

## CRHC CoC Grant Application

(One project per application)

FUNDING 2022 HUD NOFO CoC

Program interim rule at 24 CFR 578

GRANT PERIOD 23-24

Application due to [glhrncoordinator@gmail.com](mailto:glhrncoordinator@gmail.com) by noon Tuesday, August 30, 2022

**Applicant organization must have tax-exempt status under 501(c)(3) of the IRS code, UEI Number and an active registration in SAMS at the time of the application decision. UEI #: \_\_\_\_\_**

Date of Application: \_\_\_\_\_

### PART I: Program Information

Renewal  Non-DV Bonus Project  DV Bonus Project   
Consolidation  Transition  Expansion

Organization: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Title: \_\_\_\_\_

Telephone: \_\_\_\_\_ Email: \_\_\_\_\_

Project Grant Name (if a renewal, must match name on GIW on pg. 11): \_\_\_\_\_

Minimum # Units (All must respond; if a renewal, must match GIW on pg. 11): \_\_\_\_\_

**Renewal only:** GIW Award Amount: \$ \_\_\_\_\_; **New projects:** Amount Requesting: \$ \_\_\_\_\_

**Identify** the Program Component for Which You Are Requesting Funds: (only one component per application)

\* Permanent Supportive Housing  \* Rapid Rehousing  \* Joint TH-RRH

\* DV-RRH  \* DV-Joint TH-RRH  \* DV-Coordinated Entry  \* Coordinated Entry

**A.** Are other funds leveraged with the requested funds?

Yes: \_\_\_ No: \_\_\_ If yes, please identify the amounts and sources for all leveraged funds.

Amount \$ \_\_\_\_\_ Source: \_\_\_\_\_

Amount\$ \_\_\_\_\_ Source: \_\_\_\_\_

**B. This grant requires a 25% cash or in-kind match.** Please describe in detail:

a) type (cash or in-kind); b) Source of match; c) Amount, and how it will be documented.

*Note:* Match letters of intent/MOU's will be required if the application is selected for funding.

**C.** Does/Will the agency follow the Orders of Priority as defined in CPD-16-11 (See Exhibit A of this application)? Yes: \_\_\_ No: \_\_\_

**D.** How many households will be housed during the funding year under this project? \_\_\_\_\_

## Part II: Narrative

Please be concise. Use bullets where possible. Respond to all parts of the question.

1. Describe the **target population** for the Project. Specifically identify who the project will serve. i.e., individuals; families; chronic; Special populations. What is the **average acuity** level based on the VI-SPDAT assessment?

If the Project has admission preferences for different sub-populations, please explain.

2. Provide examples of how the **Project outcomes** have or will contribute to improving the CoC's system-wide performance, as measured by HUD's system performance measures below:

- Reducing the number of homeless individuals and families
- Reducing the number of 1<sup>st</sup> time homeless individuals and families
- Reducing the length of time people are **homeless**
- Increasing discharges to permanent housing
- Preventing returns to homelessness (reducing recidivism)
- Increasing participant's income

(See CRHC website for current data local system performance measures)

3. **Using Exhibit B** (pg 23)-Describe how the Project implements the **Housing First** approach. Include: 1) eligibility criteria; 2) process for accepting new clients; 3) process and criteria for exiting clients as it pertains to substance use, income, criminal records (with exceptions for restrictions imposed by federal, state, or local law or ordinance), marital status, familial status, actual or perceived sexual orientation, gender identity. Include descriptions of program policies and procedures to address situations that may lead to termination. How will the project assist clients in finding decent housing?
4. Explain how the **needs assessment** process ensures that participants are directed to appropriate services. How are participants connected to **mainstream resources**? Are there **MOUs or letters of commitment**? Include collaborations with other programs or agencies. For renewals, describe successful collaborations? (See "Mainstream Resources" definition in glossary)
5. How will clients be assisted in maximizing their ability to live independently? What **criteria** are used to evaluate participants' readiness to "graduate" or **transition** from the project to other permanent housing?
6. CoC policies require that participants be **referred from the Coordinated Entry System or designated agency** to (CES) CoC Programs. Explain your process for notifying the CES of program openings and for accepting CES referrals to fill those openings. What is your estimate of the % of referrals you accept from the CES?
7. How will the Project **engage those with the most severe needs or vulnerabilities, disabilities or limited English proficiency** per the CRHC CoC/HUD prioritization policies? Describe any outreach efforts and how you reach eligible participants throughout the County that may not know of the Project?
8. How will the Project engage **individuals with lived experience of homelessness** in service delivery, decision making and policy **decisions**?

**Commented [SD1]:** Review and check consistency for priorities with HUD and CoC priorities

**Commented [SM2R1]:** Yes, these are the HUD defined system performance measures that CoC's are evaluated on annually.

**Commented [SD3]:** Will local data be on the website? What will represent this information? What year is represented?

**Commented [SM4R3]:** The HUD System Performance Measures report was submitted by Dale as part of the MSDHA Exhibit 1 submission. That is the same document that should be posted to the CRHC website.

**Commented [SD5]:** Changed CEA to CES but include or a designated agency to remain consistent with existing year's policies

**Commented [SD6]:** NEW QUESTION

9. Describe any strategies or policies that your Project will employ to address the needs of any of the following:

- LGBTQ+ individuals
- victims of domestic violence, dating violence, sexual assault, and **stalking**
- the criminalization of homelessness.

Commented [SD7]: NEW QUESTION

10. Project performance and its contribution to improving the overall CoC homeless responses system (system performance measures) are greatly valued in this application process. It is acknowledged that certain populations present more challenges and have higher barriers to housing than others. If the renewal project works to house some of the “hardest to serve” populations, please respond to the following questions:

What percent of participants experience at least one of the following barriers to housing:

- history of victimization/abuse, domestic violence, sexual assault, childhood abuse.
- criminal histories.
- chronic homelessness.
- low or no income.
- current or past substance abuse.

Explain how these participant barriers can impact the Project’s performance and how the Project works to overcome those barriers. **Identify specific action steps being taken.**

11. People identifying as Black or African American represented more than half (52%) of the people who experienced homelessness in Ingham County in 2020, a significant over-representation compared to the population of the City of Lansing and Ingham County, which reported 23% and 12% Black or African Americans respectively (American Community Survey 5-year estimate, 2019). A) How does, or will, your agency make system and programmatic changes to address racial disparities among households experiencing homelessness? B) What barriers to participation have been identified and what steps are being taken to eliminate the barriers? Provide specific examples of how racial equity is addressed in your project.

12. Describe any partnership or coordination the Project has with state and local public health agencies or health care providers that assist in responding to or preventing infectious disease outbreaks among people experiencing **homelessness**.

Commented [SD8]: NEW QUESTION (perhaps a 0 or 1 point question)  
We need to know for the larger application.

13. Are there any **outstanding Civil Rights matters**, delinquent Federal debts, debarment or suspensions from doing business with the federal government? Yes \_\_\_\_\_ No \_\_\_\_\_  
Approved Code of Conduct is on file with HUD? Yes \_\_\_\_\_ No \_\_\_\_\_ (If No, please include a copy.)  
Please explain your response. (50 words or less)

14. Who is the agency contact person knowledgeable about **Fair Housing** and HUD priorities?  
Name: \_\_\_\_\_ Contact # \_\_\_\_\_

+++++

**ONLY Renewal Projects, complete questions 15-17**

- 15. Are the agency **reports turned in on time (%)**? Is the agency **HMIS data error free (%)**? Are the agency monthly Financial Status Reports accurate (%)?
- 16. **Project cost-effectiveness** – what was the average cost per person or family served in your Project? (Divide the cost to run the Project including match by the actual number of households served per project year).
- 17. Attach the agency’s response letter to **any findings or concerns** identified by the City during the **last monitoring/site visit** of the agency. Please also provide any CAP (Corrective Action Plan) requested by the City or CoC if applicable.

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**ONLY Reassignments of existing renewals, New Bonus and DV Bonus Projects, complete questions 18-23 and New Applicant Checklist**

- 18. Attach (in one page or less) the general Objectives/Mission of the Organization and the Organization’s: A) **experience in providing the services** for which funding is being requested, including populations served; and B) Experience with administering Federal funds, especially homeless assistance, or HUD grants.
- 19. Describe the plan to assist clients with **barriers to housing** (poor rental history, criminal history, bad credit, etc.) to rapidly secure and maintain permanent housing that is safe, affordable, accessible, and acceptable to their needs.
- 20. Describe how the **Project design** will fit the needs of Project participants: 1) to help maintain housing; 2) to meet other client needs that contribute to instability and homelessness; 3) to **establish performance measures** for housing and income that are objective, measurable, trackable, and meet or exceed any established HUD, HEARTH or CoC benchmarks.
- 21. Describe a concise plan for **rapid implementation of the Project** documenting how and when the project will be ready to house the first project participant. Provide a detailed schedule of proposed activities for 30 days, 60 days, 120 days, and 180 days, if applicable, after grant award. (Maximum: two pages)
- 22. **Estimated cost-effectiveness** – What will be the estimated cost per household served in the project? (Divide the cost to run the Project, including match, by the estimated number of households served per Project year).
- 23. My agency is **willing to be trained** in processes and programs used by the CoC to manage and administer the HUD grant, including but not limited to Homeless Management Information System (HMIS), the Coordinated Entry Agency (CEA) and the assessment tool (SPDAT). Agree: \_\_\_\_\_ Disagree: \_\_\_\_\_

**Commented [SD9]:** We do not expect any Reallocation Projects.

**DV-Bonus applicants only (complete questions 24 – 28):**

- 24. **(New Projects)** Do you have a **client-level database** that is capable of meeting HUD’s Annual Performance Reporting requirements? (see Score Sheet, pgs. 5-6 on CRHC website for clarification)  
Yes \_\_\_\_\_ No \_\_\_\_\_

25. Please describe your experience serving victims of domestic violence, dating violence, sexual assault, and stalking. Provide data used to assess a need for new permanent housing for survivors of domestic violence.

Commented [SD10]: NEW QUESTION

Commented [SD11]: NEW QUESTION

26. (Renewals) Provide data from your comparable database that demonstrates achievements on HUD define program outcomes (see Score Sheet, pgs. 5-6 on CRHC website for measures).

Commented [SD12]: Ensure this is on the website

27. What are the issues facing DV survivors in accessing local CoC permanent housing assistance programs? Support your response with local data.

28. How do you address/improve safety for the DV populations you serve? How will the Project plan to involve survivors in policy and program development? What percentage of the participants do/will receive assistance with creating a safety plan?

Commented [SD13]: Added component question for involving survivors in the programs development and policy decisions

**For further information, please see the HUD Notice of Funding Opportunity at:**

[https://www.hud.gov/program\\_offices/comm\\_planning/coc/competition](https://www.hud.gov/program_offices/comm_planning/coc/competition)

**Part III: Budget**

	HUD CoC Expenses					Number of Units
	PH: PSH – Leasing	PH: PSH – Rental Assistance	PH: RRH	Joint TH-RRH	SSO-CE	
Rental Assistance						
Leasing						
Supportive Services*						
Operating Costs						
Total Admin (Agency + City Admin)						
Sub Total						
Cash Match*						
Program Income if used as Match (if applicable)						
In-Kind Match*						
<b>Grand Total</b>						

*\*Match must total 25%, excluding Leasing costs. Shaded areas not eligible for funding in designated categories.*

	*Supportive Services details
Salaries	
Fringe Benefits	
Contractual services	
Travel	
<b>Total</b>	

Program Income*	
Source	Amount
<b>Total</b>	

\*Program Income is funds generated by project activities such as participant contributions toward their rent.

**NEW APPLICANTS:** Rental Assistance and Leasing budgets must be based on Fair Market Rent (FMR) as listed below.

FINAL FY 2022 FMRS BY UNIT BEDROOMS					
YEAR	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four Bedroom
FY 2022 FMR	\$733	\$767	\$936	\$1,203	\$1,269

Please list the personnel, job title and hire date of positions to be paid from grant funds:

**Program Supervisor** (include even if not paid with grant funds)

Name: \_\_\_\_\_ Title: \_\_\_\_\_ Hire Date: \_\_\_\_\_

**Any other staff**

Name: \_\_\_\_\_ Title: \_\_\_\_\_ Hire Date: \_\_\_\_\_ Full or Part Time: \_\_\_\_\_

Name: \_\_\_\_\_ Title: \_\_\_\_\_ Hire Date: \_\_\_\_\_ Full or Part Time: \_\_\_\_\_

Name: \_\_\_\_\_ Title: \_\_\_\_\_ Hire Date: \_\_\_\_\_ Full or Part Time: \_\_\_\_\_

Name: \_\_\_\_\_ Title: \_\_\_\_\_ Hire Date: \_\_\_\_\_ Full or Part Time: \_\_\_\_\_

**Authorized Representative: (Please print or type)**

Name:

Title:

Telephone Number:

Email:

Fax Number:

By signing this application, I certify the statements contained in the APPLICATION herein are true, complete, and accurate to the best of my knowledge.

Signature of Authorized Official \_\_\_\_\_ Date \_\_\_\_\_

## New Applicants Request for Agency Documents Checklist

Please check off each item, sign, and enclose a copy of this checklist with your documents.

**Agency Name:** \_\_\_\_\_

**Agency Address:** \_\_\_\_\_

**Director Name:** \_\_\_\_\_

**Contact Phone:** \_\_\_\_\_

**Contact Email:** \_\_\_\_\_

	Enclosed?	Emailed on (date?)	Comments
a. 990			
b. 501(c)(3)			
c. Current Board roster			Include affiliations, employment, addresses, phone
d. General Liability Insurance			Include copy of Crime & Dishonesty Insurance
e. Most Recent Audit			<b>Year?</b>
f. Single audit? <b>Y/N</b>			If yes, please include
g. Plan to use CoC funds for equipment? <b>Y/N</b> (if yes, explain)			
h. Pending Lawsuits? <b>Y/N</b> (if yes, explain)			
i. Attached Lawsuit Explanation			
j. Agency Conflict of Interest policy & Code of Conduct (Board & Staff)			Also complete City of Lansing Conflict of Interest form
k. By-laws			
l. Chart of Accounts			
m. Lobbying policy			
n. Drug Free Workforce Policy			
o. Confidentiality Policy			
p. All Shelter Inspections, Code Compliance Certificates			if applicable
q. Personnel, Financial, Procurement policies, Program Manuals, Fraud Policy			
r. Organizational Chart, job descriptions			
s. Certification of staff time allocation to grants (memo to file)			
t. Cost Allocation Plan/Current Agency Budget			

	Enclosed?	Emailed on (date?)	Comments
u. Grievance or Complaint Procedure <b>(for clients &amp; staff)</b>			
v. Non-discrimination policies (client & staff)			
w. Case Managers- Training Received in past year			
x. Copy of Leases (PSH/RRH only)			
y. Client Termination Policy			
z. LARA Certificate of Good Standing			shows date not to expire prior to 11/16/22

I understand that if my application is successful, additional forms may be required.

**Authorized Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

HUD Priorities – see 2022 NOFO pgs 9-11

Ending homelessness for all persons

Using Housing First without Service Participation Requirements or Preconditions

Reducing Unsheltered Homelessness

Improving System Performance

Partnering with Housing, Health, and Service Agencies to Maximize use of Mainstream Resources

Address Racial Equity

Using an Evidenced-Based Approach

Increasing employment

CRHC Priorities

Prioritize Permanent Housing including PSH and Rapid Rehousing

Prevention of Homelessness through intervention

Supportive Services with targeted case management and wrap around services to lead to self-stability

Shelter services

Essential Services for vulnerable sub populations

Prioritize chronically homeless persons

**HUD CoC Program Grant Inventory Worksheet (GIW)**

Project Name	Operating Term	Project Component	Leasing	Rental Assistance	Supportive Services	Operating Costs	HMIS	Admin*	Total Award	Match Requirement	Minimum Units
DV RRH	Oct - Sep	RRH	\$0	\$210,444	\$57,355	\$0	\$0	\$20,624	\$288,423	\$72,106	18
Ending Family Homelessness through Rapid Rehousing	Sep - Aug	RRH	\$0	\$208,584	\$52,189	\$0	\$0	\$16,960	\$277,733	\$69,433	18
Fresh Start RRH	Sep - Aug	RRH	\$0	\$50,076	\$12,733	\$0	\$0	\$4,019	\$66,828	\$16,707	5
Hope Housing Expansion	Jul - Jun	PSH	\$0	\$186,192	\$68,279	\$0	\$0	\$16,247	\$270,718	\$67,680	19
Ingham County - PSH 1+2	Sep - Aug	PSH	\$229,097	\$0	\$26,750	\$3,640	\$0	\$17,780	\$277,267	\$12,043	24
Permanent Housing for Families	Jun - May	PSH	\$0	\$51,336	\$21,605	\$0	\$0	\$3,034	\$75,975	\$18,994	4
Permanent Supportive Housing 2	Jan - Dec	PSH	\$0	\$648,336	\$106,417	\$0	\$0	\$32,638	\$787,391	\$196,848	70
Permanent Supportive Housing Bonus	Jul - Jun	PSH	\$0	\$156,468	\$27,743	\$0	\$0	\$9,676	\$193,887	\$48,472	17
Shelter Plus Care	May - Apr	PSH	\$0	\$331,344	\$0	\$0	\$0	\$18,084	\$349,428	\$87,357	36
Transitions PSH	Jul - Jun	PSH	\$63,283	\$0	\$71,854	\$5,150	\$0	\$9,566	\$149,853	\$21,643	7
Rapid Rehousing for Youth	Sep - Aug	Joint TH & PH-RRH	\$0	\$90,948	\$79,730	\$0	\$0	\$10,667	\$181,345	\$45,336	9

## Glossary:

**Acuity:** A term used to describe the level/severity of need /risk of a person experiencing homelessness and to assign the most appropriate housing or service intervention based on that need. The higher the need the higher the acuity.

**Case Management:** Assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Conducting the initial evaluation including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.

**Centralized or coordinated assessment system** is defined to mean a centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool. This definition establishes basic minimum requirements for the Continuum's centralized or coordinated assessment system.

**DV:** Domestic Violence

**Emergency Health Services:** Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living.

**Emergency Mental Health Services:** Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living. ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

**Engagement:** The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid rehousing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

**HARA:** Housing Assessment and Resource Agency, it is central to the coordinated assessment system, as designated by the CoC.

**Leasing:** Component of CoC grants -the lease is between the recipient of funds(agency) and the landlord.

**Leveraged funds:** Leverage is the non-match cash or non-match in-kind resources committed to making a CoC Program project fully operational. This includes all resources in excess of the required 25 percent match for CoC Program funds as well as other resources that are used on costs that are ineligible in the CoC Program.

Leverage funds may be used for any program related costs, even if the costs are not budgeted or not eligible in the CoC Program. Leverage may be used to support any activity within the project provided by the recipient or Subrecipient.

**Low Barrier programs:** An approach to quickly and successfully connect individuals and families experiencing homelessness to programs without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize stability as opposed to addressing predetermined treatment goals prior to program entry. Housing First is an illustration.

**Mainstream Resources:** Community resources that are available to any eligible person and are not financed by HUD dollars. Examples include SSDI/SSI, cash assistance, disability services, Michigan Works, Unemployment Agency, Mental Health, substance use, Legal Services, health benefits such as Medicaid, Elder services, home help services, community colleges, local schools, food assistance, informal networks, churches, other non-housing related non-profits.

**Rental Assistance:** Under this interim rule, rental assistance is an eligible cost for permanent and transitional housing, and this rule clarifies that the rental assistance may be short- term, up to 3 months of rent; medium-term, for 3 to 24 months of rent; and long-term, for longer than 24 months of rent. This section provides that rental assistance may include tenant-based, project-based, or sponsor-based rental assistance. This section also provides that project-based rental assistance may include rental assistance to preserve existing permanent supportive housing for homeless individuals and families. Given that the availability of affordable rental housing has been shown to be a key factor in reducing homelessness, the availability of funding for short-term, medium-term, and long-term rental assistance under both the Emergency Solutions Grants program and the Continuum of Care program is not inefficient use of program funds, but rather effective use of funding for an activity that lowers the number of homeless persons.

**Supportive Services:** Eligible costs of services to support the special needs of program participants. Eligible costs consist of assistance with moving costs, case management, child care, education services, employment assistance and job training, housing search and counseling services, legal services, life skills training, mental health services, outpatient health services, outreach services, substance abuse treatment services, and transportation.

**Transportation:** Eligible costs of travel by outreach workers, social workers, medical professionals, or other service providers' takes place during the provision of eligible services under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible.



**EXHIBIT A**

U.S. Department of Housing and Urban Development  
Office of Community Planning and Development

1

**Special Attention of:**

All Secretary's  
Representatives

**Notice: CPD-16-11**

**Issued: July 25, 2016**

**Expires:** This Notice is effective until it is  
amended, superseded, or rescinded

**Issued:**

All Regional Directors for  
CPD

**Cross Reference:** 24 CFR Parts 578 and  
42 U.S.C. 11381, *et seq.*

**Expires:**

All CPD Division Directors  
Continuums of Care (CoC)  
Recipients of the Continuum of Care (CoC)  
Program

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**Subject: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other  
Vulnerable Homeless Persons in Permanent Supportive Housing**

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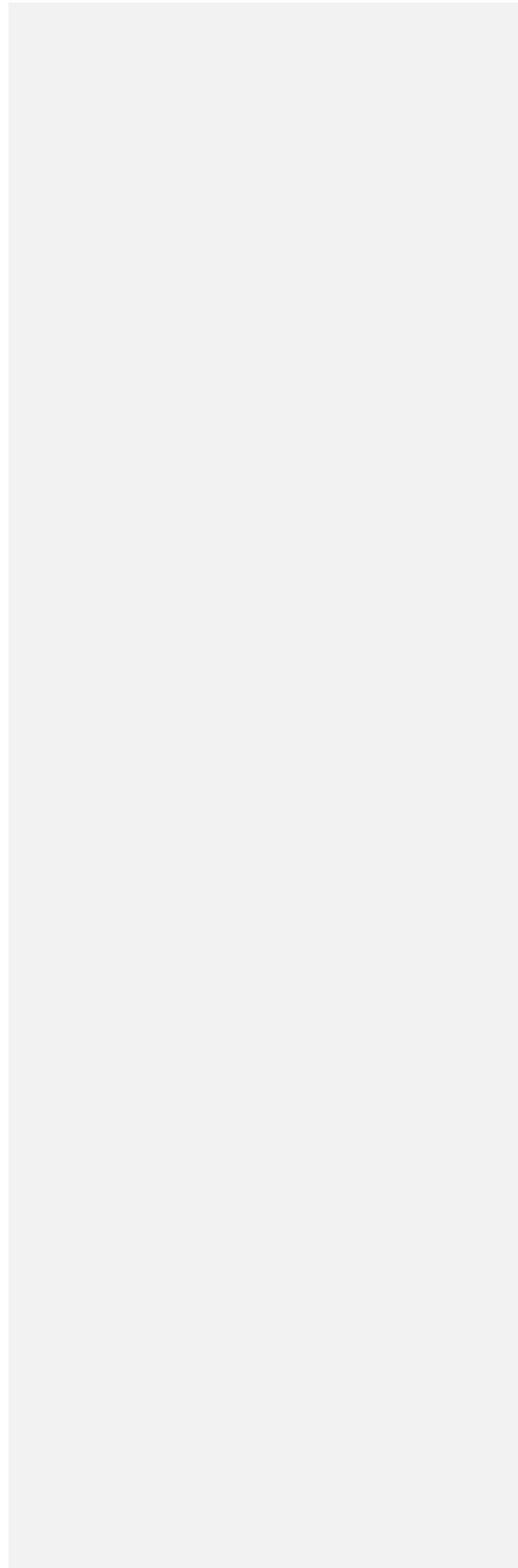
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## I. Purpose

This Notice supersedes Notice CPD-14-012 and provides guidance to Continuums of Care (CoC) and recipients of Continuum of Care (CoC) Program (24 CFR part 578) funding for permanent supportive housing (PSH) regarding the order in which eligible households should be served in all CoC Program-funded PSH. This Notice reflects the new definition of chronically homeless as defined in CoC Program interim rule as amended by the Final Rule on Defining “Chronically Homeless” (herein referred to as the Definition of Chronically Homeless final rule) and updates the orders of priority that were established under the prior Notice. CoCs that previously adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the FY2015 CoC Program Competition are encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. CoCs that have not previously adopted the orders of priority established in Notice CPD-14-012 are also encouraged to incorporate the orders of priority included in this Notice into their written standards

### A. Background

In June 2010, the Obama Administration released *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (Opening Doors)*, in which HUD and its federal partners set goals to end Veteran and chronic homelessness by 2015, and end family and youth homelessness by 2020. Although progress has been made there is still a long way to go. In 2015, the United States Interagency Council on Homelessness extended the goal timeline for achieving the goal of ending chronic homelessness nationally from 2015 to 2017. In 2015, there were still 83,170 individuals and 13,105 persons in families with children that were identified as chronically homeless in the United States. To end chronic homelessness, it is critical that CoCs ensure that limited resources awarded through the CoC Program Competition are being used in the most effective manner and that households that are most in need of assistance are being prioritized.

Since 2005, HUD has encouraged CoCs to create new PSH dedicated for use by persons experiencing chronic homelessness (herein referred to as dedicated PSH). As a result, the number of dedicated PSH beds funded through the CoC Program for persons experiencing chronic homelessness has increased from 24,760 in 2007 to 59,329 in 2015. This increase has contributed to a 30.6 percent decrease in the number of chronically homeless persons reported in the Point-in-Time Count between 2007 and 2015. Despite the overall increase in the number of dedicated PSH beds, this only represents 31.6 percent of all CoC Program-funded PSH beds.

To ensure that all PSH beds funded through the CoC Program are used as strategically and effectively as possible, PSH needs to be targeted to serve persons with the highest needs and greatest barriers towards obtaining and maintaining housing on their own persons experiencing chronic homelessness. HUD’s experience has shown that many communities and recipients of CoC Program-funded PSH continue to serve persons on a “first-come, first-serve” basis or based on tenant selection processes that screen-in those who are most likely to succeed while screening out those with the highest level of need. These approaches to tenant

selection have not been effective in reducing chronic homelessness, despite the increase in the number of PSH beds nationally.

## **B. Goals of this Notice**

The overarching goal of this Notice is to ensure that those individuals and families who have spent the longest time in places not meant for human habitation, in emergency shelters, or in safe havens and who have the most severe service needs within a community are prioritized for PSH. By ensuring that persons with the longest histories of homelessness and most severe service needs are prioritized for PSH, progress towards the Obama Administration's goal of ending chronic homelessness will increase. In order to guide CoCs in ensuring that all CoC Program-funded PSH beds are used most effectively, this Notice revises the orders of priority related to how persons should be selected for PSH as previously established in Notice CPD-14-012 to reflect the changes to the definition of chronically homeless as defined in the Definition of Chronically Homeless final rule. CoCs are strongly encouraged to adopt and incorporate them into the CoC's written standards and coordinated entry process.

HUD seeks to achieve two goals through this Notice:

1. Establish a recommended order of priority for dedicated and prioritized PSH which CoCs are encouraged to adopt in order to ensure that those persons with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens and with the most severe service needs are given first priority.
2. Establish a recommended order of priority for PSH that is not dedicated or prioritized for chronic homelessness in order to ensure that those persons who do not yet meet the definition of chronic homelessness but have the longest histories of homelessness and the most severe service needs and are therefore the most at risk of becoming chronically homeless, are prioritized.

## **C. Applicability**

The guidance in this Notice is provided to all CoCs and all recipients and subrecipients of CoC Program funds—the latter two groups referred to collectively as recipients of CoC Program-funded PSH. CoCs are strongly encouraged to incorporate the order of priority described in this Notice into their written standards, which CoCs are required to develop per 24 CFR 578.7(a)(9), for their CoC Program-funded PSH. Recipients of CoC Program funds are required to follow the written standards for prioritizing assistance established by the CoC (see 24 CFR 578.23(c)(10)); therefore, if the CoC adopts these recommended orders of priority for their PSH, all recipients of CoC Program-funded PSH will be required to follow them as required by their grant agreement. CoCs that adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Lastly, where a CoC has chosen to not adopt HUD's recommended orders of priority into their written standards, recipients of CoC Program-funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC's written standards.

#### D. Key Terms

1. **Housing First.** A model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions for entry (such as sobriety or a minimum income threshold). HUD encourages all recipients of CoC Program-funded PSH to follow a Housing First approach to the maximum extent practicable.
2. **Chronically Homeless.** The definition of “chronically homeless”, as stated in Definition of Chronically Homeless final rule is:
  - (a) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
    - 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 (a)(i) continuously for at least 12 months or on at least four 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 (a)(i). 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 an institutional care facility;
  - (b) 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 (a) of this definition, before entering the facility;
  - (c) 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 (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.
3. **Severity of Service Needs.** This Notice refers to persons who have been identified as having the most severe service needs.
  - (a) For the purposes of this Notice, this means an individual for whom at least one of the following is true:
    - i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or

- ii. Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
- iii. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
- iv. When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high-need, high cost beneficiaries.

(b) Severe service needs as defined in paragraphs i.-iv. above should be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool and process and should be documented in a program participant's case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see 24 C.F.R. § 5.105(a).

## **II. Dedication and Prioritization of Permanent Supportive Housing Strategies to Increase Number of PSH Beds Available for Chronically Homeless Persons**

### **A. Increase the number of CoC Program-funded PSH beds that are dedicated to persons experiencing chronic homelessness.**

Dedicated PSH beds are those which are required through the project's grant agreement to only be used to house persons experiencing chronic homelessness unless there are no persons within the CoC that meet that criteria. If there are no persons within the CoC's geographic area that meet the definition of chronically homeless at a point in which a dedicated PSH bed is vacant, the recipient may then follow the order of priority for non-dedicated PSH established in this Notice, if it has been adopted into the CoC's written standards. The bed will continue to be a dedicated bed, however, so when that bed becomes vacant again it must be used to house a chronically homeless person unless there are still no persons who meet that criterion within the CoC's geographic area at that time. These PSH beds are also reported as "CH Beds" on a CoC's Housing Inventory Count (HIC).

### **B. Prioritize non-dedicated PSH beds for use by persons experiencing chronic homelessness.**

Prioritization means implementing an admissions preference for chronically homeless persons for CoC Program-funded PSH beds. During the CoC Program competition project applicants for CoC Program-funded PSH indicate the number of non-dedicated beds that will be prioritized for use by persons experiencing chronic homelessness during the operating year of that grant, when awarded. These projects are then required to prioritize chronically homeless persons in their non-dedicated CoC Program-funded PSH beds for the applicable operating year as the project application is incorporated into the

grant agreement. All recipients of non-dedicated CoC Program-funded PSH are encouraged to change the designation of their PSH to dedicated, however, at a minimum are encouraged to prioritize the chronically homeless as beds become vacant to the maximum extent practicable, until there are no persons within the CoC's geographic area who meet that criteria. Projects located in CoCs where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified area. For example, if a Balance of State CoC has chosen to divide the CoC into six distinct regions for purposes of planning and housing and service delivery, each region would only be expected to prioritize assistance within its specified geographic area.<sup>1</sup>

The number of non-dedicated beds designated as being prioritized for the chronically homeless may be increased at any time during the operating year and may occur without an amendment to the grant agreement.

### **III. Order of Priority in CoC Program-funded Permanent Supportive Housing**

The definition of chronically homeless included in the final rule on "Defining Chronically Homeless", which was published on December 4, 2015 and went into effect on January 15, 2016, requires an individual or head of household to have a disability and to have been living in a place not meant for human habitation, in an emergency shelter, or in a safe haven for at least 12 months either continuously or cumulatively over a period of at least 4 occasions in the last 3 years. HUD encourages all CoCs adopt into their written standards the following orders of priority for all CoC Program-funded PSH. CoCs that adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Where a CoC has chosen to not incorporate HUD's recommended orders of priority into their written standards, recipients of CoC Program-funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC's written standards.

As a reminder, recipients of CoC Program-funded PSH are required to prioritize otherwise eligible households in a nondiscriminatory manner. Program implementation, including any prioritization policies, must be implemented consistent with the nondiscrimination provisions of the Federal civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II or III of the Americans with Disabilities Act, as applicable. For example, while it is acceptable to prioritize based on level of need for the type of assistance being offered, prioritizing based on specific disabilities would not be consistent with fair housing requirements or program regulations.

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<sup>1</sup> For the State of Louisiana grant originally awarded pursuant to "Department of Housing and Urban Development—Permanent Supportive Housing" in chapter 6 of title III of the Supplemental Appropriations Act, 2008 (Public Law 110-252; 122 Stat. 2351), projects located within the geographic area of a CoC that is not the CoC through which the State is awarded the grant may prioritize assistance within that geographic area instead of within the geographic area of the CoC through which the State is awarded the grant.

**A. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Dedicated or Prioritized for Occupancy by Persons Experiencing Chronic Homelessness**

1. CoCs are strongly encouraged to revise their written standards to include an order of priority, determined by the CoC, for CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness that is based on the length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the individual's or family's service needs. Recipients of CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness would be required to follow that order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.
2. Where there are no chronically homeless individuals and families within the CoC's geographic area, CoCs and recipients of CoC Program-funded PSH are encouraged to follow the order of priority in Section III.B. of this Notice. For projects located in CoC's where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified sub-CoC area.<sup>2</sup>
3. Recipients of CoC Program-funded PSH should follow the order of priority above while also considering the goals and any identified target populations served by the project. For example, a CoC Program-funded PSH project that is permitted to target homeless persons with a serious mental illness should follow the order of priority under Section III.A.1. of this Notice to the extent in which persons with serious mental illness meet the criteria. In this example, if there were no persons with a serious mental illness that also met the criteria of chronically homeless within the CoC's geographic area, the recipient should follow the order of priority under Section III.B for persons with a serious mental illness.
4. Recipients must exercise due diligence when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients of CoC Program-funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. CoC Program-funded PSH providers are encouraged to follow a Housing First approach to the maximum extent practicable. Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH

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<sup>2</sup> For the State of Louisiana grant originally awarded pursuant to "Department of Housing and Urban Development—Permanent Supportive Housing" in chapter 6 of title III of the Supplemental Appropriations Act, 2008 (Public Law 110-252; 122 Stat. 2351), projects located within the geographic area of a CoC that is not the CoC through which the State is awarded the grant may prioritize assistance within that geographic area instead of within the geographic area of the CoC through which the State is awarded the grant.

project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

**B. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Not Dedicated or Not Prioritized for Occupancy by Persons Experiencing Chronic Homelessness**

1. CoCs are strongly encouraged to revise their written standards to include the following order of priority for non-dedicated and non-prioritized PSH beds. If adopted into the CoCs written standards, recipients of CoC Program-funded PSH that is not dedicated or prioritized for the chronically homeless would be required to follow this order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.

**(a) First Priority—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs**

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.

**(b) Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs.**

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

**(c) Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs.**

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

**(d) Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing.**

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

2. Recipients of CoC Program-funded PSH should follow the order of priority above, as adopted by the CoC, while also considering the goals and any identified target populations served by the project. For example, non-dedicated or non-prioritized CoC Program-funded PSH that is permitted to target youth experiencing homelessness should follow the order of priority under Section III.B.1. of this Notice, as adopted by the CoC, to the extent in which youth meet the stated criteria.
3. Recipients must exercise due diligence when conducting outreach and assessment to ensure that persons are prioritized for assistance based on their length of time homeless and the severity of their needs following the order of priority described in this Notice, and as adopted by the CoC. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH (see [FAQ 1895](#)). Recipients of CoC Program-funded PSH are encouraged to follow a Housing First approach to the maximum extent practicable. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these individuals and families must continue to be prioritized until they are housed.

#### **IV. Using Coordinated Entry and a Standardized Assessment Process to Determine Eligibility and Establish a Prioritized Waiting List**

##### **A. Coordinated Entry Requirement**

Provisions at 24 CFR 578.7(a)(8) requires that each CoC, in consultation with recipients of Emergency Solutions Grants (ESG) program funds within the CoC's geographic area, establish and operate either a centralized or coordinated assessment system (referred to in this Notice as coordinated entry or coordinated entry process) that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. CoCs that adopt the order of priority in Section III of this Notice into the CoC's written standards are strongly encouraged to use a coordinated entry process to ensure that there is a single prioritized list for all CoC Program-funded PSH within the CoC. The [Coordinated Entry Policy Brief](#), provides recommended criteria for a quality coordinated entry process and standardized assessment tool and process. Under no circumstances shall the order of priority be based upon diagnosis or disability type,

but instead on the length of time an individual or family has been experiencing homelessness and the severity of needs of an individual or family.

**B. Written Standards for Creation of a Single Prioritized List for PSH**

CoCs are also encouraged to include in their policies and procedures governing their coordinated entry system a requirement that all CoC Program-funded PSH accept referrals only through a single prioritized list that is created through the CoCs coordinated entry process, which should also be informed by the CoCs street outreach. Adopting this into the CoC's policies and procedures for coordinated entry would further ensure that CoC Program-funded PSH is being used most effectively, which is one of the goals in this Notice. The single prioritized list should be updated frequently to reflect the most up-to-date and real-time data as possible.

**C. Standardized Assessment Tool Requirement**

CoCs must utilize a standardized assessment tool, in accordance with 24 CFR 578.3, or process. The [Coordinated Entry Policy Brief](#), provides recommended criteria for a quality coordinated entry process and standardized assessment tool.

**D. Nondiscrimination Requirements**

CoCs and recipients of CoC Program-funded PSH must continue to comply with the nondiscrimination provisions of Federal civil rights laws, including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II or III of the Americans with Disabilities Act, as applicable. See 24 C.F.R. § 5.105(a).

**V. Recordkeeping Recommendations for CoCs that have Adopted the Orders of Priority in this Notice**

24 CFR 578.103(a)(4) outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, HUD expects that where CoCs have adopted the orders of priority in Section III. of this Notice into their written standards. The CoC, as well as recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

- A. Evidence of Severe Service Needs.** Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in Section I.D.3. of this Notice using data-driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.
- B. Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance.** Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of

written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new program participants into the project.

**C. Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.**

- (a) When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area – or for those CoCs that implement a sub-CoC<sup>3</sup> planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area – at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.
- (b) When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area - or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area - that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.

**VI. Questions Regarding this Notice**

Questions regarding this notice should be submitted to HUD Exchange Ask A Question (AAQ) Portal at: <https://www.hudexchange.info/get-assistance/my-question/>.

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<sup>3</sup> For the State of Louisiana grant originally awarded pursuant to "Department of Housing and Urban Development—Permanent Supportive Housing" in chapter 6 of title III of the Supplemental Appropriations Act, 2008 (Public Law 110-252; 122 Stat. 2351), projects located within the geographic area of a CoC that is not the CoC through which the State is awarded the grant may prioritize assistance within that geographic area instead of within the geographic area of the CoC through which the State is awarded the grant.



## EXHIBIT B

# Housing First Checklist: Assessing Projects and Systems for a Housing First Orientation

Housing First is a proven approach, applicable across all elements of systems for ending homelessness, in which people experiencing homelessness are connected to permanent housing swiftly and with few to no treatment preconditions, behavioral contingencies, or other barriers. It is based on overwhelming evidence that people experiencing homelessness can achieve stability in permanent housing if provided with the appropriate level of services. Study after study has shown that Housing First yields higher housing retention rates, drives significant reductions in the use of costly crisis services and institutions, and helps people achieve better health and social outcomes.<sup>i</sup>

This checklist was designed to help you make a quick assessment of whether and to what degree housing programs — and entire systems — are employing a Housing First approach. Robust tools and instruments are available elsewhere to quantitatively measure program quality and fidelity to Housing First. This tool is not meant to take the place of those more rigorous assessments, but is intended to help Continuums of Care, individual housing and services providers, funders, and other stakeholders to communicate about, and quickly assess, alignment with key Housing First approaches.

### Core Elements of Housing First at the Program/Project Level

For your homelessness service system to work the most efficiently and effectively, individual programs must embrace a Housing First approach. This portion of the checklist can help you assess the extent to which your local programs are implementing Housing First. You can use this tool for trainings or planning sessions, during a site visit or program audit, as a guide when reviewing funding applications, or for many other uses.

- Access to programs is not contingent on sobriety, minimum income requirements, lack of a criminal record, completion of treatment, participation in services, or other unnecessary conditions.
- Programs or projects do everything possible not to reject an individual or family on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”
- People with disabilities are offered clear opportunities to request reasonable accommodations within applications and screening processes and during tenancy, and building and apartment units

### Quick Screen: Does Your Project Use Housing First Principles?

- 1) Are applicants allowed to enter the program without income?
- 2) Are applicants allowed to enter the program even if they aren't “clean and sober” or “treatment compliant”?
- 3) Are applicants allowed to enter the program even if they have criminal justice system involvement?
- 4) Are service and treatment plans voluntary, such that tenants cannot be evicted for not following through?

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include special physical features that accommodate disabilities.

- Programs or projects that cannot serve someone work through the coordinated entry process to ensure that those individuals or families have access to housing and services elsewhere.
- Housing and service goals and plans are highly tenant-driven.
- Supportive services emphasize engagement and problem-solving over therapeutic goals.
- Participation in services or compliance with service plans are not conditions of tenancy but are reviewed with tenants and regularly offered as a resource to tenants.
- Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants' lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.
- Substance use in and of itself, without other lease violations, is not considered a reason for eviction.
- Tenants in supportive housing are given reasonable flexibility in paying their share of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.
- Every effort is made to provide a tenant the opportunity to transfer from one housing situation, program, or project to another if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

### **Core Elements of Housing First at the Community Level**

Housing First should be adopted across your community's entire homelessness response system, including outreach and emergency shelter, short-term interventions like [rapid re-housing](#), and longer-term interventions like [supportive housing](#). You can use this part of the checklist to assess the extent to which your community has adopted a system-wide Housing First orientation, as well as guide further dialogue and progress.

- Your community has a coordinated system that offers a unified, streamlined, and user-friendly community-wide coordinated entry process to quickly assess and match people experiencing homelessness to the most appropriate housing and services, including rapid re-housing, supportive housing, and/or other housing interventions.
- Emergency shelter, street outreach, and other parts of your crisis response system implement and promote low barriers to entry or service and quickly identify people experiencing homelessness, provide access to safety, make service connections, and partner directly with housing providers to rapidly connect individuals and families to permanent housing.
- Outreach and other crisis response teams are coordinated, trained, and have the ability to engage and quickly connect people experiencing homelessness to the local coordinated entry process in order to apply for and obtain permanent housing.
- Your community has a data-driven approach to [prioritizing housing assistance](#), whether through analysis of the shared community assessment and vulnerability indices, [system performance measures](#) from the Homeless Management Information System, data on utilization of crisis services, and/or data from other

systems that work with people experiencing homelessness or housing instability, such as hospitals and the criminal justice system.

- Housing providers and owners accept referrals directly from the coordinated entry processes and work to house people as quickly as possible, using standardized application and screening processes and removing restrictive criteria as much as possible.
- Policymakers, funders, and providers conduct joint planning to develop and align resources to increase the availability of affordable and supportive housing and to ensure that a range of options and mainstream services are available to maximize housing choice among people experiencing homelessness.
- Mainstream systems, including social, health, and behavioral health services, benefit and entitlement programs, and other essential services have policies in place that do not inhibit implementation of a Housing First approach. For instance, eligibility and screening policies for benefit and entitlement programs or housing do not require treatment completion or sobriety.
- Staff in positions across the entire housing and services system are trained in and actively employ evidence-based practices for client/tenant engagement, such as motivational interviewing, client-centered counseling, critical time interventions, and trauma-informed care.

### **Additional Resources**

- [Implementing Housing First in Supportive Housing](#) (USICH, 2014) – discusses supportive housing and Housing First as tools for ending chronic homelessness and helping people with disabilities live independently in the community.
- [Webinar: Core Principles of Housing First and Rapid Re-Housing](#) (USICH, 2014) – describes the core components of the Housing First approach and the rapid re-housing model and how both work together to help end homelessness.
- [Four Clarifications about Housing First](#) (USICH, 2014) – clarifies some common misperceptions about Housing First.
- [It's Time We Talked the Walk on Housing First](#) (USICH, 2015) – advances our thinking on Housing First.
- [Housing First in Permanent Supportive Housing](#) (HUD, 2014) – provides an overview of the principles and core components of the Housing First model.
- [Permanent Supportive Housing Evidence-Based Practices KIT](#) (SAMHSA, 2010) – outlines the essential components of supportive housing, along with fidelity scales and scoresheets.

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<sup>i</sup> Lipton, F.R. et al. (2000). "Tenure in supportive housing for homeless persons with severe mental illness," *Psychiatric Services* 51(4): 479-486. M. Larimer, D. Malone, M. Garner, et al. "Health Care and Public Service Use and Costs Before and After Provision of Housing for Chronically Homeless Persons with Severe Alcohol Problems." *Journal of the American Medical Association*, April 1, 2009, pp. 1349-1357. Massachusetts Housing and Shelter Alliance. (2007). "Home and Healthy for Good: A Statewide Pilot Housing First Program." Boston.