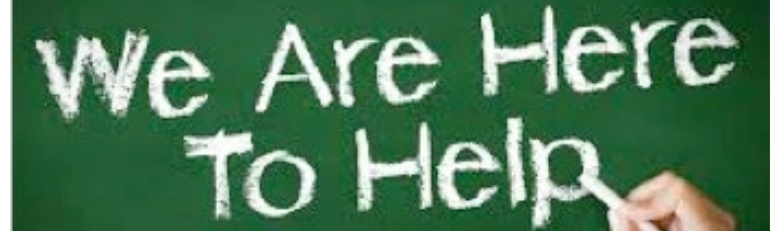




CT Youth Homelessness Demonstration Project (YHDP)

Key HUD & CT BOS CoC Policies

February 5, 2019

A hand is shown writing the phrase "We Are Here To Help" in white chalk on a dark green chalkboard. The text is written in a casual, slightly slanted font. The hand is visible on the right side of the frame, holding a piece of chalk and just finishing the letter 'p' in "Help".

Agenda

- National Policy Context
- Updates since Nov 27th Training
- Non-discrimination requirements
- Service Requirements
- Other HUD Requirements
- PSH Eligibility
- Grant Amendments & Other Changes
- 2019 CoC Competition
- 2021 Renewal Evaluation
- Monitoring, Tips for Success & Helpful Resources

Why are you here today?

What do you hope to get out of today's session?



Learning Objectives

Participants will be able to:

- Understand the national policies that are driving changes to requirements
- Understand the requirements of the CoC Program Interim Rule, relevant HUD Notices, & CT BOS policies related to the provision of services to CoC project participants
- Know what to expect in 2019 CoC Competition and how to plan for 2021 Renewal Evaluation
- Understand risks associated with non-compliance
- Know how to succeed during monitoring
- Know where to locate additional information





National Policy Context

HUD Policy Priorities

1. Ending homelessness for all persons

- Target resources to highest needs/longest homelessness
- Engage and effectively serve all, including unsheltered
- Use reallocation to create new projects, improve performance and better align with identified needs

2. Creating a systemic response to homelessness

- Measure systems performance to determine effectiveness
- Use Coordinated Entry to provide assistance quickly, promote choice and ensure transparency



HUD Policy Priorities

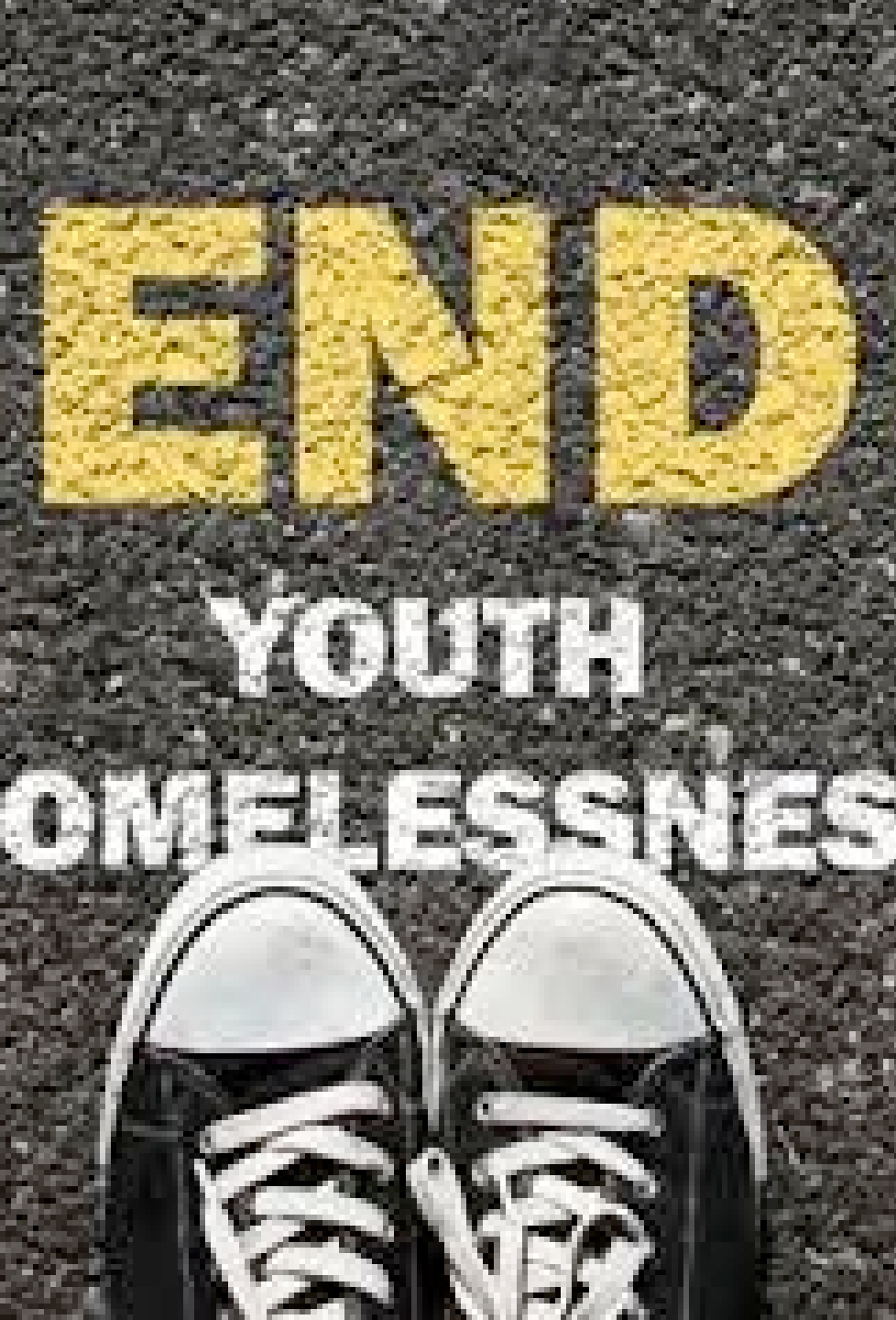
3. Strategically allocate resources

- Use cost and outcome data to improve
- Maximize use of mainstream resources
- Evaluate cost/effectiveness of renewal projects

4. Use a Housing First approach

- Eliminate preconditions & service requirements
- Prioritize rapid placement/stabilization
- Engage landlords
- Adopt client-centered practices





YHDP Objectives

- Build national momentum to prevent and end youth homelessness
- Evaluate the coordinated community approach
- Expand capacity to serve homeless youth piloting new models & determining interventions necessary
- Evaluate performance measurement strategies
- Establish a framework for federal resources to interact within a state or local system to support a coordinated approach

HUD/HEARTH Performance Measures



Length of time persons remain homeless – avg and median LOS

The extent to which persons who exit to permanent housing return to homelessness

Number of homeless persons – PIT and Annual Counts

Jobs and income growth for homeless persons in CoC funded projects

Number of people who become homeless for the first time

Number of successful housing placements

HUD Requirements

CoC Interim Rule:

<https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>

YHDP 2016 NOFA:

<https://www.hudexchange.info/resources/documents/YHDP-NOFA.pdf>

YHDP Waivers:

- As of November 2018, CT YHDP has received one waiver for YHDP RRH:
 - Case management is not mandatory – providers must proactively engage participants including contacting them at least monthly.
- Otherwise, compliance with CoC Program Interim Rule is required.



Updates & Reminders from Nov 27th Training



Youth Stipends



- YHDP project recipients/subrecipients may pay youth stipends in any appropriate form (e.g., cash, check, gift card).
- Stipends are eligible under the Project Administration line item if youth are supporting project monitoring and evaluation activities, e.g.,:
 - Monitoring progress and compliance with program requirements
 - Evaluating program results against stated objectives
- Recipients/subrecipients may also hire youth to perform eligible activities.
 - Eligible on the appropriate line item (e.g., employment support is a Supportive Service cost, HMIS data entry is an HMIS cost, project evaluation is and Admin cost)
 - Must follow the usual HUD requirements (e.g., cost must be reasonable, budgeted and documented)
- DOH may also pay youth stipends for participation in Planning activities.

Indirect rates

- At renewal, any nonprofit that has never had a negotiated indirect cost rate agreement may request and receive the 10% de minimis indirect rate.
- To honor the competitive bidding process, YHDP projects that did not include indirect costs in their initial application, may not seek the de minimis rate until renewal.
- The 10% is based on the total modified direct costs which limits pass through funding to the first \$25,000 and does not include capital costs and rent.
- If a nonprofit has a negotiated rate, that must be accepted.



Indirect rates (2)

- Grantees requesting indirect funding must be careful not to:
 - Double bill by charging the same costs to both indirect and direct (administrative)
 - Not exceed the 10% cap on administrative funding established in the regulations
- Applicants indicate the intent to claim the de minimis rate as part of the annual application
 - If grantee did not indicate it was claiming indirect costs, it needs to notify Field Office prior to claiming



Age Requirements

- May not enroll participants under 18 until further notice, unless emancipated.
- No member of the household can be older than 24 at project entry.
- No age limit post project entry.



CoC Program Component Types & Participant Eligibility

YHDP Project Type	CoC Program Component Type	Eligible Participants
Shelter Diversion/Rapid Exit Fund	RRH	Categories 1,2,4
Youth Navigators	SSO	Categories 1,2,4
Crisis Housing	TH	Categories 1 & 4
Rapid Rehousing	RRH	Categories 1 & 4

Category 2 Youth Eligible only for Shelter Diversion/Rapid Exit and Navigator Services

New YHDP Tools & Resources

- Updated Homelessness Verification Form w/Self-Certification
- Sample financial assistance letter to RRH participants
- No Income Affidavit
- RRH rent calculation tool





YHDP RRH Rent Tool Demo

TOOL AVAILABLE AT
WWW.CTBOS.ORG

Calculating Rent in Shared Housing



- If youth present as a family, then include each person in the household when determining income - spreadsheet will calculate the household's rent contribution -All must be under 25.
- A young person who is getting YHDP assistance can also rent a room in a unit occupied by other people including other young people receiving YHDP assistance and people not receiving YHDP assistance.
- If there are multiple youth living in the same unit getting YHDP assistance, calculate rent for each youth separately.
- The rent for the entire unit must be under FMR.
- You must prorate the rent & utility allowance to reflect the portion of the unit occupied by the YHDP assisted young person.
 - For example, if it's a 3 Bedroom and FMR is \$1500 /month, then the young person's prorated rent would be $1500/3=\$500/\text{month}$.
 - In the example above, if the utility allowance was \$90/month, the young person's prorated utility allowance would be $90/3=\$30/\text{month}$

Calculating Rent in Shared Housing (2)

Each YHDP assisted young person must have their own lease that reflects the prorated rent amount.

When a young person is living with people who are not part of his/her family:

- Include only the YHDP assisted youth's income in the rent calculation tool.
- Include only the prorated rent and prorated utility allowance in the rent calculation tool.





Non- Discrimination

Serving Singles v. Families

- CANS will refer families with children primarily to non-YHDP projects designed to serve families - may not always be possible.
- Scattered site projects must serve all eligible households prioritized and referred by CANS without regard to household configuration (includes singles, couples/multiple adult families, families with children)



Serving Singles v. Families (2)

- Congregate projects should seek to serve all eligible households prioritized and referred by CANs; physical layout of the facility may be a consideration (e.g., shared sleeping/bathroom arrangements)
- HUD has determined “serving a limited number of households that are not included in the target subpopulation would not be considered a significant change if the overall project target population remains the same.” (CoC Q ID 112982)



Equal Access to HUD Programs

- Programs must be open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.
- “Any group of people that present together for assistance and identify themselves as a family... are considered to be a family and must be served together as such.” (*HUD FAQ ID 1913*)
- Families cannot be separated because of age or gender of household members.
- When projects serve ANY families with children, they must serve ALL families with children (single dad, single mom, same sex couple, multi-generational, non-romantic groups, etc.)

Equal Access to HUD Programs -2



- HUD prohibits inquiring about sexual orientation or gender identity to determine eligibility for HUD-assisted or HUD-insured housing.
- Services for transgendered individuals must correspond to the person's identified gender.
- Requirements for individuals to “prove” gender identity are prohibited.
- Projects must take reasonable steps to address safety and privacy concerns.
- Providers must update policies and procedures to reflect Equal Access requirements.

Limiting access based on gender

Projects may limit access based on gender only if:

- Project has shared bathing and/or sleeping accommodations
- Shared bathrooms = intended for use by more than one person at a time

(HUD AAQ Response – Question ID 75271)



Is my project required to comply?

All HUD programs must comply with Equal Access Rules. Includes all CPD Programs:

YHDP/CoC, ESG, CDBG, HOME, CoC, ESG, HOPWA, Housing Trust Fund, Rural Housing



Accommodating Changes to Family Composition – CT BOS Policy

- Allow participants to alter their family composition at any time during the admission process or post admission

EXCEPTIONS:

- Unit is not large enough by HUD standards
- Services required to meet needs of new family member are not available
- Housing the family together would present an imminent health and/or safety risk
- When circumstances prevent accommodating family changes, projects must help families to access a different unit or work with their CAN to access a different project





Tips for Supporting Equal Access

- Staff accept & use clients' preferred name & gender pro-noun regardless of documents/sex-assigned at birth.
- Staff does not ask about clients' sex during the intake process.
- Staff honors clients' decisions regarding disclosure.
- Staff model respect, coach clients that express disrespect and promote non-discrimination by ensuring all clients understand that verbal/physical bullying are prohibited.
- Staff promptly address complaints regarding harassment.
- Staff focus on the aggressor making changes not the harassed individual.

Tips for Supporting Equal Access - 2



- Staff lead efforts to educate and do not expect LGBTQ clients to educate others about LGBTQ issues.
- Projects require no special procedures for and do not segregate households with a transgender person.
- Staff correct & engage any misperception that non-stereotypical gender expression creates a safety risk.
- Projects make facilities gender neutral and take steps to increase privacy when possible.
- Staff assists clients to access services for which they are eligible & reports Equal Access violations.

Steps to Ensure Equal Access



- Ensure your project has an anti-discrimination policy that includes gender identity, gender expression, and sexual orientation.
- Ensure the policy is posted publicly.
- Discontinue any policies that are not in accordance with Equal Access requirements.
- Regularly train staff and volunteers on the policy and how to implement.
- Connect with local LGBTQ organizations for training and resources.

Equal Access Resources



HUD Equal Access Final Rule -

<https://www.hudexchange.info/resource/1991/equal-access-to-housing-final-rule/>

HUD Equal Access in Accordance with Gender Identity Final Rule -

<https://www.hudexchange.info/resources/documents/Equal-Access-Final-Rule-2016.pdf>

HUD Equal Access Resources for Projects -

<https://www.hudexchange.info/homelessness-assistance/resources-for-lgbt-homelessness/#self-assessment-for-shelters-and-projects>

HUD Equal Access Notice for Posting at Sites – (not required pending OMB approval)

<https://www.hudexchange.info/resources/documents/Notice-on-Equal-Access-Rights.pdf>



Fair Housing

- Fair Housing Act prohibits discrimination on the basis of race, color, religion, sex, disability, familial status or national origin.
- CT also recognizes these protected classes: ancestry, marital status, age, sexual orientation, lawful income source, gender identity/expression.
- Landlords cannot deny housing or evict based on membership in a protected class.
- Members of a protected class cannot be treated differently from other tenants.
- Violations of the Fair Housing Act occur when policy or practice has an unjustified discriminatory effect, even when the provider had no intent to discriminate.
- Where a policy or practice that restricts access to housing on the basis of criminal history has a disparate impact on individuals of a particular race, national origin, or other protected class, such policy or practice is unlawful.

Fair Housing - Tips



Applies to CoC funded projects and most private market landlords:

- Retain all application records, including outcome and reason for denial.
- Ensure your CAN is documenting marketing to persons least likely to apply in the absence of special outreach (e.g., to marginalized communities).
- Terminate any blanket policy against renting to persons with criminal records.
- Use individualized and detailed assessments of criminal records.
- Consider only convictions.
- Ensure that any policy concerning a tenant's criminal record is absolutely necessary, that no less discriminatory alternative is available, and actually assists in ensuring the security of residents and property.
- Report fair housing violations, including to the Con Plan jurisdiction.

Reasonable Accommodations (504 of the Rehabilitation Act of 1973)

- Housing providers are required to make reasonable accommodations to enable people with disabilities to access housing
- Accommodations can include
 - Increased payment standards/utility allowances
 - Larger units
 - Emotional Support animals (provide emotional support that alleviates one or more symptoms of an existing disability) https://portal.hud.gov/hudportal/documents/huddoc?id=servanimals_ntcfheo2013-01.pdf
 - Service animals (ADA: a dog trained to do work or perform a task directly related to a disability)
 - Renting from family members
- Documentation can come from a physician, psychiatrist, social worker or other mental health professional



CT BOS Client Bill of Rights

- Establishes basic rights for participants in areas including:
 - ✓ Fair Housing/Equal Access
 - ✓ Respectful treatment
 - ✓ Transparent services
 - ✓ Confidentiality
 - ✓ Grievances
 - ✓ Voluntary services
- Provides information about what a client who believes rights have been violated can do
- Must be signed by all applicants and participants and maintained in files



Available at: www.ctbos.org

Review

Must a crisis housing project serve couples?

Yes

When is it allowable for a project to only accept men or women?

Only if the sleeping area or bathroom is intended for use by more than one person at a time.

May a scattered site project that applied to serve singles terminate assistance for a person because they have a child or refuse to admit families?

NO





Service Requirements

Assessment & Service Planning

- Must conduct assessment of participants' supportive services needs, the availability of such services, and the coordination of services to ensure long-term housing stability at least annually (**CT BOS recommends at least every 6 months**).
- Services must be adjusted accordingly.
- Assessment should be dated and documented in participant files.



Assessment & Service Planning



- Evidence that supportive services are available to meet the needs of participants is documented in participant files:
 - ✓ Documentation of service delivery (e.g. case notes) reconciles with time sheets
 - ✓ Services are provided with a frequency that is responsive to participant needs (in general, attempts should occur at least 2 times monthly; attempts that are less frequent should be supported by an assessment indicating a lower level of service need and approved by a supervisor)

Assessment & Service Planning (2)

- ✓ Evidence of appropriate and timely intervention on identified issues that threaten housing stability or health/wellbeing
- ✓ When participants decline services/demonstrate reluctance to engage, use a variety of contact methods (e.g., phone, mail, text, in person, invitations to recreational opportunities, attempts to provide concrete services, such as, food, clothing, toiletries).
- ✓ Service plans/case notes consistent with Housing First



Housing First



Quick, low barrier access to housing while providing needed services



Housing is not contingent on compliance with services; staff responsible for assertive engagement



Same expectations as anyone else in housing as established in lease; encourage landlord to enforce the lease



Services are wrapped around the individual
Person is assisted to meet lease obligations

Housing First is *not*

“Housing only”

OR

“Anything goes”



CT BOS Housing First Requirements

All Projects are required to adopt the CT BOS Housing First Principles. Available in CT BOS policies at:

www.ctbos.org

HUD Housing First Assessment available at:

<https://www.hudexchange.info/resource/5294/housing-first-assessment-tool/>



Termination of Assistance

Must be consistent with Housing First

Must provide formal due process:

- Written copy of program rules
- Written notice of reason for termination
- Review of the decision by someone other than person or subordinate of person who made the original decision
- Written notice of the final decision

Projects must notify CAN as early as possible to prevent unstable placements/returns to homelessness. CAN will:

- Convene a case conference to try to prevent a return to homelessness
- Does not apply in situations of imminent risk



Violence Against Women Act (VAWA) Anti Discrimination Provisions



Housing providers may not deny housing to an applicant, evict a tenant, or terminate a subsidy on the basis or as a direct result of:

- an applicant or “affiliated individual” having been a survivor of domestic violence, dating violence, sexual assault, or stalking
- adverse factors resulting from the abuse (e.g., poor credit or criminal history)

If an abuser is an unauthorized occupant and the survivor, because of the abuse, did not have choice in allowing the abuser to occupy the unit, unauthorized occupancy can not be sole grounds for eviction.



VAWA Notice of Occupancy Rights

- PSH, RRH & TH projects must give the notice to each adult tenant and applicant at each indicated time (see slide on “When is provision of VAWA forms required?”)
- Form requires some customization (e.g., name of the agency and program, contact information for local organizations that can assist survivors).
- For link to form see VAWA forms slide.

VAWA Emergency Transfer Provisions

- Allows survivors to move to another subsidized unit to protect their safety and maintain affordable housing.
- All projects are required to comply with the CoC's emergency transfer plan (available at: www.ctbos.org)
- Families living in CoC assisted units who qualify for emergency transfers but cannot make an immediate internal emergency transfer (i.e., within the inventory of the agency currently assisting them) must be provided with priority over all other applicants for a new unit elsewhere.
- Providers must retain records for all emergency transfer requests and outcomes.
- There is no limit on the number of transfers a participant can receive.



VAWA Lease Requirements



- CoC projects are required to include descriptions of VAWA protections in leases or lease addendums.
- Requirement extends to private landlords for as long as unit is CoC assisted.
- Must include:
 - Right to breach lease without penalty if qualified for an Emergency Transfer
 - Protection from being denied access to housing and/or evicted on the basis of or as a direct result of being a survivor.
 - Confidentiality requirements
 - Limitations of VAWA protections
 - Term of lease and term of CoC assistance

VAWA Lease Bifurcations



- CoC projects are required to include descriptions of VAWA protections in leases, lease addendums, and contracts.
- A housing provider may bifurcate a lease to evict an abuser while allowing the survivor to stay.
- If the evicted abuser was the person who qualified the family for CoC assistance, must provide remaining tenant(s) **until lease expiration** to establish eligibility or find alternative housing. Remaining tenants are obligated to pay rent based on the usual CoC program requirements.
- To protect survivors whose names are not included on the lease, these rights apply to tenants AND residents.

VAWA Rental Agreement Requirements

Rental Agreements between the CoC recipient and the landlord are required for TBRA projects and must also include these requirements:

- To execute a lease addendum with the required VAWA protections specified.
- To coordinate with recipient/CAN on Emergency Transfer requests.
- To notify the grant recipient before a lease is bifurcated or an eviction notice is issued.
- To provide Notice of Occupancy Rights and Incident Self-Certification Form with eviction notices.



VAWA Incident Certification

- Under most circumstances, a survivor need only self-certify.
- Third-party documentation should not cause a barrier to receiving protections needed to keep survivors safe.
- Providers may take tenants seeking VAWA protections at their word or can ask for certain documentation.
- Only when there is conflicting evidence (e.g., regarding who is the abuser and who is the survivor), can the provider ask for third-party documentation.





VAWA Incident Certification (2)

Providers must allow tenants to provide any of these:

- Self-certification form (HUD Form 5382 – See VAWA Forms slide)
- Police, court or administrative record (e.g., police reports, protective orders, restraining orders, etc.)
- Statement from a third party – (e.g., from a victim service provider, medical or mental health professional, or attorney)
- Any other statement or evidence that the housing provider has agreed to accept

VAWA Forms



- **Notice of Occupancy Rights** Under VAWA, form HUD 5380
- **Certification** of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation, form HUD 5382
- **Emergency Transfer Request** for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, form HUD 5383

All forms available in English and 14 additional languages at:

https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a

When is provision of VAWA forms required?



The **Notice of Occupancy Rights** must be provided when individuals and/or families are applying for permanent housing (PSH & RRH) and transitional housing.

The **Notice of Occupancy Rights & Certification form** must also be provided at each of the following times:

- (A) When an individual or family is denied PSH, RRH, or transitional housing;
- (B) When a program participant is admitted to PSH, RRH or transitional housing;
- (C) When a program participant receives notification of eviction; and
- (D) When a program participant is notified of termination of assistance.



VAWA Confidentiality Protections

- Victim service providers are prohibited from entering client data in HMIS
- Must keep confidential any information provided related to the exercise of VAWA rights, including the fact of exercising those rights
- Providers cannot allow anyone administering assistance or employees to have access to confidential information unless explicitly authorized under Federal, State or local law.
- Confidential information cannot be disclosed, except if disclosure is: requested or consented to in writing by survivor in a time-limited release; required for use in eviction or termination hearing; or otherwise required by law.
- Transfer plans must ensure confidentiality to prevent disclosure of the location of new unit

Additional VAWA Resources

HUD Final Rule Implementing VAWA Reauthorization Act of 2013 -

<https://www.hudexchange.info/news/hud-announces-publication-of-final-rule-implementing-vaawa-reauthorization-act-of-2013/>

HUD VAWA Housing Protections for CoC & ESG Webinar

<https://csherevents.webex.com/ec3300/eventcenter/recording/recordAction.do?siteurl=csherevents&theAction=poprecord&recordID=18067852&internalRecordTicket=4832534b000000041377650dfd0f2db5cfb8a52f6d3682811482579c12b1adef7817f64211f860cd>



Additional VAWA Resources

Safe Housing Partnerships:

<https://safehousingpartnerships.org>

National Housing Law Project webinar on HUD's Final Rule Implementing VAWA 2013 available at:

<https://www.nhlp.org/domesticviolencewebinars>

Housing Innovations would like to acknowledge the work of the National Housing Law Project, upon which this overview draws heavily.



Educational Rights

Applies to Children >18 and young adults 18-24

Grantees required to:

- Inform homeless families and youth of their rights under McKinney-Vento Education Services (Now Every Student Succeeds Act – ESSA)
- Help children and young adults to enroll in school immediately
- Advocate for ability to attend school of origin while homeless and until end of academic year once housed
- Advocate to ensure students receive services to which they are entitled, including assistance from the school district's homeless liaison
- Have a staff person assigned as educational liaison to assist
- Adopt CT BOS sample policy or similar policy (available in CT BOS Policies at www.ctbos.org)
- Post “Information for School-Age Youth” at sites (available at www.ctbos.org)



Review

To whom must the VAWA Notice of Occupancy Rights be provided?

Each adult applicant and tenant in PSH, RRH, and TH

In what circumstances can a provider ask for third-party documentation of domestic violence?

Only when there is conflicting evidence

How often is a service needs assessment recommended?

Every 6 months.

Do educational rights apply only to projects serving families?

No – applies to children and young adults 18-24



Other HUD Requirements



Participation by Homeless People

Each grantee and sub-grantee must:

- Have at least one homeless or formerly homeless person on the board of directors or equivalent policy making entity; and
- To the maximum extent practicable involve homeless people through employment, volunteer services or other means in maintaining, operating, and providing supportive services.



Conflicts of Interest

- Prohibits financial interests/benefit from assisted activity during tenure with organization and one year following tenure. Applies to:
 - ✓ Staff
 - ✓ Person with whom the staff member has immediate family or business ties
 - ✓ Board
 - ✓ Consultants
- Examples:
 - ✓ May not lease units/structures owned by a staff or board member relative, or business associate
 - ✓ Owner of a unit or his/her subordinate may not conduct HQS, rent reasonableness, or lead-based paint visual inspection.



Is it a conflict of interest, if...

A former Board member offers to provide legal services at a reduced rate?

Depends. If it has been less than one year since tenure, Yes.

An employee owns a small business, and her business partner rents units at a great rate to participants?

Yes. Person with whom an employee has business ties may not benefit financially.

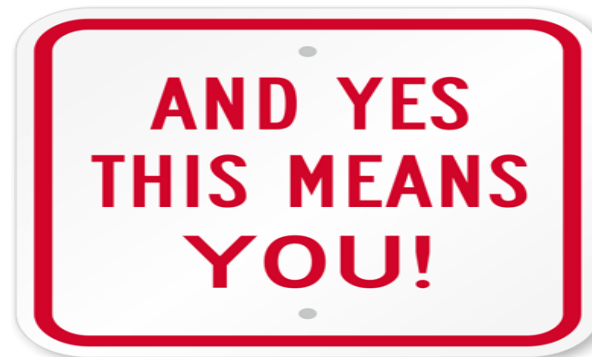
A subsidiary of the recipient agency owns the building, and an agency employee does HQS?

Yes. Agency must hire an independent entity for HQS.



Environmental Review (ER)

All CoC projects are required to complete an ER and update at least every 5 years, when new scattered site units are rented, and when environmental conditions change.



See flow chart handout to determine level of review required for your project.



Environmental Review (ER)

- Assesses the potential environmental impacts of a project
- If ER not present, HUD can issue a finding or recapture funds
- ER documentation required for current units & new housing units coming on-line.
- For scattered-site projects:
 - ✓ Update address list to include each new unit
 - ✓ Each unit located in a coastal county must be checked against the US Fish and Wildlife Service's Coastal Barrier Resource System Mapper to ensure that no units are rented in Coastal Barrier Resource Units
<https://www.fws.gov/cbra/maps/Mapper.html>

Additional ER resources available at www.ctbos.org

Managing sub-recipients

Recipient must:

- Have a signed agreement with all sub-recipients requiring project operation in accordance with the CoC Program Interim Rule
- Monitor sub-recipients at least annually
- Retain documentation of monitoring and sanctions, including findings and corrective actions required



Administrative Timeliness Requirements

- Drawdown at least quarterly
- Submit APR within 90 days of grant expiration – START EARLY!



Documenting Homelessness – Written Intake Procedures (cont.)

Must establish order of priority for obtaining evidence as:

1. Third-party documentation, examples:

- ✓ Letter from a shelter
- ✓ Letter from an outreach team
- ✓ Letter from another “service provider”
- ✓ HMIS record

2. Staff member of grantee’s observation of the conditions where the individual was living

3. Self-certification

- ✓ must be accompanied by intake worker’s documentation of the living situation and steps taken to obtain third-party documentation (limits apply)

Sample Written Intake Procedures available at www.ctbos.org





PSH Eligibility

CT BOS PSH Chronic Policy

PSH Projects must dedicate 100% of beds to Chronically Homeless and accept referrals only through their CAN from the *Statewide By-Name List*.



HUD Chronic Homelessness Definition –as of 1/2016

1) Live in a place not meant for human habitation, or an emergency shelter, or a safe haven (People in TH are not CH);

AND

2) Homeless (as defined above) for at least one year continuously or on 4 separate occasions in the last 3 years **(totaling 12 months)**;

AND

3) Disabled as defined by HUD



HUD Chronic Homelessness Definition – Continued



- ✓ People residing in an institution <90 days AND who were literally homeless (unsheltered, ES, SH only) immediately before entering also qualify (time in institution counts toward 12 months).
- ✓ Families with an adult or minor HoH who meet all criteria above also qualify.
- ✓ RRH participants retain their CH status [if CH at time of program entry] Time in RRH does not count toward CH
- ✓ **Occasion is demarcated by a break of 7 or more consecutive nights not** residing in a place not meant for human habitation, in shelter, or in a safe haven.
- ✓ Continuous means without a break of 7 or more consecutive nights.
- ✓ Third-party documentation of a single encounter is sufficient to consider an individual homeless for the entire month unless there is evidence of a break (e.g., an encounter in 5/1/16 counts for 5/1/16-5/31/16)

Definition of Disability

- Physical, mental or emotional impairment – includes impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury
 - Is expected to be long-continuing or of indefinite duration
 - AND**
 - Substantially impedes the person's ability to live independently
 - AND**
 - Could be improved by more suitable housing
- Developmental Disability
- HIV/AIDS



What counts as evidence of disability?



- Written verification from professional
 - ✓ licensed by State to diagnose and treat the disability
 - ✓ certification that disability meets the HUD definition
- Written verification from the Social Security Administration
- The receipt of a disability check (e.g., SSI/SSDI check or Veteran Disability Compensation);
- Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, is confirmed and accompanied by evidence described under bullets 1 through 3 above.
- Other documentation approved by HUD

CH PSH Eligibility - Recordkeeping Requirements

Evidence of Chronically Homeless Status must include:

- Evidence of homeless status at time of project entry
- Evidence of meeting continuous or occasional requirements
- Evidence of disability

AND

If applicable in order to maintain CH status for future program participation, evidence that the person was CH immediately before entering RRH.



Third-party documentation

- ✓ On agency letterhead
- ✓ Signed
- ✓ Dated
- ✓ Include name and title of the person signing



Self Certification



- Disability cannot be self-certified.
- For all clients, up to 3 months of homelessness can be documented through self-certification.
- Self-certification of more than 3 months may not be used for more than 25% of households served by a project during an operating year
- Must be accompanied by documentation of intake workers attempts to obtain third-party documentation.
- Documentation of breaks in homelessness between occasions can be entirely based on self-report.
- HUD allows self-certification while third-party documentation is gathered for up to 180 days (participants enrolled for fewer than 180 days can be excluded from determination of whether at least 75% of participants have at least 9 months of third-party documentation). HUD FAQ 2872

What counts as third-party documentation?

- HMIS record?
YES
- Letter from a shelter or outreach worker?
YES
- Letter from a shopkeeper, building owner, neighbor or sister?
YES
- Letter from a clergy person or educator?
YES
- Letter from a doctor, counselor or therapist?
YES
- Letter from law enforcement?
YES

Letters must:

- Be on agency letterhead
- Be signed and dated
- Include name and title of the person signing



Eligibility - Resources



- General Homelessness Verification Form (use if verifying CH for bridge to PSH):
 - ✓ Chronic Homelessness Documentation Checklist
 - ✓ Chronic Homelessness Sample Third Party Letters
- YHDP Homelessness Verification Form (use to document eligibility for YHDP projects)
- Disability Verification Form

Available at: www.ctbos.org

Review



When might a YHDP project need to help document Chronic Homelessness?

If a young person has been prioritized for PSH

Can a young person who is not CH access a PSH unit in CT BOS?

Probably not, though perhaps if no eligible CH person exists in the CAN.

Does a young person who was homeless for 12 months over the course of 2 episodes in the past 3 years, qualify as CH?

No

Can a young person self-certify a disability?

No

Does time spent in RRH count toward CH?

No – but a person who was CH at entry into RRH retains that CH status while in RRH.



GRANT AMENDMENTS & OTHER CHANGES

What is a Significant Change?

CoCs that are not
Unified Funding
Agencies (UFA):

- Change of recipient
- Change of project site
- Additions or deletions in the types of eligible activities approved for a project
- A shift of over 10% from one approved eligible activity to another
- A reduction in the number of units
- A change in the subpopulation served

How To Make a Significant Change

For significant changes:

- Prepare a detailed, written request to the HUD Field Office
- Explain the reason for the change
- Justify same or better level of service
- Attach all relevant revised application and technical submission exhibits reflecting the proposed change(s)
- Cannot make the change until approved and contract is amended by HUD

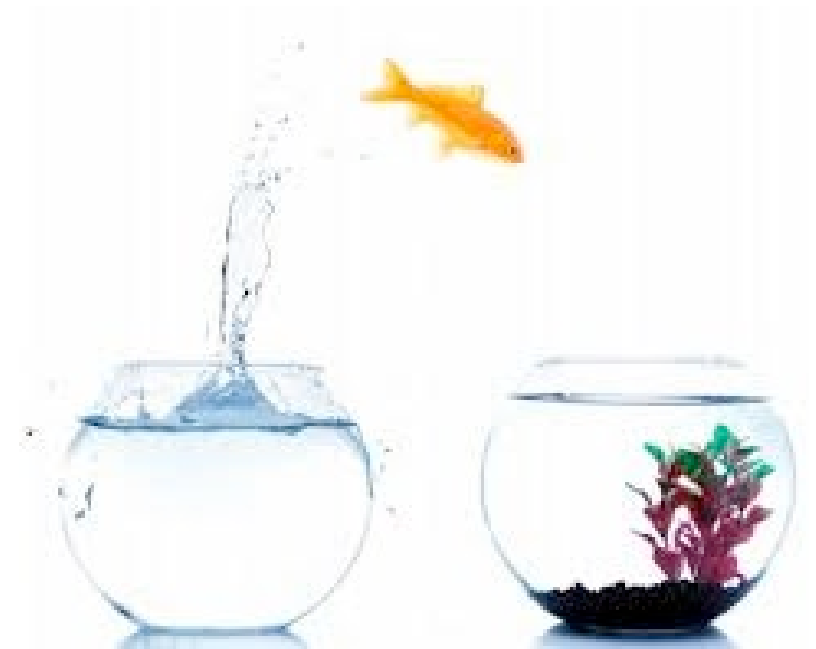


How To Make a Minor Change

For minor changes, the recipient must:

- Fully document any changes
- Maintain documentation and make it available to HUD during on-site reviews or upon request

You must alert the Field Office of the change to draw down funds in LOCCS



Which of these requires a grant amendment?



Conversion from leasing to rental assistance?

- **GRANT AMENDMENT REQUIRED**

Accepting a family into a project that applied to serve only singles?

- **MINOR CHANGE – AMENDMENT NOT REQUIRED**

Change the subrecipient?

- **MINOR CHANGE – AMENDMENT NOT REQUIRED**

Reduce under spending by moving unspent admin funds to supportive services?

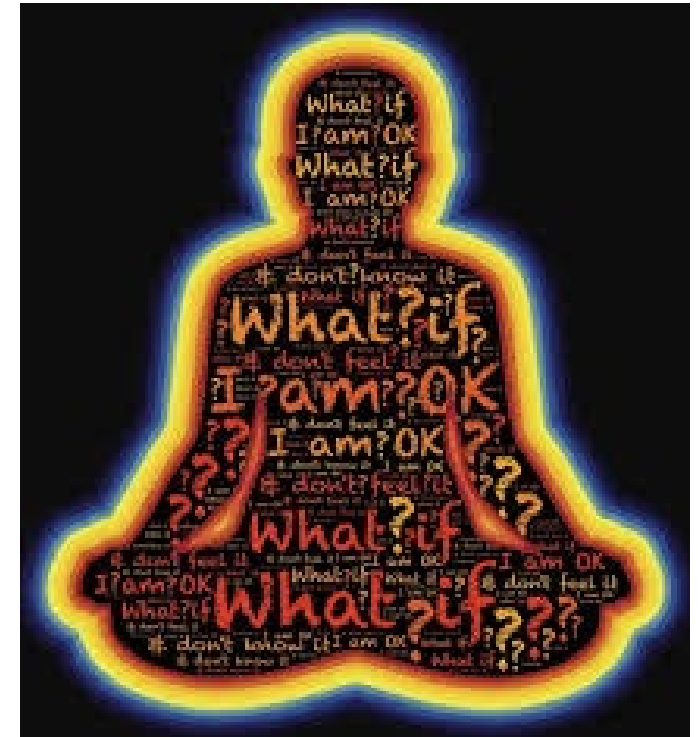
- **DEPENDS: IF YOU ALREADY HAVE AN APPROVED SUPPORTIVE SERVICES BUDGET AND THE SHIFT IS 10% OR LESS THAN TOTAL ADMIN AMOUNT AWARDED, THEN NO AMENDMENT IS REQUIRED**



What to expect - 2019 CoC Competition

CoC Competition Timeline

- Timeline is determined by HUD and based on NOFA release date and competition due date.
- Our crystal ball seems to think:
 - GIW: March or April 2019
 - New Project RFP Release: April or May 2019
 - NOFA Release: May or June 2019
 - Renewal Project Applications Due: June or July 2019
 - Competition Deadline: Aug or Sept 2019



CoC Competition Supports

- Instructions/deadlines emailed to CTBOS HUD Grantees list
- Project Applicant Webinar
- HUD eSnaps User Guides
- HUD Detailed Instructions
- HI Provides feedback on applications and applicants make changes prior to submission to HUD



CoC Competition - Next Steps

- **Make sure that you have access to esnaps and have added any staff members who need access as registrants.**
- **Be sure at least 2 staff people have access to and know how to use esnaps.**
- **Review your applicant profile and make any necessary changes.**
- **Be sure you have a DUNS Number and are registered with SAM.**

HUD Instructions and Guidance

Project Applicant Authorized Representative Update: Instructions for when there is a change in the organization's Authorized Representative.

Project Applicant Profile Navigational Guide: Instructions for accessing, updating, and completing the Project Applicant Profile, which is available year-round.

Putting the Applicant Profile in Edit-Mode: Identifies the steps to access the Project Applicant Profile in *e-snaps* and ensure it is in edit-mode.

DUNS Number and SAM Resource: This document provides instructions on how to obtain a DUNS Number and register with the System for Award Management.





Preparing for 2021 Renewal Evaluation

Anticipated Renewal Evaluation Timeline



- YHDP Projects to be evaluated in 2021 (eval period: 10/1/19-9/30/20)
- Summer 2019 - Steering Committee adopts 2020 renewal evaluation criteria
- October & November 2020 – Providers review APRs, ensure all data are current/accurate & submit any other data requested
- October & November 2020 – Consumers complete and providers submit surveys
- Winter 2021 – Providers receive evaluation results - opportunity to review/correct prior to finalization
- Evaluation results are used to rank projects during the 2021 Competition – impacts likelihood of funding
- Projects with a pattern of poor performance may be subject to reallocation
- New Projects are exempt in first year from Corrective Action (CA) – agencies with projects in CA are ineligible to apply for new project funds

Renewal Evaluation – Next Steps

- Review the current evaluation criteria (see handout or www.ctbos.org)
- Know who represents your CAN on the CTBOS Steering Committee
- Keep your HMIS data current
- Run your APR regularly
- Start monitoring your project outcomes





HUD Monitoring

HUD Monitoring Exhibits

HUD monitoring exhibits available at:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/6509.2



HUD Monitoring Areas

Beneficiaries	Housing	Supportive Services	Project Progress
Match Documentation	Subrecipient Management	Overall Systems Management	Financial Management
Cost Allowability	Procurement	Equipment and Equipment Disposition	Other Federal Requirements



Tips for Success

- Be sure current staff are signed up to receive CT BOS emails -be sure to select “HUD Grantees” & “YHDP”
- Use resources provided on handout
- Review files for compliance at least annually



Wrap-up & Evaluations

THANKS FOR
PARTICIPATING!

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Handouts – REMOVE SLIDE BEFORE COPYING

Slides – 2/page

Updated Homelessness Verification Form w/Self-Certification

Sample RRH Financial Assistance Letter

Links to helpful resources

Client Bill of Rights

Sample Edu Rights Policy

Edu Rights Poster Youth (English and Spanish)

Environmental Review Flow Chart

2019 Renewal Eval Criteria