

**CT Balance of State (CT BOS) Continuum of Care Policies  
Revised November 20, 2020**

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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 all cities and towns in the counties of Hartford, Litchfield, New Haven, New London, Windham, Tolland, and Middlesex 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). The Reaching Home Coordinating Committee (RHCC) is designated as the CoC Board for the CT BOS CoC. Reaching Home is the state-wide campaign to build the political and civic will to prevent and end homelessness in Connecticut. The RHCC delegates all responsibilities for managing the CoC to the CT BOS Steering Committee.

The CT BOS Steering Committee coordinates policies, strategies and activities toward ending homelessness in the CT BOS region. The CT BOS Steering Committee reports and is accountable to the RHCC.

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 through the work of the local planning bodies (i.e., CANs) 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**

CT BOS CoC by-laws are available at [www.ctbos.org](http://www.ctbos.org).

### III. Governance Charter

CT BOS CoC Governance Charter is available at [www.ctbos.org](http://www.ctbos.org).

### IV. 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. Immigration Status**

Agencies that are not federally required to verify immigration status will not do so for CT BOS projects.

#### **5. 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, written standards for the provision of rapid re-housing (RRH) assistance. Those standards were developed by the CT Department of Housing, adopted by the CT BOS Steering Committee, and are available at: [www.ctbos.org/policies](http://www.ctbos.org/policies)

#### **6. 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 CANs**

CT BOS CANs are responsible for coordinating with your local school district(s), charter school(s), 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 they 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.

#### **7. 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.

#### **8. 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.

#### **9. Grant Amendments**

- Grant recipients are required to submit any proposed CoC project grant amendments to the relevant CAN for approval prior to submission to HUD.
- Grant recipients are also required to notify the CT BOS Steering Committee of any approved amendments.

#### **10. Expenditure Data**

- To assist with ongoing efforts to ensure full and efficient use of federal resources, all projects funded by CT BOS are required to enter expenditure data into HMIS.

## V. 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.

## VI. Grievances

### 1. Purpose

The purpose of the CT BOS Grievance Policy is twofold:

- A. To ensure that there is a fair and accessible process for providers and Steering Committee members to file a grievance with the CoC regarding decisions made during the CoC funding process (See Section 5 below).
- B. To ensure that there is a fair and accessible process for consumers served by CT BOS projects who have filed a grievance with a CT BOS CoC funded provider, are dissatisfied with the outcome and wish to file a grievance with the CoC (See Section 6 below).

### 2. Filing a Grievance

Grievances submitted by provider agencies and Steering Committee members shall be submitted in writing to the Grievance Committee via e-mail ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)). Consumer grievances can be submitted to the CT BOS Grievance Committee in writing via e-mail ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)) or by phone at (917)449-3918.

### **3. 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. 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).

### **4. Final review by the CT BOS Co-Chairs**

All Grievance Committee decisions may be appealed to the CT BOS Steering Committee Co-Chairs within 10 working days of receipt of the committee's written decision. In instances in which a co-chair recuses, another Steering Committee member who was not involved in the decision being appealed may be appointed to participate in the final review. The final review shall be completed within 15 working days of receipt of the request. Within 10 working days of the review, the chairs shall issue a written decision specifying the reasons for the decision. The written decision shall be mailed or emailed to the person who filed the grievance by first class mail, and a copy will be maintained in the CT BOS project files. The decision is final and cannot be appealed.

### **5. Grievance Policy for Providers and Steering Committee Members**

This policy should be used when a provider or Steering Committee member wishes to file a grievance related to the CoC funding process. For instance, a project may file a grievance to appeal a project evaluation result or the rejection of a project for CoC funding.

#### **a. Resolution of a Grievance**

Grievances will be reviewed by the Grievance Committee within 30 days of receipt. The committee will issue a written decision, specifying the reasons for the decision and any actions that need to be taken. The written decision shall also indicate the opportunity to request a final review by the CT BOS Steering Committee Co-Chairs, and provide instructions for requesting the final review, including contact information. The written decision will be emailed to the person filing the complaint.

**b. Limitations on Grievances for Providers and Steering Committee Members**

Each year, the CT BOS Steering Committee approves the renewal evaluation scoring standards prior to initiating the evaluation. The CoC distributes draft standards in advance and encourages comment. In order to ensure equity, scoring is applied consistently to each program.

The Grievance Committee will not consider grievances based on disagreements with the evaluation standards adopted by the Steering Committee. Rather providers who believe the criteria or performance targets should be adjusted or certain types of projects should be exempted or have different targets should coordinate with their CAN Steering Committee representative, attend the relevant Steering Committee meeting or submit an email to [ctboscoc@gmail.com](mailto:ctboscoc@gmail.com). The Steering Committee will consider all such comments received prior to establishing the annual standards

CT BOS establishes a standardized process that provides the same opportunity for all projects to make data changes in advance of obtaining the APR data used to evaluate projects. Subsequently, providers are also provided the opportunity to review their preliminary renewal evaluation results, make additional data changes and request that their project be re-scored. Deadlines for each step are distributed and providers receive multiple reminders. In order to ensure equity, deadlines are, generally, applied consistently to each program. Where there are extenuating circumstances that prevent a project from meeting a deadline, the CoC chairs may approve extensions. The Grievance Committee will not consider grievances based on data changes made after the deadline without an approved extension. Providers who did not provide supplemental information during the change request process will not be permitted to submit a grievance related to data they could have changed but opted not to.

**6. Grievance Policy for Consumers**

This policy can be used by consumers who have filed a grievance related to a CT BOS CoC funded project with a provider agency and who remain dissatisfied with the outcome. Consumers must first complete any grievance process available to them through the relevant CT BOS funded agency prior to filing a grievance with CT BOS. Relevant issues may include determinations of service or housing subsidy terminations, repair issues, discrimination, mistreatment, or other disputes or complaints.

If the project serving the consumer is a DMHAS project (i.e., DMHAS is the CoC grantee or the project receives other DMHAS funding), the consumer must use the DMHAS Appeals Process (available at: <http://www.ctbos.org/wp-content/uploads/2017/04/1-Final-DMHAS-Rental-Assistance-Admin-Plan-June-2017-1.pdf>). The DMHAS Appeals Process includes the following steps:

- 1) Informal conference with the relevant CAN
- 2) Hearing with a DMHAS appeals panel
- 3) Final review by a Review Panel.

The outcome of the DMHAS Appeals process is final and not subject to review through the CT BOS Grievance process.

If the project serving the consumer is a DOH project (i.e., DOH is the CoC grantee or the project receives other DOH funding) or the grievance is about an eligibility or program acceptance decision, the consumer must file an appeal in accordance with the policies defined in the CT Coordinated Access Network (CAN) Policies and Procedures (available at: <http://www.ctbos.org/policies/>). The outcome of the CAN Grievance process is final and not subject to review through the CT BOS Grievance process.

Consumers who would like assistance determining which grievance processes are available to them may contact a staff member at the agency at which they receive services or the CT BOS team at ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)) or by phone at (917)449-3918.

#### **Grievance Committee Hearing Process for Consumers**

When a consumer submits a grievance to the CT BOS Grievance Committee, a hearing shall be held within 30 working days of the receipt of the grievance. A notice regarding the hearing shall be mailed to the consumer by first class mail and email, if applicable, not less than 10 days before the scheduled hearing. The notice shall include the date, time, and location of the hearing and a clear statement of the issues to be considered.

The consumer who filed the grievance must have the opportunity to be present during the hearing and to hear all oral information and review all written information that is being considered by the Grievance Committee. They must also have the opportunity to bring a person of their choice to assist them during the hearing. Consumers who would like help identifying someone who can assist them may contact a staff member at the agency at which they receive services or the CT BOS team at ([ctboscoc@gmail.com](mailto:ctboscoc@gmail.com)) or by phone at (917)449-3918.

A member of the Grievance Committee shall keep a sign-in sheet of all who attended the hearing and a list of the documents presented. If the consumer

opts not to attend the hearing, the Grievance Committee may, in lieu of convening a hearing, opt to review the grievance and gather all pertinent information via email, phone, or video conference. Such a review must be completed within 30 days of receipt of the grievance.

Within 10 working days of a hearing or other review process, the Grievance Committee shall issue a written decision specifying the reasons for the decision and any actions that need to be taken. The written decision shall also indicate the opportunity to request a final review by the CT BOS Steering Committee Co-Chairs, and provide instructions for requesting the final review, including contact information. The written decision shall be sent by first class mail and email, if applicable, and a copy will be maintained in the CT BOS project files.

## **7. Public Posting of this policy**

All CT BOS funded projects are required to post a copy of this policy in an area that is visible to staff working in and consumers receiving services from the project.

## **VII. 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.

## **IX. Reallocation**

### **1. Reallocation Background**

Through HUD's annual Continuum of Care (CoC) competition, the Connecticut Balance of State Continuum of Care (CT BOS) typically has an opportunity to

eliminate funding in whole or in part from existing projects and reinvest those resources in new projects. This process is known as reallocation, and it is intended as a tool for CoCs to continuously align investments with strategic priorities and ensure that projects are meeting HUD and CoC expectations. HUD strongly encourages CoCs to review and realign their project portfolios annually, and the scoring methodology HUD uses in the competition often provides an incentive to do so. CoCs that fail to take advantage of the reallocation opportunity, typically, do not fare as well in the annual competition, which results in receiving fewer federal resources to end homelessness.

CT BOS has implemented a comprehensive reallocation process that uses performance and need data to determine how to efficiently and effectively expend available CoC program resources to improve system performance and end homelessness within the CoC. CT BOS also considers project compliance with HUD, state and CT BOS requirements when making reallocation decisions.

The process used by CT BOS to make reallocation decisions is described below.

## **2. Reallocation Criteria**

CT BOS uses the following criteria to identify projects for possible reallocation:

- The CoC may reallocate funds from projects that are underperforming. This helps to improve system performance, for example, to:
  - reduce homelessness
  - reduce length of time clients remain homeless
  - reduce returns to homelessness
  - increase participant access to income and benefits
  - increase housing stability
- The CoC may reallocate funds to ensure efficient use of resources, for example to address:
  - under spending
  - high costs
  - program vacancies
- The CoC may reallocate funds when projects are using outdated program models.
- The CoC may reallocate funds when monitoring findings or other information indicate that a project is significantly out of compliance with HUD, state, or CT BOS requirements and that the responsible agency is unable or unwilling to make the necessary corrections.
- Projects also have the option to voluntarily reallocate to make better use of CoC resources.

## **3. Reallocation Procedures:**

- The CT BOS Steering Committee, with input from stakeholders, establishes a methodology to evaluate renewal projects annually. The evaluation methodology uses objective, performance-based scoring criteria. The criteria

are posted to the CT BOS website. The CT BOS Steering Committee establishes a corrective action threshold and projects scoring below that threshold for 2 or more years may be considered for reallocation.

- CT BOS monitors a sub-set of projects annually to determine the extent to which projects are complying with HUD, state, and CT BOS requirements. This process is primarily intended as a support to provider agencies to help them identify and correct areas in which their operations are not aligned with requirements. When a project meets one or more criteria outlined above, monitoring results may also be used to inform reallocation decisions.
- CT BOS may also periodically look at other available information about the projects it funds (e.g., spending reports from HUD, HUD monitoring findings, state monitoring findings, CAN data, complaints received, etc.)
- Using the criteria outlined above, the CT BOS Chairs identify and refer projects to the Steering Committee for possible reallocation.
- The Steering Committee determines if projects will be reallocated in whole or in part.
- Projects slated for full or partial reallocation may submit an appeal. A Grievance Committee hears and decides appeals.
- The CoC offers providers education & technical assistance. This may include, for example, providing information and assistance on renewal evaluation criteria, monitoring standards, and/or the reallocation process via Steering Committee meetings, emails, trainings, semi-annual public meetings, Coordinated Access Networks, and the CT BOS website. This may also include, for example, provision of individualized technical assistance to providers interested in voluntary reallocation and those selected for reallocation by the Steering Committee.
- The Steering Committee decides annually how to best allocate funds for new projects, including reallocated funds, bonus dollars, and any other source. Using available Coordinated Access Network and other data, the Steering Committee considers which types of projects are most needed and which target populations should be prioritized.
- The CoC welcomes and solicits new project applications from all eligible organizations, including those that have never received CoC Program funds as follows:
  - CoC posts a Request for Proposals (RFP) publicly on the CoC's website.
  - CoC sends information about the RFP opportunity out to its email list, which includes more than 460 individuals.
  - CoC partners widely distribute information about the RFP opportunity to their email lists, which include organizations that do not currently receive and have never received CoC program funds.

## IX. Coordinated Access

In accordance with HUD requirements, the CT Department of Housing has developed, and the CT BOS Steering Committee has adopted, a statewide Connecticut Coordinated Access Network (CAN) Policies and Procedures Manual. That manual is available at <http://www.ctbos.org/policies/>

In addition to the policies contained in that manual, CT BOS has established the following:

- **Requirement for all CT BOS PSH projects to be Dedicated Plus.** HUD included the option of DedicatedPLUS in the [FY 2017 CoC Program NOFA](#) to provide CoCs with more flexibility to serve vulnerable populations and to more effectively and more immediately address the needs of persons experiencing chronic homelessness, at risk of experiencing chronic homelessness, or who were chronically homeless prior to being housed and who have recently become homeless again. In May 2019, the CT BOS Steering Committee passed a motion requiring that all CT BOS funded renewal PSH projects convert to Dedicated Plus and all new PSH projects funded by CT BOS be designated as Dedicated Plus. This new policy replaces the previous requirement that 100% of PSH beds be dedicated to people experiencing chronic homelessness. Details for implementing the change from chronic dedicated to DedicatedPLUS will be made available in Statewide CAN Policies.

## X. Remote Steering Committee Voting Procedures

As per the CT BOS by-laws, at the chairs' discretion, the CT BOS Steering Committee may be convened remotely via video and/or telephone conferencing. Only Steering Committee members who participate in the remote meeting at which a matter is discussed are eligible to vote on motions related to that matter. Remote Steering Committee voting will be administered as follows:

- Steering Committee members will be reminded at the start of each meeting that to be recorded as present and eligible to vote either during the meeting or through subsequent electronic voting conducted on matters discussed during the meeting, they must do one of the following: a) Show their full name in the video conferencing application, or b) State at the beginning of the meeting when prompted that they are present.
- A member of the CoC consultant team will record the names of all participants in meeting minutes.
- The chairs will determine the method to be used for voting by the Steering Committee during or subsequent to a remote meeting.
- When decisions are being made by consensus or voice vote during a remote Steering Committee meeting, a reminder about who is eligible to vote shall be provided. The

meeting chair, with assistance as requested from the consulting team, will ensure that only eligible Steering Committee members vote.

- When votes are being administered electronically (e.g., via email or web-based survey) those casting a vote will be required to provide their name and, if applicable, the entity they represent on the Steering Committee. A member of the CoC consulting team will ensure that only votes cast by eligible Steering Committee members are counted. The chairs will ensure that Steering Committee members are provided with a minimum of one business day to cast votes.

## **XI. 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.

**DedicatedPLUS** – A DedicatedPLUS project is a permanent supportive housing (PSH) project where the entire project will serve individuals and families that meet one of the following criteria at project entry:

1. Experiencing chronic homelessness as defined in 24 CFR 578.3;
2. Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
3. Residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;
4. Residing in transitional housing funded by a Joint transitional housing (TH) and rapid re-housing (PH-RRH) component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
5. Residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
6. Receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

**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*

## **XII. 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.

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<b>Participant/Applicant Name</b>	<b>Participant/Applicant</b>	<b>Signature Date</b>
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**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](mailto: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](http://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."

## CT BOS CoC Participant/Applicant Bill of Rights

- 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:
  - 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.
  - Transitional housing programs offer participants due process to resolve issues that may result in involuntary discharge (unless immediate risk to health and safety)
  - 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>).
  - 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.