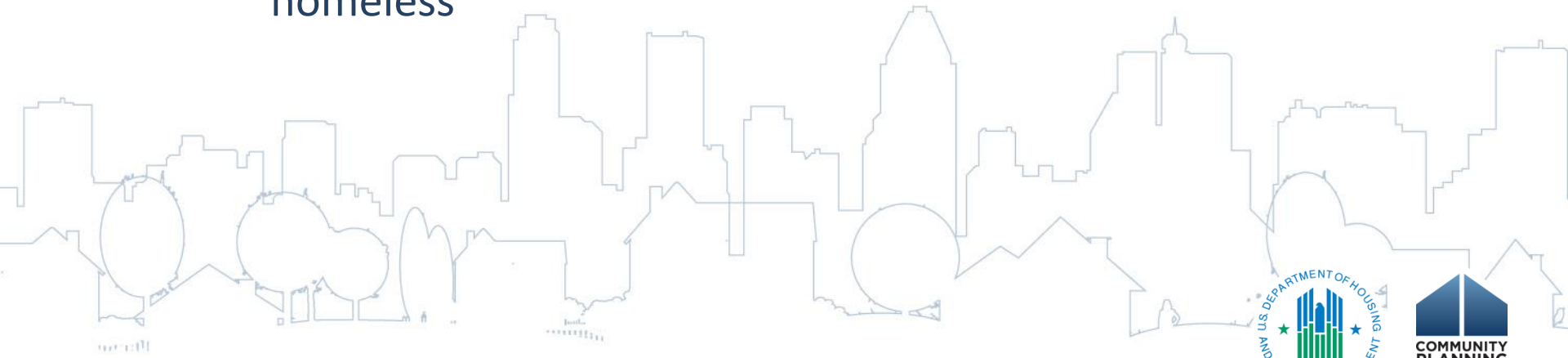
Developing System-wide Prioritization and Targeting Standards

Ann Marie Oliva, Director
Brett Gagnon, SNAPS Specialist
Office of Special Needs Assistance Programs

McKinney-Vento Selection Criteria

The McKinney-Vento Act, as amended by the HEARTH Act sets forth selection criteria that will be used to award funds under the CoC Program, which include:

- Success at reducing the number of individuals and families who become homeless
- Overall reduction in the number of homeless individuals and families
- The length of time individuals and families remain homeless



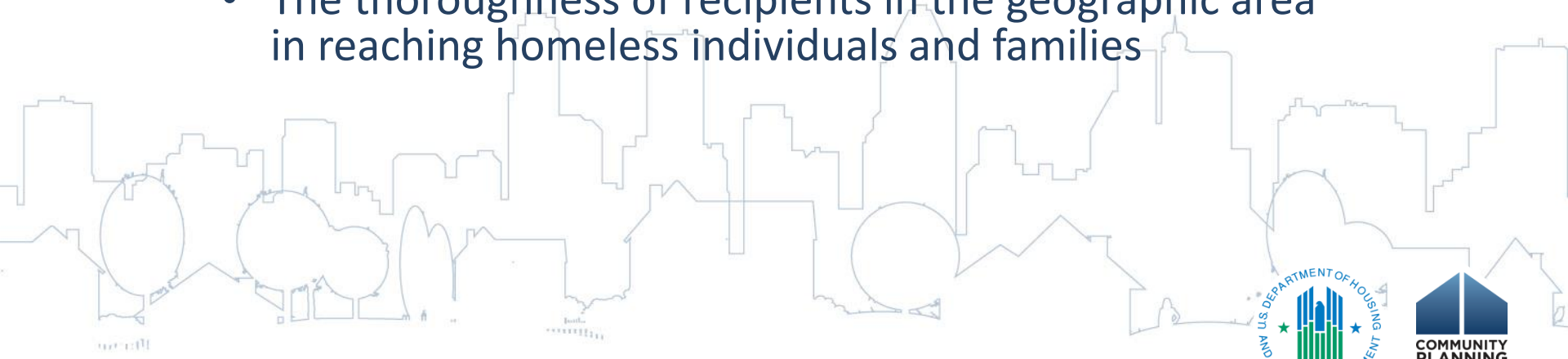
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

COMMUNITY PLANNING AND DEVELOPMENT

McKinney-Vento Selection Criteria

The McKinney-Vento Act, as amended by the HEARTH Act sets forth selection criteria that will be used to award funds under the CoC Program, which include:

- The extent to which individuals and families who leave homelessness experience additional spells of homelessness
- Jobs and income growth for homeless individuals and families
- The thoroughness of recipients in the geographic area in reaching homeless individuals and families



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
COMMUNITY PLANNING AND DEVELOPMENT

Opening Doors: Federal Strategic Plan (FSP)

There are four major goals in the FSP:

1. End chronic homelessness by 2015
2. End veteran homelessness by 2015
3. End family and youth homelessness by 2020
4. Set a path to ending all homelessness

The U.S. Interagency Council on Homelessness (ICH) is tracking the progress through HUD's annual point-in-time (PIT) data.

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
COMMUNITY PLANNING DEVELOPMENT

Why Written Standards

The CoC and ESG Program interim rules require recipients and CoCs to consult to develop written standards for administering assistance. This is necessary to:

- Establish community-wide expectations on the operations of projects within the community
- Ensure the system that is transparent to users and operators
- Establish a minimum set of standards and expectations in terms of the quality expected of projects

Why Written Standards

The CoC and ESG Program interim rules require recipients and CoCs to consult to develop written standards for administering assistance. This is necessary to:

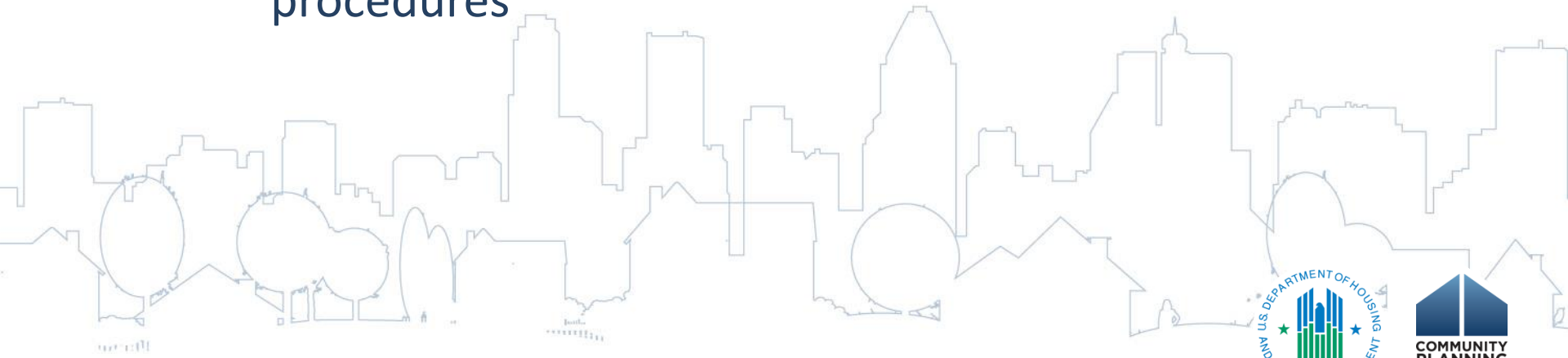
- Make the local priorities transparent to recipients and subrecipients of funds
- Create consistency and coordination between recipients' and subrecipients' projects

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
COMMUNITY PLANNING DEVELOPMENT

Integrating the Written Standards

The written standards developed by the ESG recipient and the CoC must be integrated into

- The coordinated assessment system, and
- Individual projects' intake and assessment procedures



Coordinated Assessment

- Each CoC must have a coordinated assessment system designed to coordinated program participant intake assessment and provision of referrals
- The coordinated assessment must:
  - Be used by recipients of ESG and CoC program funds
  - Cover the geographic area of the CoC
  - Be easily accessed by individuals and families seeking assistance
  - Be well advertised
  - Include a comprehensive and standardized assessment tool (which incorporate the written standards)

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
COMMUNITY PLANNING AND DEVELOPMENT

Intake Assessment and Triage

- At intake, the needs for assistance (housing and service) of homeless persons, and persons at risk of homelessness, must be assessed
- Using the assessment, individuals and families should be connected to resources that will effectively meet their identified needs

Written Standards

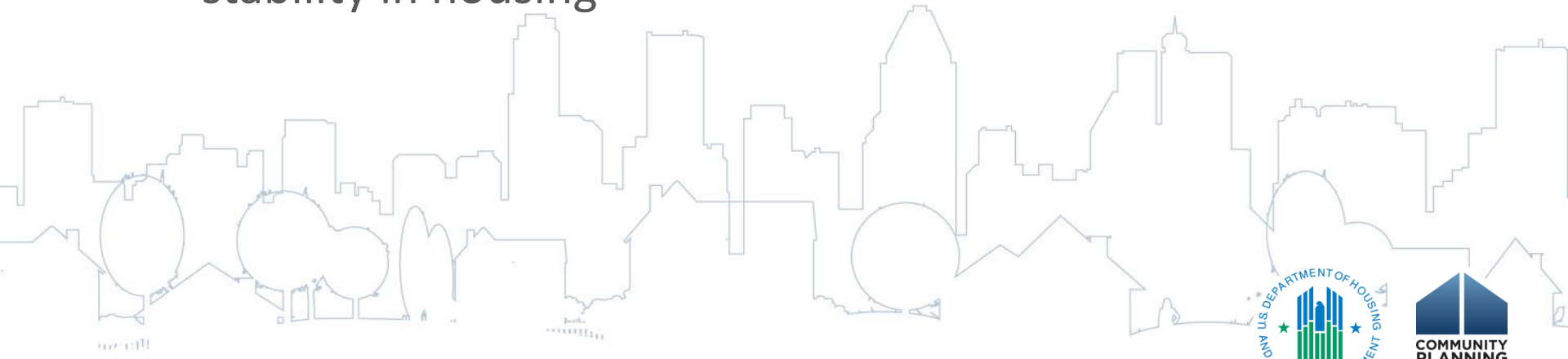
- Recipients of ESG funds and CoCs must develop, in coordination with each other, written standards for administering assistance
- The written standards must include policies and procedures for:
  - Evaluating eligibility for assistance
  - Determining and prioritizing which eligible individuals and families will receive assistance

Written Standards

- Written standards should –
  - Be specific and detailed
  - Address any unique eligibility requirements for assistance (e.g., disability or subpopulation)
  - Reflect the homeless population and subpopulations within the CoC
  - Reflect the housing and service resources available within the CoC
  - Reflect local and national targeting priorities

Prioritizing Assistance: National Priorities: PSH

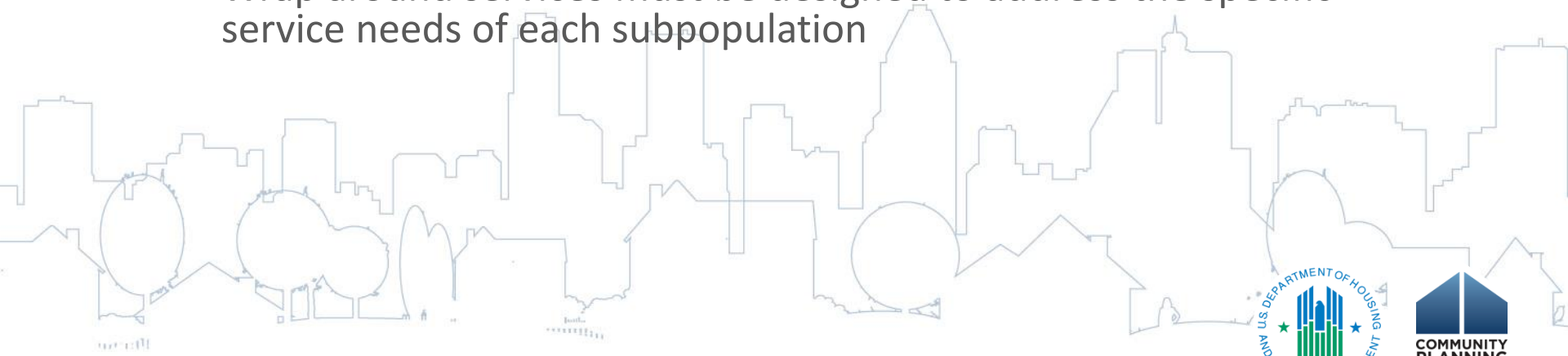
- Written standards should prioritize the chronically homeless, with a priority to those with the longest histories of homelessness
- Written standards may also prioritize individuals and families with long histories of homelessness, several disabilities, and high service needs to maintain stability in housing



Prioritizing Assistance: National Priorities: TH

- Written standards should prioritize individuals and families with heavy service needs to stabilize in housing
- Written standards may prioritize specific subpopulations of homeless individuals and families, including:
  - Victims of domestic violence, dating violence, sexual assault, or stalking
  - Transition-aged youth
  - Substance abusers

  Wrap around services must be designed to address the specific service needs of each subpopulation



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

COMMUNITY PLANNING AND DEVELOPMENT

Prioritizing Assistance: National Priorities: RRH

- Written standards should reflect local program design and local needs
- Communities may prioritize:
  - Individuals and families with higher barriers to housing, and higher service needs who are waiting to obtain another permanent housing subsidy (e.g., PSH)
  - Individuals or families with lower barriers to housing, and less service needs who are expected to stabilize in permanent housing with no additional assistance

Prioritizing Assistance: National Priorities: HP

- Written standards should prioritize those individuals and families who would spend the night in an emergency shelter or on the streets without the assistance
- Written standards may prioritize individuals and families who are presenting to emergency shelter with nowhere else to go

Not enough is known about the effectiveness of homelessness prevention as an intervention. If communities choose to spend they should note that it is the least proven strategy.

Adapting Written Standards

- When reviewing the written standards (which should occur regularly), consider:
  - Provider feedback on the current written standards
  - Program participant feedback on the intake process
  - The effectiveness and appropriateness of housing and services for current program participants
  - The CoC's success at meeting the performance standards in Section 427 of the McKinney-Vento Act
  - Changes in the characteristics of the homeless population within the CoC
  - Changes in the housing and service resources available

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
COMMUNITY PLANNING AND DEVELOPMENT

Resources

- Up to date information regarding the McKinney-Vento Act programs, including a copy of the McKinney-Act amended by the HEARTH Act, the ESG interim rule, the CoC interim rule, and TA materials can be found at https://www.onecpd.info/

- Notification of the availability of future information will be released via HUD's Homeless Assistance listserv. To join HUD's listserv, go to https://www.onecpd.info/mailinglist

Questions

Submit Questions to HUD's Homeless Resource Exchange Virtual Help Desk at:

http://www.hudhre.info/index.cfm?do=viewHelpdesk

Please note: Due to the high volume of questions, please read the regulations and the training materials provided prior to submitting your question to the Virtual Help Desk.

HEARTH Act

Developing System-wide Prioritization and Targeting Standards

Presented at the
2013 National Conference on Ending Family Homelessness
Seattle, Washington

Lianna Barbu
Community Shelter Board
www.csb.org

communityshelterboard

Overview

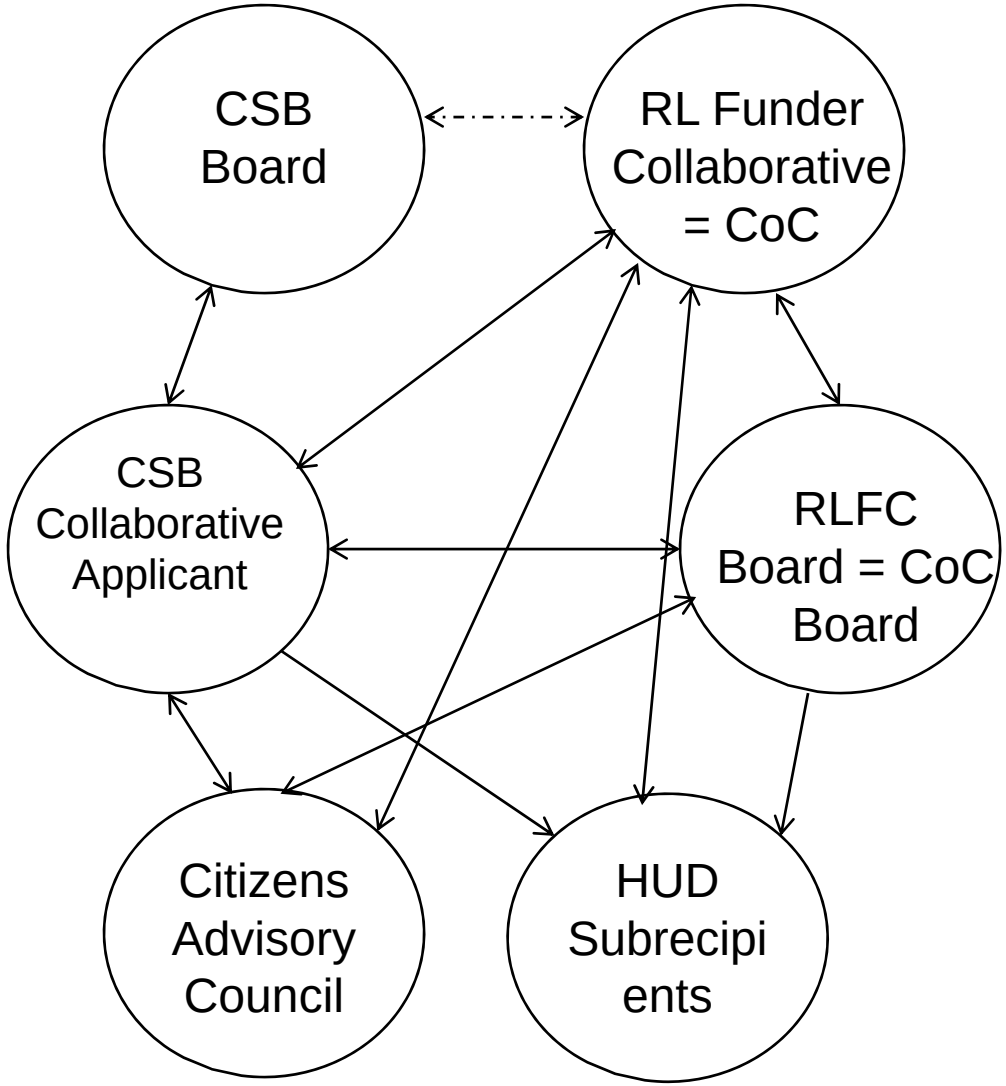
- CoC Governance Structure
- HEARTH Policies and Procedures
- CoC Monitoring Standards Process

communityshelterboard

CoC Governance structure

communityshelterboard

Columbus CoC Governance Structure



communityshelterboard

CoC Changes– Operating the CoC

- Establish performance targets, monitor recipients' performance, evaluate outcomes and take action against poor performers
- Establish and report to HUD outcomes of ESG and CoC projects
- Establish and operate a centralized or coordinated assessment system
- Establish and follow written standards for providing CoC and ESG assistance

communityshelterboard

HEARTH Policies and Procedures
Eligibility and Prioritization

communityshelterboard

iles/docs/Resources/money/Guide/2013/HEARTH_PP_Oct12.pdf
csb.org
/ 289
139%
Collaborate
Sign
Find

G. Programs and Eligibility 5

1. Determining Eligibility – Recordkeeping Guidelines 6
2. Program Participant Records 7
3. Emergency Shelter Programs (Single Adult and Families) 7
4. Outreach Program 9
5. Direct Client Assistance – Transition Program 10
6. Direct Housing Programs (Rapid Re-housing for Families) 10
7. Direct Client Assistance – Direct Housing 15
8. Critical Access to Housing Program (Rapid Re-housing for Single Adults) 16
9. Prevention Programs 17
10. Transitional Housing 17
11. Permanent Supportive Housing 20
12. CoC Eligible Activities 21

H. Terminating Assistance & Determination of Ineligibility 22

HEARTH P&Ps

- Record keeping guidelines (broad)
- Participant records (broad)
- ESG programs (specific)
  - Eligibility criteria/prioritization
  - Eligible activities
  - Program participant records
- CoC programs (specific)
  - Eligibility criteria/prioritization
  - Eligible activities
  - Program participant records
- Terminating assistance and ineligibility (broad

Homeless definition - prioritization

- Four categories:

1. Literally homeless individuals/families
2. Those who will imminently lose their residence
3. Unaccompanied youth or families with children/youth who meet the homeless definition under another federal statute
4. Those fleeing domestic violence

- Support and recovery services should start with an individual's/family's strengths.
- Healthy families create healthy communities, and healthy communities support healthy families.

Direct Housing Eligibility Criteria for Families (Rapid Re-Housing)

Direct Housing programs will serve homeless families who can be expected to achieve stability within 3-9 months and:

- Are clients of the YWCA Family Center;
- Receive a standard assessment (attached hereto as Attachment 3) that recommends Direct Housing as the best approach towards housing stability for the household;
- Desire to obtain and maintain employment and housing;
- Are willing to partner with a Case Manager for the time that is required to attain and establish maintenance of their housing;
- Have or can have, within 3-9 months, income and/or community based supports sufficient to be independent and stable;
- Have or can have, within 3-9 months, community based supports to maintain housing;
- Are unable to obtain and maintain an apartment without assistance due to barriers primarily related to income, employment, debt, criminal history, and/or previous evictions; and
- Have not been previously exited from a Direct Housing program within the last year.
- Have income at intake below 35% AMI using the standard for calculating annual income under 24 CFR 5.609

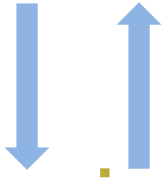
Once a Direct Housing provider completes an intake with a referred family, the time it takes to move the family into permanent housing cannot exceed 30 days.

Permanent Supportive Housing Programs - prioritization

- Rebuilding Lives PSH programs are required to meet:
  - Rebuilding Lives definition (4 episodes or 120 days homeless)
  - HUD Chronic Homeless definition
  - Definition of episode
  - Unified Supportive Housing System – Vulnerability Assessment
- All other PSH programs
  - Minimum of seven days documented homelessness prior to entry.

communityshelterboard

HEARTH Policies and Procedures



CoC Monitoring Standards

communityshelterboard

CSB Program Review and Certification (PR&C)

- Annually updated Certification Standards
- Inclusive of the established HUD-required standards for providing ESG and CoC assistance.
- Annual system-wide meeting and training with all subrecipients
- Annual on-site monitoring visit for each subrecipient

communityshelterboard

CSB PR&C Standards

- Standards are qualified as Tier 1, Tier 2, Tier 3, and Voluntary.
- Tier 1: Funder-required standards to be monitored on an annual basis.
- Tier 2: Additional standards to be monitored every four (4) years.
- Tier 3: Self-certification standards to be monitored on an annual basis.
- Voluntary: Suggested standards to serve as a template for best practices.

communityshelterboard

CSB PR&C Process

- Full reviews:
  - Upon entry into a Partnership Agreement with CSB
  - Every four (4) years
  - Non-compliance issues
  - All tier standards (1, 2 and 3)
- Targeted reviews:
  - Annually
  - Tier 1 and Tier 3 standards

communityshelterboard

CSB PR&C Standard Categories

- Organization of certification standards
  - Organizational Structure and Management (5);
  - Statutory Compliance (6);
  - Personnel (9);
  - Fiscal Administration (10);
  - Program Operations (23);
  - Client Rights (12);
  - Services Planning (7);
  - Housing (8);
  - Community Relations and Good Neighbor Agreements (7);
  - Facility Standards (24);
  - Direct Client Assistance Standards (4);
  - Data Collection and HMIS (10)

communityshelterboard

Emergency Solutions Grants Program – New Standards

- New Standards:
  - E2 – Homelessness status
  - H2 – Lease requirements
  - H4 – Program participant eligibility

http://www.csb.org/files/docs/Resources/money/Guide/2013/FY13%20Revised%20Standards.pdf
csb.org
File Edit Go to Favorites Help
6 / 30
105%
Collaborate
Sign
Find

	provide a later date upon which CSB will receive the documents.				
	E. Program Operations				
	Standard E1: The program adheres to a Housing First Model, working to efficaciously place homeless clients in housing. Quick re-housing should be the central priority of all programs.				
E1	Guideline E1: The agency should have policy statement available for review. Review of case files should clearly demonstrate efforts to obtain housing in an expeditious manner. Case files should demonstrate compliance to the Housing First approach. Case managers should be able to demonstrate comprehension with the Housing First approach.	x			
	Standard E2: Homeless status is certified and documented upon enrollment into all programs. Homeless status documentation is maintained in accordance with federal recordkeeping requirements.				
E2	Guideline E2: Client files contain homeless certification documentation as required by HUD and approved and standardized by CSB. Documentation confirming homeless status may be (in order of HUD preference): third-party written confirmation, third-party oral confirmation (recorded, signed and dated by intake staff), intake staff observation (recorded, signed and dated by intake staff), or self-certification from the client. For all permanent housing programs that are not following Rebuilding Lives or Chronic Homeless eligibility criteria, homeless status is determined by, at a minimum, a single episode of homelessness of 7 or more consecutive days in shelter, on the street, or on the land, immediately prior to admission in such programs. For those individuals being released directly from hospital, jail/prison, or another institution for stays less than 90 days, proof of homelessness for 7 or more consecutive days, immediately prior to entry into institution, is required. For all permanent housing programs that are following Rebuilding Lives or Chronic Homeless eligibility criteria, homelessness documentation meets the respective criteria.	x			
	Standard E3: The changing needs of homeless people are routinely assessed. The information gathered is used to determine program direction and updates.				
E3	Guideline E3: Staff can describe how the program staff assess and stay abreast of the needs of the homeless community. Staff can give examples of how programming has been modified based on new information about trends in homelessness. Information gathered should include some form of client feedback.				
	Standard E4: The program effectively collaborates with the system of homeless providers and other community organizations as well as other service providers.				

http://www.csb.org/files/docs/Resources/money/Guide/2013/FY13%20Revised%20Standards.pdf
csb.org
File Edit Go to Favorites Help
16 / 30
105%
Collaborate
Sign
Find

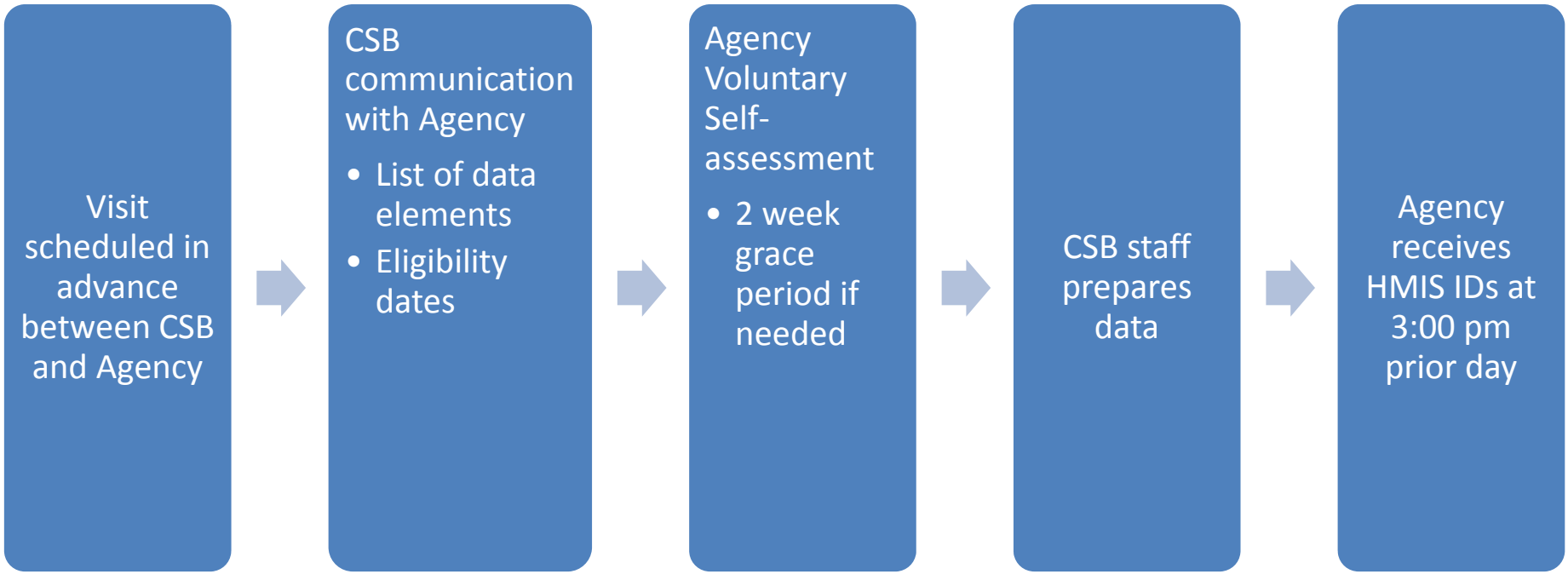
	recommended, but not required, that the Vulnerability Assessment is updated with each shelter stay.			
	H. Housing			
H1	**Standard H1: The agency has a reasonable procedure for maintaining and updating the waiting list or participates in vacancy management with USHS.** Guideline H1: The agency has a relationship with USHS to manage vacancy management or has written guidelines that identify the frequency of contact with applicants, a procedure for removing someone from the waiting list, and procedure for determining when an applicant is added to the waiting list (e.g. when the application is received, when all paperwork is received, etc.).			x
H2	**Standard H2: All clients have formal lease agreements prior to receiving direct financial assistance.** Guideline H2: Program staff can provide client files for inspection containing copies of legal leases. If direct financial assistance is provided through federal funding (including Emergency Solutions Grant), the agency will be notified and the lease agreement must be executed prior to receiving the assistance, in accordance with federal funding guidelines. Direct client assistance funds may only be spent on behalf of program participants where there is a legal lease that includes the participant's name on the document. A sublease is considered a legal lease.	x		
H3	**Standard H3: The program has documentation of how tenant rent is calculated annually. Programs require tenants to pay rent of $50.00, 10% of Annual Gross Income, or 30% of Adjusted Gross Income, whichever is greater, and provide assistance to assure tenants can meet rent requirements. CSB may waive this requirement for some units upon written agreement with the agency.** Guideline H3: Residents are expected to pay rent for their units. However, the tenant portion of rent and utilities should not exceed 30% of the monthly adjusted gross income or 10% of Annual Gross Income, whichever is greater. The income of each tenant must be recorded and verified at the time of admission into housing. Income verification should be conducted at least annually for each tenant and proper income documentation obtained and maintained in the tenant file. Appropriate adjustments to the tenant portion of the rent should be made when new income information has been verified. The agency can show documentation of tenant rent calculations, including how frequently rent is recalculated. The agency can demonstrate an approach (i.e. work equity) to assist tenants whom are unable to pay rent. Such assistance may be time limited. Agencies shall also demonstrate that payment plans for rent arrearages are developed and followed as needed.		x	
	Standard H4: All program participants meet the minimum eligibility criteria as detailed in the Emergency Solutions Grant Policies and Procedures.			

Emergency Solutions Grants Program – New Standards

- New Standards:
  - H5 - Reassessment requirement
  - H6 – Rent reasonableness requirement
  - K4 – Direct Client Assistance documentation requirement

#	Standard	Tier 1	Tier 2	Tier 3	Voluntary	Pr
H4	Guideline H4: Program staff and records can demonstrate that in order to receive financial assistance or services, individuals and families whether homeless or housed must at least meet the following criteria: (1) Any individual or family provided with financial assistance must have at least an initial consultation with a case manager or other authorized representative who can determine the appropriate type of assistance to meet their needs. (2) The household must be at or below 35% of Area Median Income (AMI). (3) The household must be either homeless or at risk of losing its housing and meet both of the following circumstances: (a) no appropriate subsequent housing options have been identified and (b) the household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing. All client records must contain evidence of a CSB Client Eligibility Assessment form. Additionally, all program records must meet the HUD Eligibility Determination and Documentation Requirements.	x				
H5	**Standard H5: The program assures re-assessment of housing units and client eligibility every three months.** Guideline H5: Program staff can explain their policy and procedures for evaluating client re-assessment. After 3 months, if program participants need additional financial assistance to remain housed, they must be re-evaluated for eligibility and appropriateness of services and assistance.	x				
H6	**Standard H6: The program complies with the Emergency Solutions Grant requirements of rent reasonableness.** Guideline H6: Program staff can explain their policy and procedure in aiding CSB with ensuring rent reasonableness on units used to house clients. Rent reasonableness assessments will be performed by a CSB-hired contractor. Rent reasonableness is determined on a case-by-case basis. Rent reasonableness should be determined by considering the following: (1) The reasonableness in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, management, and maintenance of each unit. (2) The rent should not be in excess of rents currently being charged by the same owner for comparable unassisted units. This comparison can include units advertised for rent as well those actual rents charged.	x				
	Standard H7: Supportive services are voluntary, except where required by HUD regulations, and tenants are not required to engage in supportive services as a condition of their tenancy in accordance with the					

CSB PR&C – Pre-visit



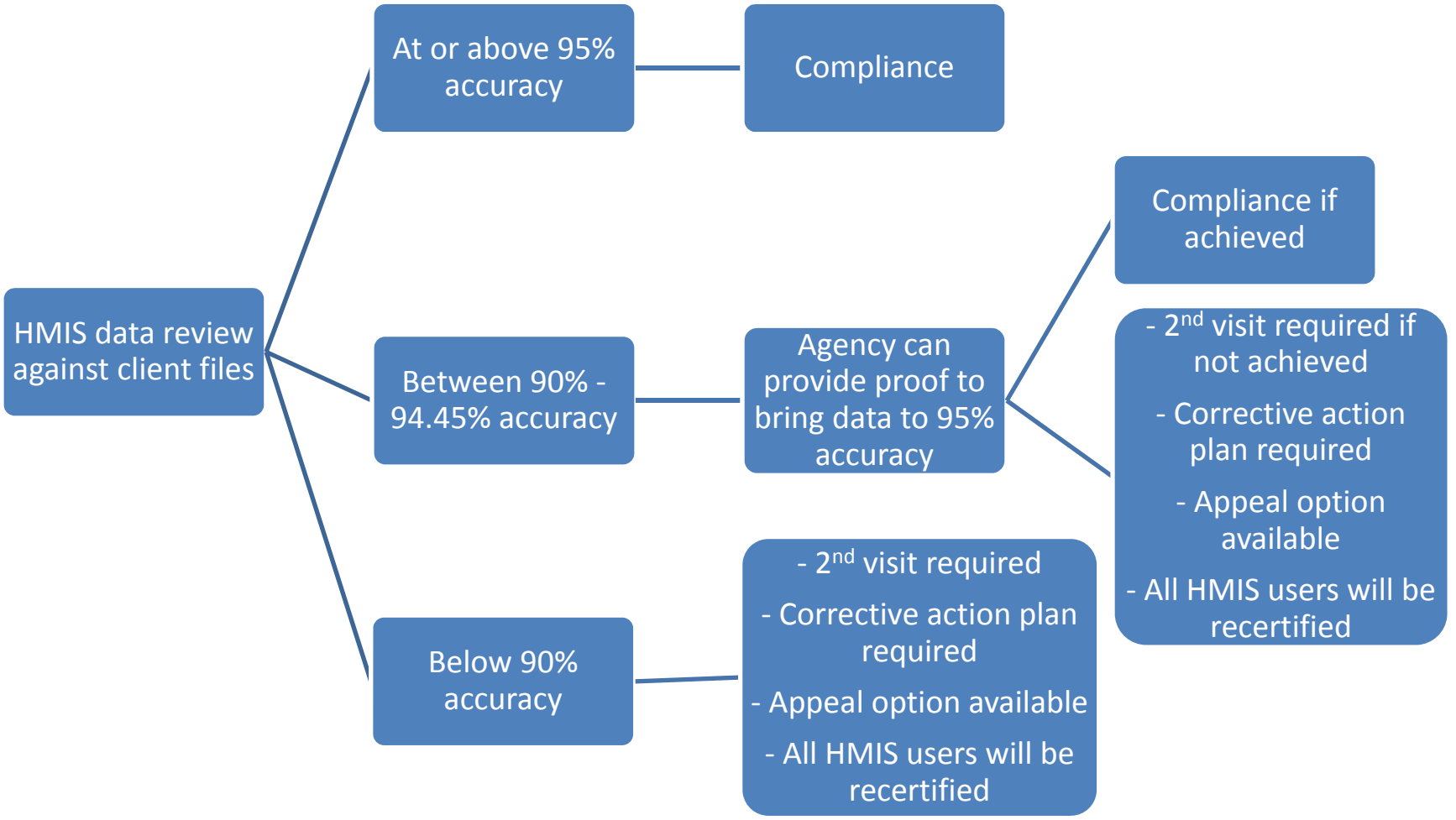
communityshelterboard

CSB PR&C Visit

- The usual CSB Review Team
  - Grants Administrator
  - Programs and Planning Department representative
  - Data and Evaluation Department representative

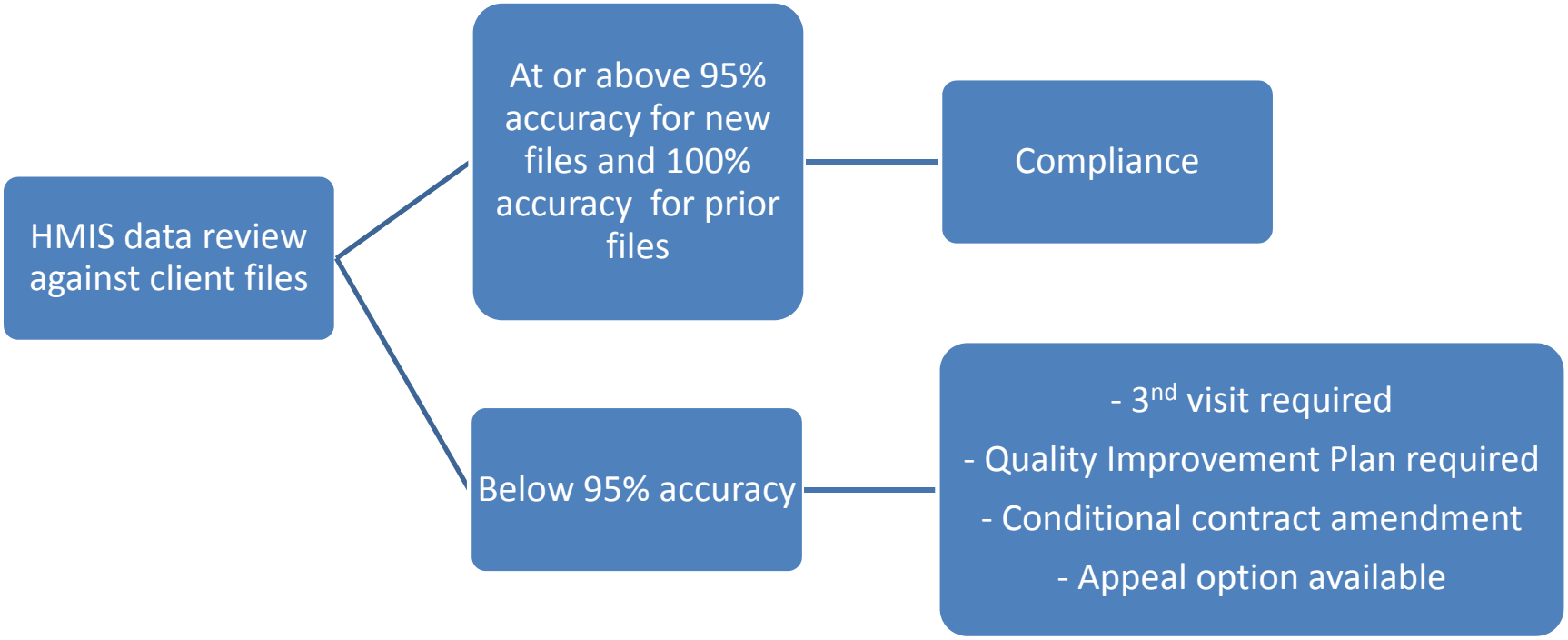
- During the site visit, the CSB Review Team will monitor all applicable certification standards for each of the twelve categories noted previously.

CSB PR&C – Data review



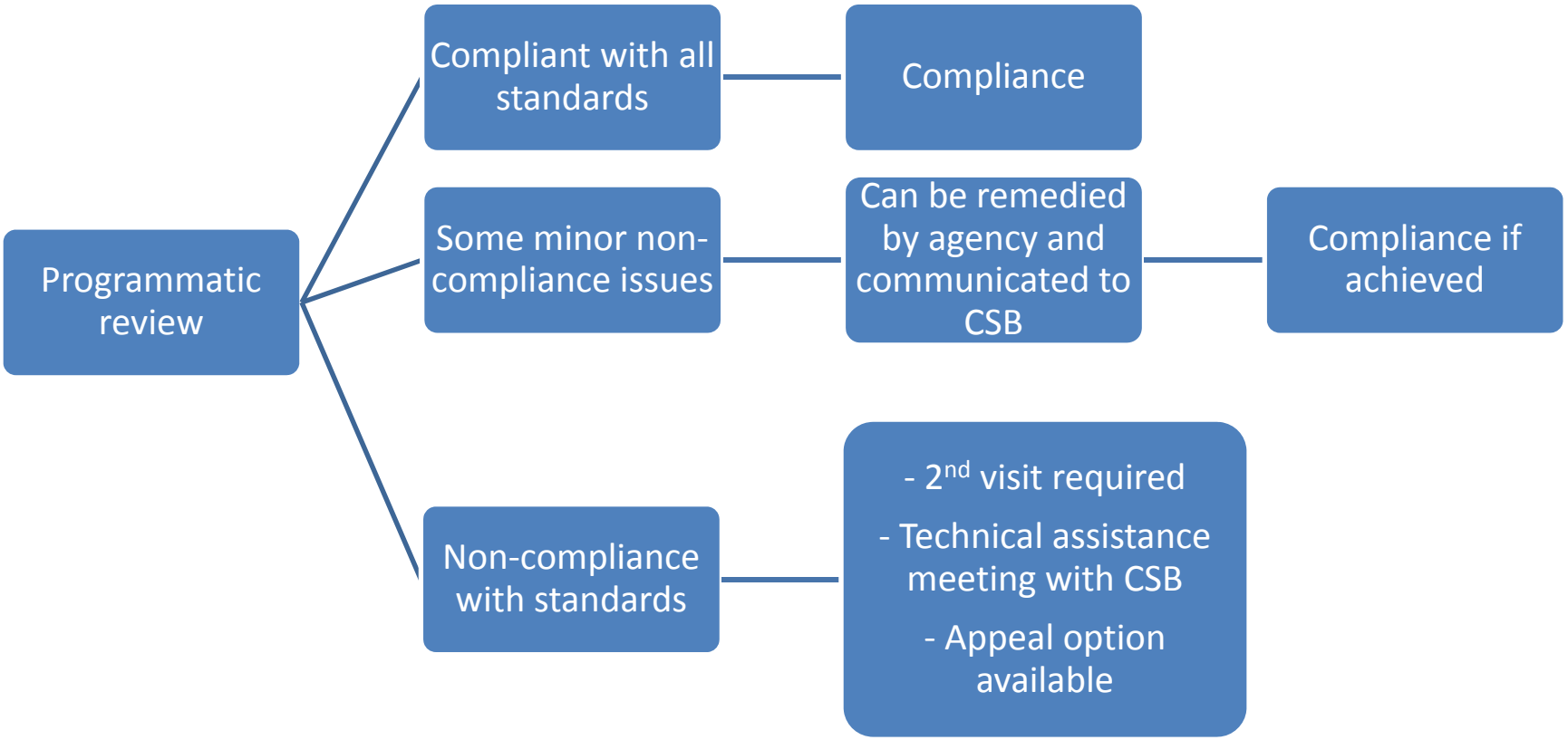
communityshelterboard

CSB PR&C – Data review- 2nd visit

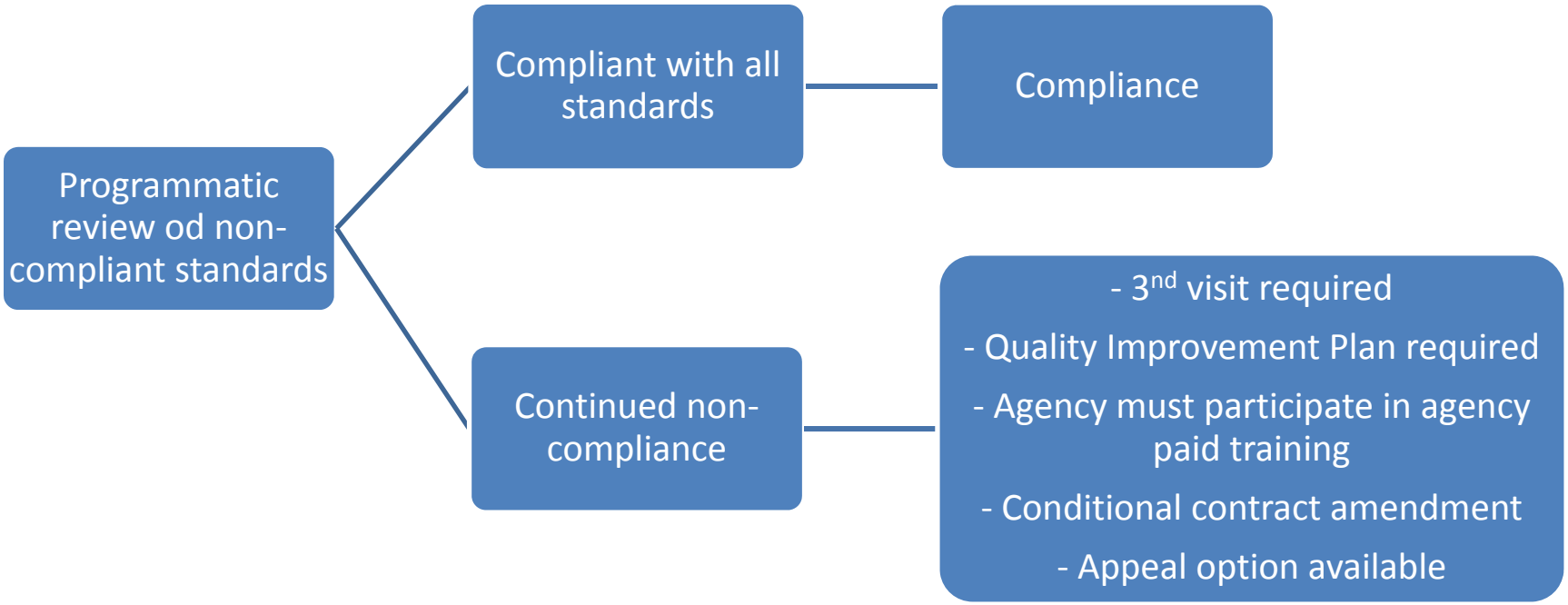


communityshelterboard

CSB PR&C – Programmatic review



CSB PR&C – Programmatic review- 2nd visit



communityshelterboard

CSB PR&C – 3rd visit non-compliance

- Non-compliant status for the current fiscal year.
- Ineligible for any merit incentive payments paid during the fiscal year or reimbursement of HMIS licensing fees.
- Conditional contract for the next fiscal year as well.

CSB PR&C – 1st visit compliance

- Agencies found fully compliant upon the initial site visit are eligible to receive a staff appreciation bonus of up to $500 to be used at the discretion of the agency.

communityshelterboard

CSB PR&C Report

- Program Review and Certification Compliance Reports
- Appeals are managed as needed
- Outstanding compliance issues and requirements for corrective action, quality improvement, and/or recertification.
- Non-compliant subrecipients reported to the CSB Board of Trustees, the Rebuilding Lives Funder Collaborative (RLFC) Board and the RLFC (the Continuum of Care governing body).

CSB Financial Monitoring

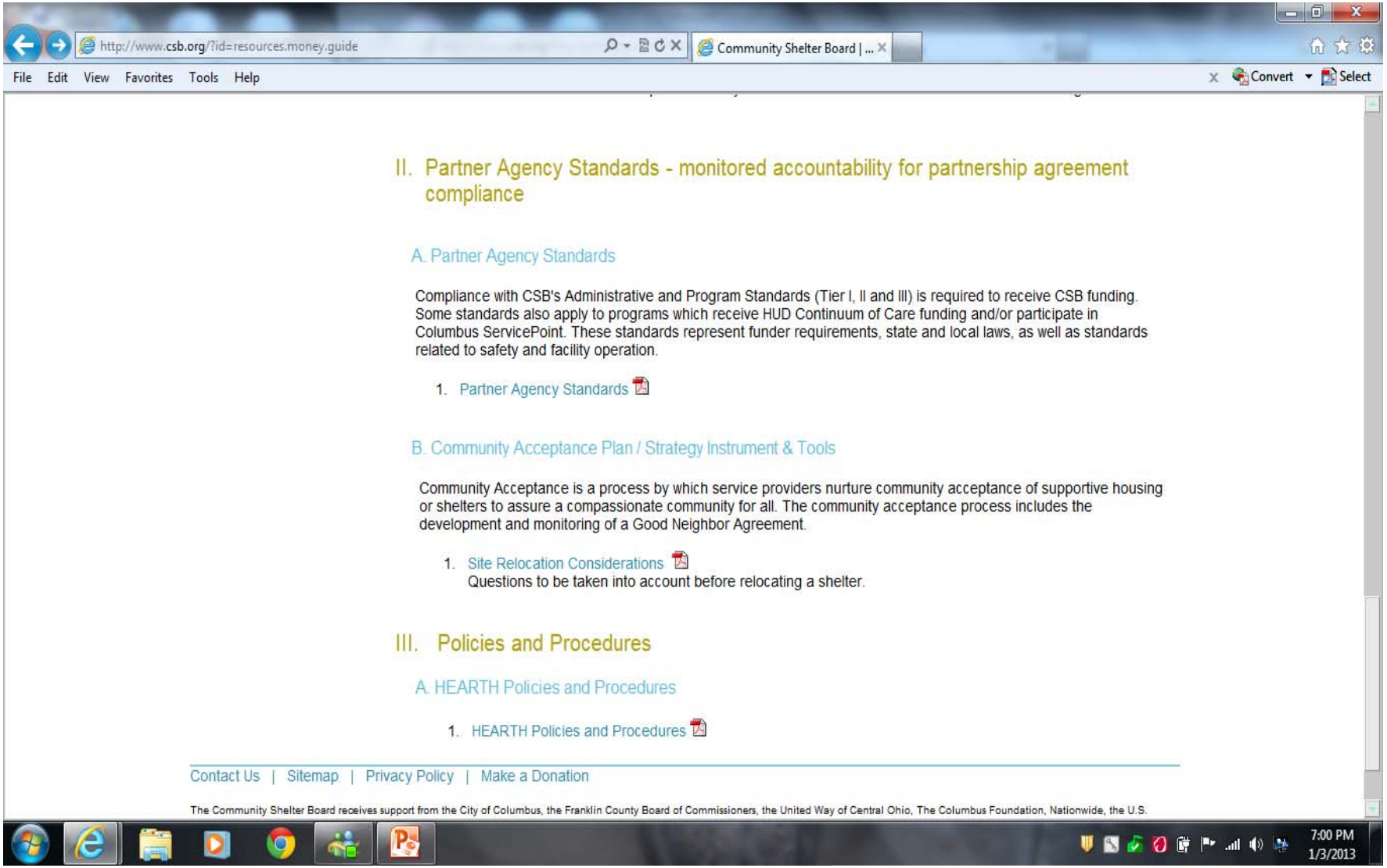
- Audits and 990s are collected by CSB
- CSB compiles “Organizational indicators”
  - Agency director, finance director and board chair receive.
- Significant sustainability concerns are addressed

communityshelterboard

CSB Financial Monitoring

- Semi-annual financial report for each CSB-funded program
- Assess subrecipient spending for compliance with CSB-approved budgets.
- An Aggregate Semi-Annual Report is compiled.
- Semi-annual financial reports are presented twice a year to the RLFC Board and RLFC (the Continuum of Care governing body) for review, discussion and approval.

communityshelterboard



communityshelterboard

Questions?

communityshelterboard