CT Balance of State (CT BOS) Continuum of Care Policies Posted August 4, 2026

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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 though 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.

III. Governance Charter

CT BOS CoC Governance Charter is available at www.ctbos.org.

IV. Program Operating Standards

1. CT BOS Engagement Principles

The Connecticut Balance of State Continuum of Care (CT BOS CoC) uses an engagement approach that centers on connecting people experiencing homelessness with safe, stable housing and the services and supports they need to achieve long-term stability, recovery, and increased self-sufficiency. The CoC follows a rules-in approach, meaning that services and housing programs are designed to include and engage individuals whenever possible, with eligibility limitations applied when necessary to ensure safety or comply with funding or legal requirements.

Project Entry

- CT BOS projects, in partnership with local Coordinated Access Networks (CANs), offer individuals and families experiencing homelessness access to interim and permanent housing options, accompanied by assessment and service planning that address barriers to stability such as mental health, substance use, and employment.
- Projects and CANs apply admission criteria, consistent with funder requirements, to ensure participant and community safety.
- Screening and admission practices follow a rules-in philosophy, emphasizing inclusion and support rather than exclusion. Screening and admission practices are designed to balance accessibility with safety. For example, applicants are evaluated holistically; challenges such as substance use, treatment history, poor credit and criminal or rental history are not automatically disqualifying but may be reviewed case-by-case in the context of a plan for stability.
- CT BOS CoC, along with its state partners, make efforts to ensure that sufficient sober housing options are available to meet the need for such models.

Community Integration and Recovery

- Housing and services are structured to promote integration into the community and support recovery, stability, and independence.
    a. Housing is located in neighborhoods accessible to community resources such as employment opportunities, schools, libraries, healthcare providers, faith communities, and transportation.

b. Housing is designed to blend with surrounding residences and reflect community standards.
c. Services help participants build supportive relationships, engage in positive activities, and strengthen family and community ties.
d. Services are recovery-oriented, helping participants set and achieve personally meaningful goals related to health, employment, education, and wellness. Service participation is required and reluctance to engage is used as a critical indicator of service quality. Projects continuously evaluate service participation and adjust services to meet each individual participants' needs to achieve 100% service participation.

Lease, Occupancy Agreement and Service Contract Compliance and Housing Retention

- Participants are expected to comply with standard leases/occupancy agreements and service contracts. Programs provide services and supports to promote housing stability and prevent eviction.
  a. Program expectations align with standard tenancy obligations and community standards.
  b. Services identify and mitigate risks to housing stability, health, and well-being.
  c. Case management and coordination with treatment and service providers help participants address issues before they jeopardize housing.
  d. Involuntary termination from housing or services occurs only with due process and is consistent with legal eviction procedures when applicable.

Coordination of Housing and Services

- Projects are structured so that property management and supportive service functions are clearly defined and coordinated to promote stability and accountability.
  a. Property management and support services are handled by distinct staff or entities with separate responsibilities.
  b. Communication protocols support coordination while maintaining confidentiality.
  c. Property management staff are responsible for enforcing tenancy and occupancy agreement requirements.
  d. Property management and service staff collaborate to address issues impacting housing stability and ensure early intervention and problem-solving.

Participant Choice

- Participants are supported to take an active role in service planning and decision-making, with an emphasis on informed choice.
  a. Programs provide meaningful opportunities for participant feedback and involvement in program design, activities, and policy development,

integrating input on the type, frequency, location and focus of services offered.

b. Staff use person-centered approaches to motivate and support progress toward stability, recovery and independence.
c. Participants are supported in understanding and reducing risks associated with their choices.
d. Staff intervene when necessary to protect the safety of participants and others.
e. Participants are informed of their rights and responsibilities and are assisted in maintaining lease/occupancy agreement compliance.

2. Service Participation Requirement

As a condition of applying for new and renewal funding, all CoC-funded projects must require participation in supportive services. Projects prohibited from doing so by statute (e.g., VAWA are exempt from the requirement). See Engagement Principles above for more details regarding the approach to implementation of this requirement.

3. Substance Use and Recovery Housing Policy

Purpose: The Connecticut Balance of State Continuum of Care (CT BOS CoC) is committed to ensuring that CoC-funded housing projects operate in compliance with federal law, HUD requirements, the FY 2026 CoC Notice of Funding Opportunity (NOFO), and future CoC Program NOFOs. The CoC also recognizes that substance use disorders are treatable medical conditions and supports access to evidence-based treatment, recovery services, and recovery-oriented housing opportunities.

Prohibited Activities in CoC-funded housing projects

All CT BOS CoC-funded **housing projects** must comply with the following requirements:

1. Shall not operate drug injection sites or "safe consumption sites."
2. Shall not knowingly distribute drug paraphernalia on or off property under their control.
3. Shall not knowingly permit the use or distribution of illicit drugs on property under their control.
4. Shall not conduct, permit, encourage, facilitate, or allow any of the activities described above under the pretext of "harm reduction."

All project applicants and recipients must comply with all certifications and assurances required by HUD in the applicable CoC Program Competition.

Recovery and Treatment Services

The CT BOS CoC urges all CoC-funded projects to:

- Assist participants in accessing substance use disorder (SUD) treatment when requested or clinically appropriate;
- Establish referral relationships with licensed treatment providers within or outside of the CoC;
- Connect participants to medication-assisted treatment, outpatient treatment, inpatient treatment, peer recovery supports, recovery coaching, and other evidence-based services within or outside of the CoC;
- Coordinate with recovery housing providers and recovery-oriented systems of care within or outside of the CoC;
- Support participants pursuing recovery goals consistent with their individual needs and preferences.

Recovery Housing and Treatment-Based Programs

Nothing in this policy restricts or prohibits CoC-funded housing projects that require program participants, as a condition of assistance, to maintain sobriety or participate in SUD treatment or recovery programming. Nothing in this policy restricts or prohibits projects from partnering with treatment providers, recovery programs, or recovery housing operators.

Participant Rights

Nothing in this policy shall be interpreted as requiring:

- Program participants to be sober to receive assistance;
- Program participants to participate in treatment to receive assistance; or
- Automatic eviction, termination, or program exit for a violation of a drug-related lease or program requirement.

Though individual CoC projects may implement the requirements above, the CoC does not require that they do so. Applicants may opt to decline an offer for assistance if the project does not meet their needs. Doing so will not impact their position on the By Name List.

Projects may establish and enforce program rules and lease requirements consistent with 24 CFR Part 578, fair housing laws, disability rights requirements, and applicable due process protections.

Compliance Monitoring and Remedies

The CT BOS CoC will monitor compliance with this policy through its established monitoring and compliance oversight processes.

If the CoC determines that a project has violated this policy, the CoC may take one or more of the following actions:

1. Require corrective action and submission of a corrective action plan;
2. Require staff training or technical assistance;
3. Place the project on a performance improvement plan;
4. Consider the violation during local competition scoring, project review, or ranking processes;
5. Pursue any additional remedies available under CoC governance documents, grant agreements, or federal regulations.

Serious, repeated, or unresolved violations may be considered in future funding decisions and may be referred to the CoC Board (i.e., Steering Committee) for review.

Applicability

This policy applies:

- To all housing projects submitted by the CT BOS CoC for funding
- To all recipients and subrecipients operating CoC-funded projects within the CT BOS CoC geographic area.
- Beginning with projects funded through 2026 Continuum of Care Program competition (i.e., with operating start dates in CY2027)

4. 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 jobrelated 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).

5. Permanent Supportive Housing 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 Permanent Supportive Housing assistance. Those standards were developed by the CT Department of Mental Health & Addiction Services and adopted by the CT BOS Steering Committee, and are available in the CT Statewide PSH Operations & Requirements Guide on the CT BOS Website (www.ctbos.org). All PSH projects funded by CT BOS are required to follow the CT Statewide PSH Operations Guide.

6. Street Outreach 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 Street Outreach assistance. Those standards were developed by the CT Department of Mental Health & Addiction Services and CT Department of Housing and adopted by the CT BOS Steering Committee, and are available in the CT Street Outreach Guidelines on the CT BOS Website (www.ctbos.org). Implementation of these guidelines is required for all Street Outreach projects funded by CT BOS.

7. 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

in the CT Statewide RRH Operations Guide on the CT BOS Website (www.ctbos.org). All RRH projects funded by CT BOS are required to follow the CT Statewide RRH Operations Guide.

The **YHDP Diversion/Rapid Exit Fund** (YHDP Div/RE) provides assistance to youth age 18-24 at program entry who are experiencing HUD Category 1, 2 or 4 homelessness. It is intended for youth households that only need minimal, short-term assistance to obtain and maintain housing. It was originally established under HUD's Youth Homelessness Demonstration Program (YHDP) and is renewed annually as a CoC project. It operates across the CoC and is administered centrally by the CT Coalition to End Homelessness (CCEH; referred to herein as the "fund administrator"). CCEH approves and distributes all payments, enters into MOU's with and provides training and technical assistance to partner agencies. Those partner agencies are responsible for a broad range of tasks, including determining and documenting participant eligibility, conducting HQS inspections, determining rent reasonableness, housing search/ leasing assistance, and provision of housing stabilization services.

The YHDP Div/RE is a modified rapid rehousing project and, as such, is not required to follow the statewide RRH standards referenced above. Rather, the YHDP Div/RE Fund follows the eligibility and prioritization standards as outlined in the CT Coordinated Access Network Policies & Procedures and the standards outlined below for providing rental and financial assistance to eligible participants.

8.YHDP Diversion Rapid Exit Maximum Financial Assistance

Maximum Financial Assistance per household per homeless episode is $5,000. Households may receive up to 100% of security deposit for up to a two months and first month's rent. If participants are responsible for paying some or all of the costs of their own utilities, the applicable utility allowance must be provided as follows.

The responsible partner agency must:

1) Obtain the local PHA utility allowance schedule, if applicable, or state DOH schedule if no local PHA exists.
2) Keep in project and/or applicable client files a copy of all utility allowance schedules used, including all updates released by PHA and/or DOH.
3) Consult the individual client leas to determine which utilities a tenant is responsible for paying.
4) Determine the amount of the utility allowance based on the applicable PHA/DOH schedule- only applying the allowance for utilities that the tenant is responsible for paying.
5) Include applicable utility allowances when calculating the amount of Div/RE assistance to be provided.

6) Document the calculation, including any utility allowance applied in the client's chart
7) Provide CCEH with the applicable utility allowance amount, utility account number and payment mailing address (or first bill).

CCEH will pay the applicable utility allowance directly to the utility company

The example below illustrates:

- YHDP Div/RE program is assisting a participant to lease a unit in Hartford
- Lease indicates tenant is responsible for paying heat and electric
- Hartford PHA utility allowances per month: electric $50 and heat $50 (total: $100/month)
- Rent for unit is $1000
- Security is 2 months: $2000
- Client has no income
- Document how initial payment was calculated in client chart:
    - Security @ 2months = $2000 +
    - Rent @ 1 month = $1000 +
    - Utility allowance at 1 month= $100

  Total initial payment = $3100
    - $3000 paid to landlord
    - $100 paid to utility company
- Client still has no income in month 2
- Document how subsequent payment was calculated in client chart:
    - Rent @ 1 month = $1000
    - Utility allowance at 1 month= $100

  Total subsequent payment = $1100
    - $1000 paid to landlord
    - $100 paid to utility company

If a youth's case manager determines that the youth will lose their housing unless additional assistance is received, then the youth may be eligible for up to 100% of rent for up to two additional months. Until such time as further guidance becomes available, determinations regarding whether additional assistance is necessary can be made at the discretion of the case manager and reviewed by the fund administrator (i.e., CCEH). The utility allowance requirements described above continue to be applicable for each additional month of rental assistance provided.

Additional financial assistance (up to the $5,000 maximum) is eligible if necessary to assist participants with obtaining and maintaining housing. Eligible costs are as follows:

Transportation:

- The costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other services eligible under Section 578.53 of the CoC Interim Rule.
- If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following: Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types); Payments for car repairs or maintenance must be paid by CCEH directly to the third party that repairs or maintains the car; and DOH or CCEH may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.

Utility deposits:

- This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies.

Moving Costs:

- Reasonable one-time moving costs are eligible and include truck rental and hiring a moving company.
- This also includes a bus, plane, or train ticket to relocate to permanent housing if
  (i.) CCEH has ensured that the cost of the assistance provided is reasonable and appropriate, in accordance with the Uniform Administrative Requirements, Cost Principles, & Audit Requirements for Federal Awards (2 CFR 200),
  (ii.) And, the partner agency has provided the participant with information about the CoC that serves the area to which he/she is moving (if applicable) and has confirmed that the household has permanent housing in the new location, and will not be homeless in that community upon their arrival.

Childcare Costs:

- The costs of providing child-care vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible.
  (i) The children must be under the age of 13, unless they are disabled children.
  (ii) Disabled children must be under the age of 18.
  (iii) The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Credit Counseling:

- Credit counseling, accessing a free personal credit report, and resolving personal credit issues.

Rental Application Fees

Identification:

- The cost of obtaining a birth certificate or other required documentation for obtaining federal, state or local benefits is an eligible supportive services cost under case management, if it is a necessary to obtain mainstream benefits, and if obtaining primary documents is necessary to obtain and/or maintain housing.

Food:

- The cost of providing meals or groceries to program participants.

Though, rental assistance may be provided only for a maximum of 3 months, the other types of financial assistance detailed above may continue as needed to prevent a return to homelessness; however, no additional financial assistance may be provided and program participants must be exited from the project within six months from the date they move into permanent housing. Support services must be offered by the responsible partner agency to participants throughout the duration of enrollment in the project. Until they are exited from the project, participants are required to meet with YHDP Div/RE partner agency staff not less than once per month to assist in ensuring long-term housing stability. It is the responsibility of partner agency staff to make assertive attempts to engage participants in the required services.

9. Educational Services for Children

BACKGROUND

Federal law ensures educational rights and protections for children and young adults 1824 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/subrecipients 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 the are eligible according to their needs and comparable to those provided to other students, including assistance from the local school district's homeless liaison, Early Intervention Program for Infants and Toddlers with Disabilities, Head Start, other preschool programs, services for disabled students, free school meals, services for English language learners, gifted and talented services, before and after school care, career and technical education, summer learning, online learning, and referrals to health, mental health, dental and other services.
k. Advocating as necessary to ensure that homeless students who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet and charter schools, summer school, career and technical education, advanced placement, online learning, and athletic programs.
l. Advocating, as necessary, to ensure that students receive appropriate full or partial credit for coursework, including consulting with the prior school about partial coursework completed, evaluating students' mastery of partly completed courses, and offering credit recovery.
m. Advocating as necessary to ensure that all homeless youth receive information and individualized counseling regarding college readiness, college selection, the application process, financial aid, and the availability of on-campus supports; and that unaccompanied homeless youths are informed of their status as independent students for the purposes of Federal financial aid for postsecondary education and assisted in receiving verification of such status.
n. Advocating as necessary to ensure that records, including information about a student's living situation, are kept private.
o. Helping homeless students to succeed in school and to get help from the local homeless education liaison, as necessary.

p. Developing relationships with colleges to access higher education services specifically for homeless young adults.

q. Designating a staff person who is responsible for:
   - Helping participants to understand their educational rights
   - Ensuring that children and young adults are enrolled in school and early childhood education
   - Ensuring that students get access to all services, programs, and extracurricular activities for which they are eligible
   - Ensuring that children and young adults receive the transportation services to which they are entitled

   These need not be the only responsibilities of the designated staff person.

r. Ensuring that the designated staff person is involved in the development of participants' service plans where there are extensive or significant unmet educational needs.
   - Ensuring that no policies, procedures, or practices that are inconsistent or interfere with the educational rights established under federal law are adopted by the project.

10. Special Requirements for Leasing and Rental Assistance and Transitional Housing 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.
- Only Transitional housing projects, including YHDP Crisis Housing, can use occupancy agreements in lieu of leases with program participants. The occupancy agreement must be for a term of at least one month that ends in 24 months and cannot be extended beyond 24 months. The goal for YHDP Crisis Transitional housing projects is to house youth within 60 days, but longer stays may be necessary. Projects may not charge occupancy fees.
- For rental assistance, there needs to be an agreement with the administrator including customary terms and conditions.

11. Participant/Applicant Bill of Rights

- Coordinated Access Networks (CANs) and all projects funded by CT BOS must review with and provide a written copy of the consolidated *CT BOS CoC Participant Rights Notice* (see www.ctbos.org/policies) to all participants and applicants when they first apply for assistance, when they enter your project, and at least once each year. The rights notice includes participant rights, emergency transfer rights, and grievance rights.

12. 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.

13. Age Requirements for YHDP projects

Per HUD requirements, YHDP eligibility is limited to unaccompanied youth experiencing homelessness, including pregnant or parenting youth and couples, who are not accompanied by their parent or guardian during their episode of homelessness and where no member of the household is older than 24 at project entry. Age of adult participants must be verified when determining program eligibility.

The following documents are considered to be reliable for age verification: birth certificate, driver's license, passport, immigration card, military identification, school-age record, social security record, or any other state, local, national or international documentation, provided it contains current information about the age or birth of the possessor. Proof of age should not serve as a barrier to program enrollment. In the absence of these forms of documentation at program entry, a client may self-certify their date of birth while the provider continues to assist with obtaining vital documents. This self-certification does **not** need to be notarized. See YHDP Additional Household Member Guidance for more information on the YHDP age restriction.

14. Youth Navigator Projects

Youth Navigator projects are Supportive Services Only (SSO) projects that were originally funded under HUD's Youth Homelessness Demonstration Program. These projects provide services to youth age 18-24 at program entry who are experiencing HUD Category 1, 2 or 4 homelessness and who are not residing in housing operated by the SSO recipient or sub-recipient. Youth Navigators may conduct youth-specific CAN appointments. Eligible youth who are unable to be diverted from homelessness at their CAN appointment are referred to and enrolled in a Youth Navigator project as capacity allows.

Services focus on assisting program participants to quickly obtain housing and connect with community supports as needed to obtain and maintain housing. This includes but is not limited to: reconnecting youth with natural supports when this contact would not jeopardize the youth's safety; assisting youth with

following through on service linkages, such as connection to McKinney-Vento liaison, local workforce assistance program, and the Department of Children and Families' re-entry process; and connecting youth to housing assistance projects as needed. As project capacity allows, services may continue up to 6 months from the date the youth moves into permanent housing. Youth Navigator services should terminate once the youth is enrolled in a transitional housing, rapid rehousing (except for YHDP Diversion/Rapid Exit Fund), or permanent supportive housing project with the navigator providing a warm handoff to the respective case manager. Youth participants who were originally eligible for the program under HUD Category 2, and who have remained in the housing they were at imminent risk of losing at entry, should be discharged from the program within 90 days of entry after referrals to community resources are made.

15. Expenditure Data

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

16. Emergency Transfer Plan and Notification Requirement

In accordance with the Violence Against Women Act (VAWA), the CT BOS CoC has adopted an emergency transfer plan, which allows tenants of transitional housing, permanent supportive housing, and rapid re-housing projects that receive federal, county, or state funds who are victims of domestic violence, dating violence, sexual assault, stalking or human trafficking to request an emergency transfer from the tenant's current unit to another unit. All recipients and subrecipients of federal, county, or state funds for transitional housing, permanent supportive housing, and rapid rehousing projects must follow this plan.

All CANs and CoC/ESG funded projects are required upon application for assistance, at project entry, and at annual recertification to:

- inform all individuals/families seeking or receiving assistance, regardless of known DV survivor status, of their rights under the emergency transfer plan and of the process to seek a transfer; and
- provide a brief user-friendly notice that clearly explains the emergency transfer rights and process (see Consolidated Participant Rights Notice at www.ctbos.org/policies).

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. 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). Consumer grievances can be submitted to the CT BOS Grievance Committee in writing via e-mail (ctboscoc@gmail.com) or by phone at (860) 375-4634.

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. The Steering Committee will

consider all such comments received prior to establishing the annual standards.

CT BOS establishes a standardized process that applies criteria and benchmarks established by the Steering Committee equitably across all projects. To ensure the equitable application of the standards, the Grievance Committee will not consider grievances based on circumstances that are commonly experienced across projects. For example, the Grievance Committee will not consider grievances based on a challenging housing market, staff turnover, or housing stability challenges commonly faced by participants.

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.

CT BOS is committed to ensuring good stewardship of CoC funding and effective use of the resources to end homelessness. This includes ensuring that CoC investments are allocated in a manner that is aligned with the demonstrated needs of people experiencing homelessness. Each year the CoC has the opportunity to reallocate renewal funding to better align investments with needs. The Grievance Committee will not consider Grievances from projects indicating that that they could not meet certain performance benchmarks (e.g., occupancy or spending) because there was an insufficient number of people experiencing homelessness who are eligible for the project. Rather, such projects are encouraged to seek referrals from another CT BOS CAN or work with their CAN and the HUD field office to alter their target population and/or reduce the size of the project.

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. Consumers must file the grievance within 30 days of having received notification of the outcome of the grievance filed with the relevant provider

agency. 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-Help-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 RRH project, the consumer must file a grievance in accordance with the policies defined in the CT DOH Statewide RRH Operations Guide. If the project serving the consumer is a different type of DOH project (i.e., DOH is the CoC grantee for a project other than RRH or the project receives other DOH funding) or the grievance is about a Coordinated Access Network (CAN) decision, the grievance will be reviewed via the CT BOS Grievance Process described in this Section (Section 6).

Consumers who would like help 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) or by phone at (860) 375-4634.

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) or by phone at (860) 375-4634.

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 within 15 days 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.

Notification

CT BOS funded projects and Coordinated Access Networks (CANs) are required to notify all households seeking or receiving help of their grievance rights. All CANs and CT BOS funded projects are required upon application, at project entry and at a minimum annually to provide a notice issued by CT BOS summarizing these rights (see Consolidated Participant Rights Notice at www.ctbos.org/policies) and to review that notice with participants/applicants to help them understand their grievance rights.

VII. Monitoring

1. Purpose

HUD requires CoCs to monitor and evaluate CoC programs. CT BOS provides onsite 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. Projects also have the option to apply for a transition grant to change component types.

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 or transition to a different component type.
- The Steering Committee determines if projects will be reallocated in whole or authorized to transition to a different component type.
- 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 longcontinuing 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