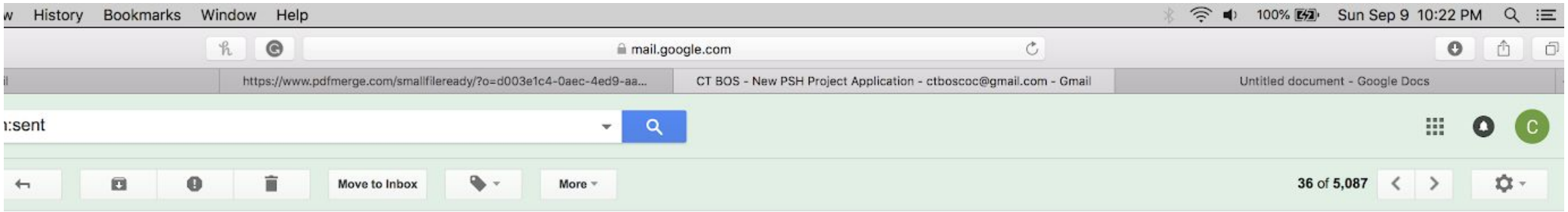
Dear Kellyann :

Thank you for submitting your New Haven CAN PSH application to the CT BOS CoC for a new project for submission in the FY2018 HUD CoC NOFA. We are writing to inform you that your application will not be included in the 2018 HUD bonus project application.

This year, CT BOS received more new PSH project applications, in the response to the new project RFP, than could be included in the new project submissions to HUD. The CT BOS Scoring Committee scored each application based on objective criteria, and, based on that score, the committee did not recommend the project for inclusion in the final submission to HUD.

We very much appreciate the time and energy you put into the application and thank you again for your submission. We are grateful for your efforts to end homelessness in CT. Please feel free to contact us with any questions.

Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs



CT BOS - New PSH Project Application

CT BOS CoC <ctboscoc@gmail.com>
to Andrea, Steve, JMerz, Liz

Aug 27 (13 days ago)

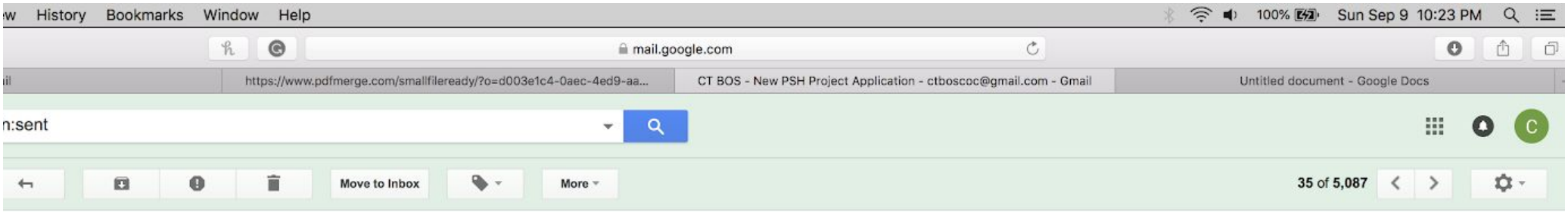
Dear Andrea :

Thank you for submitting your Central CAN and Greater Hartford CAN PSH application to the CT BOS CoC for a new project for submission in the FY2018 HUD CoC NOFA. We are writing to inform you that your application will not be included in the 2018 HUD bonus project application.

This year, CT BOS received more new PSH project applications, in the response to the new project RFP, than could be included in the new project submissions to HUD. The CT BOS Scoring Committee scored each application based on objective criteria, and, based on that score, the committee did not recommend the project for inclusion in the final submission to HUD.

We very much appreciate the time and energy you put into the application and thank you again for your submission. We are grateful for your efforts to end homelessness in CT. Please feel free to contact us with any questions.

Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs



CT BOS - New PSH Project Application

CT BOS CoC <ctboscoc@gmail.com> Aug 27 (13 days ago)

to Jon-Paul, Steve, JMerz, Liz

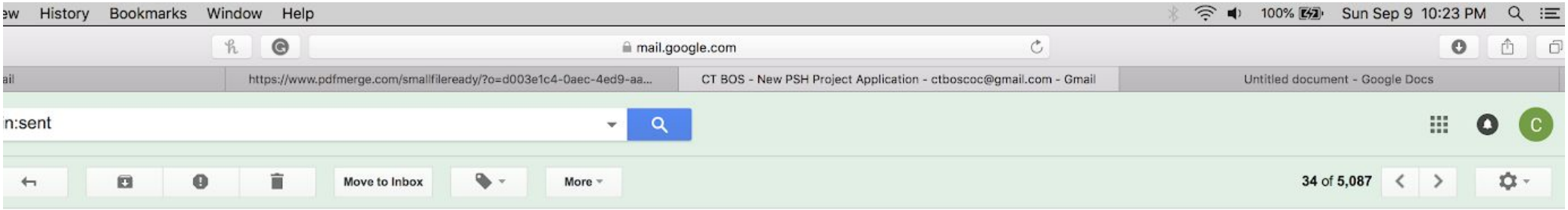
Dear Jon Paul:

Thank you for submitting your SE CAN PSH application to the CT BOS CoC for a new project for submission in the FY2018 HUD CoC NOFA. We are writing to inform you that your application will not be included in the 2018 HUD bonus project application.

This year, CT BOS received more new PSH project applications, in the response to the new project RFP, than could be included in the new project submissions to HUD. The CT BOS Scoring Committee scored each application based on objective criteria, and, based on that score, the committee did not recommend the project for inclusion in the final submission to HUD.

We very much appreciate the time and energy you put into the application and thank you again for your submission. We are grateful for your efforts to end homelessness in CT. Please feel free to contact us with any questions.

Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs



CT BOS - New PSH Project Application

CT BOS CoC <ctboscoc@gmail.com> Aug 27 (13 days ago)

to Manssour, Steve, JMerz, Liz

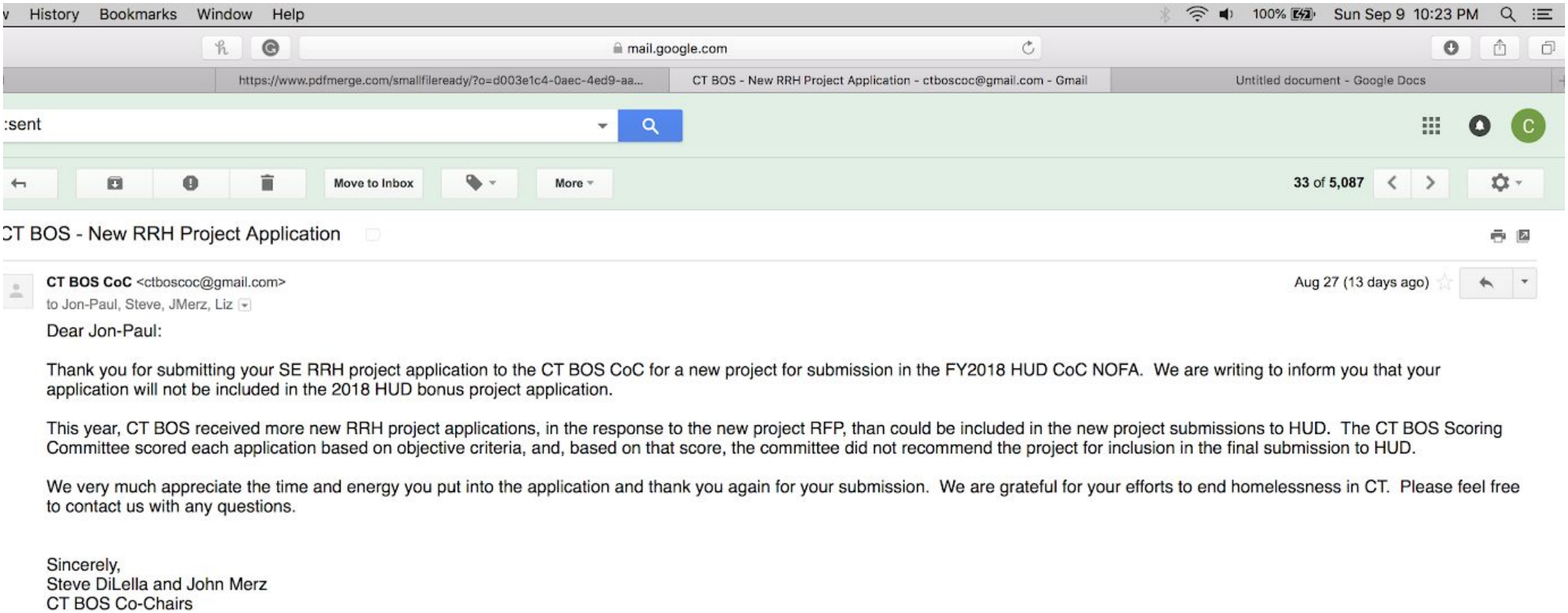
Dear Manssour:

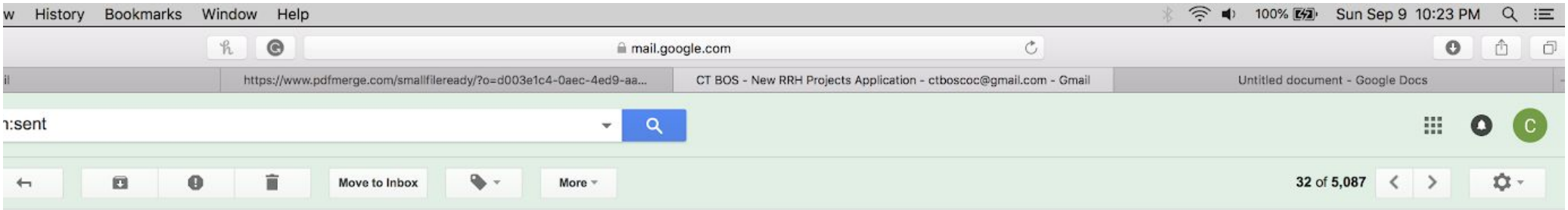
Thank you for submitting your Central CAN PSH application to the CT BOS CoC for a new project for submission in the FY2018 HUD CoC NOFA. We are writing to inform you that your application will not be included in the 2018 HUD bonus project application.

This year, CT BOS received more new PSH project applications, in the response to the new project RFP, than could be included in the new project submissions to HUD. The CT BOS Scoring Committee scored each application based on objective criteria, and, based on that score, the committee did not recommend the project for inclusion in the final submission to HUD.

We very much appreciate the time and energy you put into the application and thank you again for your submission. We are grateful for your efforts to end homelessness in CT. Please feel free to contact us with any questions.

Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs


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33 of 5,087
CT BOS - New RRH Project Application
CT BOS CoC <ctboscoc@gmail.com>
to Jon-Paul, Steve, JMerz, Liz
Aug 27 (13 days ago)
Dear Jon-Paul:
Thank you for submitting your SE RRH project application to the CT BOS CoC for a new project for submission in the FY2018 HUD CoC NOFA. We are writing to inform you that your application will not be included in the 2018 HUD bonus project application.
This year, CT BOS received more new RRH project applications, in the response to the new project RFP, than could be included in the new project submissions to HUD. The CT BOS Scoring Committee scored each application based on objective criteria, and, based on that score, the committee did not recommend the project for inclusion in the final submission to HUD.
We very much appreciate the time and energy you put into the application and thank you again for your submission. We are grateful for your efforts to end homelessness in CT. Please feel free to contact us with any questions.
Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs



CT BOS - New RRH Projects Application

CT BOS CoC <ctboscoc@gmail.com> Aug 27 (13 days ago)

to Lisa, Steve, JMerz, Liz

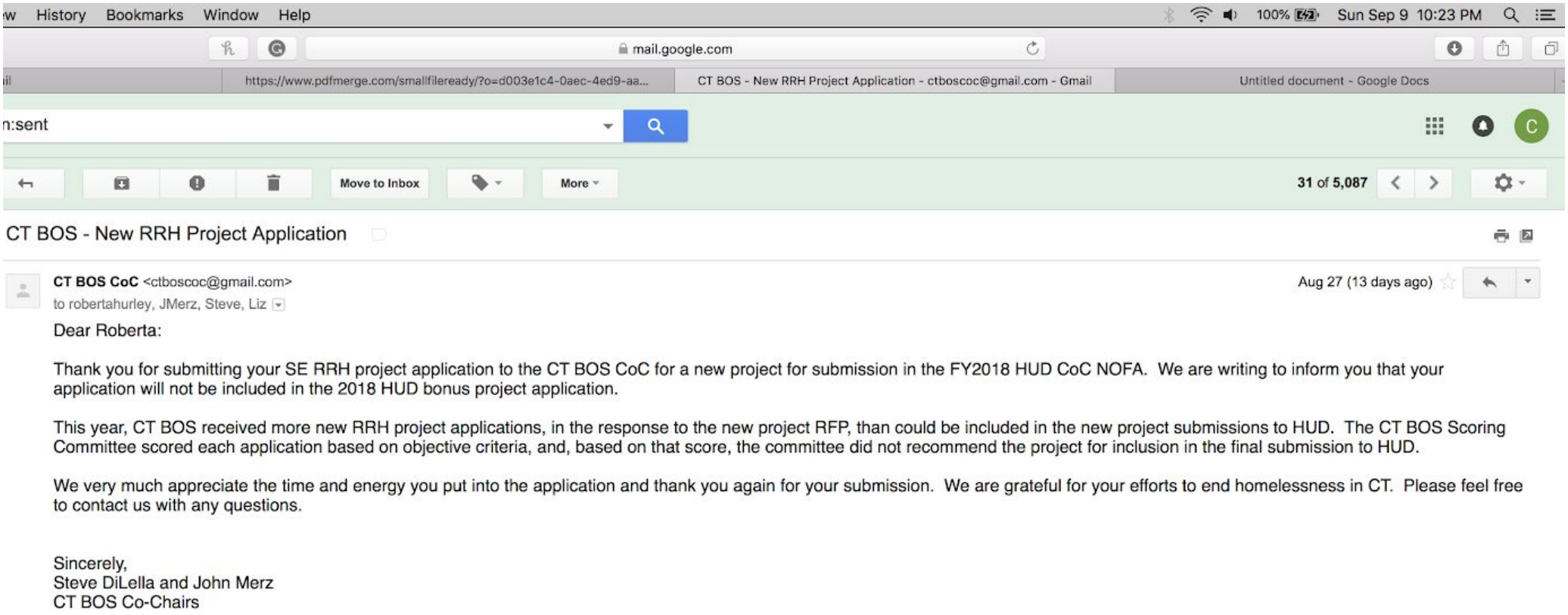
Dear Lisa:

Thank you for submitting your Greater Hartford RRH project application to the CT BOS CoC for a new project for submission in the FY2018 HUD CoC NOFA. We are writing to inform you that your application will not be included in the 2018 HUD bonus project application.

This year, CT BOS received more new RRH project applications, in the response to the new project RFP, than could be included in the new project submissions to HUD. The CT BOS Scoring Committee scored each application based on objective criteria, and, based on that score, the committee did not recommend the project for inclusion in the final submission to HUD.

We very much appreciate the time and energy you put into the application and thank you again for your submission. We are grateful for your efforts to end homelessness in CT. Please feel free to contact us with any questions.

Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs


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More
31 of 5,087
CT BOS - New RRH Project Application
CT BOS CoC <ctboscoc@gmail.com>
to robertahurley, JMerz, Steve, Liz
Aug 27 (13 days ago)
Dear Roberta:
Thank you for submitting your SE RRH project application to the CT BOS CoC for a new project for submission in the FY2018 HUD CoC NOFA. We are writing to inform you that your application will not be included in the 2018 HUD bonus project application.
This year, CT BOS received more new RRH project applications, in the response to the new project RFP, than could be included in the new project submissions to HUD. The CT BOS Scoring Committee scored each application based on objective criteria, and, based on that score, the committee did not recommend the project for inclusion in the final submission to HUD.
We very much appreciate the time and energy you put into the application and thank you again for your submission. We are grateful for your efforts to end homelessness in CT. Please feel free to contact us with any questions.
Sincerely,
Steve DiLella and John Merz
CT BOS Co-Chairs

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More
26 of 5,087

CT BOS - Reallocation of CT0223 Hartford Salvation Army Rapid Rehousing

CT BOS CoC <ctboscoc@gmail.com>
to Alice, Sarah.Dimaio, Liz, JMerz, Steve

Aug 28 (12 days ago)

Dear Sarah and Alice:

This e-mail confirms the joint decision between CT BOS CoC and DMHAS to reallocate CT Department of Mental Health and Addiction Services (DMHAS) project, CT0223 Hartford Salvation Army Rapid Rehousing.

This project is being reallocated because the sub-recipient (Salvation Army) sent a letter to DMHAS on May 31, 2018 expressing intent to terminate the contract to provide services to participants. Upon a review of recent monitoring findings and project outcomes, DMHAS, in conjunction with the CTBOS Steering Committee, decided that the project resources could be used more efficiently to end homelessness if reallocated.

Sincerely,
John Merz and Steve DiLella
CT BOS CoC Steering Committee Co-Chairs

w History Bookmarks Window Help 100% Sun Sep 9 10:25 PM

mail.google.com

https://www.pdfmerge.com/smallfileready/?o=d003e1c4-0aec-4ed9-aa... | CT BOS - ARC Vouchers 1 - 2017 - ctboscoc@gmail.com - Gmail | Untitled document - Google Docs

:sent

Move to Inbox More 23 of 5,087

CT BOS - ARC Vouchers 1 - 2017

CT BOS CoC <ctboscoc@gmail.com>
to Phyllis, JMerz, Steve, Liz

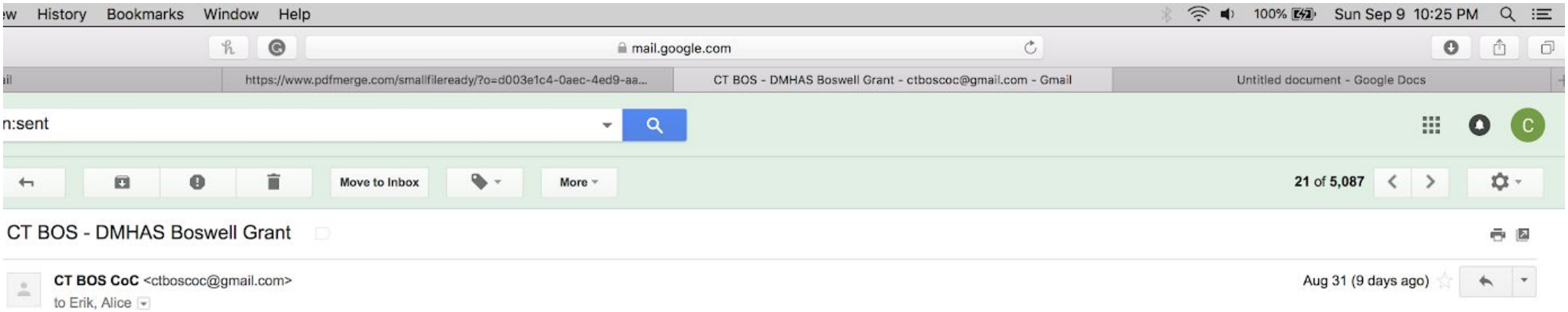
Aug 31 (9 days ago)

Dear Reverend Leopold:

This e-mail confirms the joint decision between CT BOS CoC and Association of Religious Communities to eliminate the project, ARC Vouchers 1 - 2017 Renewal in the amount of $33,335 and for those funds to be reallocated.

This project is being reallocated because the grantee (ARC) in conjunction with the CTBOS Steering Committee, decided that the project resources could be used more efficiently to end homelessness if reallocated. ARC will be able to access different state resources to continue to house and serve homeless persons in Danbury.

Sincerely,
John Merz and Steve DiLella
CT BOS CoC Steering Committee Co-Chairs

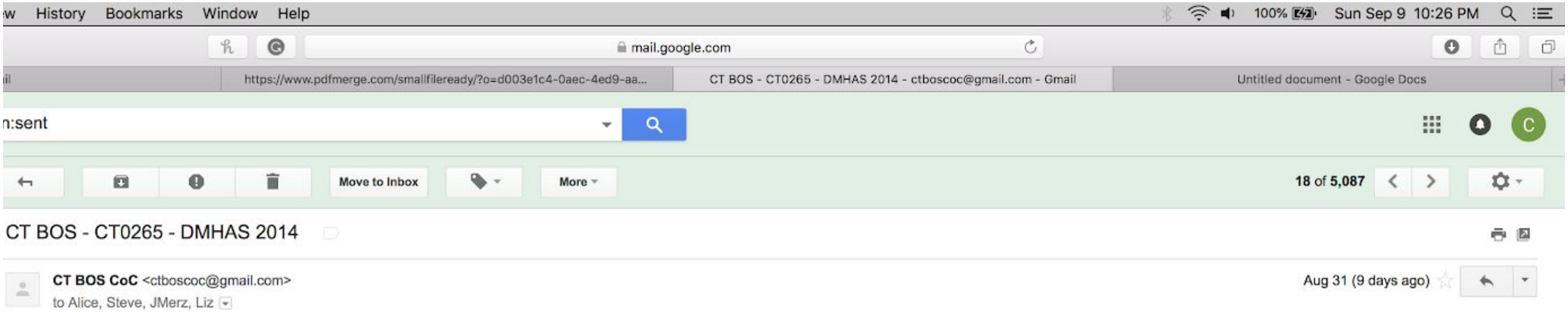


Dear Erik and Alice:

This e-mail confirms the joint decision between CT BOS CoC and DMHAS and the grantee for this project, DMHAS, to reduce the project, CT0176 Norwich New London Rental Assistance Boswell by $4,993 resulting in a final budget of $35,960.

This project is being reduced because the grantee in conjunction with the CTBOS Steering Committee, decided that the rental budget for the project should be amended to better reflect actual rents and the budget required to support those rents. Both DMHAS and the Steering committee decided that these resources could be used more efficiently to end homelessness if reallocated.

Sincerely,
John Merz and Steve DiLella
CT BOS CoC Steering Committee Co-Chairs



CT BOS - CT0265 - DMHAS 2014

CT BOS CoC <ctboscoc@gmail.com>
to Alice, Steve, JMerz, Liz

Aug 31 (9 days ago)

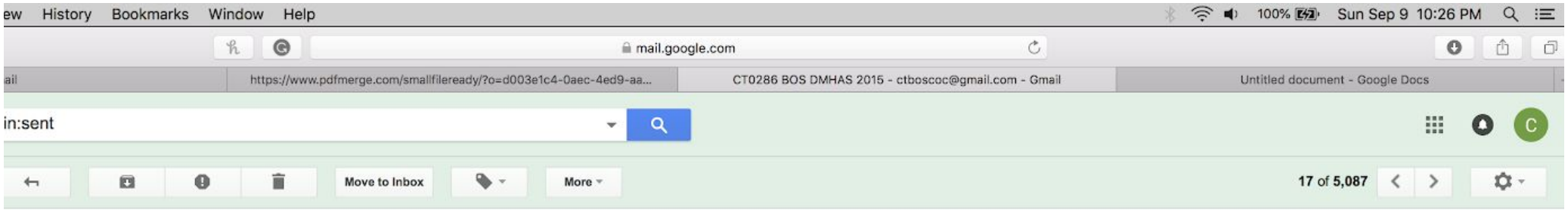
Dear Alice:

This e-mail confirms the joint decision between CT BOS CoC and DMHAS, the grantee for this project, to reduce the project, CT0265 - DMHAS 2014. While the project overall is being reduced, $4992 will be added to the services budget resulting in a final budget of $2,620,957.

This project is being reduced because the grantee in conjunction and agreement with the CTBOS Steering Committee, decided that these resources could be used more efficiently to end homelessness if reallocated.

Please feel free to contact us with any questions.

Sincerely,
John Merz and Steve DiLella
CT BOS CoC Steering Committee Co-Chairs



CT0286 BOS DMHAS 2015

CT BOS CoC <ctboscoc@gmail.com>
to Alice, Steve, JMerz, Liz

Aug 31 (9 days ago)

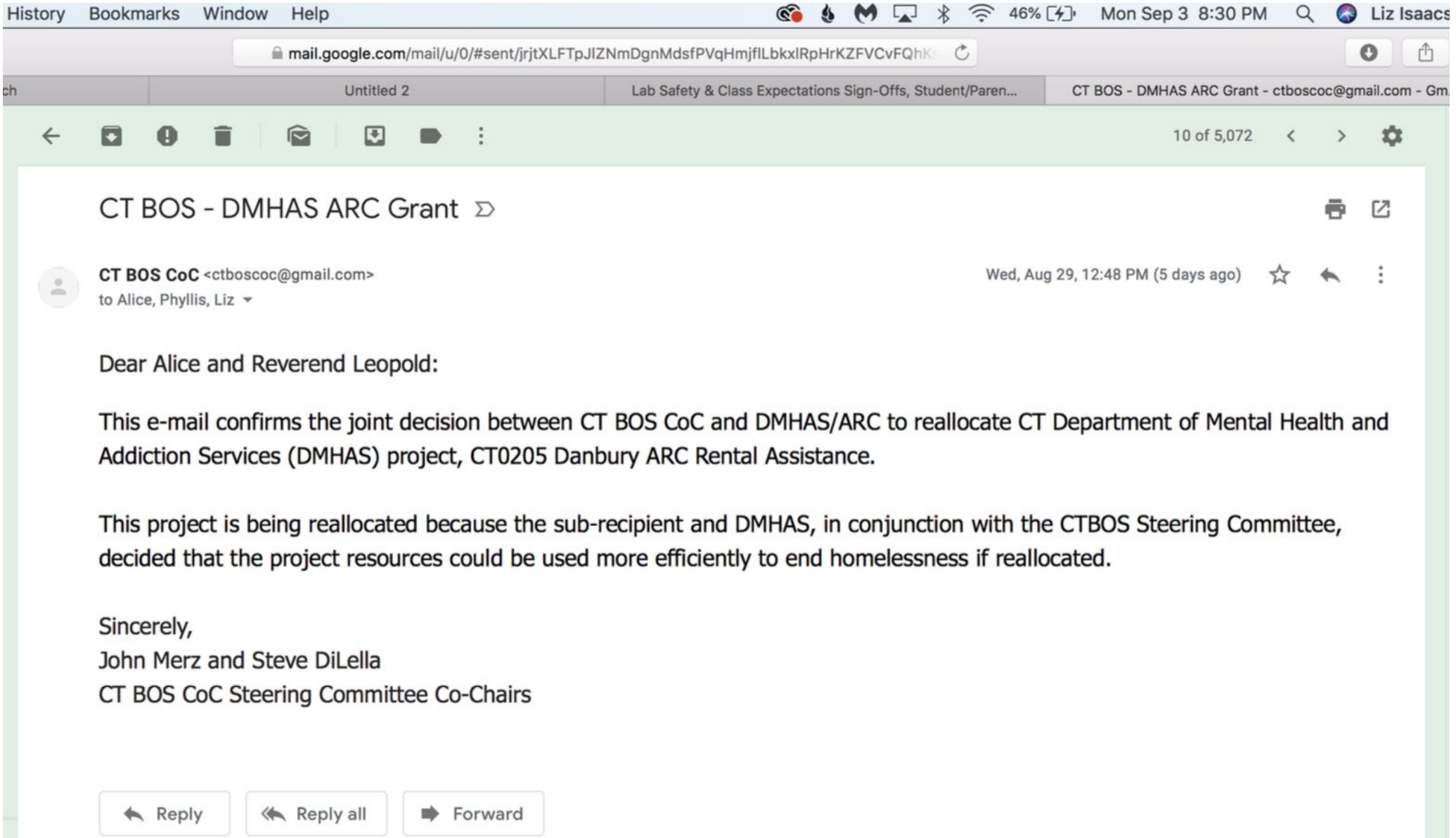
Dear Alice:

This e-mail confirms the joint decision between CT BOS CoC and DMHAS, the grantee for this project, to reduce the project CT0286 BOS DMHAS 2015, resulting in a final budget of $1,842,025.

This project is being reduced because the grantee in conjunction and agreement with the CTBOS Steering Committee, decided that these resources could be used more efficiently to end homelessness if reallocated.

Please feel free to contact us with any questions.

Sincerely,
John Merz and Steve DiLella
CT BOS CoC Steering Committee Co-Chairs


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Lab Safety & Class Expectations Sign-Offs, Student/Paren...
CT BOS - DMHAS ARC Grant - ctboscoc@gmail.com - Gm
10 of 5,072
CT BOS - DMHAS ARC Grant
CT BOS CoC <ctboscoc@gmail.com>
to Alice, Phyllis, Liz
Wed, Aug 29, 12:48 PM (5 days ago)
Dear Alice and Reverend Leopold:
This e-mail confirms the joint decision between CT BOS CoC and DMHAS/ARC to reallocate CT Department of Mental Health and Addiction Services (DMHAS) project, CT0205 Danbury ARC Rental Assistance.
This project is being reallocated because the sub-recipient and DMHAS, in conjunction with the CTBOS Steering Committee, decided that the project resources could be used more efficiently to end homelessness if reallocated.
Sincerely,
John Merz and Steve DiLella
CT BOS CoC Steering Committee Co-Chairs
Reply
Reply all
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Edit View History Bookmarks Window Help 62% Sat Sep 1 11:23 AM Liz Isaacs

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CT BOS - HUD CoC Renewal Application Info

SENT on Fri, Jul 13, 2018 at 6:43 pm EDT

Lists HUD Grantees

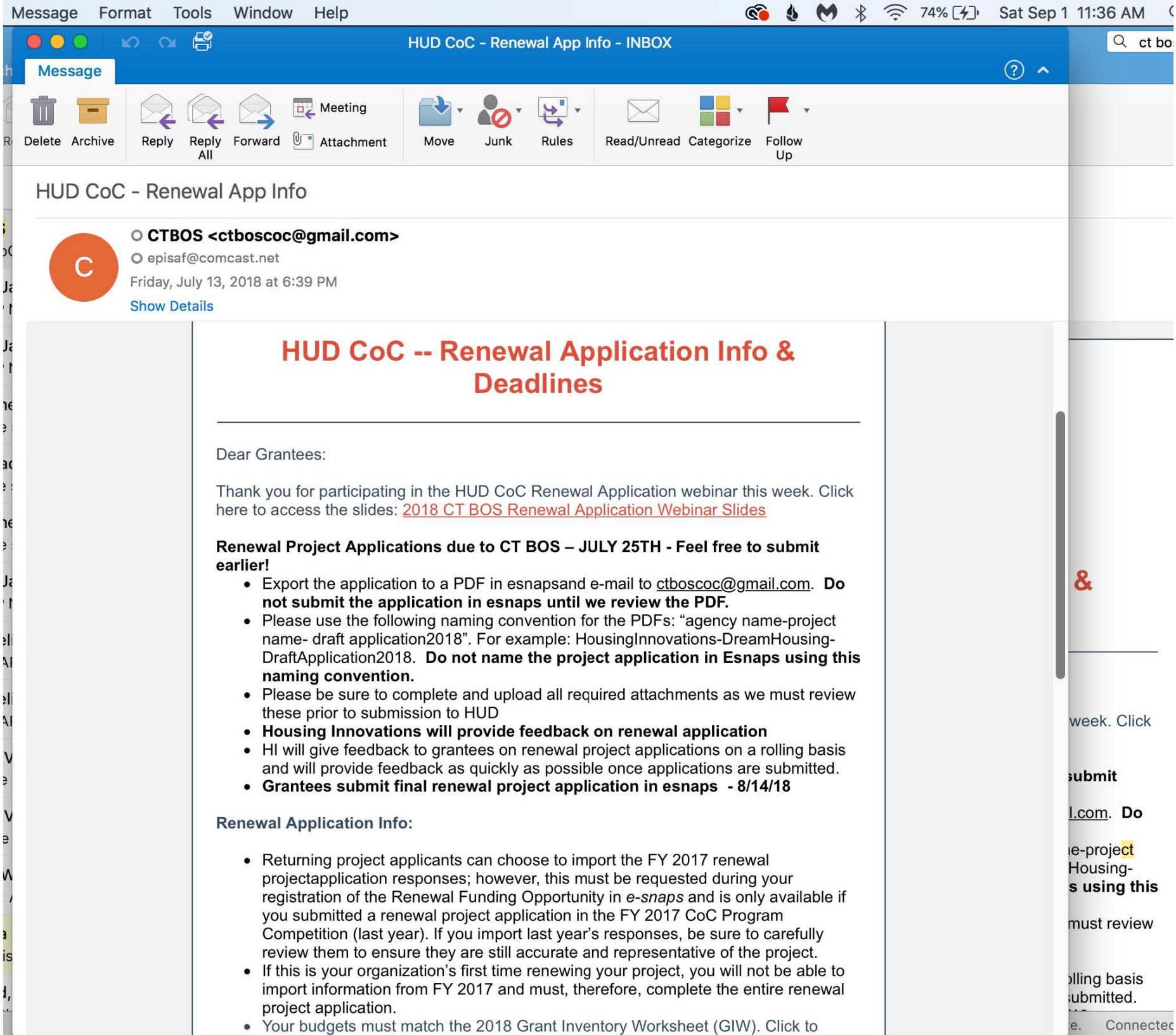
From Name CTBOS

From Address ctboscoc@gmail.com

Reply-to Address ctboscoc@gmail.com

Email Link https://conta.cc/2JmbCIk

EMAIL STATS


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C
CTBOS <ctboscoc@gmail.com>
episaf@comcast.net
Friday, July 13, 2018 at 6:39 PM
Show Details
HUD CoC -- Renewal Application Info & Deadlines
Dear Grantees:
Thank you for participating in the HUD CoC Renewal Application webinar this week. Click here to access the slides: 2018 CT BOS Renewal Application Webinar Slides
Renewal Project Applications due to CT BOS – JULY 25TH - Feel free to submit earlier!
Export the application to a PDF in esnapsand e-mail to ctboscoc@gmail.com. Do not submit the application in esnaps until we review the PDF.
Please use the following naming convention for the PDFs: “agency name-project name- draft application2018”. For example: HousingInnovations-DreamHousing-DraftApplication2018. Do not name the project application in Esnaps using this naming convention.
Please be sure to complete and upload all required attachments as we must review these prior to submission to HUD
Housing Innovations will provide feedback on renewal application
HI will give feedback to grantees on renewal project applications on a rolling basis and will provide feedback as quickly as possible once applications are submitted.
Grantees submit final renewal project application in esnaps - 8/14/18
Renewal Application Info:
Returning project applicants can choose to import the FY 2017 renewal projectapplication responses; however, this must be requested during your registration of the Renewal Funding Opportunity in e-snaps and is only available if you submitted a renewal project application in the FY 2017 CoC Program Competition (last year). If you import last year’s responses, be sure to carefully review them to ensure they are still accurate and representative of the project.
If this is your organization’s first time renewing your project, you will not be able to import information from FY 2017 and must, therefore, complete the entire renewal project application.
Your budgets must match the 2018 Grant Inventory Worksheet (GIW). Click to

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CT BOS CoC New Project Application 2018 released – DUE 6/29/18

On May 31, 2018 By ctbos In News 0

New Project Application 2018.

HUD Announces COC Awards

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www.cceh.org/recent-news/cts-bos-coc-2018-project-application-rel

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Connecticut's Balance of State Continuum of Care

2018 Project Application Released – DUE 6/29/18

CT Balance of State Continuum of Care (CT BOS) is requesting applications for Rapid Re-Housing and Permanent Supportive Housing (PSH) projects funded through HUD CoC using both permanent housing bonus and/or any available reallocation funds. Applications are due 6/29/18. Application can be found: www.ctbos.org/stay-tuned-upcoming-news/

The following types of new projects will be considered:

- New permanent supportive housing (PSH) projects that create new units to serve 100 percent chronically homeless individuals and families including youth/young adults experiencing chronic homelessness, as defined in the appendix of this RFP.
- New permanent supportive housing (PSH) projects that will not create new units but will provide additional services to participants in one or more existing PSH projects. Additional services funded through this RFP must be used to serve 100 percent chronically homeless individuals and families including youth/young adults experiencing chronic homelessness, as defined in the appendix of this RFP.
- New rapid rehousing (RRH) projects that will create new units to serve homeless individuals and families, including youth, coming directly from the streets or emergency shelters, or meeting the criteria of paragraph (4) of the HUD definition of homeless. (See Appendix for Definition of Category 4 – fleeing domestic violence, dating violence, sexual assault, stalking or other dangerous situations).
- New rapid rehousing (RRH) projects that will not create new units but will provide additional services to participants in one or more existing RRH projects. Additional services funded through this RFP must be used to serve homeless individuals and families, including youth, coming directly from the streets or emergency shelters, or meeting the criteria of paragraph (4) of the HUD definition of homeless. (See Appendix for Definition of Category 4 – fleeing domestic violence)

Please note that the CoC is seeking applications that will not create new units but will provide additional services to participants in one or more existing PSH or RRH project only in order to fill critical gaps as identified by the applicable Coordinated Access Network(s) (CAN)[1]. Such applications will be considered only where the applicable CAN(s) has determined that the additional services proposed are essential to assist eligible participants in one or more existing projects to obtain and/or retain permanent housing.

HUD allows project applicants to apply for a new expansion project under the reallocation process or bonus in order to expand projects that will increase the number of units in the project or allow the recipient to serve additional persons. HUD has clarified that the component type for the existing project and the new expansion project must be identical (e.g., an existing PSH project may only apply for a PSH expansion, an existing RRH project may only apply for a RRH expansion). Projects may not apply for an

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CT BOS Seeks Applications for New Housing Projects

June 05, 2018

CT Balance of State Continuum of Care

Tweet Like 0

The CT Balance of State Continuum of Care (CT BOS) has published a Request for Proposals for rapid rehousing (RRH) and permanent supportive housing (PSH) projects funded through HUD CoC using both permanent housing bonus and/or any available reallocation funds.

The following types of new projects will be considered:

- New permanent supportive housing (PSH) projects that create new units to serve 100 percent chronically homeless individuals and families including youth/young adults experiencing chronic homelessness.
- New permanent supportive housing (PSH) projects that will not create new units but will provide additional services to participants in one or more existing PSH projects.
- New rapid rehousing (RRH) projects that will create new units to serve homeless individuals and families, including youth, coming directly from the streets or emergency shelters, or meeting the criteria of paragraph (4) of the HUD definition of homeless.
- New rapid rehousing (RRH) projects that will not create new units but will provide additional services to participants in one or more existing RRH projects.

The CoC is seeking applications that will not create new units but will provide additional services to participants in one or more existing PSH or RRH project only in order to fill critical gaps as identified by the applicable Coordinated Access Network(s) (CAN). Such applications will be considered only where the applicable

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June 11 ·

CT Balance of State Continuum of Care (CT BOS) is requesting applications for Rapid Re-Housing and Permanent Supportive Housing (PSH) projects funded through HUD CoC using both permanent housing bonus and/or any available reallocation funds. Applications are due 6/29/18.

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CT's BOS COC 2018 Project Application Released | Connecticut Coalition to End Homelessness

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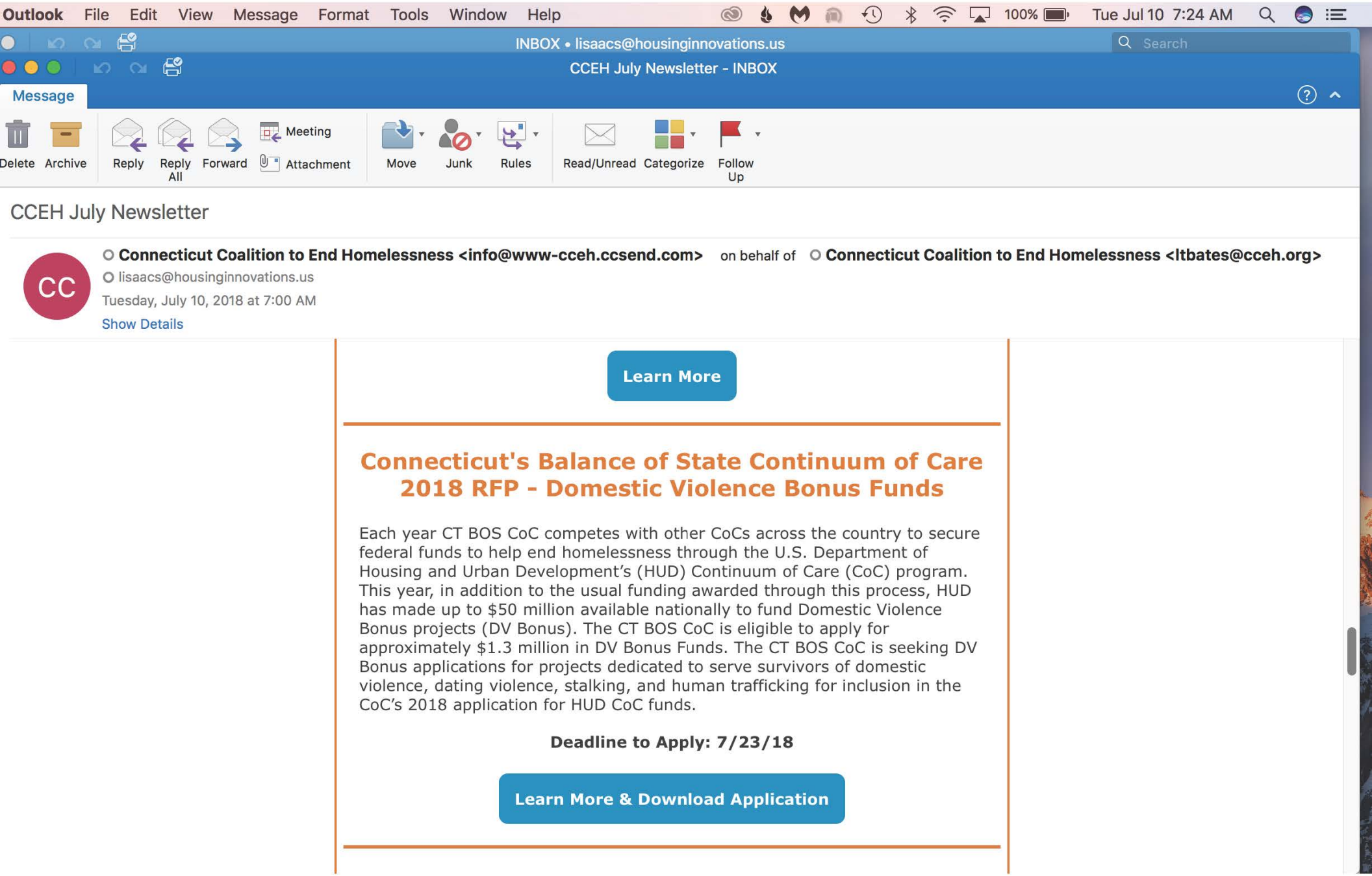
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Connecticut's Balance of State Continuum of Care 2018 RFP - Domestic Violence Bonus Funds
Each year CT BOS CoC competes with other CoCs across the country to secure federal funds to help end homelessness through the U.S. Department of Housing and Urban Development's (HUD) Continuum of Care (CoC) program. This year, in addition to the usual funding awarded through this process, HUD has made up to $50 million available nationally to fund Domestic Violence Bonus projects (DV Bonus). The CT BOS CoC is eligible to apply for approximately $1.3 million in DV Bonus Funds. The CT BOS CoC is seeking DV Bonus applications for projects dedicated to serve survivors of domestic violence, dating violence, stalking, and human trafficking for inclusion in the CoC's 2018 application for HUD CoC funds.
Deadline to Apply: 7/23/18
Learn More & Download Application

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The CT BOS CoC is seeking DV Bonus applications for projects dedicated to serve survivors of domestic violence, dating violence, stalking, and human trafficking for inclusion in the CoC's 2018 application for HUD CoC funds. The deadline to apply is July 23rd.

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Connecticut Homeless Management Information System (CT HMIS) Lead Agency

MEMORANDUM OF UNDERSTANDING
between
The Connecticut Coalition to End Homelessness and
Balance of State Continuum of Care

I. PURPOSE AND BACKGROUND

The purpose of this Memorandum of Understanding (MoU) is to confirm agreements between each of Connecticut's Continua of Care (CoC) as acknowledged by the U.S. Department of Housing and Urban Development and the Connecticut Coalition to End Homelessness (CCEH), related to management of the Connecticut Homeless Management Information System (CT HMIS). This MoU establishes CCEH as the CT HMIS Lead Agency for the each CoC and the state as a whole, defines general understandings, and defines the roles and specific responsibilities of each party relating to key aspects of the governance and operation of the HMIS Project.

HMIS is mandated by the U.S. Department of Housing and Urban Development (HUD) for all communities and agencies receiving HUD Continuum of Care (CoC) and Emergency Solutions Grant program (ESG) funding. CT HMIS is essential to efforts to coordinate client services and inform community planning and public policy. Through CT HMIS, homeless individuals benefit from improved coordination in and between agencies, informed advocacy efforts, and policies that result in targeted services. Analysis of information gathered through CT HMIS is critical to the preparation of a periodic accounting of homelessness in individual CoCs and the state of Connecticut, including required HUD reporting. The parties to this MoU recognize that thorough and accurate capture and analysis of data about homeless services and individuals is necessary to service and systems planning, effective resource allocation, and advocacy, and thus, share a mutual interest in successfully implementing and operating CT HMIS.

II. DURATION

Except as provided in Section VIII (Termination), the duration of this MoU shall be from the date signed through December 31st, 2019. While it is anticipated that this MoU will be renewed annually for periods of one year thereafter, the parties will revise and affirmatively agree to the terms of this relationship annually. The process of this review is intended to ensure the continued relevance of the terms to the parties and to ensure continued consistency and compliance with HUD regulation.

III. GOVERNANCE AND PARTICIPATION

1. CoC Governance

The CoC is the lead planning group for HUD-funded efforts to end homelessness and for implementing and operating a homeless CoC system. As such and per HUD policy, the CoC is responsible for CT HMIS Project oversight and implementation, which encompasses planning, administration, software selection, and reviewing and approving of all policies, procedures, and data management plans governing Contributing CT HMIS Organizations (described below). The CoC's oversight and governance responsibilities are carried out by the statewide CT HMIS Steering Committee.

2. Contributing CT HMIS Organizations ("CHO") is a HUD term used in U.S. Department of Housing and Urban Development Homeless Management Information System (HMIS) Data and Technical Standards Final Notice

and in the CT HMIS Policies and Procedures manual, for an organization that operates a project that contributes data to an HMIS.

For purposes of this MOU and to provide consistency with the CT HMIS Agency MOU, a CHO is equivalent to a "Participating HMIS Agency" which is a legal entity responsible for one or more "Participating HMIS Programs" that is licensed to use the CT HMIS.

A CHO/Participating HMIS Agency is defined as an organization (inclusive of the CT HMIS Lead) that operates a provider program and a program-level, CT HMIS-compliant system (described below), whether or not it is a member of the CoC, and that contributes Protected Personal Information or other client-level data to the CT HMIS. Participating HMIS Agencies must enter into Participation Agreement MOUs in order to contribute such data to the CT HMIS. The authority to enter into Participation Agreement MOUs with Participating HMIS Agencies for the purposes of ensuring compliance with all applicable HUD and CoC HMIS Project requirements, including the operation of a program-level CT HMIS-compliant system, rests with the HMIS Lead Agency.

3. Program-level- HMIS-compliant System

A program-level HMIS-compliant system is defined as a client management information system operated by a provider program that allows the provider program to collect the minimum required data elements and to meet other established minimum participation thresholds as set forth in Participating Agency HMIS Participation Agreement MOU.

This program-level HMIS compliant System is defined in the Participating Agency MOU as "...a computerized data collection application designed to capture information about homeless people and homeless programs over time. "CT HMIS" is the general name for one or more HUD-compliant software applications implemented and adopted in the state."

4. Participating HMIS Agency Administrator

A Participating Agency HMIS Administrator is defined as single point-of-contact established by each Participating Agency who is responsible for day-to-day operation of the CT HMIS, ensuring program-level data quality according to the terms of the Participation Agreement and associated data quality plan, and other policies and procedures.

In Connecticut these responsibilities are largely discharged by the CT HMIS Data Coordinator (HDC) defined in the Participating Agency MOU as "... an individual designated by each Participating HMIS Agency as responsible for ensuring that the Agency meets HMIS participation standards as outlined herein and in the CT HMIS Policies and Procedures."

5. Licensed End Users (End Users) are persons at the Participating Program and Participating HMIS Agency levels who require legitimate access to the software system and are granted such access after training and participating program authorization. Individuals with specific authorization and established roles within CT HMIS software can access the software application for the purpose of conducting data management tasks associated with their area of responsibility.

6. Software and Hosting

The CT HMIS Steering Committee has selected a single product - CaseWorthy - to serve as the sole CT HMIS Data system for all CoCs in Connecticut.

The authority to enter into contracts with CaseWorthy for the purposes of operating and overseeing CT HMIS is the responsibility of the CT HMIS Lead Agency, CCEH.

IV. GENERAL UNDERSTANDINGS

1. Funding

1a. HUD Grant(s)

HMIS Project activities are funded in part by HUD CoC grants. The CoC authorizes CCEH, as the HMIS Lead Agency, to apply for and administer these funds. The terms and uses of HUD funds are governed by the HUD CoC grant agreement and applicable rules.

1b. Cash Match

The HUD CoC grants require a cash match. As detailed below, CCEH is responsible for providing the commitment of the required local match for the HMIS grants.

2. Fees

CT HMIS activities are covered by federal, state and local funds. Expansion of CT HMIS is anticipated in the future. Funding options, including additional local contributions, will be explored by the CT HMIS Steering Committee to ensure ongoing operations and enhancement of CT HMIS.

3. Compliance with HMIS Standards

It is the responsibility of the CoC to ensure that the HMIS Lead Agency is operating the HMIS Project in compliance with HUD HMIS Technical Standards (2017), HUD HMIS Data Standards (2017), and other applicable laws. The parties agree to update this MoU (as provided in section VII, Amendment/Notices), other HMIS Project operational documents, and HMIS Project practices and procedures in order to comply with any updates to these standards established in notices or other guidance, within the HUD-specified timeframe for such changes.

4. Local Operational Policies and Agreements

All agencies within a CoC agree to operate within the most current release of CT HMIS Policies and Procedures, developed by the CT HMIS Steering Committee. These policies and procedures include but are not limited to an operating policies and procedures manual for use and management of data (including procedures for ensuring the security of data, disaster recovery, and data quality assurance), privacy policies and notices, data collection and technical standards, Participation Agreements, and End User Agreements. The parties agree to collaboratively develop and implement these agreements, policies and procedures for the three State Fiscal Year period of 7/1/13-6/30/16 and renewed from 7/1/16-6/30/19. Amendments and agreements may be authorized during this effective period.

V. SPECIFIC RESPONSIBILITIES OF THE PARTIES

As needed, changes to the policies and procedures may be made from time to time at the request of CCEH or the CoC, through its Steering Committee, to comply with HUD HMIS standards or otherwise improve CT HMIS operations. During any such modification periods, all existing CT HMIS policies and procedures will remain in

effect until such time as the CT HMIS Steering Committee approves the changes.

1. CoC Responsibilities

The CoC serve as the lead HMIS Project governance body, providing oversight, project direction, policy setting, and guidance for the CT HMIS Project. The CoC exercises its responsibilities for CT HMIS governance through the CT BOS Steering Committee and the CT HMIS Steering Committee, effective as of the date of the authorization of this MoU. These responsibilities include:

a) Ensuring and monitoring compliance with relevant HUD regulations and standards;
b) Recording in official meeting minutes all approvals, resolutions, and other key decisions of the CoC that may be required by HUD rules related to the CT HMIS governing body;
c) Designating the CT HMIS Lead Agency, *any vendor contracted for HMIS services,* and the software to be used for CT HMIS, and approving any changes to the CT HMIS Lead Agency, *any vendor contracted for HMIS services,* or software;
d) Reviewing and approving all CT HMIS Project operational agreements, *subcontracts,* policies, and procedures;
e) Reviewing data quality standards and plans, and establishing protocols for addressing CHOs' compliance with those standards;
f) Promoting the effective use of CT HMIS data, including measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs;
g) Using CT HMIS data to inform CoC program and system design, and measuring progress toward implementation of community Plans to End Homelessness and other CoC-established goals;
h) Provide all local information as necessary for compilation of the annual Housing Inventory Count (HIC), the HMIS elements of the annual Point-in-Time (PIT) Count, Annual Homeless Assessment Report (AHAR), and Pulse Report; and
i) Coordinating participation in the CT HMIS (and broader Continuum of Care) by all homeless prevention and assistance programs and other mainstream programs serving homeless people or working to prevent homelessness.

2. CCEH Responsibilities

CCEH serves as the Lead Agency for the CT HMIS Project, managing and administering all CT HMIS operations and activities. CCEH exercises these responsibilities at the direction of the CT HMIS Steering Committee and its constituent *CoC's.* These responsibilities are contingent on continued receipt of the appropriate HUD grant funding, and are delineated in the following paragraphs. References below to the approval or adoption by the CoC is interpreted to include the approval or adoption of the several *CoC's* through the CT HMIS Steering Committee.

a) Governance and Reporting
    - Provide staffing for operation of the CT HMIS Project;
    - Prepare the following data reports and analyses for review by the CoC and for submission to HUD:
        - At least annually, a point-in-time unduplicated count of clients served in the CT HMIS (for sheltered PIT Count, AHAR, and Pulse reports, or as required);
        - Annually, an unduplicated count of clients served in the CT HMIS over the course of one year (for AHAR);
        - At least annually, an accounting of lodging units in the HMIS (for HIC, AHAR, and Pulse reports, or as required); and
        - Quarterly, an unduplicated count of newly homeless clients (for Pulse reports);
    - Prepare reports on the BOS CoC's progress on HEARTH performance measures as required by HUD regulations;

Ensure the consistent contribution of data that meets all HUD-established data standards to CT HMIS by, at minimum, every program operating with funds authorized by the McKinney-Vento Act as amended by the HEARTH Act, including ESG funds;

- Work with the CoC to facilitate participation by all homeless prevention and assistance programs and other mainstream programs serving homeless people to participate in CT HMIS;
- Attend CT HMIS Steering Committee meetings;
- Determine length of time that records must be maintained for inspection and monitoring purposes per HUD standards and ensure compliance with these standards;
- Respond to CT HMIS Steering directives; and
- Provide data needed to inform CoC's progress toward achieving goals laid out in its community Plans to End Homelessness (as applicable).

b) Planning and Policy Development

- Manage and maintain mechanisms for soliciting, collecting and analyzing feedback from end users, homeless persons and Participating Agency personnel such as: CT HMIS administrators, program managers, and executive directors.
- Identify general milestones for project management, including training and expanding system functionality;
- Develop and, upon adoption by the CoC, implement written policies and procedures for the operation of the CT HMIS Project, including requirements and standards, and provide for the regular update of these procedures as required by changes to policy;
- Develop and, upon adoption by the CoC, implement a data quality plan consistent with requirements established by HUD, and review and update this plan annually and upon update to HUD regulations, notice, or guidance;
- Develop and, upon adoption by the CoC, implement a security plan consistent with requirements established by HUD, and review and update this plan annually and upon update to HUD regulations or guidance;
- Develop and, upon adoption by the CoC, implement a disaster recovery plan consistent with requirements established by HUD, and review and update this plan annually according to the most current HUD regulations or guidance;
- Develop and, upon adoption by the CoC, implement a privacy policy specifying data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description; access and correction standards; accountability standards; and process and protections for victims of domestic violence included in CT HMIS;
- Ensure privacy protection in project administration; and
- Develop and, upon approval by the CoC, execute CT HMIS Participation Agreements with each Participating HMIS Agency, including:
  - Obligations and authority of the CT HMIS Lead and the Agency;
  - Protocols for participation in CT HMIS;
  - Requirements of the policies and procedures by which the Agency must abide;
  - Sanctions for violating the CT HMIS Participation Agreement; and
  - Terms of sharing and processing Protected Identifying Information between the CT HMIS Lead and the Agency.

c) Grant Administration

- Prepare and submit information relevant to HMIS for Project Application Renewals for HUD's NOFA responses for HUD grants in e-snaps;
- Create annual budgets outlining the most efficient resource allocation to meet CT HMIS Project requirements;
- Support CT HMIS by funding eligible CT HMIS activities with eligible matching sources to serve as the HUD-required match;
- Ensure accurate and regular (quarterly, at minimum) draw down of HUD grant funding; and to complete and submit APR for HMIS portion of HUD grants in e-snaps.

d) System Administration

- Oversee the day-to-day administration of the CT HMIS system;
- Manage contracts for CaseWorthy, which includes training for Participating Agencies and CCEH staff, and licensing of CT HMIS Server;
- Ensure CT HMIS software meets the minimum data and technical functionality requirements established by HUD in rule or notice, including unduplication, data collection, maintenance of historical data, reporting (including HUD-required reports and data quality and audit reports), and any other requirements established by HUD;
- Ensure CT HMIS data processing capabilities, including the collection, maintenance, use, disclosure, transmission, and destruction of data and the maintenance of privacy, security, and confidentiality protections;
- Develop standard reports and queries of CT HMIS data (e.g., data quality *report,* COC quarterly report, etc.);
- Oversee and relate small- and large-scale changes to CT HMIS through coordination with CCEH, the CT HMIS Steering Committee and its Release Management Sub-Committee and CT HMIS administrators, as applicable;

e) End-User Administration
- Provide or coordinate technical assistance and support;
- Ensure documentation of technical issues experienced by providers;
- Develop and deliver a comprehensive training curriculum and protocol, including accompanying tools and resources, that:
  - Includes, but is not limited to, data entry requirements and techniques, client confidentiality and privacy requirements, data security, data quality, CaseWorthy data entry;
  - Requires all relevant personnel to participate in trainings; it is the responsibility of the Local System Administration, often discharged through the HMIS Data Coordinator, to ensure end users at the Participating Agency receive training information. Participating Agency requirements are enumerated in the Participating Agency MOU and the CT HMIS Policies and Procedures.

f) Data Quality and Compliance Monitoring
- Establish data quality benchmarks, including bed coverage rates, service-volume coverage rates, missing/unknown value rates, timeliness criteria, and consistency criteria;
- Consistent with the data quality plan, run and disseminate data quality reports on a quarterly basis to HMIS Participating Programs indicating levels of data entry completion, consistency with program model, and timeliness;
- Consistent with the data quality plan, provide quarterly reports on CT HMIS participation rates, data quality and other analyses to the CT HMIS Steering Committee; and
- Monitor compliance by all Participating Agencies with CT HMIS participation requirements, policies and procedures, privacy standards, security requirements, and data quality standards through an annual review per the process outlined in the Participation Agreement and approved by the CT HMIS Steering Committee.

3. CT HMIS Steering Committee

As the HMIS in Connecticut is a statewide implementation, the CT HMIS Steering Committee has been established to ensure consistency and coordination across all CoC's and to manage many of the governance responsibilities for the CoC's in the state. The roles, responsibilities and composition of the CT HMIS Steering Committee are outlined in Policy 102 of the CT HMIS Policies and Procedures manual.

The CT HMIS Steering Committee is comprised of representatives from all of the CoC's in the state as well as the Sub-Regions of the CT Balance of State CoC. The CT BOS CoC representatives on this committee are the Steering Committee Co-Chairs who are authorized to participate and vote by the CT BOS Steering Committee. The other CoCs and the Sub-Regions of the BOS CoC designate their representatives to this committee.

VI. DATA ACCESS ANO MANAGEMENT

CCEH will ensure that data that is maintained in the CaseWorthy software and will have access to all data entered. Data access and usage is governed by CT HMIS Policies and Procedures including Policy 113 "Release Management & Data Use Plan" calling for the creation of a data usage policy that is consistent with statewide data sharing (Policy 205) and with client confidentiality policies (Policy 207).

VII. AMENDMENT/NOTICES

This MoU may be amended in writing by either party. Notices shall be mailed or delivered to:

Connecticut Coalition to End Homelessness
Care of Brian Roccapriore, Director of HMIS and Strategic Analysis
257 Lawrence St.
Hartford, CT 06105

VIII. TERMINATION

Either party may terminate this MoU at a date prior to the renewal date specified in this MoU by giving 60 days written notice to the other parties. If the funds relied upon to undertake activities described in this MoU are withdrawn or reduced, or if additional conditions are placed on such funding, any party may terminate this MoU within 30 days by providing written notice to the other parties. The termination shall be effective on the date specified in the notice of termination.

IX. SIGNATURES

CoC Name: Balance of State

CoC Co-Chair 1 Signature: [signature]

Date of Co-Chair 1 Signature: 9-11-18

CoC Co-Chair 2 Signature: [signature]

Date of Co-Chair 2 Signature: 9-12-18

CT HMIS Lead Agency: CT Coalition to End Homelessness

CCEH Executive Director Signature: [signature]

CCEH ED Signature Date: 9-11-18

CONNECTICUT HOMELESS MANAGEMENT INFORMATION SYSTEM (CT HMIS)

POLICIES AND PROCEDURES MANUAL

Version 5.3: Revised August 2018 -

The Connecticut Homeless Management Information System (CT HMIS) is managed by the Connecticut Coalition to End Homelessness. For further information about the CT HMIS contact:
Connecticut Coalition to End Homelessness
257 Lawrence Street
Hartford, CT 06106
Voice :(860) 721-7876
FAX: (860) 257-1148
www.cceh.org

SECTION 1:
CONTRACTUAL REQUIREMENTS AND ROLES

SECTION 1: CONTRACTUAL REQUIREMENTS AND ROLES **Written: 10/2005**
Revised: 07/2013

POLICY 101: CT HMIS CONTRACT REQUIREMENTS **Approved:**

Policy:
The CT HMIS Lead Agency is tasked with coordination and provision of data management services to Homeless programs, including emergency shelter, transitional and supportive housing programs, and other HUD funded programs that are required to participate in a CT HMIS. Participating Agencies shall sign a Memorandum of Understanding and comply with the stated requirements.

Procedure:
The CT HMIS Lead Agency will contract for and administer a contract for a fully functional and secure HMIS, which may include a CT HMIS System Administrator who will also be bound by these policies and procedures.

Participating HMIS Agencies shall sign a Memorandum of Understanding (see Attachments) and comply with the stated requirements. Participating Agencies will be granted access to the CT HMIS software system after:

- The Memorandum of Understanding (MOU) has been signed with CT HMIS Lead Agency, and
- Participating Agencies have put into place the stated requirements in the MOU.

Agencies agree to comply with the policies and procedures approved by the CT HMIS Steering Committee.

SECTION 1: CONTRACTUAL REQUIREMENTS AND ROLES **Written: 10/2005**
Revised: 07/2013

POLICY 102: CT HMIS STEERING COMMITTEE **Approved:**

Policy:

A Steering Committee, convened by CT HMIS Lead Agency, representing stakeholders to this project, will advise all project activities. The committee meets on a schedule it determines. (A current CT HMIS Steering Committee Membership List may be obtained from CT HMIS Lead Agency).

The CT HMIS Steering Committee guides this project, serves as the decision making body and provides advice and support to the CT HMIS Lead Agency staff.

Procedure:

The CT HMIS Steering Committee will take actions that ensure adequate privacy protection provisions in project implementation.

Membership of the CT HMIS Steering Committee will be established according to the following guidelines:

- Each Continuum and sub-continuum of the Balance of State, will appoint two individuals who will represent their members and communicate back to them.
- Each Continuum/sub-continuum is responsible to find a replacement for any representative that is participating inconsistently or is inactive.
- The CT HMIS Steering Committee has the authority to add representatives from other sectors of the community in a method it deems appropriate.

The CT HMIS Steering Committee has decision making authority in the following areas:

- Determining the guiding principles that should underlie the implementation activities of the CT HMIS, including participating organizations, consumer involvement and service programs;
- Selecting the minimal data elements to be collected by all programs participating in the CT HMIS project;
- Defining criteria, standards, and parameters for the release of aggregate data, aggregated and disaggregated; and
- Approving the software vendor

SECTION 1: CONTRACTUAL REQUIREMENTS AND ROLES **Written: 10/2005**
Revised: 07/2013

POLICY 103: CT HMIS MANAGEMENT **Approved:**

Policy:

The Executive Director of the CT HMIS Lead Agency is responsible for oversight of all contractual agreements with funding entities, and the CT HMIS organization's adherence to the guiding principles, as determined by the CT HMIS Steering Committee.

Procedure:

- The Statewide CT HMIS Steering Committee holds the final authority for all decisions related to the statewide governance of the CT HMIS. CT HMIS Lead Agency is responsible for the day-to-day operation and oversight of the system and the CT HMIS Steering Committee grants CT HMIS Lead Agency the authority to act on its behalf to address operational and system level concerns as they arise. This authority may be delegated to third parties at the discretion of CCEH management. Decisions made or actions authorized by CT HMIS Lead Agency which do not satisfy an interested party, which may be an agency (agencies) or a consumer(s), may be brought before the CT HMIS Grievance Committee for review in accordance with the CT HMIS Grievance Procedure. (See Grievance Procedure policy and forms pages)
- The Grievance Committee members shall be selected on a rotating basis and shall not have a conflict of interest for the grievance they are adjudicating. Membership will consist of one Co-Chair of the CT HMIS Steering Committee, one CT HMIS System Administrator and three CT HMIS Steering Committee members.

CT HMIS Lead Agency responsibilities for the operation and oversight of the system include:

- Management of technical infrastructure;
- Planning, scheduling, and meeting statewide project objectives;
- Coordinating training and technical assistance including an annual series of training workshops for end users, agency administrators; and
- Implementing software enhancements approved by the CT HMIS Steering Committee.

SECTION 1: CONTRACTUAL REQUIREMENTS AND ROLES **Written: 07/2013**
Revised:
POLICY 105: CT HMIS SECURITY OFFICER **Approved:**

Policy:
The CT HMIS Lead Agency must designate a CT HMIS Security Officer. Each Participating Agency must designate an Agency Security Coordinator who is responsible for ensuring each Participating Agency is meeting the minimum security requirements established in the Security Plan and the CT HMIS Participation Agreement, and is authorized by the Executive Director or Designee of the Participating Agency to provide verification of that status.

Procedure:

The CT HMIS Security Officer is named by the CT HMIS Lead Agency. The duties of the Security Officer must be included in the individual's job description. These duties include, but may not be limited to:

- Cooperatively with the CT HMIS Administrator, review the Security Plan annually and at the time of any change to the security management process, the system software, the methods of data exchange, and any HMIS data or technical requirements issued by HUD. In the event that changes are required to the CT HMIS Security Plan, work with the CT HMIS Administrator to develop recommendations to the CT HMIS Steering Committee for review, modification, and approval.
- Annually review the CT HMIS Security Plan, test the CT HMIS security practices for compliance, and work with the CT HMIS Administrator to coordinate communication with the CT HMIS System Administrator(s) to confirm security compliance of the system.
- Using the CT HMIS Security Plan , certify that the CT HMIS Lead Agency adheres to the Security Plan or develop a plan for mitigating any shortfall, including milestones to demonstrate elimination of the shortfall over as short a period of time as is possible.
- Implement any approved plan for mitigation of shortfalls and provide appropriate updates on progress to the CT HMIS Steering Committee.
- Respond, in cooperation with the CT HMIS Administrator, to any security questions, requests, or security breaches to the CT HMIS System Administrator and CT HMIS Security Officer, and for communicating security-related HMIS information relayed from CT HMIS Lead Agency to the Participating Agency's Licensed End Users.
- Work with the CT HMIS System Administrator to communicate and interact collaboratively with the Agency Security Coordinators.

SECTION 1: CONTRACTUAL REQUIREMENTS AND ROLES **Written: 10/2005**
Revised: 07/2013

POLICY 106: PARTICIPATING AGENCY RESPONSIBILITY **Approved:**

Policy:

Each Participating Agency will be responsible for oversight of all agency staff that generate or have access to consumer-level data stored in the system software to ensure adherence to HIPAA and all State and Federal regulations as well as to ensure adherence to the CT HMIS principles, policies and procedures outlined in this document.

Procedure:

The Participating HMIS Agency:

- Holds final responsibility for the adherence of the agency's personnel to The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and all State and Federal regulations as well as ensuring adherence to the CT HMIS principles, policies and procedures outlined in this document;
- Is responsible for all activity associated with agency staff access and use of the CT HMIS data system;
- Is responsible for establishing and monitoring agency procedures that meet the criteria for access to the CT HMIS System, as detailed in the policies and procedures outlined in this document;
- Will have established policies and procedures to prevent any misuse of the software system by designated staff;
- Agrees to allow access to the CT HMIS System only to staff who have been trained in the CT HMIS system and who have a legitimate need for access. Need exists only for those designated personnel and/or volunteers who work directly with (or who supervise staff who work directly with) consumers, or have data entry or technical responsibilities;
- Agrees to follow approved policies and procedures for all changes as identifies by the CT HMIS Lead Agency and/or the CT HMIS Steering Committee;
- Oversee the implementation of data security standards;
- Assume responsibility for integrity and protection of consumer-level data entered into the CT HMIS system;
- Ensure organizational adherence to the CT HMIS Policies and Procedures;
- Assign staff to serve as Agency Security Coordinator and HMIS Data Coordinator;
- Agency Security Coordinator and/or HMIS Data Coordinator will effectively communicate system requirements and changes to Agency Licensed End Users;
- Authorize system access to agency staff;
- Monitor compliance and periodically review data quality and completeness;
- Ensure that data is collected in a way that respects the dignity of the consumers;
- Ensure that all required data is collected and entered accurately and on time (timeliness is determined by HUD and other funders, and varies by program type);
- Provide prompt and timely communications of data, changes in license assignments, and user accounts and software to the CT HMIS Systems Administrator; and

POLICY 106: PARTICIPATING AGENCY RESPONSIBILITY, continued

- Notify CCEH CT HMIS staff of any issue relating to system security or consumer confidentiality on a timely basis and using the Security Alert Reporting Form for CT HMIS (attached).

SECTION 1: CONTRACTUAL REQUIREMENTS AND ROLES **Written: 10/2005**
Revised: 07/2013

POLICY 107: PARTICIPATING AGENCY HMIS DATA COORDINATOR **Approved:**

Policy:
Every Participating Agency must designate one person to be the HMIS Data Coordinator (HDC) who holds responsibility for the coordination of the system software in the agency.

Procedure:
The HMIS Data Coordinator will be responsible for duties including:

- Serve as point-person in communicating with CT HMIS System Administrator
- Ensure to the extent possible that all agency and program data is entered accurately and on time according to all contractual requirements
- Facilitate timely reporting from the agency she/he represents (unless the agency has designated another person for this function) reports such as;
    - DSS Emergency Shelter Utilization Report
    - DSS AIDS Funded Program Report
    - HUD Annual Performance Report(APR)
    - Data Quality Reports etc.
- Ensure that all agency staff who will be using HMIS:
    - Receive authorized HMIS training
    - Satisfactorily demonstrated proficiency in use of the software
    - Understand the Policies and Procedures that apply to their role in the system.
- Designate each individual's level of access by submitting a Designation of Access (DOA) form (as provided by, and) to CT HMIS System Administrator.
- Notify CT HMIS System Administrator when a CT HMIS system user leaves the agency or no longer requires access to the CT HMIS system.
- Grant technical access to CT HMIS for agency staff as needed.
- Keep agency and Program information up to date. This includes but is not limited to, location, services provided, HUD requirements, and bed inventories (for housing programs).
- Notify all users in their agency of interruptions in service, changes to data entry workflow, reporting requirements, and upcoming trainings.
- Attend monthly HMIS Data Coordinator meeting held by CT HMIS System Administrator
- Inform CT HMIS users and senior management of pertinent activity.
- Ensure agency is prepared for annual site visits

The following responsibilities may be performed by the Agency Security Coordinator or the HDC, who may be the same individual:

POLICY 107: PARTICIPATING AGENCY HMIS DATA COORDINATOR, continued

- Assume responsibility for the integrity and protection of consumer-level data by following the policies outlined for the project, which include but are not limited to:

    - Consumer CT HMIS Consent and Release of Information Forms (see Attachment) are signed and on file;
    - Interagency agreements are signed and on file (when applicable);
    - Ensure that the proper IT controls are in place for network, desktop and user security;

CT HMIS Lead Agency will coordinate training and technical assistance for HMIS Data Coordinators.

SECTION 1: CONTRACTUAL REQUIREMENTS AND ROLES **Written: 10/2005**
Revised: 07/2013

POLICY 108: AGENCY SECURITY COORDINATOR

Approved:

Policy:
Every Participating Agency must designate one person to be the Agency Security Coordinator who holds responsibility for the coordination of the system software in the agency. The Agency Security Coordinator and the HMIS Data Coordinator may be, but are not required to be, the same person.

Procedure:
The Agency Security Coordinator will ensure Participating Agency compliance with the administrative requirements as listed in the CT HMIS Memorandum of Understanding, Section B Attachments.

The Agency Security Coordinator oversees the implementation of data security policies and standards and will:

- Assume responsibility for integrity and protection of consumer-level data entered into the CT HMIS system;
- Ensure organizational adherence to the CT HMIS Policies and Procedures;
- Authorize data access to agency staff and assign responsibility for custody of the data;
- Monitor compliance and periodically review data security;
- Ensure that data is collected in a way that respects the dignity of the participants;
- Ensure that all data collected must be relevant to the purpose for which it is used, that the data is entered accurately and on time;
- Provide prompt and timely communications of data, changes in license assignments, and licensed end user accounts and software to the CT HMIS System Administrator;
- Notify CT HMIS Lead Agency staff of any issue relating to system security or consumer confidentiality (Security Alert Report).

Memorandum of Understanding Attachment B

- Agency has a policy detailing its internal communication practices for HMIS matters consistent with Section 2 of the CT HMIS policies and procedures;
- Agency has a policy for granting access to its agency-level HMIS-compliant system's end users consistent with Section 4 of the policies and procedures;
- The agency has adopted Licensed End User Agreement provided by CT HMIS Lead Agency;
- Licensed End User Agreements are signed and on file for all staff who access the agency-level HMIS-compliant system.
- Agency has a policy for managing the breach of Licensed End User agreements.
- Agreement that meets the minimum standards outlined in Section 3 of the policies and procedures;

POLICY 108: PARTICIPATING AGENCY'S AGENCY SECURITY COORDINATOR, continued

- Each end user has been trained on system use, privacy, security, and data collection requirements consistent with train the trainer sessions provided by the CT HMIS Lead Agency or its Agent, the CT HMIS System Administrator, and the CT HMIS policies and procedures, consistent with Sections 3 and 4 of the policies and procedures.
- Agency is a HIPAA covered entity and has a Privacy Policy that meets HIPAA requirements (you must attach a copy of your HIPAA Privacy Policy).
- Agency is not a HIPAA covered entity and the agency has adopted the minimal standard Privacy Policy provided by the CT HMIS Lead Agency
- Agency is not a HIPAA covered entity and has established a Privacy Policy that otherwise meets the minimum requirements established in Section 2 of the policies and procedures (you must attach a copy of the non-standard Privacy Policy).
- The agency's Privacy Policy is posted on the agency's website.
- A sign including the required language described in Section 2 of the policies and procedures is posted at all intake desks or other location where data collection occurs.
- The agency has a policy requiring that all consumer data is entered into the system within, at most, the timeframe established in CT Data Quality Standards (following the standards required by HUD for HMIS data) as approved and adopted by the CT HMIS Steering Committee
- The agency has a policy for conducting logic checks to validate the accuracy of the data in its program-level HMIS-compliant system and regularly comparing universal and provider program specific data elements to available paper records and updating/correcting missing or inaccurate data, consistent with the CT Data Quality Standards.

Agency Procedure: Each Agency will provide the name and contact information of the Agency Security Coordinator at least annually in the Security Certification document. Changes to the individual named as the Security Contact that occur during the course of the year will be communicated via email to the CT HMIS System Administrator and CT HMIS Security Officer within thirty days of the change.

The CT HMIS Security Officer will maintain the name and contact information of the current Agency Security Coordinator of each Agency on file. This file is considered part of the CT HMIS Security Plan and is incorporated by reference.

- Communicate any security questions, requests, or security breaches to the CT HMIS System Administrator and CT HMIS Security Officer, and security-related HMIS information relayed from CT HMIS Lead Agency to the agency's licensed end users.

POLICY 108: PARTICIPATING AGENCY'S AGENCY SECURITY COORDINATOR, continued

- Complete security training offered by the CT HMIS System Administrator. Additional duties that may be incorporated in the Agency Participation Agreement on a case-by-case basis include:

    - Provide security training to the agency's end users based on Security training provided to the Agency Security Coordinator by the CT HMIS System Administrator.
    - Any security-related questions from Agency staff will be communicated to CT HMIS Lead Agency via the Agency Security Coordinator, consistent the CT HMIS policies and procedures.

CT HMIS Lead Agency will coordinate training and technical assistance for Agency Security Coordinators.

SECTION 1: CONTRACTUAL REQUIREMENTS AND ROLES **Written: 10/2005**
Revised: 07/2013

POLICY 109: LICENSED END USER **Approved:**

Policy:

All individuals at the CT HMIS Lead Agency, CT HMIS System Administrator and at the Participating Agency levels who require legitimate access to the software system will be granted such access after training and agency authorization. Individuals with specific authorization can access the system software application for the purpose of conducting data management tasks associated with their area of responsibility.

Procedure:

- The CT HMIS Systems Administrator agrees to authorize use of the CT HMIS only to users who have received appropriate training, and who need access to the system for technical administration of the system, report writing, data analysis and report generation, back-up administration or other essential activity associated with carrying out CT HMIS responsibilities.
- The Participating Agency agrees to authorize use of the CT HMIS only to users who need access to the system for data entry, editing of consumer records, viewing of consumer records, report writing, administration or other essential activity associated with carrying out participating agency responsibilities.

Licensed End User Requirements:

- Licensed End Users are any persons who use the CT HMIS software. They must be aware of the data's sensitivity and take appropriate measures to prevent unauthorized disclosure.
- Licensed End Users are responsible for protecting institutional information to which they have access and for reporting security violations.
- Licensed End Users must comply with the data security policy and standards as described and stated by the Agency.
- Licensed End Users must stay current with software modifications, policy and procedure updates, and security protocols.
- Licensed End Users are expected to work collaboratively with HMIS Data Coordinators and Agency Security Coordinators, to maximize system functionality and data accuracy and relevance.
- Licensed End Users are accountable for their actions and for any actions undertaken with their usernames and passwords. Licensed End Users must advise the Agency Security Coordinator, HMIS Data Coordinator (and/or CT HMIS System Administrator) if their passwords are compromised.
- Contractors, volunteers, interns and others who function as staff, whether paid or not, are bound by the same Licensed End Users responsibilities and rules set forth in this manual.

SECTION 1: CONTRACTUAL REQUIREMENTS AND ROLES **Written: 10/2005**
Revised: 08/2013

POLICY 110: TRAINING SCHEDULE **Approved:**

Policy:

CT HMIS Lead Agency will coordinate training for system users. CT HMIS Lead Agency may contract with the CT HMIS System Administrator or other entities that are qualified to provide the appropriate training. Different levels of training are required for level of access and roles such as Systems Administrators, HMIS Data Coordinators, Agency Security Coordinators and Licensed End Users. Training will occur on a regular basis. The schedule of trainings will be published by the CT HMIS Lead Agency.

Procedure:

All system users must have a license and have successfully completed training that is required for the level of access prior to use of the system.

SECTION 1: CONTRACTUAL REQUIREMENTS AND ROLES **Written: 10/2005**
Revised: 07/2013

POLICY 111: AMENDING POLICIES AND PROCEDURES **Approved:**

Policy:

These Policies and Procedures may be amended. It is expected that information will be added, removed and altered as necessary.

Procedure:

Each Continuum has representation on the CT HMIS Steering Committee. Any changes suggested by any party in the Continuum may be presented by a member of the CT HMIS Steering Committee or any CT HMIS Lead Agency staff member to the CT HMIS Steering Committee. Suggestions will be handled and recommendations for action will be made according to the CT HMIS Steering Committee procedure for making decisions.

SECTION 1: CONTRACTUAL REQUIREMENTS AND ROLES **Written: 07/2013**
Revised:
POLICY 113: DISASTER RECOVERY PLAN **Approved:**

Policy:
The CT HMIS System Administrator will maintain a current Disaster Recovery Plan.

Procedure:
The CT HMIS Steering Committee will set a schedule and procedures for reviewing the Disaster Recovery Plan.

SECTION 2:
PARTICIPATION REQUIREMENTS

SECTION 2: PARTICIPATION REQUIREMENTS **Written: 10/2005**
Revised: 07/2013

POLICY 201: PARTICIPATION AND IMPLEMENTATION REQUIREMENTS **Approved:**

Policy:

In order to participate in CT HMIS Participating Agencies must sign the CT HMIS Memorandum of Understanding (MOU), meet the minimum criteria stated within the MOU, and comply the CT HMIS Policies and Procedures.

Procedure:

Participating Agencies are responsible for the following responsibilities whether discharged by employed personnel or through contract:

a) Compliance and self-certification thereof, with all policies, procedures and agreements through mechanisms established by the CT HMIS Steering Committee (see CT HMIS Memorandum of Understanding, Exhibits A and B)
b) Collecting and entering data into CT HMIS as per these policies and procedures
c) Ensuring end users of the program level HMIS compliant system are adhering to the privacy and confidentiality requirements
d) Ensuring end-user participation in trainings
e) Participating in CoC meetings and other initiatives of their CoC(s)
f) Assigning qualified personnel to support initiatives such as the ECM software implementation
g) Produce all necessary HUD reports, e.g. APR, ESG.

The CT HMIS Lead Agency or its designee will monitor Participating Agency compliance with these policies and procedures and can verify Self-Certifications via site visits. Participating Agencies must self-certify that Administrative and Security Checklist requirements are met.

SECTION 2: PARTICIPATION REQUIREMENTS **Written: 10/2005**
Revised: 07/2013

POLICY 202: CT HMIS LEAD AGENCY DATA SECURITY RESPONSIBILITY **Approved:**

Policy:
CT HMIS Lead Agency will manage the contractual relationship with a third party software vendor who will in turn continue to develop, implement and maintain all components of operations of the web-based system including a data security program.

Procedure:
The CT HMIS Lead Agency, in consultation with the CT HMIS Steering Committee, will:

- Develop the Security Plan;
- Implement its standards; and
- Require compliance.

Access to areas containing statewide CT HMIS equipment, data, and software will be secured. All client-identifying information will be strictly safeguarded in accordance with appropriate technical safeguards. All data will be securely protected to the maximum extent possible. Ongoing security assessments to include penetration testing will be conducted on a regular basis.

The scope of security includes:

- Technical safeguards;
- Physical safeguards, including, but not limited to locked doors;
- Network protocols and encryption standards such as https/ssl encryption (an indicator of encryption use); and
- Client data security (Data Encryption).

A CT HMIS Security Officer will be assigned by the CT HMIS Lead Agency to monitor the CT HMIS Security Plan, and monitor compliance by Participating Agencies and Licensed End Users, in collaboration with the CT HMIS System Administrator.

SECTION 2: PARTICIPATION REQUIREMENTS **Written: 10/2005**
Revised: 08/2013

POLICY 205: STATEWIDE DATA SHARING REQUIREMENT **Approved:**

Policy:

Multiple funders of programs that provide services to homeless individuals and families require a standardized data collection system (HMIS). HUD and other funders mandate data sharing among Participating Agencies. CT HMIS is compliant with this requirement and all Participating Agencies must follow data sharing policy and procedures. In addition, Participating Agencies must follow Privacy and Informed Consent procedures as outlined in relevant policies.

Procedure:

Participating Agencies must ensure that all Licensed End Users are aware of the Statewide Data Sharing Requirement and understand the benefits and need for confidentiality, inform consumers of their options and have the proper internal policies and procedures to protect consumer data.

Participating Agencies must inform each consumer whose record is included in the CT HMIS that data in the system is shared. Each consumer must authorize the inclusion of their information in the system through the written consumer consent and release of information form to have data shared at the level they determine (Attachment). Consumer consent and privacy policies must be followed.

SECTION 2: PARTICIPATION REQUIREMENTS **Written: 10/2005**
Revised: 08/2013
Approved:

POLICY 207: CONFIDENTIALITY, INFORMED CONSENT TO ENTER DATA AND SYSTEM WIDE RELEASE OF INFORMATION

Policy:
Each consumer must authorize the inclusion of their information in the CT HMIS system through the written consumer consent and release of information form. This authorization determines the level of data to be included and shared.

Procedure:
Informed Consent: Includes both an **oral explanation** and **written consumer consent** for each consumer.

Oral Explanation All consumers will be provided an oral explanation of CT HMIS. The Participating Agency will provide an oral explanation of CT HMIS and the terms of consent. The agency is responsible for ensuring that this procedure takes place prior to every consumer interview. The Oral Explanation must contain the following information: (Sample script Attachment)

1. Explanation of CT HMIS:
    - Computer based information system that homeless services agencies across the state use to capture information about the persons they serve

2. Why the agency uses it:
    - To understand their consumers' needs
    - Help the programs plan to have appropriate resources for the people they serve to inform public policy in an attempt to end homelessness
    - Federal mandate that all HUD funded homeless providers must enter data into an electronic system and capture universal data elements

3. Security
    - Only staff who work directly with consumers or who have administrative responsibilities can look at, enter, or edit consumer records

4. Privacy Protection
    - No information will be released to another agency without written consent
    - Consumer has the right to not answer any question, unless entry into a program requires it
    - Consumer information is transferred in an encrypted format to CT HMIS
    - Consumer has the right to know who has added to, deleted, or edited their CT HMIS electronic record
    - Information that is transferred over the web is through a secure connection

5. Benefits for consumers.
    - Case manager tells consumer what services are offered on site or by referral through the assessment process
    - Case manager and consumer can use information to assist consumers in obtaining resources that will help them find and keep permanent housing

Written Consumer Consent to Enter Data:
Each consumer must provide written permission to authorize the agency to enter information into CT HMIS. (Attachment)

Written Consumer Release to Share Data: Each Consumer whose record is being shared electronically with another Participating Agency must agree via a written consumer release of information form to have their data shared. A consumer must be informed what information is being shared and with whom it is being shared. A consumer must also be informed of the expiration date of the consent. (Attachment)

Verbal Consent and Release of Information for telephone based resource access:

Information Release: The Participating Agency agrees not to release consumer identifiable information to any other organization pursuant to federal and state law without proper consumer consent.

Federal/State Confidentiality Regulations: The Participating Agency will uphold Federal and State Confidentiality regulations to protect consumer records and privacy. In addition, the Participating Agency will only release consumer records with written consent by the consumer, unless otherwise provided for in the regulations.

1. The Participating Agency will abide specifically by the Federal confidentiality rules regarding disclosure of alcohol and/or drug abuse records.
2. The Participating Agency will abide specifically by State of Connecticut general laws providing guidance for release of consumer level information including who has access to consumer records, for what purpose and audit trail specifications for maintaining a complete and accurate record of every access to and every use of any personal data by persons or organizations.

Encryption: The Participating Agency understands that all consumer identifiable data is to be made inaccessible to unauthorized users.

SECTION 2: PARTICIPATION REQUIREMENTS **Written: 10/2005**
Revised: 07/2013
POLICY 208: INFORMATION SECURITY PROTOCOLS **Approved:**

Policy:
To protect the confidentiality of the data and to ensure its integrity at the site whether during data entry, storage and review or any other processing function, at a minimum, a Participating Agency must develop and have in place appropriate rules, protocols or procedures.

Procedure:
Participating Agency rules, protocols or procedures must address each of the following:

- Assignment of user accounts
- Unattended workstations
- Physical access to workstations
    - The implementation of hardware and/or software firewall to secure local systems/networks from malicious intrusion.
- Use of Antivirus Software, including the automated scanning of files as they are accessed by users on the system where the HMIS application is housed as well as assuring that all consumer systems regularly update virus definitions from the software vendor.
- Password complexity, expiration, and confidentiality
- Policy on licensed users access which includes not sharing accounts
- Consumer record disclosure, confidentiality and release of information
- Report generation, disclosure and storage
- Maintain and routinely monitor all system access logs for systems which have access to HMIS data.
- Additional requirements as established by the CT HMIS Steering Committee.

Each Participating Agency will participate in annual compliance reviews conducted by the CT HMIS System Administrator.

SECTION 2: PARTICIPATION REQUIREMENTS **Written: 07/2013**
Revised:
POLICY 210: Compliance Review **Approved:**

Policy:

Each Participating Agency will participate in annual compliance reviews conducted by the CT HMIS System Administrator.

Procedure:

Participating Agency will participate in the Annual Administrative Certification Process. This may include a completed and certified Annual Administrative Certification Checklist, attached in the CT HMIS Memorandum of Understanding as Exhibit A; and Annual Security Certification Checklist, attached in the CT HMIS Memorandum of Understanding as Exhibit B.

- Agencies seeking first-time access to CT HMIS will be granted access to CT HMIS when all Administrative and Security requirements as outlined in Exhibits A and B have been self-certified as being met.

- Agencies established on CT HMIS that in any given year are unable to self-certify that all requirements are met will be engaged in a 45-60 day remediation process to correct any shortfall. CT HMIS access will continue during this period.

Any required remediation steps recommended by the CT HMIS System Administrator will be completed in a timely manner by the Participating Agency. The CT HMIS Lead Agency will monitor compliance and remediation steps.

The Participating HMIS Agency shall appoint an HMIS Data Coordinator (HDC) responsible for all duties specified in Exhibit A and any additional relevant duties that may be established by the CT HMIS Steering Committee.

The Agency shall appoint a Participating HMIS Agency Security Coordinator responsible for all duties specified in Exhibit B and any additional relevant duties, such as providing security trainings to Agency staff.

No exceptions can be made for any Agency that has indicated in Exhibit A or B of this Agreement that it does not, at the time of execution of this Agreement, meet all requirements for participation in the CT HMIS. Consistent with CT HMIS Policies and Procedures, Agency shall resolve the issues. First time Agency users of CT HMIS must resolve the issues in order to be granted access to the CT HMIS system. Agencies that already have access will work with the CT HMIS System Administrator in a 45-60 day remediation process to resolve identified issues.

SECTION 2: PARTICIPATION REQUIREMENTS **Written: 07/2015**
Revised:
POLICY 211: CT HMIS RETRAINING **Approved: 07/2015**

Policy:
Agencies with CT HMIS users who are in need of retraining will adhere to the guidelines outlined in the procedure of this policy.

Procedure:
Identification of users who are in need of retraining is based on the following criteria:

- User has not logged into the system in the first 45 days from their initial training
- User has generated three or more helpdesk tickets about the same or similar issue that is unrelated to system performance in a 60 day period
- User has used four or more hours of help desk support in a month for issues unrelated to system performance
- The CoC may also request a re-train of an agency with consistently low UDE and/or ESG performance

When a retraining is necessary, the user(s) will be notified that they must register and attend the appropriate training for their project type within 45 days. The user(s) agency HDC and Executive Director on record with the CT HMIS System Administrator will also be notified of the request and reason for the retraining.

Noncompliance with registration and completion of a training session within the 45 day timeframe will result in the user(s) CT HMIS access being made inactive.

SECTION 2: PARTICIPATION REQUIREMENTS **Written: 05/2016**
Revised:
POLICY 212: CT HMIS TRAINING NO SHOW POLICY **Approved: 06/2016**

Policy:
CT HMIS trainings are currently provided at no cost to CT HMIS users or potential users. Agencies with new staff, or with existing CT HMIS users who are in need of retraining will adhere to the guidelines outlined in the procedure of this policy.

Procedure:
Definition of "No Show": A no show occurs when an individual who has registered for an in-person CT HMIS training does not attend and fails to notify the system administrator within 1 full business day in advance of their absence. Training confirmation will be sent from the CT HMIS system administrator, and will include the contact information for whom to contact if the individual cannot attend the training for any reason. If there is an extenuating circumstance that prevents someone from attending training, the fee may be waived if the individual's supervisor alerts the system administrator.

If an individual is a no show for training, their organization will be charged a no-show fee according to the following schedule:

- First occurrence per organization: $50
- Subsequent occurrences: $150 per incident

Monthly, the CT HMIS system administrator will provide the CT HMIS Lead Organization with a list of individuals who were no shows – and the CT HMIS Lead Organization will issue the invoices to the appropriate organizations. Funds collected will generally be used to enhance the CT HMIS training environment and will be allocated by the CT HMIS Data Quality Management sub-Committee of the CT HMIS Steering Committee. If an agency has an outstanding fee for CT HMIS training no-shows for over 60 days, the agency will not be able to register new individuals for CT HMIS trainings until all fees are paid.

SECTION 3:
DATA QUALITY

SECTION 3: DATA QUALITY **Written: 10/2005**

Revised: 07/2013

POLICY 301: MINIMUM REQUIRED DATA ELEMENTS **Approved:**

Policy:

The CT HMIS Steering Committee will identify minimum required data elements that are required for every Participating Agency to complete.

The CT HMIS includes data elements that U.S. Department of Housing and Urban Development (HUD) has identified are required, as documented in the Federal Register. For programs that do not have HUD reporting requirements, HUD states that the standards are optional but recommended for CoC's to obtain consistent information. In addition to the HUD required data elements, there are program-specific data elements that are recommended and may be added to funder reports in the future.

Procedure:

The CT HMIS System Administrator will maintain a current data dictionary, located on the CT HMIS website:
Link to file page
http://www.cthmis.com/files/file_detail/1919/

Link is also available off of the main conversion page
http://www.cthmis.com/information/info_detail/category/ct_hmis_conversion/

The CT HMIS Steering Committee may include additional data elements to facilitate reporting for other programs funded in addition to HUD, by organizations including various state agencies such as DSS, DOH, DHMAS, UNITED WAY, and the CT HMIS itself.

SECTION 3: DATA QUALITY **Written: 10/2005**

Revised: 05/2014

POLICY 302: Data Quality Management Plan

Approved:

Policy:

The CT HMIS has a multi-faceted data quality management strategy.
The CT-HMIS Steering Committee Bylaws require a Data Quality Management Subcommittee which is charged with implementing and monitoring the Data Quality Management (DQM) Plan, making recommendations and reporting on a periodic basis. The DQM plan will include policies and procedures, indicators and targets, monitoring components and periodic review of the plan itself, on a schedule determined by the sub-committee and approved by the Steering Committee.

Participating Agencies are required to enter data into the system in a timely, complete, and accurate manner. This policy outlines the procedures for adherence to the CT HMIS Data Quality standards including the following elements; Timeliness, Completeness, Accuracy/Consistency, Monitoring, and Incentives/Enforcement.

Participating Agencies are required designate an HMIS Data Coordinator (HDC) who is trained on the software and how to run and review program level reports (including data quality). This person is local contact for agency staff and is usually the most knowledgeable person. The HDC is responsible for adherence to the following Data Quality Standards.

Procedure:
The Data Quality Management Plan is based on establishment of and adherence to Data Quality Standards, including the following:

- **Timeliness:**
  Data entry should be current within the scheduled number of days from intake, exit, service provision, or any other client interaction which necessitates any form of data entry. The timeliness schedule is determined by type of program and client contact.

  To ensure data is accessible for agency, community level, and funder reporting as well as to improve data accuracy. Reducing the time period between data collection and data entry will increase the accuracy and completeness of client data. The schedule of timeliness standards will be available on the projects website.

- **Completeness:**
  A current HUD standard of completeness rate, typically 95%, for all CT HMIS participating organizations and HUD funded homeless projects is established and expected.

To ensure that CT HMIS can accurately describe the clients and services provided to clients who are accessing services, a complete and accurate client record is critical for program level reporting, for the use of data in any community level reporting, as well as for HUD required processes such as NOFA and AHAR.

- **Accuracy/Consistency:**
  HDCs are responsible for monitoring the data entry accuracy and consistency of CT HMIS approved data collection tools at their agency level. The CT HMIS Steering Committee and Continuum of Care entities are responsible for approving the data entry collection tools.

  HDCs also monitor the use of the system by approved users, ensuring that users meet the requirements set by their agency, and are appropriately trained in the CT HMIS system and policies before starting access.

  All CT HMIS users must attend training before they are allowed to enter any data into the CT HMIS system. Training includes methods to navigate the system and how to understand the intent of each question asked, to ensure that the data being collected is based on a clear understanding of the question and response options.

  Each Participating Agency must adhere to their own internal policies for conducting logic checks to validate the accuracy of the data in its program-level system and regularly compare data elements to available paper records and updating/correcting missing or inaccurate data. Users must be authorized and trained in order to use the CT HMIS system.

- **Monitoring:**
  The CT HMIS lead organization is responsible for the generation of a monthly statewide report that measures data quality for the previous month. This report focuses on the past month's total active clients, as well as the data quality for those clients. This statewide data quality report is posted on the project website (www.cthmis.com). Agency HDC's are expected to review and make corrections to the data as needed.

  In addition to the data quality report, Continuum and Agency dashboards that highlight both data quality and data completeness are completed on a monthly basis. Data Elements that do not adhere to the CT HMIS Data Quality Standards are highlighted, and the agencies or continuums determine action plans to address concerns. The CoC's are expected to have a data evaluation plan in place.

- **Incentives/Enforcement:**

  The Data Quality Management Committee is charged with the creation, implementation, and maintenance of a Data Quality Management Plan that will recognize and provide positive incentives to outstanding performers, as well as develop corrective action and remediation plans as needed.

RECOGNITION:
Participating Agencies that meet the data quality benchmarks will be periodically recognized by the CT HMIS Steering Committee, and their respective Continuum of Care. CT HMIS participating agencies that do not adhere to the minimum data entry standards set forth herein will be notified of their deficiencies and provided with specific information regarding the nature of the deficiencies and methods by which to correct them.

REMEDIATION ENFORCEMENT:
CT HMIS Data Quality Management Plan will establish a schedule for working with Participating Agencies that are determined to need to correct identified data quality issues. In the corrective action time period, training will be offered to agencies as needed for them to remain compliant with the minimum data entry standards. When there is any progressive discipline for any CT HMIS participating organization, the programs HDC and Director, as well as the CoC leadership and the CT HMIS Steering Committee will all be alerted. CT HMIS participating agencies continuing to perform below the established Data Quality Standards may have their CT HMIS access restricted or suspended, as determined by the CT HMIS Steering Committee, until such time as agencies demonstrate that compliance with minimum data entry standards can be reached.

Continuous Improvement:

- Statewide HDC webinars are facilitated each month by the CT HMIS Statewide Administrator; this call focuses on changes to the system and common problems that are reported via the CT HMIS Help Desk and data quality reports.
- The Statewide Lead Agency reviews data on a quarterly basis and will report anomalies as they are discovered to the CT HMIS Steering Committee. The CT HMIS Steering Committee with review and may make the decision follow the recommendations of the Data Quality Management Committee regarding anomalies. The CT HMIS Data Quality Management Committee will conduct continuous quality improvement activities and periodic review of the plan and its implementation, with the oversight of the CT HMIS Steering Committee.

SECTION 4:
USER, LOCATION, PHYSICAL AND DATA ACCESS

SECTION 4: USER, LOCATION, PHYSICAL and DATA ACCESS **Written: 10/2005**
Revised: 07/2013

POLICY 401: ACCESS LEVELS FOR LICENSED END USERS **Approved:**

Policy:
Licensed User Levels are designated by the CT HMIS System Administrator. Licensed User accounts will be created and deleted by the CT HMIS System Administrator with approval by the Participating Agency's Executive Director and/or designee.

Procedure:
CT HMIS Licensed End Users designation is based on the access level a user needs to perform their job responsibilities. The determination of an individual's access level should be need-based.

The Participating Agency will designate a representative to facilitate registering Licensed End Users with CT HMIS. This will either be the HMIS Data Coordinator (HDC) or Agency Security Coordinator.

A Participating Agency must require each member of its staff (including employees, volunteers, affiliates, contractors and associates) to sign a Licensed End User Agreement upon successful completion of CT HMIS training, and to comply with the Licensed End User Agreement requirements.

SECTION 4: USER, LOCATION, PHYSICAL and DATA ACCESS **Written: 10/2005**
Revised: 07/2013

POLICY 403: ACCESS TO CONSUMER PAPER RECORDS **Approved:**

Policy:
Agencies shall follow their existing policies and procedures and applicable local, state and federal regulations for access to consumer records on paper.

Procedure:
Each agency must secure any paper or other hard copy containing Personal Protect Information (PPI) that is either generated by or for HMIS, including, but not limited to reports, data entry forms and signed consent forms.

All paper or other hard copy generated by or for HMIS that contains PPI must be directly supervised when the hard copy is in a public area. When agency staff are not present, the information must be secured in areas that are not publicly accessible. Written information specifically pertaining to user access (e.g., username and password) must not be stored or displayed in any publicly accessible location. Users are prohibited from storing client-level data on any personally owned media or devices.

SECTION 4: USER, LOCATION, PHYSICAL and DATA ACCESS **Written: 08/2015**
Revised:
POLICY 404: CASE NOTE DELETION IN CT HMIS **Approved: 11/2015**

Policy:
To protect the integrity of the case notes recorded in the system Participating Agencies do not have the ability to delete case notes after they have been saved. The guidelines outlined in the procedure of this policy are to be adhered to when it is necessary for a case note to be deleted from the system.

Procedure:
Participating Agencies are required designate an HMIS Data Coordinator (HDC) who is trained on the software and will be the only designee at a Participating Agency who may request the deletion of a case note.

When a case note has been identified by a Participating Agency – the agency staff must work with the HDC to initiate the request for the deletion of the case note. The procedure for requesting a deletion would be handled by the HDC through the CT HMIS Help Desk. Information to be included in the deletion request is the HMIS ID of the client record the case note is associate with, the date the case note was created, and the reason for the deletion request.

FY2017 - Performance Measurement Module (Sys PM)

Summary Report for CT-505 - Connecticut Balance of State CoC

For each measure enter results in each table from the System Performance Measures report generated out of your CoCs HMIS System. There are seven performance measures. Each measure may have one or more "metrics" used to measure the system performance. Click through each tab above to enter FY2017 data for each measure and associated metrics.

RESUBMITTING FY2017 DATA: If you provided revised FY2017 data, the original FY2017 submissions will be displayed for reference on each of the following screens, but will not be retained for analysis or review by HUD.

ERRORS AND WARNINGS: If data are uploaded that creates selected fatal errors, the HDX will prevent the CoC from submitting the System Performance Measures report. The CoC will need to review and correct the original HMIS data and generate a new HMIS report for submission.

Some validation checks will result in warnings that require explanation, but will not prevent submission. Users should enter a note of explanation for each validation warning received. To enter a note of explanation, move the cursor over the data entry field and click on the note box. Enter a note of explanation and "save" before closing.

Measure 1: Length of Time Persons Remain Homeless

This measures the number of clients active in the report date range across ES, SH (Metric 1.1) and then ES, SH and TH (Metric 1.2) along with their average and median length of time homeless. This includes time homeless during the report date range as well as prior to the report start date, going back no further than October, 1, 2012.

Metric 1.1: Change in the average and median length of time persons are homeless in ES and SH projects.
Metric 1.2: Change in the average and median length of time persons are homeless in ES, SH, and TH projects.

a. This measure is of the client's entry, exit, and bed night dates strictly as entered in the HMIS system.

FY2017 - Performance Measurement Module (Sys PM)

	Universe (Persons)			Average LOT Homeless (bed nights)				Median LOT Homeless (bed nights)			
	Submitted FY 2016	Revised FY 2016	FY 2017	Submitted FY 2016	Revised FY 2016	FY 2017	Difference	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
1.1 Persons in ES and SH	6871		6330	59		64	5	35		42	7
1.2 Persons in ES, SH, and TH	8024		7295	117		122	5	46		51	5

b. This measure is based on data element 3.17.

This measure includes data from each client's Living Situation (Data Standards element 3.917) response as well as time spent in permanent housing projects between Project Start and Housing Move-In. This information is added to the client's entry date, effectively extending the client's entry date backward in time. This "adjusted entry date" is then used in the calculations just as if it were the client's actual entry date.

The construction of this measure changed, per HUD's specifications, between FY 2016 and FY 2017. HUD is aware that this may impact the change between these two years.

	Universe (Persons)			Average LOT Homeless (bed nights)				Median LOT Homeless (bed nights)			
	Submitted FY 2016	Revised FY 2016	FY 2017	Submitted FY 2016	Revised FY 2016	FY 2017	Difference	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
1.1 Persons in ES, SH, and PH (prior to "housing move in")	7642		7090	194		296	102	67		114	47
1.2 Persons in ES, SH, TH, and PH (prior to "housing move in")	8761		8013	240		329	89	85		129	44

FY2017 - Performance Measurement Module (Sys PM)

Measure 2: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range.Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.

After entering data, please review and confirm your entries and totals. Some HMIS reports may not list the project types in exactly the same order as they are displayed below.

	Total # of Persons who Exited to a Permanent Housing Destination (2 Years Prior)		Returns to Homelessness in Less than 6 Months			Returns to Homelessness from 6 to 12 Months			Returns to Homelessness from 13 to 24 Months			Number of Returns in 2 Years	
	Revised FY 2016	FY 2017	Revised FY 2016	FY 2017	% of Returns	Revised FY 2016	FY 2017	% of Returns	Revised FY 2016	FY 2017	% of Returns	FY 2017	% of Returns
Exit was from SO		28		11	39%		1	4%		3	11%	15	54%
Exit was from ES		2102		289	14%		158	8%		150	7%	597	28%
Exit was from TH		500		48	10%		18	4%		24	5%	90	18%
Exit was from SH		0		0			0			0		0	
Exit was from PH		1635		78	5%		64	4%		77	5%	219	13%
TOTAL Returns to Homelessness		4265		426	10%		241	6%		254	6%	921	22%

Measure 3: Number of Homeless Persons

Metric 3.1 – Change in PIT Counts

FY2017 - Performance Measurement Module (Sys PM)

This measures the change in PIT counts of sheltered and unsheltered homeless person as reported on the PIT (not from HMIS).

	January 2016 PIT Count	January 2017 PIT Count	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	3016	2610	-406
Emergency Shelter Total	1857	1765	-92
Safe Haven Total	0	0	0
Transitional Housing Total	642	511	-131
Total Sheltered Count	2499	2276	-223
Unsheltered Count	517	334	-183

Metric 3.2 – Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
Universe: Unduplicated Total sheltered homeless persons	8024		7295	-729
Emergency Shelter Total	6871		6330	-541
Safe Haven Total	0		0	0
Transitional Housing Total	1476		1204	-272

FY2017 - Performance Measurement Module (Sys PM)

Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

Metric 4.1 – Change in earned income for adult system stayers during the reporting period

	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
Universe: Number of adults (system stayers)	1454		1559	105
Number of adults with increased earned income	85		117	32
Percentage of adults who increased earned income	6%		8%	2%

Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period

	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
Universe: Number of adults (system stayers)	1454		1559	105
Number of adults with increased non-employment cash income	427		499	72
Percentage of adults who increased non-employment cash income	29%		32%	3%

Metric 4.3 – Change in total income for adult system stayers during the reporting period

	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
Universe: Number of adults (system stayers)	1454		1559	105
Number of adults with increased total income	472		578	106
Percentage of adults who increased total income	32%		37%	5%

FY2017 - Performance Measurement Module (Sys PM)

Metric 4.4 – Change in earned income for adult system leavers

	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
Universe: Number of adults who exited (system leavers)	493		527	34
Number of adults who exited with increased earned income	110		116	6
Percentage of adults who increased earned income	22%		22%	0%

Metric 4.5 – Change in non-employment cash income for adult system leavers

	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
Universe: Number of adults who exited (system leavers)	493		527	34
Number of adults who exited with increased non-employment cash income	143		174	31
Percentage of adults who increased non-employment cash income	29%		33%	4%

Metric 4.6 – Change in total income for adult system leavers

	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
Universe: Number of adults who exited (system leavers)	493		527	34
Number of adults who exited with increased total income	228		259	31
Percentage of adults who increased total income	46%		49%	3%

FY2017 - Performance Measurement Module (Sys PM)

Measure 5: Number of persons who become homeless for the 1st time

Metric 5.1 – Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS

	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
Universe: Person with entries into ES, SH or TH during the reporting period.	7189		6184	-1005
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	2476		2335	-141
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)	4713		3849	-864

Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
Universe: Person with entries into ES, SH, TH or PH during the reporting period.	8676		7571	-1105
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	3191		3111	-80
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)	5485		4460	-1025

FY2017 - Performance Measurement Module (Sys PM)

Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD's Homeless Definition in CoC Program-funded Projects

This Measure is not applicable to CoCs in FY2017 (Oct 1, 2016 - Sept 30, 2017) reporting period.

Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing

Metric 7a.1 – Change in exits to permanent housing destinations

	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
Universe: Persons who exit Street Outreach	167		226	59
Of persons above, those who exited to temporary & some institutional destinations	37		91	54
Of the persons above, those who exited to permanent housing destinations	45		75	30
% Successful exits	49%		73%	24%

Metric 7b.1 – Change in exits to permanent housing destinations

FY2017 - Performance Measurement Module (Sys PM)

	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
Universe: Persons in ES, SH, TH and PH-RRH who exited, plus persons in other PH projects who exited without moving into housing	5848		5135	-713
Of the persons above, those who exited to permanent housing destinations	2788		2282	-506
% Successful exits	48%		44%	-4%

Metric 7b.2 – Change in exit to or retention of permanent housing

	Submitted FY 2016	Revised FY 2016	FY 2017	Difference
Universe: Persons in all PH projects except PH-RRH	4290		4444	154
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	4179		4362	183
% Successful exits/retention	97%		98%	1%

FY2017 - SysPM Data Quality

CT-505 - Connecticut Balance of State CoC

This is a new tab for FY 2016 submissions only. Submission must be performed manually (data cannot be uploaded). Data coverage and quality will allow HUD to better interpret your Sys PM submissions.

Your bed coverage data has been imported from the HIC module. The remainder of the data quality points should be pulled from data quality reports made available by your vendor according to the specifications provided in the HMIS Standard Reporting Terminology Glossary. You may need to run multiple reports into order to get data for each combination of year and project type.

You may enter a note about any field if you wish to provide an explanation about your data quality results. This is not required.

FY2017 - SysPM Data Quality

	All ES, SH				All TH				All PSH, OPH				All RRH				All Street Outreach			
	2013-2014	2014-2015	2015-2016	2016-2017	2013-2014	2014-2015	2015-2016	2016-2017	2013-2014	2014-2015	2015-2016	2016-2017	2013-2014	2014-2015	2015-2016	2016-2017	2013-2014	2014-2015	2015-2016	2016-2017
1. Number of non-DV Beds on HIC	1496	1526	1543	1496	840	784	653	579	4523	4840	5063	5144	236	276	517	634				
2. Number of HMIS Beds	1466	1497	1529	1482	726	682	611	528	3413	3705	3728	3849	133	273	498	590				
3. HMIS Participation Rate from HIC (%)	97.99	98.10	99.09	99.06	86.43	86.99	93.57	91.19	75.46	76.55	73.63	74.83	56.36	98.91	96.32	93.06				
4. Unduplicated Persons Served (HMIS)	11162	9253	8298	7289	1813	1672	1622	1384	4513	4452	4724	4948	2549	2580	2613	2598	836	1081	711	603
5. Total Leavers (HMIS)	9508	7887	6802	5919	987	887	920	812	717	579	566	588	1539	1660	1690	1376	452	854	318	186
6. Destination of Don't Know, Refused, or Missing (HMIS)	4779	3066	1861	1385	282	171	43	23	141	91	62	29	366	405	36	37	180	209	107	25
7. Destination Error Rate (%)	50.26	38.87	27.36	23.40	28.57	19.28	4.67	2.83	19.67	15.72	10.95	4.93	23.78	24.40	2.13	2.69	39.82	24.47	33.65	13.44

CT Balance of State (CT BOS) Continuum of Care Policies
Revised 6/16/17
By CT BOS CoC Steering Committee

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I. CoC Overview

In accordance with HUD regulations (24 CFR Part 578), representatives from relevant organizations that serve homeless and formerly homeless individuals and other interested, relevant organizations within the following geographic areas, New Haven and its suburbs, Hartford suburbs, the Valley, Windham/Tolland Counties, Litchfield County, Manchester, New London/Norwich, Middletown/Middlesex, Bristol, Danbury, and New Britain have established a Continuum of Care to carry out the duties assigned in the aforementioned regulations. That Continuum of Care is named the Connecticut Balance of State Continuum of Care (CT BOS) and has established a Board, which is named the BOS Steering Committee in accordance with the process described in the by-laws included herein.

CT BOS is a united coalition of community and state systems that assist homeless and near homeless residents in the BOS region to obtain housing, economic stability, and an enhanced quality of life through comprehensive services. CT BOS addresses critical issues related to homelessness through a coordinated community-based process of identifying and addressing needs utilizing not only HUD dollars, but also mainstream resources and other sources of funding. This is often achieved though the work of the local planning bodies and sub-CoCs that help comprise the CT BOS CoC.

The BOS Steering Committee has adopted the policies contained herein to ensure compliance with HUD regulations and to support efforts to assist homeless and near homeless residents in the BOS region to obtain housing, economic stability and enhanced quality of life. These policies were developed over time by the BOS Steering Committee. The policies were adopted in full by the Steering Committee on September 11, 2014 and may be amended by a majority vote at any meeting of the Steering Committee, with a quorum present. Amendments made by the Steering Committee subsequent to 9/11/14 have been incorporated accordingly.

II. CoC By-Laws

BYLAWS
Connecticut Balance of State Continuum of Care

Article I – Name

Section 1: The name of this association shall be the Connecticut Balance of State Continuum of Care.

Article II – Mission and Vision

Section 1: The mission of the Connecticut Balance of State (CT BOS) Continuum of Care (CoC), a united coalition of community and state systems, is to assist homeless and near homeless residents to obtain housing, economic stability, and an enhanced quality of life through comprehensive services.

Section 2: The vision of the CT BOS CoC is that within the next ten years, all persons and families experiencing the possibility of homelessness in Connecticut will have a permanent, safe, decent and affordable place to call home.

Article III – Purpose

Section 1: To receive funding through the U.S. Department of Housing and Urban Development (HUD), under HEARTH (formerly, the McKinney Vento Homeless Assistance Act), geographic regions are required to establish and maintain a Continuum of Care.

A. The CT BOS CoC covers: all the cities and towns in the counties of Hartford, Litchfield, New Haven, New London, Windham, Tolland, Middlesex and the City of Danbury.
B. The CT BOS CoC is designed to address critical issues related to homelessness through a coordinated community-based process of identifying and addressing needs utilizing not only HUD dollars, but also mainstream resources and other sources of funding. This is often achieved though the work of the local planning bodies, Sub-CoCs and CANs that help comprise the CT BOS CoC. Avoiding duplication of efforts, leveraging resources, and coordinated planning are other purposes of the CoC.

Section 2: The CT BOS CoC assists in the coordination and development of services and housing for homeless and low-income persons with housing needs through planning, education and advocacy.

To achieve this purpose the CT BOS CoC will seek to:

A. Enhance the knowledge of the service and housing providers to address the housing and service needs of homeless and formerly homeless persons in CT.
B. Identify housing needs of homeless and low-income persons in Connecticut on an ongoing basis.
C. Identify the gaps and needs of homeless households in Connecticut and participate in the process of prioritizing local, state and federal funding to meet these needs
D. Support planning and development of housing and services to meet prioritized needs within Connecticut.
E. Participate in the operation of and ongoing planning for a coordinated access system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services and helps direct those persons to the appropriate providers.
F. Evaluate outcomes of projects funded under Emergency Solutions Grant and CoC programs and report to HUD.
G. Ensure that there is a single Homeless Management Information System (HMIS) for the CT BOS CoC area.
H. Ensure that there is a regular point-in-time count of homeless persons in the CT BOS CoC region at intervals that are at least as frequent as required by HUD.

Section 3: Lead Agency

A. The lead agency for the CT BOS CoC is the CT Department of Mental Health and Addiction Services (DMHAS).

Section 4: Role of Regional Planning Bodies

A. CT BOS is comprised of the following regions: Bristol, Danbury, Greater Hartford, Greater New Haven, Litchfield County, Manchester, New Britain, New London/Norwich, Middletown/Middlesex, Waterbury, and Windham/Tolland. Many of these regions have their own planning groups, known as Coordinated Access Networks (CANs) and/or Sub-CoCs, which guide the community's work around homeless housing and services. Each region is eligible to have one representative on the BOS Steering Committee. The Sub-CoCs and CANs are the core organizing and implementation entities for local implementation of housing and service initiatives intended to help to end homelessness. The Sub-CoCs and CANs bring local providers and stakeholders together to collaboratively address homelessness and plan for housing and services in their region.
B. The Sub-CoCs and CANs work with the Coalition to End Homelessness to complete the Point-in-Time count (PIT) and the Housing Inventory Chart (HIC).
C. CT BOS Steering Committee Representative from each region shares the planning and work being conducted in their communities as well as raise local issues of importance and concern for CT BOS CoC to address.

Section 5: Specific Tasks of the Continuum

A. The CT BOS CoC evaluates renewal projects each year based on an agreed upon set of criteria/performance targets which includes but is not limited to: performance on HUD Annual Performance Report (APR), accuracy of budgets, HMIS data quality and consumer survey results.
B. Each year the Continuum assesses the gaps and needs in the state and creates priorities for new project proposals based on the assessment.
C. The CT BOS provides guidance and support to the localities that make up the CT BOS CoC.
D. The CT BOS CoC seeks an equitable distribution of resources among the localities that make up the Continuum.
E. The CT BOS CoC provides information needed for the Housing and Urban Development (HUD) annual application for CoC Program funding known as the Consolidated CoC application. The CT BOS CoC ensures that the application is reviewed and completed each year.
F. The CT BOS CoC establishes performance targets, evaluation criteria and process for renewal projects.
    i. Providers are asked to submit data such as consumer surveys and APRs before the CoC Program NOFA is released.
    ii. Once the CoC Program NOFA is released, providers will submit project applications to CT BOS and HUD for review and evaluation.
G. For projects that do not meet threshold requirements, the CT BOS CoC establishes corrective action plan criteria.
    i. An agency in corrective action is unable to submit a new project application.

ii. An agency in corrective action for two years jeopardizes ongoing receipt of HUD funding through a non-renewal vote by the CT BOS Steering Committee.

H. An independent Scoring Committee (see Article V) evaluates and scores proposals submitted for new HUD funding according to funding priorities and other criteria as determined by the Steering Committee.

I. Projects are ranked based on renewal criteria as adopted by the Steering Committee and new project scores as assigned by the independent Scoring Committee. Final project ranking is adopted by the Steering Committee, based on CoC priorities prior to submission with the annual CoC Consolidated application to HUD.

Article IV – Membership

Section I: Composition of CT BOS CoC

A. Membership may be comprised of all individuals and agencies concerned with the development and coordination of homeless assistance programs.

Membership shall include but not be limited to:

- Homeless or formerly homeless individuals and families
- Non-profit organizations representing veterans and individuals with disabilities
- Victim service providers
- Faith-based organizations
- Public housing agencies
- Advocates
- Mental Health agencies
- School districts
- Hospitals
- Universities
- Affordable housing developers
- Law enforcement
- Representatives of business and financial institutions
- Representatives of private foundations and funding organizations
- Social service providers
- State and local government agencies

B. There will be a full membership meeting, with published agendas at least semi-annually with an invitation for new members to join publicly available at least annually

Article V – Committees

CT BOS CoC shall have the following committees:

Section 1: Steering Committee (see description below in Article VI)

Section 2: An **Executive Committee** comprised of the co-chairs of the Steering Committee, and consultant shall be established to serve as the administrative arm of the CT BOS CoC. The Executive Committee provides planning for the CoC, ensures the

cooperation of members, preparation of reports, evaluation of systems and the development of necessary procedures to implement policies ratified by the CoC. The Executive Committee will review the annual CoC Consolidated Application to HUD and will research additional funding sources for the CoC agencies programs. The Executive Committee will provide an opportunity for committee reports.

Section 3: The HMIS Steering Committee guides the planning and implementation of the HMIS. The HMIS/PIT Committee provides oversight of the Point-In-Time Count and HMIS data quality and compliance. The committee coordinates AHAR participation and expansion of HMIS and coordinates efforts to ensure accurate, timely & useful data reports. The group coordinates training and support around HMIS for providers.

Section 4: The Evaluation (Scoring) Committee will evaluate and score proposals submitted for new HUD CoC Program funding according to funding priorities and other guidelines and/or plans of the CoC. The Evaluation (Scoring) Committee will be comprised of individuals who do not have a conflict of interest due to funding or requests for funding. Appeals of any Evaluation (Scoring) Committee decisions shall be referred to the Grievance Committee (See Section 8 below).

Section 5: The Opening Doors CT Retooling the Crisis Response and CAN Leadership Committees oversee the implementation of coordinated entry systems (CES) for the State of CT. These committees coordinate efforts with the CT BOS CoC Steering Committee around policy and procedure development for CES in CT.

Section 6: Youth Advisory Board (YAB)– The Institute for Community Research (ICR) Youth Action Hub serves as the Youth Advisory Board for the CT Balance of State CoC. CT BOS CoC consults with the YAB on relevant policy decisions.

Section 7: Grievance Committee - The purpose of the CT BOS Grievance Policy is to ensure that there is a fair and accessible process for providers and Steering Committee members to file a grievance with the CoC. The Grievance Committee shall be made up of a minimum of three members of the CT BOS CoC Steering Committee. Members shall be appointed by the CT BOS CoC Steering Committee Co-Chairs. In all instances when a conflict of interest is present, parties shall recuse themselves from voting on and otherwise influencing the outcome of matters referred to the Grievance Committee.

Article VI: The Steering Committee

Section 1: Composition of Steering Committee

Membership shall be comprised of individuals and agencies concerned with the development and coordination of homeless assistance programs, through a nominating process initiated by the Co-Chairs at least annually.

Membership shall include but not be limited to:

- Homeless or formerly homeless individuals and families
- Non-profit organizations representing veterans and individuals with disabilities
- Victim service providers
- Faith-based organizations
- Public housing agencies
- Advocates
- Mental Health agencies
- School districts
- Hospitals
- Universities
- Affordable housing developers
- Law enforcement
- Representatives of business and financial institutions
- Representatives of private foundations and funding organizations
- Social service providers
- State and local government agencies

Section 2: Membership from BOS Regions on the Steering Committee

Each region is eligible to have one representative on the CT BOS Steering Committee and may request such, provided that:

A. The locality must have a functioning and active local homeless planning process (i.e. Sub-CoC and/or CAN) holding at least 4 meetings per year.

B. A standard application with documentation must be submitted to the Steering Committee annually.

Section 3: Rights of Steering Committee Members

Members are entitled to:

A. Have voting rights (One vote per agency unless individual member)

B. Receive letters of support for grants indicating length of membership and level of participation

C. Receive information and updates via e-mail

Section 4: Expectation of Steering Committee Members

A. Members are expected to be present and active participants in CoC Committee meetings.

B. Members are expected to actively participate in CT BOS CoC Committee activities, correspondence, sub-committees, and/or ad-hoc committees.

C. Members are expected to following the By-Laws and CT BOS CoC Code of Conduct.

Section 5: Steering Committee Voting

A. The CT BOS CoC Steering Committee operates by consensus whenever possible. When a vote is necessary, each member shall have one vote upon any motion.

B. No member shall vote on any issue where there could be a conflict of interest. (Refer to Conflict of Interest)

C. As needed, Roberts Rules of Order will govern procedural questions during CoC Steering Committee Meetings.
D. A simple majority vote of members present will be used to settle issues that reach an impasse.

Section 6: Steering Committee Meetings/Attendance

A. The Steering Committee shall meet at a minimum 6 times per year.
B. Upon a request, in writing, by at least five members of the Steering Committee, a special meeting can be called by the Co-Chairs at any time.
C. Attendance will be recorded at all Steering and committee meetings. Members are expected to have at least an 80% attendance rate at all Steering Committee meetings.
D. A member can be removed by a majority vote of the Steering Committee.

Section 7: Quorum at Steering Committee Meetings

A. A simple majority (50% + 1) of Members, at a Steering Committee meeting, constitutes a quorum.
B. A quorum is needed to (a) change CT BOS CoC bylaws and Governance Charter (b) approve Steering Committee members and (c) elect co-chairs.

Section 8: Steering Committee Co-Chairs

A. The officers of the Ct BOS CoC Continuum shall be two co-chairs, one representing state government and one representing the non-profit provider community.
B. Selection of one Co-Chair will take place annually.
C. The Co-Chairs will serve two-year staggered terms and can serve unlimited consecutive terms.
D. Election of the Co-Chairs will be by simple majority vote of Members present (Quorum required) annually .
E. The Co-Chairs are authorized to represent the CT BOS CoC in all matters not requiring a quorum.
F. The Co-Chairs shall call, preside over all meetings, and set agendas for all CoC meetings. The co-chairs can call special meetings of the Continuum.
G. Immediate Past Co-Chairs may assist and advise the Co-Chairs, upon their request, in the performance of their duties.
H. Any vacancies occurring during the year shall be filled upon the recommendation of the Executive Committee and shall be ratified by the Steering Committee.

Article VII – Consultant Functions

A. A Consultant manages the day-to-day operations of the CT BOS Continuum of Care and writes the annual HUD Continuum of Care Application.
B. A Consultant is selected by and reports to the Lead Agency.

Article VIII – Conflict of Interest & Code of Conduct

Section 1: CT BOS CoC members must conduct themselves at all times with the highest ethical standards. Members are required to follow the CT BOS CoC Code of Conduct. (See Appendix 1.) Conflicts of interest, and even the appearance of a conflict of interest, must be avoided.

Section 2: All individuals and representatives of organizations who have, are seeking, or considering seeking funds under the endorsement of the CoC must adhere to the following:

A. He or she shall disclose to the CoC any conflict or appearance of conflict which may or could be reasonably known to exist.
B. He or she shall not vote on any item that would create a conflict or appearance of conflict.
C. He or she shall not participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.
D. He or she shall not lobby or seek information from any other member of the Continuum if such action would create a conflict or the appearance of a conflict.

Article IX– Nondiscrimination

Section 1: The members, officers, and persons served by the Continuum shall not discriminate against any CoC member because of race, color, religious creed, age, marital status, national origin, sex, sexual orientation, gender identity or gender expression, intellectual disability, or physical disability and will follow all state and federal regulations regarding nondiscrimination.

Article X- Amendments

Section 1: These Bylaws may be amended by a majority vote at a meeting of the Steering Committee, with a present, provided that the proposed amendment(s) shall have been submitted in writing to each member at 10 business days before action is taken by the Steering Committee.

Appendix I: CT BOS CoC Code of Conduct

This CT BOS CoC Code of Conduct represents the CoC's commitment to high standards. The following standards should be regarded as minimum expectations for conduct. Members will act in accordance with and maintain the highest standards of professional integrity, impartiality, diligence, creativity and productivity. CoC business will be conducted in a manner that reflects the highest standards and in accordance with federal, state, and local laws and regulations.

1. Compliance with Policies

A. Members will conduct the CT BOS CoC business in accordance with the by-laws of CT BOS CoC including conflict of interest and information management policies.

2. Conflict of Interest

A. Members must act in the best interests of the organization and avoid situations where their personal interests or relationships interfere with acting in good faith on behalf of the CT BOS CoC.
B. Members may not engage in activities that are in conflict with the interests of the CT BOS CoC or that may negatively impact the reputation of the CoC.
C. Members are required to follow Article VIII of the CT BOS CoC Bylaws regarding conflict of interest and code of conduct.

3. Confidentiality

A. Members must maintain the highest standards of confidentiality regarding information obtained directly or indirectly through their involvement with the CT BOS CoC. This includes but is not limited to information about members and their organizations and funded agencies. Members must also avoid inadvertent disclosure of confidential information through casual or public discussion, which may be overheard or misinterpreted.

4. Impartiality

A. Member agencies shall act impartially and with integrity.

Members will:

- Not knowingly being a party to or condoning any illegal or improper activity.
- Not directly, or indirectly, seek personal gain which would influence, or appear to influence, the conduct of their duties.
- Not exploit CoC professional relationships for personal or professional gain
- Be alert to the influences and pressures that interfere with the professional discretion and impartial judgment required for the performance of members.

5. Fraud

A. The term fraud refers to, but is not limited to: intentionally entering false or erroneous information into electronic software systems; any dishonest or fraudulent act; forgery or alteration of any official document; misappropriation of funds, supplies, or Continuum of Care materials; improper handling or reporting of money or financial transactions; profiting by self or others as a result of inside knowledge; destruction or intentional disappearance of records, furniture, fixtures, or equipment; accepting or seeking anything of material value from vendors or persons providing services or materials to the Continuum of Care for personal benefit; or any similar or related irregularities.
B. Fraudulent acts will not be tolerated and may result in termination from CoC committees.

6. Gifts or honoraria

A. It is not permissible to offer or accept gifts, gratuities, excessive favors or personal rewards intended to influence the CT BOS CoC's decisions or activities.

7. Harassment

A. Harassment, interpreted as unwelcome conduct, comment, gesture, contact, or intimidating and offensive behavior likely to cause offence or humiliation, will not be tolerated and may result in disciplinary measures up to and including removal from CoC committee/s

8. Laws and Regulations

A. CoC business will be conducted in manner that reflects the highest standards and in accordance with all federal, state, and local laws and regulations.

III. Governance Charter

CT Balance of State CoC Governance Charter

For additional information on Membership, Leadership, Selection of Steering Committee, Conflict of Interest for Steering Committee members; Proceedings, Committees and Work groups and Full Membership, see By-Laws

CT Balance of State CoC Governance Charter

The CT BOS By-Laws are attached as an Appendix to this document and include additional sections on Membership, Leadership, Selection of Steering Committee, Conflict of Interest for Steering Committee members; Proceedings, Committees and Work groups and Full Membership. The by-laws and this charter provide the core governance and operating policies for the CT BOS CoC.

The charter was adopted in full by the Steering Committee on September 11, 2014 and may be amended by a majority vote at any meeting of the Steering Committee, with a quorum present.

CT BOS CoC and CT BOS CoC Steering Committee

The name of this CoC shall be Connecticut Balance of State Continuum of Care and the name of this Continuum of Care board shall be Connecticut Balance of State Steering Committee, herein referred to, respectively, as the "CT BOS CoC" and "CT BOS CoC Steering Committee."

Purpose of the CT BOS CoC and CT BOS CoC Steering Committee

The CT BOS CoC is a united coalition of community and state systems that assist homeless and near homeless residents in the BOS region to obtain housing, economic stability, and an enhanced quality of life through comprehensive services. The CT BOS CoC addresses critical issues related to homelessness through a coordinated community-based process of identifying and addressing needs utilizing not only HUD dollars, but also mainstream resources and other sources of funding. This is often achieved though the work of the local planning bodies and Sub-CoCs that help comprise the CT BOS CoC. Avoiding duplication of efforts, leveraging resources, and coordinated planning are other purposes of the CT BOS CoC.

CT BOS CoC Steering Committee is the planning body that coordinates policies, strategies and activities toward ending homelessness in the CT BOS region. The Steering Committee gathers and analyzes information in order to determine the local needs of people experiencing homelessness, implements strategic responses, educates the community on homeless issues, provides advice and input on the operations of homeless services, and measures CoC performance.

For additional information see CT BOS CoC By-Laws Article III, Section 1

Responsibilities

The responsibilities for operating the CT BOS CoC are divided among the CT BOS CoC Steering Committee, CT BOS CoC Collaborative Applicant, and CT BOS CoC HMIS lead, as described below:

CoC Operations

CT BOS CoC Steering Committee is responsible for the following activities:

- Develops and updates annually this governance charter and CT BOS CoC By-Laws, which together include all procedures and policies needed to comply with HUD requirements and with HMIS requirements, including a code of conduct and recusal process for the CT BOS CoC Steering Committee, its chairs, and any person acting on behalf of the CT BOS CoC Steering Committee.
- In consultation with recipients of ESG funds within the CoC's geographic area, works with the CT Department of Housing, CT Department of Social Services, Connecticut Coalition to End Homelessness (CCEH), CT Department of Mental Health and Addiction Services, and CoC members to develop and operate a coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services.
- In consultation with recipients of ESG funds within the CoC, establishes and consistently follows written standards for providing CoC assistance.
- Consults with recipients and subrecipients to establish performance targets appropriate for population and program type.
- Monitors performance of CoC and ESG recipients and subrecipients.
- Evaluates the outcomes of projects funded under ESG and CoC programs.
- Takes action against ESG and CoC projects that perform poorly.
- Reports the outcomes of ESG and CoC projects to HUD annually.

For additional information, see CT BOS CoC By-Laws Article II, Sections 2 and 5

CoC Planning

The CT BOS Steering Committee is responsible for the following activities:

- Conducts an annual gaps analysis of the needs of homeless people, as compared to available housing and services within the CoC geographic area
- Works closely with government agencies, funders, advocates, providers and consumers to coordinate the implementation of a housing and service system within the CoC's geographic area that meets the needs of homeless individuals and families. The system encompasses:
    - Outreach, engagement, and assessment

    - Shelter, housing, and supportive services
    - Prevention strategies
- Provides information required to complete the Consolidated Plan(s) within the CoC geographic area
- Consults with State and local government ESG recipients within the CoC geographic area on the plan for allocating ESG funds and reporting on and evaluating the performance of ESG recipients and subrecipients

For additional information, see CT BOS CoC By-Laws, Article III, Section 2

Designating and Operating an HMIS

The CT BOS Steering Committee is responsible for the following activities:

- Designates a single HMIS for the CoC's geography. CCEH, an eligible applicant, serves as the CoC's HMIS lead agency.

The CT BOS CoC HMIS Lead is responsible for the following activities:

- Works with the CT HMIS Steering Committee to review, revise and approve a CoC HMIS data privacy plan, data security plan, and data quality plan.
- Ensures that the HMIS is administered in compliance with HUD requirements.

The CT BOS CoC HMIS Lead and CT BOS Steering Committee are responsible for the following activities:

- Ensure consistent participation by CoC, ESG, and PATH recipients and subrecipients in the HMIS

Preparing an application for CoC funds

The CT BOS Steering Committee:

- Establishes priorities that align with local and federal policies for recommending projects for HUD Homeless Assistance CoC Grant funding.
- Designates an eligible collaborative applicant (i.e., Connecticut Department of Mental Health and Addiction Services – DMHAS) to collect and combine the required application information from all applicants.
- Determines whether to select the collaborative applicant to apply for Unified Funding Agency designation from HUD.
- Approves the final submission of applications in response to the CoC Notice of Funding Availability.

- Designs, operates, and follows a collaborative process for the development of a CoC application to HUD.
- Determines if one application for funding will be submitted for all projects within the geographic area or if more than one application will be submitted; retains its responsibilities, even if designating one or more eligible applicant other than itself to apply for funds on behalf of the Continuum.

Membership and Leadership of the CoC Steering Committee

The CT BOS CoC Steering Committee shall adhere to the membership and leadership standards outlined in Article IV and Article VI of the CT BOS CoC By-Laws.

CoC Steering Committee Member Qualifications

All members of the CT BOS CoC Steering Committee shall demonstrate a professional interest in, or personal commitment to, addressing and alleviating the impacts of homelessness on the people of the community.

CoC Steering Committee Member Responsibilities

CT BOS CoC Steering members are expected to:

- Attend meetings and contribute to informed dialogue on actions the group undertakes
- Serve on a committee of the CT BOS CoC – do we still want this? Most do not
- Participate in the activities of the CT BOS CoC Steering Committee, including the Point-in-Time count, HMIS oversight, strategic planning, advocacy and public education efforts, project and system performance reviews, and the application processes for CoC Homeless Assistance Grants and other funding proposals
- Seek input from and report back to the constituency they represent on key issues and strategies and otherwise keep abreast of needs and gaps in the CoC

For additional information, see CT BOS CoC By-Laws, Article VI

CoC Steering Committee Member Selection

The CoC Steering Committee is comprised of representatives of state government agencies (including ESG recipients), nonprofit intermediaries, up to two consumers (homeless/formerly homeless persons), and homeless provider organizations representing sub-regions (or Sub-CoC's) of the BOS. New members may be added by a majority vote of the existing Steering Committee.

Government representatives are appointed by their respective commissioners and include the CT Department of Mental Health and Addiction Services, Department of Housing (ESG Recipient), CT Housing Finance Agency, CT Department of Education, CT Department of Social Services, CT Department of Children and Family Services, CT

Department of Corrections, CT Department of Veteran Affairs, and U.S. Department of Veterans Affairs.

Sub-CoCs of the Balance of State select their representatives to the Steering Committee. Sub-CoCs must meet requirements to have a representative on the BOS SC (see requirements section below.) The CT BOS Sub-CoCs include: the Cities of: Bristol, New Britain, Danbury, Greater Hartford, New Haven, and Litchfield/Torrington, Manchester, Middlesex, Norwich/New London, Waterbury, and Windham/Tolland counties.

Intermediaries/advocates on the CT BOS Steering Committee include the Corporation for Supportive Housing, CT Coalition Against Domestic Violence, Partnership for Strong Communities, Connecticut Coalition to End Homelessness, and AIDS Connecticut. Representatives serving on the CT BOS Steering Committee are appointed by their respective organizations.

Consumer representatives (homeless and formerly) submit applications to join the Steering Committee. The CoC encourages consumers who have utilized homeless housing or services to apply. Consumers may not be employed by any agency receiving CoC funds and no Sub-CoC can have more than one consumer representing its region.

Regional Representation Requirements

CT BOS is comprised of the following regions: Bristol, Danbury, Greater Hartford, Greater New Haven, Litchfield County, Manchester, New Britain, New London/Norwich, Middletown/Middlesex, Waterbury, and Windham/Tolland. Many of these regions have their own local planning groups, known as Coordinated Access Networks (CANs) and/or Sub-CoCs, which guide the community's work around homeless housing and services. Each region is eligible to have one representative on the BOS Steering Committee. To maintain a representative on the BOS Steering Committee, a Sub-CoC or CAN must meet the following requirements:

- In order to be a member of the BOS CoC Steering Committee, the region must have a functioning and active local planning body (i.e., Sub-CoC or CAN), holding at least 4 meetings per year and engage in local planning with a diverse group of stakeholders.
- To certify eligibility for participation in the BOS CoC Steering Committee, each year, all Regions are required to submit the name of their appointed Steering Committee representative, Sub-CoC/CAN minutes, and member list to the Steering Committee.
- Each year, all regions of CT BOS are required to participate in the annual point-in-time homeless count to collect information on inventory and homeless persons; each agency must also designate one staff member to assist with the unsheltered homeless count.

- Regional representatives on the Steering Committee are responsible for convening local planning on homeless housing and services and obtaining input from members to share with the Steering Committee. The representatives are charged with ensuring that decisions made and information shared at Steering Committee meetings is brought back to the relevant local planning bodies.
- Collaborate with local educational agencies in identification of homeless children and youth.
- Develop and implement local Coordinated Access policies and procedures in the CAN.

CoC Steering Committee Member Termination

Members may be dismissed from the CT BOS CoC Steering Committee for violating the CT BOS CoC Code of Conduct. If a board member wishes to resign, the board member shall promptly submit a letter of resignation to a Steering Committee chairperson.

For additional information, see CT BOS CoC By-Laws, Article VI, Section 6

CoC Steering Committee Decision Making

The CT BOS CoC Steering Committee shall conduct business and make decisions in accordance with Article VI, Section 5 and Section 7 of the CT BOS CoC By-Laws.

CoC Governance Charter Amendment and Review

The CT BOS CoC will review, update, and approve this governance charter at least annually. Amendment of the charter requires a majority vote of the members present at a CT BOS CoC Steering Committee meeting.

Relationship between the CT BOS CoC Steering Committee and Full CoC Membership

CT BOS CoC Steering Committee meetings will be open to the full membership and the public. CT BOS CoC Steering Committee will post minutes of the CT BOS CoC Steering Committee meetings on the CT BOS CoC website. Between CT BOS CoC Steering Committee meetings, CT BOS CoC Steering Committee members will keep the full membership involved by involving CoC members in workgroups and committees and sharing information (including meeting minutes, resources for homeless services providers, plans and implementation progress, data about homelessness in the region and funding availability) via email list and/or via the CoC website.

Full Membership Meetings

The CT BOS CoC will hold meetings of the full CT BOS CoC membership at least semiannually.

The CT BOS Steering Committee will announce the date, time and location of these meetings at least one month in advance and will publish the meeting agenda at least 24 hours before the meeting. Meeting agendas will be distributed via email and posted online on the CT BOS CoC website for review prior to the meeting.

Recruitment of and Outreach to CoC Members

The CT BOS CoC Steering Committee (*or its designee)* will publish and appropriately disseminate an open invitation at least annually for persons within the CT BOS CoC area to join as new CoC members. Recruitment efforts will be documented by the Steering Committee.

The CT BOS CoC identifies and addresses membership gaps in essential sectors, from key providers or other vital stakeholders. The CT BOS CoC recruits members to ensure that it meets all membership requirements set forth in its governance charter, including representation of certain populations and certain organizations. Specifically, outreach will be conducted to obtain membership from the following groups as they exist within the CT BOS CoC geographic area and are available to participate in the CoC:

- Nonprofit homeless assistance 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 veterans
- Homeless and formerly homeless individuals
- Other relevant organizations within the CoC's geography

V. Program Operating Standards

1. CT BOS Housing First Principles

Housing First is a programmatic and systems approach that centers on providing homeless people with housing quickly and *then* providing services as needed using a low barrier approach that emphasizes community integration, stable tenancy, recovery and individual choice.

Low barrier approach to entry:

- Housing First offers individuals and families experiencing homelessness immediate access to permanent supportive housing without unnecessary prerequisites. For example:
  a. Admission/tenant screening and selection practices do not require abstinence from substances, completion of or compliance with treatment, or participation in services.
  b. Applicants are not rejected on the basis of poor or lack of credit or income, poor or lack of rental history, minor criminal convictions, or other factors that might indicate a lack of "housing readiness."
  c. Blanket exclusionary criteria based on more serious criminal convictions are not applied, though programs may consider such convictions on a case by case basis as necessary to ensure the safety of other residents and staff.
  d. Generally, only those admission criteria that are required by funders are applied, though programs may also consider additional criteria on a case by case basis as necessary to ensure the safety of tenants and staff. Application of such additional criteria should be rare, and may include, for example, denial of an applicant who is a high risk registered sex offender by a project serving children, or denial of an applicant who has a history of domestic violence involving a current participant.

Community integration and recovery:

- Housing is integrated into the community and tenants have ample opportunity and are supported to form connections outside of the project.
  a. Housing is located in neighborhoods that are accessible to community resources and services such as schools, libraries, houses of worship, grocery stores, laundromats, doctors, dentists, parks, and other recreation facilities.
  b. Efforts are made to make the housing look and feel similar to other types of housing in the community and to avoid distinguishing the housing as a program that serves people with special needs.

c. Services are designed to help tenants build supportive relationships, engage in personally meaningful activities, and regain or develop new roles in their families and communities.
d. Services are recovery-based and designed to help tenants gain control of their own lives, define their personal values, preferences, and visions for the future, establish meaningful individual short and long-term goals, and build hope that the things they want out of life are attainable. Services are focused on helping tenants achieve the things that are important to them and goals are not driven by staff priorities or selected from a pre-determined menu of options.

Lease compliance and housing retention

- Tenants are expected to comply with a standard lease agreement and are provided with services and supports to help maintain housing and prevent eviction. Visitors are expected to comply with requirements in the lease agreement.
  a. Leases do not include stipulations beyond those that are customary, legal, and enforceable under Connecticut law.
  b. No program rules beyond those that are customary, legal, and enforceable through a lease are applied (e.g., visitor policies should be equivalent to those in other types of permanent, lease-based housing in the community). Housing providers may ask for identification from visitors.
  c. Services are designed to identify and reduce risks to stable tenancy and to overall health and well-being.

- Retention in housing is contingent only on lease compliance and is not contingent on abstinence from substances or compliance with services, treatment or other clinical requirements. For example:
  a. Tenants are not terminated involuntarily from housing for refusal to participate in services or for violating program rules that are not stipulated in the lease.
  b. Transitional housing programs offer participants due process to resolve issues that may result in involuntary discharge (unless immediate risk to health and safety)
  c. PH providers only terminate occupancy of housing in cases of noncompliance with the lease or failure of a tenant to carry out obligations under Connecticut's Landlord and Tenant Act (Chapter 830 of the Connecticut General Statute http://www.cga.ct.gov/2011/pub/chap830.htm).
  d. In order to terminate housing, PH providers are required to use the legal court eviction process.

Separation of housing and services

- Projects are designed in such a manner that the roles of property management (e.g., housing application, rent collection, repairs, and eviction) and supportive services staff are clearly defined and distinct.
  a. Property management and support service functions are provided either by separate legal entities or by staff members whose roles do not overlap.
  b. There are defined processes for communication and coordination across the two functions to support stable tenancy.
  c. Those processes are designed to protect client confidentiality and share confidential information on a need to know basis only.

Tenant Choice

- Efforts are made to maximize tenant choice, including type, frequency, timing, location and intensity of services and whenever possible choice of neighborhoods, apartments, furniture, and décor.
- Staff accepts tenant choices as a matter of fact without judgment and provides services that are non-coercive to help people achieve their personal goals.
- Staff accepts that risk is part of the human experience and helps tenants to understand risks and reduce harm caused to themselves and others by risky behavior.
- Staff understands the clinical and legal limits to choice and intervenes as necessary when someone presents a danger to self or others.
- Staff helps tenants to understand the legal obligations of tenancy and to reduce risk of eviction.
- Projects provide meaningful opportunities for tenant input and involvement when designing programs, planning activities and determining policies.

2. Housing First Requirements

- All CT BOS projects (Permanent Supportive Housing Rapid Re-Housing, and Transitional Housing) are required to adopt the CT BOS Housing First Principles listed above or penalties apply. Applicable penalties are established by the BOS Steering Committee.

3. Non-discrimination

- Providers shall have non-discrimination policies in place and assertively outreach to people least likely to engage in the homeless system.
- Providers shall comply with all federal statutes including, the Fair Housing Act and the Americans with Disabilities Act.
- Providers shall comply with the following requirements as set forth by section 4a-60 of the Connecticut General Statutes:

(1) The Contractor agrees and warrants that in the performance of the Contract such Contractor will not discriminate or permit discrimination against any person or group of persons on the grounds of race, color, religious creed, age, marital status, national origin, ancestry, sex, mental retardation, mental disability or physical disability, including, but not limited to, blindness, unless it is shown by such Contractor that such disability prevents performance of the work involved, in any manner prohibited by the laws of the United States or of the state of Connecticut. The Contractor further agrees to take affirmative action to insure that applicants with job-related qualifications are employed and that employees are treated when employed without regard to their race, color, religious creed, age, marital status, national origin, ancestry, sex, mental retardation, mental disability or physical disability, including, but not limited to, blindness, unless it is shown by such Contractor that such disability prevents performance of the work involved;

(2) the Contractor agrees, in all solicitations or advertisements for employees placed by or on behalf of the Contractor, to state that it is an "affirmative action-equal opportunity employer" in accordance with regulations adopted by the commission;

(3) the Contractor agrees to provide each labor union or representative of workers with which such Contractor has a collective bargaining agreement or other contract or understanding and each vendor with which such Contractor has a contract or understanding, a notice to be provided by the commission advising the labor union or workers' representative of the Contractor's commitments under this section, and to post copies of the notice in conspicuous places available to employees and applicants for employment;

(4) the Contractor agrees to comply with each provision of this section and sections 46a-68e and 46a-68f and with each regulation or relevant order issued by said commission pursuant to sections 46a-56, 46a-68e and 46a-68f;

(5) the Contractor agrees to provide the Commission on Human Rights and Opportunities with such information requested by the commission, and permit access to pertinent books, records and accounts, concerning the employment practices and procedures of the Contractor as relate to the provisions of this section and section 46a-56.

g) The following subsections are set forth here as required by section 4a-60a of the Connecticut General Statutes:

(1) the Contractor agrees and warrants that in the performance of the Contract such Contractor will not discriminate or permit discrimination against any person or group of persons on the grounds of sexual orientation, in any manner prohibited by the laws of the United States or of the state of Connecticut, and that employees are treated when employed without regard to their sexual orientation;

(2) the Contractor agrees to provide each labor union or representative of workers with which such Contractor has a collective bargaining agreement or other contract or understanding and each vendor with which such Contractor has a contract or understanding, a notice to be

provided by the Commission on Human Rights and Opportunities advising the labor union or workers' representative of the Contractor's commitments under this section, and to post copies of the notice in conspicuous places available to employees and applicants for employment;

(3) the Contractor agrees to comply with each provision of this section and with each regulation or relevant order issued by said commission pursuant to section 46a-56; and

(4) the Contractor agrees to provide the Commission on Human Rights and Opportunities with such information requested by the commission, and permit access to pertinent books, records and accounts, concerning the employment practices and procedures of the Contractor which relate to the provisions of this section and section 46a-56.

(h) The Contractor shall include the provisions of section (g) above in every subcontract or purchase order entered into in order to fulfill any obligation of a contract with the state and such provisions shall be binding on a subcontractor, vendor or manufacturer unless exempted by regulations or orders of the commission. The Contractor shall take such action with respect to any such subcontract or purchase order as the commission may direct as a means of enforcing such provisions including sanctions for noncompliance in accordance with section 46a-56; provided, if such Contractor becomes involved in, or is threatened with, litigation with a subcontractor or vendor as a result of such direction by the commission, the Contractor may request the state of Connecticut to enter into any such litigation or negotiation prior thereto to protect the interests of the state and the state may so enter.

(i) For the purposes of this entire Non-Discrimination section, "Contract" or "contract" includes any extension or modification of the Contract or contract, "Contractor" or "contractor" includes any successors or assigns of the Contractor or contractor, "marital status" means being single, married as recognized by the state of Connecticut, widowed, separated or divorced, and "mental disability" means one or more mental disorders, as defined in the most recent edition of the American Psychiatric Association's "Diagnostic and Statistical Manual of Mental Disorders", or a record of or regarding a person as having one or more such disorders. For the purposes of this section, "Contract" does not include a contract where each contractor is

(1) a political subdivision of the state, including, but not limited to, a municipality,

(2) a quasi-public agency, as defined in C.G.S.§ 1-120,

(3) any other state, including but not limited to any federally recognized Indian tribal governments, as defined in C.G.S.§ 1-267,

(4) the federal government,

(5) a foreign government, or

(6) an agency of a subdivision, agency, state or government described in the immediately preceding enumerated items (1), (2), (3), (4) or (5).

4. Rapid Rehousing Standards

In accordance with HUD regulations (24 CFR Part 578), the CT BOS Continuum of Care (CT BOS) has developed, in consultation with ESG recipients, the following written standards for the provision of rapid re-housing (RRH) assistance. The standards contained herein apply to Rapid Re-housing projects funded by the U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Program and located in jurisdictions covered by CT BOS.

In addition to compliance with the standards contained herein, CT BOS RRH programs must comply with 24 CFR Part 578 (HEARTH Interim Rule) and the applicable CoC Program NOFA. CT Rapid Re-housing programs funded by State of CT Homeless Housing Account, U.S. Health and Human Services Social Services Block Grant, and HUD Emergency Solutions Grant Financial Assistance should refer to and comply with CT Rapid Re-housing Program (CTRRP) Policies and Procedures.

Participant Eligibility

- To be eligible for CT BOS CoC RRH assistance, at initial evaluation, households must: 1) demonstrate literal homelessness (i.e., HUD Category One); and 2) have household annual income of less than or equal to 50% of Area Median Income (AMI); and 3) have completed a VI-SPDAT or Next Step Tool for transition aged youth during their current episode of homelessness.
- Recipients and subrecipients must conduct regular re-evaluations, at least every 90 days, of program participants receiving RRH assistance. To continue to receive rental assistance, the program participant household's annual income must be less than or equal to 30% of Area Median Income (AMI) at re-evaluation.
- Households with no income at initial evaluation and/or re-evaluation are eligible.
- As indicated by HUD, households who are eligible for PSH and awaiting PSH placement may receive RRH assistance and will retain their homeless and, if applicable, chronically homeless status.

Participant Prioritization

- For sheltered households, those whose current episode of literal homelessness[1] has been at least seven days in duration shall be prioritized for RRH assistance. RRH grant recipients and subrecipients shall determine whether households

[1] Note that literal homelessness, as defined by HUD in Category One of the HEARTH Homeless Definition Final Rule, includes both sheltered homelessness and homelessness in places not meant for human habitation. As such, time spent in either location is counted when determining eligibility for this priority.

meet this prioritization criterion at the point of initial evaluation using HMIS data and, as necessary, permissible written documentation of unsheltered homelessness as defined by the HEARTH Homeless Definition Final Rule.

- Unsheltered households shall be prioritized for RRH assistance regardless of the length of their current episode of homelessness.

Determining the type of assistance & amount or percentage of rent each program participant must pay

- CT BOS RRH programs are required to use a progressive engagement model, i.e., starting with a small amount of assistance for the shortest period of time possible to help resolve homelessness then adding more assistance, only as necessary, if the less intensive intervention is unsuccessful.
- CT BOS RRH participants may receive eligible supportive services alone or a combination of eligible supportive services and rental assistance. At a minimum, all participants must attend monthly case management meetings in accordance with HUD regulations 24 CFR Part 578.
- All participants receiving rental assistance subsidies must contribute a minimum of 30% of their monthly adjusted household income towards their monthly rent. This tenant rent contribution may be adjusted at any time based on changes to household income, including, but not limited to at each 90 day reassessment. There is no minimum rent requirement and tenant rent contribution may be zero, for households with no income.
- In addition to rental assistance, eligible program costs are defined in 24 CFR Part 578 and include:

    - ✓ **Financial assistance** (eligible under rental assistance): security deposits (up to 2 months), first and last month's rent, property damage; CoC RRH assistance **<u>may not</u>** be used for payment of rent in arrears. Total property damage payments during a single enrollment in the RRH program may not exceed an amount equal to one month of the participant household's rent.
    - ✓ **Supportive services:** Case management, child care, education services, employment assistance and job training, food, housing search and counseling services, including mediation, credit repair, and payment of rental application fee, legal services, life skills training, mental health services, moving costs, outpatient health services, outreach services, substance abuse treatment services, transportation, utility deposits

Limitations on amount, frequency and duration of assistance

- In accordance with HUD regulations 24 CFR Part 578, participants may receive eligible supportive services for no longer than 6 months after rental assistance stops. HUD regulations 24 CFR Part 578 also indicate:
    - Services may be provided to current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving homelessness to assist their adjustment to independent living; and

- Rapid rehousing projects must require the program participant to meet with a case manager not less than once per month to assist the program participant in maintaining long-term housing stability.

As such, participants may receive eligible supportive services alone (i.e. without receiving rental assistance) for up to 6 months after leaving homelessness.

Participants may also receive short-term (up to 3 months) and/or medium-term (for 3 to 12 months) tenant-based rental assistance alone or in combination with eligible supportive services.

- Participants must be re-evaluated at least every 90 days to determine the need for continued assistance. This requirement applies to both supportive services and rental assistance. Through each re-evaluation the recipient or subrecipient must determine that the continuation of assistance is necessary to avoid literal homelessness.
- Participants may receive rental assistance of no more than the following percentages of FMR for each of the indicated time frames (security deposits are excluded from these limits):

  •Months 1-3 – 100% of FMR

  •Months 4 to 6 - 80% of FMR

  •Months 7 to 9 - 60% of FMR

  •Months 10 to 12 - 40% of FMR

- If through the re-evaluation it is determined that a higher amount of assistance than the levels defined above for any period or the continuation of assistance is necessary to avoid literal homelessness, the recipient or subrecipient must submit an exemption request to the relevant Coordinated Access Network (CAN) or an entity designated by the CAN. Only the CAN or designated entity may approve exemptions. The co-chairs of CT BOS Steering Committee shall authorize exemptions as necessary until the CAN is operational. If an exemption is authorized, recipients or subrecipients must continue to re-evaluate participants at least every 90 days to determine the need for continued assistance. Under no circumstances may assistance be provided for more than the maximum period authorized by HUD regulations 24 CFR Part 578.
- Participants may be eligible for rapid re-housing assistance for multiple episodes of literal homelessness based on their need. To ensure the efficient use of resources, recipients may establish a maximum amount or number of times that a program participant may receive rapid re-housing assistance.

5. Educational Services for Children

BACKGROUND

Federal law ensures educational rights and protections for children and young adults 18-24 experiencing homelessness. Protections apply to children and youth who are living with a parent or guardian and those who are not. Every school district and public charter school in CT is required to designate a homeless liaison who is responsible for ensuring the identification, school enrollment and stability, attendance and opportunities for academic success of students in homeless situations using a child-centered, best interest framework for decision-making. In addition, HUD establishes requirements for CoCs and project applicants through the annual CoC competition and the CT Balance of State Continuum of Care (CT BOS) has established related requirements. This document summarizes basic information about the responsibilities of sub CoCs and recipients/sub-recipients of CoC and ESG funds. For more information or to find contact information for you local homeless liaison please visit: http://youth-help.org

Information is also available at the National Center for Homeless Education: http://center.serve.org/nche/briefs.php

RESPONSIBILITIES OF SUB-COCS

CT BOS Sub CoCs are responsible for coordinating with your local school district(s), charter school(s), and Coordinated Access Network (CAN) in the following ways:

- Helping to identify children and young adults who are eligible for educational services. If a child or young adult does not have a fixed, regular, and adequate place to sleep at night, he or she is eligible. This includes those living in places not meant for human habitation, emergency shelters, transitional housing, motels/hotels, campgrounds, in doubled-up situations, or in housing that lacks utilities, is infested or has other dangerous conditions.
- Helping to ensure that all families with children and young adults who qualify in your area are informed about their educational rights and their eligibility for educational services and they receive those services.
- Attending relevant meetings and planning events held by your local school district.
- Ensuring that the local school districts' homeless liaisons are aware of 211 and CAN processes for connecting homeless families and young adults to ESG & CoC resources and helping to resolve any issues that might arise in linking eligible households to those resources.
- Helping to ensure that when placing families in emergency, transitional or permanent housing, consideration is given to the educational needs of children, including placing children as close as possible to schools of origin and early

childhood education programs.

RESPONSIBILITIES OF RECIPIENTS/SUB-RECIPIENTS & SAMPLE POLICY

Recipients and sub-recipients of CoC and ESG funds serving families with children and/or young adults 18-24 are responsible for the things outlined in the sample policy below, which is intended to help providers comply with requirements established under federal law, by HUD through the annual CoC project application, and by CT BOS. All projects receiving CoC funds that are serving families with children and/or young adults 18-24 are required to have similar policies. Projects may opt to adapt this sample policy or to adopt a different policy that fulfills the requirements.

Purpose:

To ensure that participants in (INSERT CoC PROJECT NAME) are helped to understand their educational rights established under Subtitle VII-B of the McKinney-Vento Homeless Assistance Act and most recently reauthorized by the Every Student Succeeds Act; To ensure that children and young adults are immediately enrolled in school, as required by federal and State law, & to ensure that they are connected to transportation and educational services to help them succeed in school.

Policy:

1. All housing, whether temporary or permanent, provided by the CoC project shall be located in neighborhoods that are accessible to community resources and services, including schools, libraries, and other educational services.

2. The Program Director and/or his/her designee is responsible for:
   a. Ensuring that all families with children and young adults participating in this project are informed about their educational rights and their eligibility for educational services at intake and as necessary thereafter.
   b. Ensuring that no matter where they live, how long they have lived there, or how long they plan to stay, all children and young adults participating in the project are enrolled in school immediately, even if they lack the paperwork normally required (e.g., school records, records of immunization, and other required health records, proof of residency, guardianship, and other documents), are unable to pay fines or fees, or have missed application or enrollment deadlines. Students have the right to enroll in school and attend classes while the school gathers needed documents. Enrollment shall occur as quickly as possible and within no more than 48 hours of project entry. Children and young adults who are not required by State law to enroll in school shall be encouraged and assisted but not required to enroll. Families shall be encouraged and assisted to enroll children in early childhood education programs. Enrollment includes attending

classes and participating fully in school activities and applies to youth without a parent or guardian.

c. Assist unaccompanied youth to choose and enroll in a school, giving priority to his/her wishes and assisting to exercise his/her right to appeal.
d. Advocating as necessary to ensure that homeless students are able to continue to attend their school of origin (i.e., where they went before becoming homeless or the school in which they were last enrolled) the entire time they are homeless and until the end of the academic year during which they find permanent housing. This includes pre-schools and the designated receiving school at the next grade level when a student completes the final grade level served by the school of origin. Remaining in the school of origin should be presumed to be in the best interest of the student unless contrary to the request of the parent, guardian or unaccompanied youth.
e. Assisting, as necessary, to ensure that the parent, guardian, or unaccompanied youth is provided with the required written explanation of decisions made by school districts/charter schools and how to appeal them and that they are referred to the local school district's homeless liaison who must carry out the dispute resolution process as expeditiously as possible.
f. Assisting, as necessary, to appeal any decision by the local school district or charter school that it is not in the student's best interest to attend the school of origin or the school where they currently live if requested by the parent, guardian or unaccompanied youth.
g. Advocating, as necessary, to ensure that if a dispute arises over eligibility, school selection, or enrollment, the student is immediately enrolled in the school in which enrollment is sought, pending resolution of all available appeals.
h. Advocating, as necessary, to secure the transportation services to which students are entitled (i.e., to and from the school or preschool of origin, including until the end of the year when the student obtains permanent housing).
i. Assisting, as necessary, to secure temporary transportation services through other means, if possible, when school districts/charter schools are unable to immediately provide such required services.
j. Advocating on behalf of homeless students as necessary to ensure that they receive the services for which the are eligible according to their needs and comparable to those provided to other students, including assistance from the local school district's homeless liaison, Early Intervention Program for Infants and Toddlers with Disabilities, Head Start, other preschool programs, services for disabled students, free school meals, services for English language learners, gifted and talented services, before and after school care, career and technical

education, summer learning, online learning, and referrals to health, mental health, dental and other services.

k. Advocating as necessary to ensure that homeless students who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet and charter schools, summer school, career and technical education, advanced placement, online learning, and athletic programs.

l. Advocating, as necessary, to ensure that students receive appropriate full or partial credit for coursework, including consulting with the prior school about partial coursework completed, evaluating students' mastery of partly completed courses, and offering credit recovery.

m. Advocating as necessary to ensure that all homeless youth receive information and individualized counseling regarding college readiness, college selection, the application process, financial aid, and the availability of on-campus supports; and that unaccompanied homeless youths are informed of their status as independent students for the purposes of Federal financial aid for postsecondary education and assisted in receiving verification of such status.

n. Advocating as necessary to ensure that records, including information about a student's living situation, are kept private.

o. Helping homeless students to succeed in school and to get help from the local homeless education liaison, as necessary.

p. Developing relationships with colleges to access higher education services specifically for homeless young adults.

q. Designating a staff person who is responsible for:
   - Helping participants to understand their educational rights
   - Ensuring that children and young adults are enrolled in school and early childhood education
   - Ensuring that students get access to all services, programs, and extracurricular activities for which they are eligible
   - Ensuring that children and young adults receive the transportation services to which they are entitled

   These need not be the only responsibilities of the designated staff person.

r. Ensuring that the designated staff person is involved in the development of participants' service plans where there are extensive or significant unmet educational needs.

- Ensuring that no policies, procedures, or practices that are inconsistent or interfere with the educational rights established under federal law are adopted by the project.

6. **Special Requirements for Leasing and Rental Assistance Projects**
    - If agencies chose the leasing option, they are required to master lease and provide a sublease to tenants (not occupancy agreement); there also must be a functional separation of roles between services and property management.
    - For rental assistance, there needs to be an agreement with the administrator including customary terms and conditions.

7. **Participant/Applicant Bill of Rights**

    Emergency shelter, transitional housing, rapid re-housing, and permanent supportive housing projects operating within CT BOS must review with and provide a written copy of the *CT BOS CoC Participant/Applicant Bill of Rights* (see appendix) to all participants and applicants.

8. **Grant Amendments**
    - Grant recipients are required to submit any proposed CoC project grant amendments to the relevant sub-CoC for approval prior to submission to HUD.
    - Grant recipients are also required to notify the CT BOS Steering Committee of any approved amendments.

VI. Performance Evaluation

1. **Renewal Evaluations**
    - Each year, the BOS Steering Committee establishes performance targets, and evaluation criteria for renewing projects.
    - Providers are asked to submit data such as consumer surveys and APRs to enable project evaluation before the NOFA is released.
2. **Corrective Actions**
    - Each year the Steering Committee establishes a minimum scoring threshold.
    - Projects scoring below the threshold must do a corrective action plan.
    - Agencies in corrective action process are not eligible to apply for funding for new projects.
    - Programs in corrective action status for 2 consecutive years may be at risk of losing their funding.
    - Local BOS CoC representatives are copied on correction action letters for their jurisdictions.
3. **Underspending**

- If a project is underspent by more than 20% or $50,000 for 2 years, the project is at risk of partial or complete reallocation.

VII. Grievances

1. Purpose

The purpose of the CT BOS Grievance Policy is to ensure that there is a fair and accessible process for providers and Steering Committee members to file a grievance with the CoC. For example, a provider might have a grievance with how their renewal evaluation results are scored or rejection of a project application for funding.

2. Composition of Grievance Committee

The Grievance Committee shall be made up of a minimum of three members of the CT BOS CoC Steering Committee. Members shall be appointed by the CT BOS CoC Steering Committee Co-Chairs.

4. **Filing a Grievance**

Grievances shall be submitted in writing to the Grievance Committee via e-mail (ctboscoc@gmail.com).

5. **Resolution of a Grievance**

Written grievances will be reviewed within 30 days of receipt. The committee will issue a written decision that specifies the resolution of the grievance and any actions that need to be taken. The decision may be appealed to the CT BOS Steering Committee Co-Chairs within 10 days of the written decision. The decision of the Co-Chairs is final. In all instances when a conflict of interest is present, parties shall recuse themselves from voting on and otherwise influencing the outcome of matters referred to the Grievance Committee. (see CT BOS Policies, Article VIII, Section 1).

VIII. Monitoring

1. Purpose

HUD requires CoCs to monitor and evaluate CoC programs. CT BOS provides on-site monitoring for a subset of funded providers annually in order to help grantees prepare for HUD visits, reduce recapture risk, and identify areas of need for technical assistance.

2. Selection

The BOS Steering Committee establishes selection criteria annually to determine which programs will be offered monitoring.

3. Procedures and Tool

Monitoring procedures and the tool used during monitoring visits are available on the CT BOS website.

VIII. Coordinated Access

1. Introduction

The coordinated access policies contained herein apply to Permanent Supportive Housing (PSH), Emergency Shelter (ES), Transitional Housing (TH), Rapid Rehousing (RR) funded with CoC and ESG Funds in the CT BOS CoC jurisdictions. The aim is to set some CoC wide standards but allow for CAN level or sub-CoC level customization and tailoring to local circumstances. Section M includes pertinent definitions.

2. Guiding Principles

The CT BOS CoC has defined the following coordinated access guiding principles:

- Promotes collaboration among providers
- Honors client choice re: geography and services needed
- Incorporates provider choice in enrollment decisions
- Establishes standard, consistent eligibility criteria and priorities
- Eligibility requirements limited to those required by funding sources (and no additional requirements that are not required by funders) in order to accommodate as many people as possible
- Ensures quality housing and services are provided
- Ensures clear and easy access for consumers
- Improves efficiency, communication, and knowledge of resources
- Is cost effective and focuses on cost effective solutions to homelessness
- Uses systemic “Rapid Exit to Housing” approach
- Streamlines processing
- Accountability -The process must be transparent and consistent
- Leverage HMIS and the use of “real time” data whenever possible (Once new system is up and 2-1-1 is fully staffed)
- Prioritizes Enrollment Based on Need
- Goal: a system that is clear and creates ease of access for clients

- All data collected is relevant to the process
- Staff are trained and competent in assessment

3. Intake

- **Accepting People from Other Public Systems of Care**

  The McKinney-Vento Act, as amended by the HEARTH Act, stipulates that state and local governments have policies and protocols in place to ensure that publicly-funded institutions do not routinely discharge individuals into homelessness. Before accepting participants into CoC programs from the Mental Health, Foster Care, Correctional or Public Health Systems, providers will work to ensure that all other discharge options have been exhausted. Accepting a person directly from publicly-funded institutions should only be considered if there are no other viable housing options and the person meets the eligibility criteria for the bed or unit.

- **Ensuring families with children are not denied admission or separated**
  - To maintain family unity homeless shelters or housing funded by the CoC or ESG to serve families may not deny admission to any family based on age or gender (e.g. admissions policies disallowing entry for adult males or boys over 15 are not permissible).

  - The CT BOS CoC recognizes that household composition may change during the course of a homeless episode. (For example, a family may enter emergency shelter as a parent with two teenage children but the plan is to re-unite in permanent housing with a younger child who is currently staying with a relative.) To the greatest extent possible, the CoC wants to accommodate changes in family composition.
  - In accordance with the CT BOS Client Bill of Rights (see Appendix), participants in or applicants to any emergency shelter, transitional housing, rapid re-housing, or permanent supportive housing project operating within the CT BOS CoC have the right to decide for themselves who is a member of their families and to be served together with their families. A family may include adults and children or just adults of any age, disability, marital status, actual or perceived sexual orientation or gender identity. This requirement applies whether the family initially presented together upon admission or the family composition changed post admission. It is the intent of the CT BOS CoC to allow families to form and change composition during their participation in projects, however that may not be feasible in every situation.
  - Projects may restrict changes to family composition in the following situations:
    - Unit is not large enough to accommodate additional family members in accordance with applicable federal, state, and local standards (Note that

CoC-funded programs are required to have at least one bedroom or living/sleeping room for each two persons and may not require children of the opposite sex, other than very young children, to occupy the same bedroom or living/sleeping room); and/or

- The services required to meet the needs of a new family member are not available; and/or
- Housing the family together would present an imminent health and/or safety risk.

- When circumstances prevent a project from accommodating changes to family composition, projects should assist the family in accessing a different unit or work with their CAN and assist the family in accessing a different project that meets their needs and can accommodate them together as a family.

4. Assessment Forms

- All Permanent Supportive Housing (PSH), Emergency Shelter (ES), Transitional Housing (TH), and Rapid Rehousing (RR) programs funded with CoC and ESG Funds in the CT BOS CoC jurisdictions are required to use common assessment forms as directed by their local CAN. CT BOS will use the VI SPDAT as its common assessment form at least initially. CT BOS will use the Next Step Tool for transition aged youth.

5. Core Referral Policies

A. Educational Considerations for Children

- When placing families in emergency or transitional shelter, CANs must consider the educational needs of children, including placing children as close as possible to schools of origin and early childhood care and education programs.

B. Determination of Eligibility and Priority for the Service

Eligibility- Programs may not establish additional eligibility requirements beyond those specified below and those required by other funders

Veterans ineligible for VA Services – Veterans who are ineligible for U.S. Department of Veterans Affairs housing and services shall be prioritized in CT BOS CoC funded projects.

Emergency Shelter – Applicants must be screened for diversion and admitted to shelter only if no other options (such as staying safely with friends or family) are available. Applicants must be, literally homeless, and able to be safely maintained in the shelter (e.g., behavior is not an obstacle to safety). For family homeless shelters, registered sex offenders are not eligible.

Transitional Housing – Transitional Housing – Applicants must be screened for diversion and admitted only if no other options are available. Projects may serve only participants coming from emergency shelter and unsheltered locations, including those who have 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 who were residing in an emergency shelter or unsheltered location immediately before entering that facility. Projects may serve only participants with income below 30% of AMI. Applicants must be able to be safely maintained in the program, including not posing any danger to other participants.

Rapid Rehousing – Applicants must be homeless and have income below 30% of AMI. Rapid rehousing projects must serve only individuals or families coming from emergency shelters or the streets, with the exception of youth under age 25 who may also qualify under HUD Category 4 (i.e., fleeing domestic violence).

Permanent Supportive Housing – Must meet HUD definition of literally homeless and include at least one family member with disabilities.

Priority for Service

Emergency Shelter – There are no priorities for ES defined by CT BOS CoC. CANs and local sub-CoCs may establish local priorities provided they follow ESG, DOH and other funding guidelines.

Transitional Housing

- Not able to be diverted or slated for PSH AND
- At least one prior episode of homelessness (except for young adults) AND
- In one of the following life stage transitions
    - young adults 18-24,
    - family with children under age 5,
    - interested in recovery
    - fleeing DV and DV cause of recent homeless episode

Priorities for PSH

Purpose: This policy provides information to Coordinated Access Networks (CANs) and Permanent Supportive Housing (PSH) projects receiving Continuum of Care Program funds regarding the order in which eligible households should be served. This policy reflects the new definition of chronic homelessness as amended by HUD's Final Rule on Defining Chronically Homeless and updates the orders of priority that were previously established in CT BOS policies. This policy is intended to ensure that the individuals and families who have been homeless the longest and who have the most severe service

needs are prioritized for PSH and to support progress towards ending chronic homelessness in Connecticut.

- **Requirement to dedicate or prioritize PSH beds to people experiencing chronic homelessness:**
  - All CT BOS CoC-funded PSH beds are required to dedicate or prioritize 100% of their beds to people experiencing chronic homelessness. When filling vacant beds, CoC-funded PSH projects must seek referrals only through their local CAN from the *Statewide By-Name List* maintained by the local CANs and monitored by the Connecticut Department of Housing (CT DOH) and should be filtered for each CAN's homeless population for prioritization decisions.
  - This by-name list uses the order of priority established in HUD Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing. Relevant guidance from the Notice appears below, and the full Notice is available at:https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf
  - The notice defines which chronically homeless people get priority access to PSH beds and how to prioritize PSH beds when no chronically homeless persons exist within the geographic area.
- **Accepting Referrals through a Single Prioritized List for PSH**
  - All CoC-funded PSH projects are required to accept referrals ONLY from the *Statewide By-Name List* that is maintained by each CAN and monitored by CT DOH, and should be filtered for each CAN's homeless population for prioritization decisions The single prioritized list is updated frequently to reflect the most up-to-date and real-time data as possible.
  - This requirement does not include homeless veterans or homeless youth, who have separate processes for prioritization for PSH projects that are dedicated to these populations.
- **Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Dedicated or Prioritized for Occupancy by Persons Experiencing Chronic Homelessness:**
  - When selecting participants for housing, CANs and CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness are required to use the following order of priority that has been established by the CT BOS CoC and the *Statewide Coordinated Access Network Leadership Committee*, which is consistent with HUD Notice CPD-16-11:
  - People who meet the HUD definition of chronic homelessness and have a

VISPDAT 2.0 score of at least 8 for individuals, a Family VISPDAT 2.0 score of at least 9 for families, or a Next Steps score of at least 8 for homeless youth . Housing Placement Teams will determine prioritization within this category based on the VISPDAT score, the length of history of homelessness, and other knowledge of the individual or family that may help measure severity of service needs.

-
- Applicants will be prioritized based on VI SPDAT score and a consensus of severity of service needs from the local Housing Placement Committee. For example, applicants with a higher VI SPDAT score will be prioritized over other applicants with a lower VI SPDAT score.
- Exceptions to the specified order must be approved by consensus at the local CAN Housing Placement Committee. For example, an exception might be made by the Housing Placement Committee to prioritize an individual who has been living in an unsheltered location for 14 months and has a VI SPDAT 2.0 score of 17 over an individual who has been living in shelter for 15 months and has a VISPDAT 2.0 score of 13. When the Housing Placement Committee feels that the VISPDAT 2.0 or Next Step score does not reflect the individual's true service needs, a full SPDAT may be requested or required by the local CAN Housing Placement Committee before matching the homeless individual to a PSH program. For example, it may be helpful to conduct a full SPDAT when someone has 22 months of homelessness but has scored a 2 on the VISPDAT. When there is no consensus in the Housing Placement Committee for an exception, approval should be sought by the HUD grantee and/or funder of the program with the opening. CAN Housing Placement Committees should document all decisions, including the rationale for any exceptions to prioritization in meeting notes.

- Recipients must follow the order of priority while also considering any target populations served by the project as identified in the project application submitted to HUD. For example, a CoC Program-funded PSH project that targets homeless persons with a serious mental illness should follow the order of priority to the extent to which persons with serious mental illness meet the criteria. In this example, if there were no persons with a serious mental illness that also met the criteria of chronically homeless, the recipient should follow the order of priority for PSH when no chronically homeless person exists on the By-Name List (see below).

- Recipients must exercise due diligence when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs. CT BOS recognizes that some persons–particularly

those living on the streets or in places not meant for human habitation–might require significant engagement and contacts prior to their entering housing and recipients of CoC Program-funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. CANs and providers should continue to make attempts to engage those persons that have not accepted an offer of PSH and these chronically homeless persons must continue to be prioritized for PSH until they are housed.

- **Prioritizing access to PSH when participants are transferred from a different PSH project:**
  - Existing PSH participants being transferred from a different CTBOS PSH project are exempt from the order of priority established in HUD Notice CPD-16-11. Such transfers should be considered both within and across CAN's and Sub-CoCs to best serve the needs of PSH participants and/or ensure efficient use of PSH resources. All PSH transfers must be coordinated through and approved by the appropriate local Coordinated Access Network(s) CAN(s) to ensure consistency with local priorities and that any resulting PSH vacancy is filled using the order of priority established in this policy and HUD Notice CPD-16-11, except in cases where existing CT BOS PSH participant households exchange units. In all cases, PSH units must be prioritized for eligible applicants residing in the CT BOS covered geography over eligible applicants residing in another CoC.

- **Order of priority for PSH when no chronically homeless person exists on the By-Name List or wants to live in the jurisdiction where the vacancy is:**

  - When no chronically homeless person or no chronically homeless person who meets a project's HUD-approved target population criteria (e.g. families with children, youth under 25, veterans, domestic violence, mental illness, substance abuse, or HIV/AIDS) exists on the *Statewide By-Name List* that is maintained by the local CANs, and monitored by CT DOH and should be filtered to each local CAN for prioritization decisions, CANs and recipients of CoC Program-funded PSH are required to follow the order of priority below when selecting participants. CT DOH will continue to work with CANs to match eligible applicants to vacancies in their preferred geographic area, and homeless people may decline referrals that are inconsistent with their geographic preferences. Projects are required to follow the order of priority below when there is no eligible chronically homeless applicant who wishes to live in the geographic area (local CAN region) where the vacancy exists.

  - **(a) First Priority–Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs**

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs as demonstrated by a VI SPDAT 2.0 score of 8 or higher, a family VISPDAT 2.0 score of 9 or higher, or a Next Step score of 8 or higher.

- **(b) Second Priority–Homeless Individuals and Families with a Disability with Severe Service Needs.**

  An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation or in an emergency shelter for at least 8 months and has been identified as having severe service needs as demonstrated by a VI SPDAT 2.0 score of 8 or higher, a family VISPDAT 2.0 score of 9 or higher, or a Next Step score of 8 or higher.

- **(c) Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs.**

  An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation or an emergency shelter prioritized by the length of homeless history where the individual or family has not been identified as having severe service needs.

- **(d) Fourth Priority–Homeless Individuals and Families with a Disability Coming from Transitional Housing.**

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

  The bed will continue to be a dedicated or prioritized bed, however, so when that bed becomes vacant again it must be used to house a chronically homeless person unless there are still no persons who meet that criterion within the sub- CoC's geographic area at that time.

- **Projects that serve 100% CH Veterans**, and are unable to locate a CH Veteran to fill a vacancy, will follow the prioritization process detailed in the CT BOS Policies and Procedures which are based on *Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons* (http://www.csh.org/wp-content/uploads/2015/04/CT-BOS-Policies-revised-4.6.15.pdf) to house a NON-CHRONIC homeless Veteran. For projects that have dedicated units for Veterans, but do not serve 100% Veterans, and are unable to locate a chronically homeless Veteran to fill a vacancy, the project will follow the prioritization process noted above to house a chronically homeless non-veteran."
- **Prioritization and Fair Housing:** The Fair Housing Act prohibits discrimination in housing on the basis of race, color, religion, sex, family status, national origin or disability. Other than prohibiting the seven bases of discrimination listed above, the Act does not limit the considerations that may be taken into account in making a housing decision, or prevent the adoption of preferences as long as those preferences do not violate the rights of one of those seven classes. The Act permits preferences for persons who are disabled.

C. Notification of Vacancies

All Programs: All Emergency Shelter, Transitional Housing, Rapid Re-housing, and Permanent Supportive Housing Programs are required to report vacancies to the CAN within 12 hours of unit/bed availability. If providers know of an impending vacancy, they are required to report the anticipated availability date within 72 hours of being made aware of such availability. Programs must update vacancy information in HMIS within one business day of a unit/bed being filled.

D. Time frames and expectations for Responses to Referrals by Providers

Emergency Shelter

Provider must make a determination within two hours of a referred client presenting at the shelter regarding whether the client can be accommodated that night and must notify the CAN and enter that decision in HMIS within one business day. If at 7pm the referred individual or family does not arrive at the shelter to claim a bed, the ES program may offer that bed to another eligible client.

Transitional Housing and Rapid Rehousing

For RRH, within two business days of intake interview and receipt of a complete intake packet, and for TH, within three business days of the intake interview and

receipt of a complete intake packet, staff will determine eligibility and acceptance or rejection into the program.

Permanent Supportive Housing
Within three days of intake interview and receipt of a complete intake packet, staff will determine eligibility and acceptance or rejection into the program.

E. Referrals from CAN to CAN (TBD)

F. Centralized Priority Lists

Emergency Shelter
When issuing a referral for Emergency Shelter that cannot be immediately accommodated because no vacancy exists, the *Coordinated Access Network* may assign the singles and families seeking services to a priority list.

Permanent Supportive Housing
The CoC has a centralized priority list for PSH and each CAN will have a list for their geographic area. When a provider has a vacancy, the next eligible person on the list will be referred to the program with the vacancy within 2 business days. To ensure that vacancies are promptly filled, the *Coordinated Access Network* may issue up to 3 referrals per vacancy.

Transitional Housing and Rapid Rehousing
When issuing a referral to Transitional Housing or Rapid-Re-housing when there are no vacancies, the *Coordinated Access Network* will assign the person/household seeking services to the priority list for TH or RR using the prioritization criteria described above.
When a vacancy becomes available, the *Coordinated Access Network* will, within one business day of receiving the vacancy notification, based on the prioritization criteria, determine the next single/family on the applicable priority list and refer them to the program. To ensure that vacancies are promptly filled, the *CAN* may, at its discretion, issue up to 3 referrals per vacancy.

Transitioning from existing wait lists to CA priority lists CT BOS suggests that Sub CoCs use the following process for the transition from existing wait lists to the new priority lists that will be used to determine referrals under a Coordinated Access system. 1) CANs choose a date to close the existing waitlists 2) CANs work with providers to review and purge current lists of households who are no longer eligible or cannot be found 3) CANs work with providers to administer the common assessment form for all households that remain on the wait list 4) CANs assemble a new unified priority list combining households from the previous waitlist with those assessed since wait lists were closed and determining priority order using eligibility and priority standards as adopted by the CoC/CAN.

G. Client/Consumer Choice – Preferences and Decline Policy

Consumers may decline a referral because of program requirements that are inconsistent with their needs or preferences. There is no limitation on this decline. For example, consumers may decline participation in programs requiring sobriety. The *Receiving Program* must document the reason for client rejections.

The *Coordinated Access Network* will, at their discretion, require a case conference to review and resolve rejection decisions by consumers. The purpose of the case conference will be to resolve barriers to the client receiving the indicated and desired level of service.

H. Provider Decline Policy – Information to be provided, rules regarding rates of acceptance

Emergency Shelter
Emergency Shelters may only decline individuals and families found eligible for and referred by the *Coordinated Access Network* under limited circumstances, such as there is no actual vacancy available, the household presents with more people than referred by the *Coordinated Access Network*, or based on their individual program policies and procedures the Emergency Shelter has determined that the individual or family cannot be safely accommodated. The Emergency Shelter must report the reason for any decisions to reject a client. If the rejected client has not otherwise been accommodated for the night, the Emergency Shelter must refer the client back to the *Coordinated Access Network*, and document that outcome in HMIS.

Transitional Housing, **Rapid Rehousing** and **Permanent Supportive Housing**
Receiving Programs may only decline individuals and families found eligible for and referred by the *Coordinated Access Network* under limited circumstances, such as there is no actual vacancy available, the individual or family missed two intake appointments, the household presents with more people than referred by the *Coordinated Access Network*, or based on their individual program policies and procedures the *Receiving Program* has determined that the individual or family cannot be safely accommodated or cannot meet tenancy obligations with the supports provided by the program. Programs may not decline persons with psychiatric disabilities for refusal to participate in mental health services except as required by a funder. Providers must accept at least 2 of 3 referrals.

An intake decision notification will include at a minimum:

- first available move-in date, if applicable
- if applicable, reason the client cannot enter the program, Including reason for rejection by client or program, if applicable

- alternative recommendation regarding indicated housing model/exit option for the client with justification, if applicable, Instructions for appealing the decision, including the contact information for the person to whom and time frame under which the appeal should be submitted.

If the homeless individual or family is accepted, the *Receiving Program* must document that acceptance and notify applicant of acceptance within one business day. In all cases, best faith effort for prompt unit turnover should be made and, on average, units should be turned over within 5 business days.

If the homeless family or individual referred by the *Coordinated Access Network* has not presented at the *Receiving Program* within 3 business days from the intake appointment the *Receiving Program* must notify the *Coordinated Access Network* and document the no show. Should the client present at or call the *Receiving Program* after more than 3 days from the appointment, the *Receiving Program* must refer the client back to the *Coordinated Access Network*.

I. Clients declined by all referrals

The *Coordinated Access Network* may convene a case conference in the event that a client is declined by 3 programs. The purpose of the case conference will be to resolve barriers to the client receiving the indicated level of service. The *Coordinated Access Network* will determine, which parties will attend the case conference, including but not limited to the *Assessment Entity*, the *Receiving Programs*, the Funding Agency, the Client, and other Collateral Contacts as determined necessary.

J. Returns to Homelessness and Discharges without a Stable Placement

If an individual or family residing at a permanent housing project is at risk of returning to homelessness or an individual or family is being discharged from a transitional housing project or shelter without a stable placement, the service provider is required to notify the local CAN at the earliest possible point in the process. The CAN will convene a case conference to evaluate the situation, determine intervention(s) that might help to preserve housing or secure an alternative placement, plan for the best possible outcome and try to prevent a return to homelessness. This requirement does not apply in situations of imminent risk to self or others.

K. Holding Beds/Units to Locate People

Emergency Shelter
Once a referral is made to emergency shelter, the provider is required to hold a bed until 7pm (or the latest time possible given staffing limitations).

Transitional Housing, Rapid Rehousing and Permanent Supportive Housing
Once referral/s have been made by the Coordinated Access Network, the Receiving Program is required to hold the unit vacant for 5 days in order to locate and inform the individual/household of the availability of housing and arrange the intake.

L. Grievance and Appeal Policies

All households shall have the right to appeal eligibility determinations and individual program acceptance decisions. Appeals of program acceptance decisions should be first made to the receiving agency using their grievance process. The entity receiving the appeal must respond in writing to all appeals within 14 days.

All appeals of eligibility decisions made by a CAN and appeals of receiving program acceptance decisions that could not be resolved to the satisfaction of the applicant through the receiving agency's grievance process shall be managed in accordance with the CT Department of Mental Health and Addiction Services Appeals Process. That process entails these steps: 1) Informal conference with the Shelter Plus Care Screening Committee or an equivalent body that replaces S+C Screening Committees post full CAN implementation 2) Hearing with the DMHAS Appeal Panel 3) Final review with the Director of Housing and Homeless Services. Each step is available to the applicant if the previous step did not result in satisfactory resolution. (Final Decision TBD based on outcome of statewide CAN planning meeting – CT DMHAS policy to be updated to conform with CAN process)

DMHAS funded programs must comply with their appeals process. (See Section O for the CT Department of Mental Health and Addiction Services Appeals Process)

M. Process for Referrals to DV, VA and other non-HMIS programs including paper referrals

DV: See policy drafted by CCEH and the CT DV Network (See Section P). If the household does not wish to seek DV specific services, the household will have full access to the Coordinated Access Network programs and services.

Veterans: To be developed

N. **Definitions**

Chronically Homeless (HUD Definition):
HUD Released the Final Rule on Homeless Emergency Assistance and Rapid Transition to Housing: Defining "Chronically Homeless" on 12/4/15. The final rule defines chronic homelessness as follows:

(1) A **''homeless individual with a disability''**:

i. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

ii. Has been homeless and living as described in paragraph (1)(i) above continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i) above. Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;

(2) An individual who has been residing in an **institutional care** facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) **A family** with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Disability (HUD Definition):
A Physical, Mental or Emotional Impairment, including impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury that Is expected to be long-continuing or of indefinite duration, substantially impedes the individual's ability to live independently, and could be improved by the provision of more suitable housing conditions; includes:
Developmental Disability *Defined in §102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 USC 15002). Means a severe, chronic disability that Is attributable to a mental or physical impairment or combination AND Is manifested before age 22 AND Is likely to continue indefinitely AND reflects 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. An individual may be considered to have a developmental disability without meeting three or more of the criteria listed previously, if Individual is 9 years old or younger AND has a substantial developmental delay or specific congenital or acquired condition AND without services and supports, has a high probability of meeting those criteria later in life.*
HIV/AIDS Criteria Includes the disease of acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).

Literally Homeless (HUD Homeless Definition Category 1):
(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a 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 and local government programs); or (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

O. DMHAS CoC Rental Assistance Appeal Process – *excerpted from the DMHAS Permanent Supportive Housing Rental Assistance Administrative Plan (updated June 16, 2016)*

Introduction

1. Any participant determined to be ineligible for or being terminated from CoC Rental Assistance has the right to appeal. There are several levels of appeal set out below.
2. At all stages of the appeal process, factual findings relating to the individual circumstances of the applicant shall be based on a preponderance of the evidence presented.
3. At all stages of the appeal process, any deadlines for the applicant will be liberally construed.

Informal Conference with the relevant CAN

1. If the relevant CAN finds that the applicant is not eligible, it will notify the applicant in writing, clearly stating the specific reasons for the ineligibility determination and informing the applicant that he/she has the right to appeal the ineligibility decision.
2. The appeal process may begin with an informal conference with the relevant CAN. The CAN shall provide the applicant/participant with a conference request form and a list of available advocates when it notifies the applicant/participant of the determination. The determination letter must be mailed to the applicant by first class mail and a copy will be maintained in the applicant/participant's file
3. When an applicant/participant requests an informal conference with the CAN, the informal conference shall be held within thirty (30) working days of the receipt of the request.
4. The CoC Rental Assistance Housing Office or CAN shall mail a notice of the informal conference to the applicant/participant. The notice of the informal conference shall include the date, time and place for the conference and a clear and specific statement of the issues presented and shall include a list of available advocates. The notice of the conference shall be mailed to the applicant/participant by first class mail.
5. The notice of informal conference with the CAN shall contain the following advisements:

b. The applicant/participant has a right to review and receive (free of charge before the informal conference) photocopies of the documents in the CoC Rental Assistance file upon which the determination being appealed is based.
c. The applicant/participant has the right to have a representative or advocate present at the informal conference with the CAN. A list of available advocates shall be provided with the notice of the informal conference.
d. The applicant/participant will be given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the initial decision at the informal conference.
e. The applicant/participant has the right to question any witnesses who may be present at the informal conference and to be informed in advance who those witnesses will be.
f. The applicant/participant has the right to bring his/her own witnesses and/or advocates to the informal conference.

6. If the applicant/participant has any special needs or accommodations or transportation problems which may affect his/her ability to attend the informal conference, he/she should contact the CoC Rental Assistance Housing Office. The relevant CAN shall conduct an informal conference with the applicant/participant.
7. At the conference, the applicant/participant and the CAN may make an agreement.
8. If the CAN and the applicant/participant do not reach an agreement, the CAN will inform the applicant/participant, in writing (mailed first class) of the specific reason(s) for the determination, and the applicant/participant's right to a formal conference with the DMHAS Appeal Panel. That written notification will include a list of advocates.
9. The CAN shall make its determination and mail the notice of the determination to the applicant/participant within fifteen (15) working days following the informal conference.
10. The Housing Office staff CAN shall provide the applicant/participant with a hearing request form, which contains the name and address of the DMHAS Housing Director, and instructions for requesting a hearing orally.

Hearing with DMHAS Appeal Panel

This panel will have three members, one representing the DMHAS Housing Staff, one representing the DMHAS Recovery Community Affairs staff, and one representing a CoC Rental Assistance Housing Office outside of the CAN from which the appeal originated.

1. When an applicant/participant requests a hearing with the DMHAS Appeal Panel, the hearing shall be held within thirty (30) working days of the receipt of the request.
2. The notice of hearing shall include the date, time, and place of the hearing and a clear statement of the issues presented. The notice of the hearing shall be mailed to the applicant/participant by first class mail not less than 10 days

before the scheduled hearing. The notice of hearing with the DMHAS Appeal Panel shall contain the same advisements as described in above section. (Section XIV, Part B 5)

3. At the hearing, evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings. However, a decision to deny or terminate eligibility cannot be based on hearsay evidence alone. Applicants/ participants must have the opportunity to confront and cross examine adverse witnesses.
4. The DMHAS Housing staff shall keep a sign-in sheet of those who attended the hearing and a list of the documents discussed and witnesses present.
5. Within ten (10) working days of the hearing, the DMHAS Appeal Panel shall issue a written decision specifying the reasons for the decision and informing the applicant/participant that he/she can request a final review by the Review Panel. The decision shall be mailed to the applicant by first class mail and a copy will be maintained in the applicant/participant file.
6. DMHAS Housing staff shall provide the applicant/participant with a request form for the final review with the Review Panel, which contains the name and address of the Review Panel contact, and instructions for requesting a final review orally.

Final Review by Review Panel

1. When an applicant/participant requests a final review from the Review Panel, the final hearing shall be held within fifteen (15) working days of the receipt of the request.
2. The final review will be conducted by a Review Panel composed of three individuals:
    a. The first Review Panel member will be the DMHAS Team Leader.
    b. The second Review Panel member will be a participant/applicant Advocate (not representing applicant), including but not limited to, NAMI, Legal Services, Connecticut Legal Rights Project, CT Community for Addiction Recovery (CCAR) and Advocacy Unlimited.
    c. The DMHAS Team Leader and the Advocate will select a third Review Panel member. To qualify as a Review Panel member, the individual must have participated in the training workshop regarding this Administrative Plan and must not be a person (or a subordinate of a person) who made or approved the decision being appealed;
    d. The Review Panel members will serve pro bono.
3. The notice of the final review shall include the date, time and place for the hearing and a clear and detailed statement of the issues. The notice of the hearing shall be mailed to the applicant/participant by first class mail not less than ten (10) days before the scheduled hearing. The notice shall contain the same advisements as stated above (Section XIV, Part B 5) and a copy will be maintained in the applicant/participant file.
4. The Review Panel shall keep a sign-in sheet of those who attended the final review and a list of documents discussed and witnesses present.

5. The final review shall be governed by the process described above in Section XIV Part C.
6. The Review Panel shall issue a written decision within (15) working days of the final review, giving a short statement of the facts on which the decision is based.
7. Copies of the Review Panel's decision shall be mailed to the applicant or participant by first class mail and retained in the applicant/participant's file.

Disputes/Complaints Regarding CoC Rental Assistance

When a participant has a dispute (complaint) about the administration of the CoC Rental Assistance Program (e.g., rent calculation, repair issues, mistreatment by the Housing Office, etc.) he/she may use the review process described in Section XIV of the administrative plan, including: A) Informal Conference with CAN; B) Hearing with DMHAS Appeal Panel C) Final Review by Review Panel

P. Domestic Violence Protocol

An effective Coordinated Access System in CT:

- Includes domestic violence service providers in the coordinated access systems in every community:
    - Domestic violence providers are engaged in all phases of the Coordinated Access process from planning through implementation and evaluation.
    - Domestic violence providers are included in the day to day operations of the Coordinated Access system, including daily identification and coordination of services for domestic violence survivors.
- Has safety assessment options for survivors of domestic violence and offers immediate referral to domestic violence services if needed;
    - 211 call specialists, trained in working with survivors of domestic violence, will continue to serve as a front door for screening of domestic violence survivors and will make immediate referral to domestic violence services when needed.
- Provides an option for survivors to access the statewide network of domestic violence providers;
- Takes a trauma-informed approach;
    - Recognizes the prevalence of trauma and how it impacts people and responds by fully integrating knowledge about trauma into policies, procedures, practices, and settings.
    - Takes a thoughtful perspective on how assessment is completed and how many times survivors may be asked to tell their stories, the impact of these questions and the potential for re-traumatizing survivors in this process
- Screens for domestic violence in the initial steps of the coordinated access process;

    - CCADV or their member agencies will provide training on how to best screen for DV issues.
    - Screening questions for DV will be included in the HMIS Intake, that will indicate when referral to DV services may be needed
- Allows self-certification of homelessness for survivors of domestic violence (in accordance with federal law around eligibility for services that indicate that domestic violence survivors are considered homeless if they are actively fleeing)
- Provides for training of all coordinated access staff in the confidentiality and privacy rights of domestic violence survivors, included in the federal Violence Against Women Act (VAWA) and CT state law;
    - To be provided by CCADV or their member agencies
- Permits survivors and others to decline having their personal information entered into HMIS, and maintains confidentiality, without limiting their access to programs and services, in accordance with the Violence Against Women Act;
    - Allows for anonymous entry of domestic violence survivors into HMIS in order to meet funder data entry requirements with a protocol to be determined.
- Encourages referrals for domestic violence survivors that are made based on knowledge of the programs and program types that are most appropriate for survivors of domestic violence;
- Provides for training of coordinated access staff on issues related to domestic violence survivors, including risk assessment and delivery of trauma-informed services;
    - Training will be provided by CCADV
- And recognizes that survivors connect to housing services most successfully when domestic violence service providers work in conjunction with homeless services providers.
    - Rapid rehousing, transitional housing and permanent supportive housing resources are critical for all homeless households entering the services system including survivors of domestic violence.

IX. Appendix

CT BOS CoC Participant/Applicant Bill of Rights

Adopted April 22, 2016

As a participant in or applicant to any emergency shelter, transitional housing, rapid re- housing, or permanent supportive housing project operating within the Connecticut Balance of State Continuum of Care (CT BOS CoC), **YOU HAVE THE RIGHT TO:**

- Not be discriminated against based on race, color, national origin, religion, sex, actual or perceived sexual orientation, gender identity/expression, disability or marital status.
- Not be denied admission or separated from members of your family based on any of these things.
- To decide for yourself who is a member of your family and to be served together with those people whether your family includes adults and children or just adults, or the age, disability, marital status, actual or perceived sexual orientation, or gender identity of any member of your family.
- To be placed in a shelter based on the gender with which you identify.
- If at any time you express safety or privacy concerns, the project must take reasonable steps to address your concerns.
- Not to be sexually harassed.

In addition, as a participant in any transitional housing, rapid re-housing, or permanent supportive housing project funded by CT BOS CoC **YOU HAVE THE RIGHT:**

- To be treated with respect and dignity and in a way that honors differences.
- To get services that meet your needs with a focus on helping you to get and keep permanent housing and achieve the things that are important to you.
- To not be physically, sexually, verbally and/or emotionally abused or threatened.
- To receive services that are consistent with the Housing First model (See details attached).

CT BOS CoC Participant/Applicant Bill of Rights

- To receive a written statement describing the services provided by the project, any rules and your responsibilities and to receive an updated written statement if any changes are made.
- To have your personal information and records kept private and not shared without your written permission and to say with whom the information can be shared.
- To be informed of situations when your personal information can be shared without your permission, for example, when there is a medical emergency, when a clear and immediate danger to you or to others exists, when there is possible child or elder abuse, or when ordered by a court of law.
- To make suggestions and complaints about services or denial of services.
- To receive a prompt and reasonable response to requests and complaints.
- To have the freedom to participate in or choose not to participate in services and activities offered by the CoC project or by any other organization in the community.
- If you are no longer going to get services and/or housing, to get a written notice that includes a clear statement of the reasons, an opportunity to appeal the decision, and the right to receive a written notification of the final decision. This right applies whether you decide you no longer want the services or the project decides they can no longer serve you.
- If you are a participant in a tenant-based rental assistance program, you have the right to choose the housing unit you will live in and to move within the CT BOS CoC area when your lease expires. All housing units must meet HUD standards, and you may be directed to a smaller geographic area, if necessary, to ensure that you can get services, unless that would put you at likely threat of violence or stalking.
- To receive a copy of these rights and to have someone review them with you when you enter the project.

Please sign below to indicate that you received a copy of these rights and someone reviewed them with you. More information about your rights and what you can do if you believe your rights have been violated is attached.

_____

Participant/Applicant Name Participant/Applicant Signature Date

_____

Staff Name Staff Signature Date

CT BOS CoC Participant/Applicant Bill of Rights

ADDITIONAL INFORMATION ABOUT YOUR RIGHTS

- A shelter or housing program is allowed to limit assistance to households with children; however, it may not limit assistance to only women with children and must also serve the following family types:
  o Single men with minor children; and

  o Any household made up of two or more adults with minor children, regardless of sexual orientation, marital status, or gender identity,

- Projects may not ask about your sexual orientation or gender identity to determine if you are eligible. This does not mean that you cannot choose to share that information. Emergency shelters may ask about your sex if they have shared sleeping areas or bathrooms. Other types of projects may also ask about your family members' sex to determine the number of bedrooms you need.
- There, generally, is no reason for a provider to request documentation of your sex in order to determine where to place you. You should not be denied access to a single- sex emergency shelter because your documents indicate a sex different than the gender with which you identify. The provider may not ask you questions or seek information or documentation about your anatomy or medical history. The provider also may not consider you ineligible for an emergency shelter or other facility because your appearance or behavior does not conform to gender stereotypes.
- Reasonable steps that a provider must take to address a transgender client's safety or privacy concerns, include, for example: adding a privacy partition or curtain; allowing you to use a nearby private restroom or office; or having a separate changing schedule. The provider must permit any transgender clients expressing concern to use bathrooms and dressing areas at a separate time from others in the facility. The provider should work with the layout of the facility to provide for privacy in bathrooms and dressing areas, if possible. For example, toilet stalls should have doors and locks and there should be separate showers stalls to allow for privacy. The provider should ensure that its policies do not isolate or segregate you based upon your gender identity.

CT BOS CoC Participant/Applicant Bill of Rights

WHAT CAN I DO IF I FEEL MY RIGHTS HAVE BEEN VIOLATED?

- If your family has been separated or you believe your rights have been violated in any other way, you can submit a complaint to the CT BOS CoC at ctboscoc@gmail.com
- You can also contact the HUD Hartford Field Office at (860) 240-4800.
- If you believe you have been discriminated against based on race, color, national origin, religion, sex, disability, or familial status, you can file a fair housing complaint with HUD by telephone (800-669-9777) or via the Internet. Follow this link to fill out a fair housing complaint form online.

Connecticut's anti-discrimination laws also protect people who are gay, lesbian, bi-sexual, and transgender. You may file a complaint in person or in writing at the **Connecticut Commission on Human Rights and Opportunities (CHRO).** The main office of the CHRO is at 21 Grand St., Hartford, CT 06106. You should call them because they will want you to file your case in the appropriate regional office. Their number is (800) 477-5737 and you can visit their website at www.state.ct.us/chro

CT BOS HOUSING FIRST PRINCIPLES

Housing First is a programmatic and systems approach that centers on providing homeless people with housing quickly and *then* providing services as needed using a low barrier approach that emphasizes community integration, stable tenancy, recovery and individual choice.

Low barrier approach to entry:

Housing First offers individuals and families experiencing homelessness immediate access to permanent supportive housing without unnecessary prerequisites. For example:

a. Admission/tenant screening and selection practices do not require abstinence from substances, completion of or compliance with treatment, or participation in services.
b. Applicants are not rejected on the basis of poor or lack of credit or income, poor or lack of rental history, minor criminal convictions, or other factors that might indicate a lack of "housing readiness."

c. Blanket exclusionary criteria based on more serious criminal convictions are not applied, though programs may consider such convictions on a case by case basis as necessary to ensure the safety of other residents and staff.
d. Generally, only those admission criteria that are required by funders are applied, though programs may also consider additional criteria on a case by case basis as necessary to ensure the safety of tenants and staff. Application of such additional criteria should be rare, and may include, for example, denial of an applicant who is a high risk registered sex offender by a project serving children, or denial of an applicant who has a history of domestic violence involving a current participant.

Community integration and recovery:
Housing is integrated into the community and tenants have ample opportunity and are supported to form connections outside of the project.

a. Housing is located in neighborhoods that are accessible to community resources and services such as schools, libraries, houses of worship, grocery stores, laundromats, doctors, dentists, parks, and other recreation facilities.
b. Efforts are made to make the housing look and feel similar to other types of housing in the community and to avoid distinguishing the housing as a program that serves people with special needs.
c. Services are designed to help tenants build supportive relationships, engage in personally meaningful activities, and regain or develop new roles in their families and communities.
d. Services are recovery-based and designed to help tenants gain control of their own lives, define their personal values, preferences, and visions for the future, establish meaningful individual short and long-term goals, and build hope that the things they want out of life are attainable. Services are focused on helping tenants achieve the things that are important to them and goals are not driven by staff priorities or selected from a pre-determined menu of options.

CT BOS CoC Participant/Applicant Bill of Rights

Lease compliance and housing retention

- Tenants are expected to comply with a standard lease agreement and are provided with services and supports to help maintain housing and prevent eviction. Visitors are expected to comply with requirements in the lease agreement.
    a. Leases do not include stipulations beyond those that are customary, legal, and enforceable under Connecticut law.
    b. No program rules beyond those that are customary, legal, and enforceable through a lease are applied (e.g., visitor policies should be equivalent to those in other types of permanent, lease-based housing in the community). Housing providers may ask for identification from visitors.
    c. Services are designed to identify and reduce risks to stable tenancy and to overall health and well-being.
- Retention in housing is contingent only on lease compliance and is not contingent on abstinence from substances or compliance with services, treatment or other clinical requirements. For example:
    a. Tenants are not terminated involuntarily from housing for refusal to participate in services or for violating program rules that are not stipulated in the lease.

    b. Transitional housing programs offer participants due process to resolve issues that may result in involuntary discharge (unless immediate risk to health and safety)
    c. PH providers only terminate occupancy of housing in cases of noncompliance with the lease or failure of a tenant to carry out obligations under Connecticut's Landlord and Tenant Act (Chapter 830 of the Connecticut General Statute http://www.cga.ct.gov/2011/pub/chap830.htm).
    d. In order to terminate housing, PH providers are required to use the legal court eviction process

CT BOS CoC Participant/Applicant Bill of Rights

Separation of housing and services eviction process

Projects are designed in such a manner that the roles of property management (e.g., housing application, rent collection, repairs, and eviction) and supportive services staff are clearly defined and distinct.

a. Property management and support service functions are provided either by separate legal entities or by staff members whose roles do not overlap.
b. There are defined processes for communication and coordination across the two functions to support stable tenancy.
c. Those processes are designed to protect client confidentiality and share confidential information on a need to know basis only.

Tenant Choice

- Efforts are made to maximize tenant choice, including type, frequency, timing, location and intensity of services and whenever possible choice of neighborhoods, apartments, furniture, and décor.
- Staff accepts tenant choices as a matter of fact without judgment and provides services that are non-coercive to help people achieve their personal goals.
- Staff accepts that risk is part of the human experience and helps tenants to understand risks and reduce harm caused to themselves and others by risky behavior.
- Staff understands the clinical and legal limits to choice and intervenes as necessary when someone presents a danger to self or others.
- Staff helps tenants to understand the legal obligations of tenancy and to reduce risk of eviction.
- Projects provide meaningful opportunities for tenant input and involvement when designing programs, planning activities and determining policies.

Analysis of Racial Disparity in CT-505

Overall population data from the state of Connecticut is 67% white / non-Hispanic, and 33% are racial or ethnic minorities. Source: https://datausa.io/profile/geo/connecticut/#ethnicity If you look further into the data for those that are living below the poverty line – the demographics shift to 47% white / non-Hispanic, and 53% minority. Source: https://datausa.io/profile/geo/connecticut/#poverty_ethnicity

Using this as a grounding for evaluating our homelessness response system data – it is clear that even looking at the percentages of people living below the poverty line that minorities are still over represented in the homelessness population. Root causes of higher rates of homelessness among minorities are far reaching and include discrimination in employment, housing, and the criminal justice system. Source: https://endhomelessness.org/resource/racial-disparities-homelessness-united-states/

A look at how the homelessness response system is functioning can be found in the following tables which look at a year's worth of data in the region from 10/1/16 to 9/30/17 from the CT Homelessness Management Information System (CT HMIS). CT HMIS collects both race and ethnicity information – and the measures used are outlined in the Housing and Urban Development's data standards manual. There were two groups that were compared, head of households who answered that they were non-Hispanic and white, and those who were either Hispanic or any other racial category other than white. People who refused to answer, didn't know, or just didn't have that information collected for their race or ethnicity were excluded on all measures (this was less than 5 percent of the total data collected). Information was further split out between individuals and families. Analysis completed to date examines:

- Attended Coordinated Access Network (CAN) appointments – to see who is attempting to access the homelessness system
- Emergency Shelter utilization – to show who has made it through coordinated entry, and into shelter
- Emergency Shelter exits to permanent housing – to show how the emergency system is functioning in terms of those who are exiting homelessness
- Rapid Re-Housing entries – to show who is being served by this intervention which is designed to help individuals and families to quickly exit homelessness and return to permanent housing.
- Permanent Supportive Housing entries – to show who is being served by this intervention which is non-time-limited affordable housing assistance with wrap-around supportive services.
- Exits from ES to permanent housing – to see performance outcome data for both whites and minorities

Preliminary findings include:

- Minorities, particularly families, are over-represented in all components of the homeless services system included in the analysis.
- Though minorities represent 65% of all attended CAN appointments, they represent just 55% of shelter users, 62% of PSH entries, and 64% of RRH entries.
- Minorities exiting ES have a higher rate of exits to PH (21%) compared to whites (19%).

Additional analysis is ongoing, and is monitored by the CoC.

Racial Disparity Analysis - CT Balance of State (CT-505) from CT HMIS

CAN Appointments - ALL			Families			Individuals		
All Apts	17933		All	3975		All	13958	
Minority	11588	64.62%	Minority	3159	79.47%	Minority	8429	60.39%
White	6345	35.38%	White	816	20.53%	White	5529	39.61%
Shelter Utilization - HOH								
All	4224		All	502		All	3722	
Minority	2339	55.37%	Minority	361	71.91%	Minority	1978	53.14%
White	1885	44.63%	White	141	28.09%	White	1744	46.86%
Shelter Exits to PH								
All	711		All	170		All	541	
Minority	402	56.54%	Minority	118	69.41%	Minority	284	52.50%
White	309	43.46%	White	52	30.59%	White	257	47.50%
PSH Entries								
All	679		All	65		All	614	
Minority	420	61.86%	Minority	52	80.00%	Minority	368	59.93%
White	259	38.14%	White	13	20.00%	White	246	40.07%
RRH Entries								
All	1320		All	415		All	905	
Minority	850	64.39%	Minority	332	80.00%	Minority	518	57.24%
White	470	35.61%	White	83	20.00%	White	387	42.76%

Additional shelter exit information:	
Total Exits from ES among minorities	1876
Exits from ES to PH among minorities	402
% of minorities exiting to PH	21%

Total Exits from ES among whites	1592
Exits from ES to PH among whites	309
% of whites exiting to PH	19%

Source: CT HMIS
Data from FFY17
Retrieved May, 2018 by the CT Coalition to End Homelessness