File No. ___151165___   Committee Item No. ___13___

                                            Board Item No. _____

COMMITTEE/BOARD OF SUPERVISORS

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Committee: Budget & Finance Committee   Date January 20, 2016

Board of Supervisors Meeting   Date _____

Cmte Board

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OTHER   (Use back side if additional space is needed)

Cmte	Board	
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Completed by: Linda Wong   Date January 15, 2016

Completed by: Linda Wong   Date_____

1 [Apply for Grant - United States Department of Housing and Urban Development - Continuum
2 of Care Program - Not to Exceed $33,000,000]

3 **Resolution retroactively approving the 2015 grant application for the United**

4 **States Department of Housing and Urban Development Continuum of Care**

5 **Program in an amount not to exceed $33,000,000; and fulfilling the Board of**

6 **Supervisors' review and approval process for all annual or otherwise recurring**

7 **grants of $5,000,000 or more.**

8

9   WHEREAS, Under the Department of Housing and Urban Development (HUD)

10 2015 Continuum of Care grant application, the City and County of San Francisco and

11 participating nonprofit entities are eligible to submit the application for funding not to

12 exceed $33,000,000 to assist the homeless population; and

13   WHEREAS, During the San Francisco 2014 Continuum of Care competition,

14 San Francisco and its nonprofit partners were awarded over $26,000,000; and

15   WHEREAS, San Francisco's community efforts to end homelessness scored in

16 the top ten percent nationally; and

17   WHEREAS, HUD requires submission of the 2015 Continuum of Care

18 application by November 20, 2015; and

19   WHEREAS, The San Francisco Local Homeless Coordinating Board (LHCB)

20 serves as the lead entity that oversees the Continuum of Care process and programs,

21 including the creation of program priorities, funding categories, application guidelines,

22 and scoring tools; and

23   WHEREAS, The LHCB expects to submit the consolidated application for an

24 amount not to exceed $33,000,000, of which a portion of those that passes through the

25 Department of Human Services is greater than $5,000,000; and

1   WHEREAS, The LHCB has been meeting regularly to better understand the

2   Continuum of Care process and programs, which includes community input and

3   participation in the development of program priorities, application scoring criteria, and

4   application guidelines and process; and

5   WHEREAS, The LHCB with community input and advice, will approve a 2015

6   application process, scoring criteria, and funding priorities for the 2015 application; and

7   WHEREAS, The 2015 application process established funding categories that

8   include Permanent Supportive Housing, Rapid Re-Housing, Transitional Housing,

9   Homeless Management and Information System (HMIS) and Supportive Services; and

10   WHEREAS, Under San Francisco Ordinance No. 265-05, the appropriate City

11   department shall submit a resolution articulating its grant application as well as funding

12   categories to the Board of Supervisors for all annual grant applications of $5,000,000

13   or more; now, therefore be it

14   RESOLVED, That the San Francisco Local Homeless Coordinating Board and

15   the Department of Human Services are authorized to submit to the United States

16   Department of Housing and Urban Development the 2015 Continuum of Care

17   application for funding to support programs serving homeless families and individuals

18   in an amount not to exceed $33,000,000.

19

20
Recommended:

21

22

23
Trent Rhorer
Executive Director
24   Human Services Agency

25

City and County of San ┌rancisco

Edwin Lee, Mayor

Human Services Agency
Department of Human Services
Department of Aging and Adult Services

Trent Rhorer, Executive Director

October 26, 2015

Ms. Angela Calvillo, Clerk
Board of Supervisors
City and County of San Francisco
#1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102

RE: 2015 U.S. Department of Housing and Urban Development (HUD)
       Continuum of Care Funding Application Resolution

Dear Ms. Calvillo:

Enclosed you will find a proposed resolution for the Board of Supervisors approval for the
upcoming 2015 Continuum of Care funding application to the Department of Housing and Urban
Development (HUD).   This application is to secure federal funding for many of our programs
serving homeless families and individuals. Also enclosed is a description of the Local Homeless
Coordinating Board funding application process.

The Board of Supervisors has approved similar resolutions annually since 2008.

Please schedule a hearing on this resolution as soon as possible so we can have final Board
approval to submit the application by the November 20, 2015 deadline.

If you need additional information, please contact Megan Owens Faught, Staff to the Local
Homeless Coordinating Board, at 415-557-6007. Thank you for your assistance.

Sincerely,

Trent Rhorer
Executive Director

Enclosures

151165

San Francisco Local Homeless Coordinating Board
Continuum of Care Homeless Assistance Grants

The San Francisco Local Homeless Coordinating Board (LHCB), formed by Resolution 208-05, oversees the San Francisco application for Federal Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Homeless Assistance Grants. Last year HUD awarded San Francisco over $26,000,000 in competitive Continuum of Care Homeless Assistance grant funds.

This year the proposed resolution would authorize the LHCB to apply for funds not to exceed $33,000,000. The funding goes to city departments and non-profits to provide homeless individuals and families with permanent supportive housing, transitional housing and a variety of supportive services. The grant application is due November 20, 2015.

Each year the LHCB undertakes an intensive community process to determine priorities and to create the competition process. This year the review and rank process for scoring the various applicant programs was discussed at three LHCB Funding Committee meetings and four LHCB meetings. The LHCB Funding Committee considered community priorities, then designed and presented scoring tools and materials to the full Board for approval. .

As part of the review process, HSA and LHCB staff will review and score the applications in accordance with the rubric created during the community process. Additionally a neutral panel will score and rank the applications for any new projects. After the preliminary scoring results are delivered to applicants, any project that is at risk of not being funded will have the opportunity to appeal. After the appeal process is complete, the LHCB will meet to consider and approve the final list of project applications.

The LHCB also oversees the community portion of the application, which describes the homeless housing and services provided in San Francisco, as well as LHCB plans for future activities.

This year's application will include a Tier 2 list of projects that will be subject to special scrutiny from HUD previous to funding, and it is possible that some of those programs will not be selected for funding by HUD. The projects listed in Tier 2 will include new projects that do not yet exist and renewal programs that scored the lowest on performance measures such as housing placement and retention rates and timely and accurate grant management. HUD determines which new projects to fund and which low performing renewal programs to fund based on a complex three component, multi-category process. The Tier 2 scrutiny is not projected to impact any current housing programs since San Francisco's community-wide HUD performance score is very high compared to other community scores nationally.

Contact: Megan Owens Faught
415-557-6007

October 26, 2015

Before Starting the CoC Application

The CoC Consolidated Application is made up of two parts: the CoC Application and the CoC Priority Listing, with all of the CoC's project applications either approved and ranked, or rejected. The Collaborative Applicant is responsible for submitting both the CoC Application and the CoC Priority Listing in order for the CoC Consolidated Application to be considered complete.

The Collaborative Applicant is responsible for:

- Reviewing the FY 2015 CoC Program Competition NOFA in its entirety for specific application and program requirements.
- Using the CoC Application Detailed Instructions for assistance with completing the application in e-snaps.
- Answering all questions in the CoC Application. It is the responsibility of the Collaborative Applicant to ensure that all imported and new responses in all parts of the application are fully reviewed and completed. When doing so, please keep in mind that:

- This year, CoCs will see that a few responses have been imported from the FY 2013/FY 2014 CoC Application. Due to significant changes to the CoC Application questions, most of the responses from the FY 2013/FY 2014 CoC Application could not be imported.
- For some questions, HUD has provided documents to assist Collaborative Applicants in filling out responses.
- For other questions, the Collaborative Applicant must be aware of responses provided by project applicants in their Project Applications.
- Some questions require that the Collaborative Applicant attach a document to receive credit. This will be identified in the question.
- All questions marked with an asterisk (*) are mandatory and must be completed in order to submit the CoC Application.

For Detailed Instructions click here.

1A. Continuum of Care (CoC) Identification

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

1A-1. CoC Name and Number: CA-501 - San Francisco CoC

1A-2. Collaborative Applicant Name: City and County of San Francisco

1A-3. CoC Designation: CA

1A-4. HMIS Lead: City and County of San Francisco

1B. Continuum of Care (CoC) Engagement

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

1B-1. From the list below, select those organizations and persons that participate in CoC meetings. Then select "Yes" or "No" to indicate if CoC meeting participants are voting members or if they sit on the CoC Board. Only select "Not Applicable" if the organization or person does not exist in the CoC's geographic area.

Organization/Person Categories	Participates in CoC Meetings	Votes, including electing CoC Board	Sits on CoC Board
Local Government Staff/Officials	Yes	Yes	Yes
CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes	No
Law Enforcement	Yes	Yes	No
Local Jail(s)	No	No	No
Hospital(s)	Yes	Yes	Yes
EMT/Crisis Response Team(s)	Yes	Yes	Yes
Mental Health Service Organizations	Yes	Yes	Yes
Substance Abuse Service Organizations	Yes	Yes	Yes
Affordable Housing Developer(s)	Yes	Yes	Yes
Public Housing Authorities	Yes	Yes	No
CoC Funded Youth Homeless Organizations	Yes	Yes	Yes
Non-CoC Funded Youth Homeless Organizations	Yes	Yes	Yes
School Administrators/Homeless Liaisons	Yes	Yes	No
CoC Funded Victim Service Providers	Yes	Yes	No
Non-CoC Funded Victim Service Providers	Yes	Yes	No
Street Outreach Team(s)	Yes	Yes	Yes
Youth advocates	Yes	Yes	Yes
Agencies that serve survivors of human trafficking	Yes	Yes	Yes
Other homeless subpopulation advocates	Yes	Yes	Yes
Homeless or Formerly Homeless Persons	Yes	Yes	Yes
Non-English Speaker/ESL Advocates	Yes	Yes	Yes
Veterans Advocates	Yes	Yes	Yes
Family Advocates	Yes	Yes	Yes

1B-1a. Describe in detail how the CoC solicits and considers the full range of opinions from individuals or organizations with knowledge of homelessness in the geographic area or an interest in preventing and ending homelessness in the geographic area.   Please provide two examples of organizations or individuals from the list in 1B-1 to answer this question.
(limit 1000 characters)

All LHCB (CoC Bd) mtgs are public, & members of the public are encouraged to participate & vote. 1)In 2015, an SFPD Deputy Chief & the SFPD Homeless Outreach Coord. (HOC) partnered w/LHCB Policy & Legislative Cmte (PLC) on public mtgs to decriminalize homelessness. The HOC & Deputy Chief sat on a panel (w/local advocates, USICH rep, LHCB mem.) at a PLC public mtg, developing recommendations for CoC action. The HOC helped plan the panel & participated in a follow-up mtg of LHCB. 2)In 2012, LHCB formed a Coord. Assessment Working Group (CAWG) to design a Coord. Entry (CE) for Single Adults pilot. To plan & implement CE, LHCB, city, VA Medical clinic, SSVF, non-VA funded veterans advocates, & CoC-funded veterans svc/housing providers, chose a single common application for all CoC Housing for single adults & prioritization by length of homelessness for PSH entry & create by-name list of all homeless vets, & prioritization of CH vets for PSH (375 of an est. 540 CH vets placed in PSH).

1B-1b. List Runaway and Homeless Youth (RHY)-funded and other youth homeless assistance providers (CoC Program and non-CoC Program funded) who operate within the CoC's geographic area. Then select "Yes" or "No" to indicate if each provider is a voting member or sits on the CoC Board.

Youth Service Provider (up to 10)	RHY Funded?	Participated as a Voting Member in at least two CoC Meetings within the last 12 months (between October 1, 2014 and November 15, 2015).	Sat on the CoC Board as active member or official at any point during the last 12 months (between October 1, 2014 and November 15, 2015).
Larkin Street Youth Services	Yes	Yes	No
Huckleberry Youth Programs	Yes	Yes	No
At the Crossroads	No	No	No
First Place for Youth	No	No	No
Homeless Youth Alliance	No	Yes	No
CCCYO	No	Yes	Yes
Compass Family Services	No	Yes	No
Hamilton Family Center	No	Yes	No
Homeless Prenatal Program	No	Yes	No

1B-1c. List the victim service providers (CoC Program and non-CoC Program funded) who operate within the CoC's geographic area. Then select "Yes" or "No" to indicate if each provider is a voting member or sits on the CoC Board.

Victim Service Provider for Survivors of Domestic Violence (up to 10)	Participated as a Voting Member in at least two CoC Meetings within the last 12 months (between October 1, 2014 and November 15, 2015).	Sat on CoC Board as active member or official at any point during the last 12 months (between October 1, 2014 and November 15, 2015).
Riley Center (St. Vincent de Paul)	Yes	No
SafeHouse for Women (SF Network Ministries)	Yes	No
Asian Women's Shelter	No	No
San Francisco Domestic Violence Consortium	Yes	Yes
La Casa De Las Madres	No	No
Community United Against Violence	Yes	No
W.O.M.A.N., Inc.	No	No
APA-Family Support Services	No	No
Justice and Diversity Center/Bay Area Legal Aid	Yes	No
Survivor Restoration Program of the Sheriff's Department/DA Victim Services	No	No

1B-2. Does the CoC intend to meet the timelines for ending homelessness as defined in Opening Doors?

Opening Doors Goal	CoC has established timeline?
End Veteran Homelessness by 2015	Yes
End Chronic Homelessness by 2017	Yes
End Family and Youth Homelessness by 2020	Yes
Set a Path to End All Homelessness by 2020	Yes

1B-3. How does the CoC identify and assign the individuals, committees, or organizations responsible for overseeing implementation of specific strategies to prevent and end homelessness in order to meet the goals of Opening Doors?
 (limit 1000 characters)

Local Homeless Coordinating Board (LHCB, CoC Board), Committees are chaired by LHCB members & staffed by LHCB staff & meet publicly. The Local Homeless Coordinating Board (LHCB), CoC Board, Strategic Planning Committee, co-chaired by Richard Springwater & Laura Guzman, developed the CoC's Strategic Plan Framework (Plan), incorporating Opening Doors goals in the Plan's Key Indicators of Success. LHCB approved the Plan & oversees implementation through its staff & committee structure. LHCB's Coordinated Assessment Work Group designed SF's Coordinated Entry, a key strategy to end Vet & Chronic homelessness, & LHCB staff oversees implementation. LHCB partners w/ the City to create new housing units. Mayor's Office of HOPE (Sam Dodge) leads an effort to secure 500 SRO units over 3 months. LHCB & its staff solicit & prioritize applications for new CoC-funded PH. Prevention is a key aspect of the CoC's Plan; LHCB coordinates w/ private funders, the VA, SSVF, & the City to offer HP CoC-wide.

1B-4. Explain how the CoC is open to proposals from entities that have not previously received funds in prior CoC Program competitions, even if the CoC is not applying for any new projects in 2015.
(limit 1000 characters)

The CoC announces funding availability CoC-wide via: 1) Online posting on the LHCB website. 2) Multiple emails to the 600-plus person CoC mailing list, the majority of whom aren't CoC-funded agencies. 3)Postings at City Hall & the SF Public Library. 4)An email to SF County's homeless provider list, the majority of whom aren't CoC-funded. All announcements suggest forwarding to interested parties. The CoC accepted all applications submitted by previously un-funded agencies in 2011-15, totaling 2 applications. The CoC includes new projects on the priority listing based on the New Project Scoring Tool w/ 12 threshold & 26 scored factors assessing program design, agency capacity, experience, budget, cultural competency, disability access. Relevant experience in non-CoC funded activities adequately fulfills the experience requirement. To encourage new RRH projects, agencies that serve a target population may meet the experience requirement through a short-term partnership w/ another agency.

1B-5. How often does the CoC invite new members to join the CoC through a publicly available invitation? Monthly

1C. Continuum of Care (CoC) Coordination

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

1C-1. Does the CoC coordinate with other Federal, State, local, private and other entities serving homeless individuals and families and those at risk of homelessness in the planning, operation and funding of projects? Only select "Not Applicable" if the funding source does not exist within the CoC's geographic area.

Funding or Program Source	Coordinates with Planning, Operation and Funding of Projects
Housing Opportunities for Persons with AIDS (HOPWA)	Yes
Temporary Assistance for Needy Families (TANF)	Yes
Runaway and Homeless Youth (RHY)	Yes
HeadStart Program	Yes
Other housing and service programs funded through Federal, State and local government resources.	Yes

1C-2. The McKinney-Vento Act, as amended, requires CoCs to participate in the Consolidated Plan(s) (Con Plan(s)) for the geographic area served by the CoC. The CoC Program interim rule at 24 CFR 578.7(c)(4) requires that the CoC provide information required to complete the Con Plan(s) within the CoC's geographic area, and 24 CFR 91.100(a)(2)(i) and 24 CFR 91.110(b)(1) requires that the State and local Con Plan jurisdiction(s) consult with the CoC. The following chart asks for information about CoC and Con Plan jurisdiction coordination, as well as CoC and ESG recipient coordination.

CoCs can use the CoCs and Consolidated Plan Jurisdiction Crosswalk to assist in answering this question.

	Number	Percentage
Number of Con Plan jurisdictions with whom the CoC geography overlaps	1	
How many Con Plan jurisdictions did the CoC participate with in their Con Plan development process?	1	100.00 %
How many Con Plan jurisdictions did the CoC provide with Con Plan jurisdiction level PIT data?	1	100.00 %
How many of the Con Plan jurisdictions are also ESG recipients?	1	
How many ESG recipients did the CoC participate with to make ESG funding decisions?	1	100.00 %

How many ESG recipients did the CoC consult with in the development of ESG performance standards and evaluation process for ESG funded activities?	1	100.00 %

1C-2a. Based on the responses selected in 1C-2, describe in greater detail how the CoC participates with the Consolidated Plan jurisdiction(s) located in the CoC's geographic area and include the frequency, extent, and type of interactions between the CoC and the Consolidated Plan jurisdiction(s).
(limit 1000 characters)

The Mayor's Office of Housing and Community Development (MOHCD) drafts SF's Con Plan. MOHCD participates in monthly 2-hr mtgs of the Local Homeless Coordinating Board (LHCB), the CoC Board. MOHCD consults w/ the LHCB & Collaborative Applicant to collect information for Con Plan drafting, including PIT data, & planning updates. The SF Con Plan includes goals of the LHCB 2014-19 strategic plan & reflects participation of the Mayor's Office in CoC planning. MOHCD & LHCB staff meet at least 1 hr/wk via email, phone, & in-person, to plan & coordinate monitoring & evaluation of ESG, HOME, CDBG, HOPWA, & CoC projects. In 2015, the LHCB & MOHCD developed a shared CoC/ESG program manual & held 5 provider trainings. The HMIS Lead & MOHCD meet 4 hrs/wk to refine & improve HMIS, & develop HMIS policies & procedures. SF Mayor's Office collaborates quarterly w/ LHCB at HMIS Committee mtgs & recently to plan two public mtgs on decriminalization, & served on the Priority Panel that ranks CoC projects.

1C-2b. Based on the responses selected in 1C-2, describe how the CoC is working with ESG recipients to determine local ESG funding decisions and how the CoC assists in the development of performance standards and evaluation of outcomes for ESG-funded activities.
(limit 1000 characters)

The Mayor's Office of Housing and Community Development (MOHCD) administers ESG in SF. In 2014/15, MOHCD participated in monthly LHCB meetings, and LHCB Funding; Policy & Legislative; and Coordinated Entry committee mtgs. The LHCB participated in the most recent community process to set ESG funding priorities, and MOHCD & the CoC Funding Committee collaborated to draft LHCB's response to the 2015 ESG Interim Rule Solicitation of Public Comment on Specific Issues. The CA developed a single ESG/CoC Manual for providers in the community to clarify federal and local expectations at the project level. HSA & LHCB staff provide MOHCD PIT & HMIS data, including ESG project-level performance data. MOHCD uses HMIS data to complete the CAPER. MOHCD & LHCB use HMIS data to track key housing & income metrics in the ESG portfolio. MOHCD participated in designing the CoC performance measures, and is active in refining & planning improvements to San Francisco's HMIS to more accurately track outcomes.

1C-3. Describe the how the CoC coordinates with victim service providers and non-victim service providers (CoC Program funded and non-CoC funded) to ensure that survivors of domestic violence are provided housing and services that provide and maintain safety and security. Responses must address how the service providers ensure and maintain the safety and security of participants and how client choice is upheld. (limit 1000 characters)

SCENARIO A: Safety security & choice are key values in the CoC's response to DV. CoC providers assess households at intake for DV experience & need for DV shelter, legal, & mental health services. CoC providers refer to DV providers (W.O.M.A.N., Inc, Asian Women's Shelter, La Casa De Las Madres, St. Vincent de Paul Riley Center). DV shelter placement is coordinated for 9 Bay Area counties, for greater geographic choice & maximized access to DV safe houses. CoC providers share only de-identified data, unless they have signed consent. SCENARIO B: DV shelter & TH providers refer to CoC Coordinated Entry (CE). The CoC ensures safety & choice for DV survivors by: emergency transfer following DV incident in CoC PSH; in VASH, the survivor retains the original voucher; CE for Single Adults allows unlimited placement refusals related to DV; RRH places families w/ DV experience outside of normal range, as needed. DV providers get detailed & time-limited signed consent before sharing client data.

1C-4. List each of the Public Housing Agencies (PHAs) within the CoC's geographic area. If there are more than 5 PHAs within the CoC's geographic area, list the 5 largest PHAs. For each PHA, provide the percentage of new admissions that were homeless at the time of admission between October 1, 2014 and March 31, 2015, and indicate whether the PHA has a homeless admissions preference in its Public Housing and/or Housing Choice Voucher (HCV) program. (Full credit consideration may be given for the relevant excerpt from the PHA's administrative planning document(s) clearly showing the PHA's homeless preference, e.g. Administration Plan, Admissions and Continued Occupancy Policy (ACOP), Annual Plan, or 5-Year Plan, as appropriate).

Public Housing Agency Name	% New Admissions into Public Housing and Housing Choice Voucher Program from 10/1/14 to 3/31/15 who were homeless at entry	PHA has General or Limited Homeless Preference
Housing Authority of the City and County of San Francisco	59.79%	Yes-Both

If you select "Yes--Public Housing," "Yes--HCV," or "Yes--Both" for "PHA has general or limited homeless preference," you must attach documentation of the preference from the PHA in order to receive credit.

1C-5. Other than CoC, ESG, Housing Choice Voucher Programs and Public Housing, describe other subsidized or low-income housing opportunities that exist within the CoC that target persons experiencing homelessness.
(limit 1000 characters)

SF GENERAL FUNDS: General Funds subsidize 4,576 PSH units. SF's Human Services Agency, the Collaborative Applicant (CA) identifies homeless frequent users of multiple systems & highly vulnerable homeless persons for PSH.
LOCAL OPERATING SUBSIDY PROGRAM: General Fund program providing operating subsidies for permanently affordable units w/ services attached. Tenants are CH at entry, ID'ed by the CA.
CALWORKS HOUSING SUPPORT PROGRAM: SF received $2.1 million in rental subsidies for homeless families on CalWORKS & leveraged its RRH system to house >100 families since 9/2014.
PHILANTHROPY: In 5/2015, SF opened a pilot Navigation Center (low-barrier ES) w/ a $3 million gift, $1 million to fund 500 SRO units for homeless adults.
CITY'S INCLUSIONARY HOUSING BELOW-MARKET RATE: 17,983 units of affordable housing for moderate & low-income. The Housing Counsel Program targets & reduces barriers for homeless. An online access point is being developed, to connect w/ SF's Single Adult Coordinated Entry.

1C-6. Select the specific strategies implemented by the CoC to ensure that homelessness is not criminalized in the CoC's geographic area. Select all that apply. For "Other," you must provide a description (2000 character limit)

Engaged/educated local policymakers:	X
Engaged/educated law enforcement:	X
Implemented communitywide plans:	
No strategies have been implemented:	
Cohosted CoC Policy and Legislative Committee meetings with SF Police Department, USICH, and local advocates for community discussion of strategies for decriminalization of homelessness in SF. The Policy and Legislative Committee developed recommendations to the LHCB around decriminalization.	X

1D. Continuum of Care (CoC) Discharge Planning

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

1D-1. Select the systems of care within the CoC's geographic area for which there is a discharge policy in place that is mandated by the State, the CoC, or another entity for the following institutions? Check all that apply.

Foster Care:	X
Health Care:	X
Mental Health Care:	X
Correctional Facilities	X
None:	

1D-2. Select the systems of care within the CoC's geographic area with which the CoC actively coordinates to ensure that institutionalized persons that have resided in each system of care for longer than 90 days are not discharged into homelessness. Check all that apply.

Foster Care:	X
Health Care:	X
Mental Health Care:	X
Correctional Facilities:	X
None:	

**1D-2a. If the applicant did not check all boxes in 1D-2, explain why there is no coordination with the institution(s) and explain how the CoC plans to coordinate with the institution(s) to ensure persons discharged are not discharged into homelessness.
(limit 1000 characters)**

1E. Centralized or Coordinated Assessment (Coordinated Entry)

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

CoCs are required by the CoC Program interim rule to establish a Centralized or Coordinated Assessment system – also referred to as Coordinated Entry. Based on the recent Coordinated Entry Policy Brief, HUD's primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that it be easily accessible regardless of where or how people present for assistance. Most communities lack the resources needed to meet all of the needs of people experiencing homelessness. This combined with the lack of a well-developed coordinated entry processes can result in severe hardships for persons experiencing homelessness who often face long wait times to receive assistance or are screened out of needed assistance. Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. Coordinated entry processes also provide information about service needs and gaps to help communities plan their assistance and identify needed resources.

1E-1. Explain how the CoC's coordinated entry process is designed to identify, engage, and assist homeless individuals and families that will ensure those who request or need assistance are connected to proper housing and services.
(limit 1000 characters)

SF Coordinated Entry (CE) for Single Adults was publicized through a year-long public information campaign & takes online referrals w/ a no-wrong-door, low-barrier approach to facilitate a high referral volume. The CE team engages existing outreach & public services to advertise & refer to CE: SF Homeless Outreach Team (daily outreach, multi-lingual & clinical staff); the Navigation Center (encampments); SFPD Homeless Outreach; VA outreach; 211 & 311 hotlines; drop-in centers & ES; libraries. The 25 Cities Team continues to build a by-name registry of homeless vets for prioritization & referral. CE case managers assess & prioritize referrals by length of time homeless (& vulnerability for vets); ID housing based on need & target population; & assist w/ every step of the housing application. Compass Connecting Point (CCP) is SF's long-standing low-barrier phone & drop-in family CE system. Families are assessed for housing & services needs, & entered in a database for ES & PH diversion.

1E-2. CoC Program and ESG Program funded projects are required to participate in the coordinated entry process, but there are many other organizations and individuals who may participate but are not required to do so. From the following list, for each type of organization or individual, select all of the applicable checkboxes that indicate how that organization or individual participates in the CoC's coordinated entry process. If the organization or person does not exist in the CoC's geographic area, select "Not Applicable." If there are other organizations or persons that participate not on this list, enter the information, click "Save" at the bottom of the screen, and then select the applicable checkboxes.

Organization/Person Categories	Participates in Ongoing Planning and Evaluation	Makes Referrals to the Coordinated Entry Process	Receives Referrals from the Coordinated Entry Process	Operates Access Point for Coordinated Entry Process	Participates in Case Conferencing	Not Applicable
Local Government Staff/Officials	X	X	X	X	X	
CDBG/HOME/Entitlement Jurisdiction	X	X	X	X	X	
Law Enforcement	X			X		
Local Jail(s)	X	X		X		
Hospital(s)	X	X		X		
EMT/Crisis Response Team(s)	X	X				
Mental Health Service Organizations	X	X	X	X	X	
Substance Abuse Service Organizations	X	X	X	X	X	
Affordable Housing Developer(s)	X	X	X	X		
Public Housing Authorities	X	X	X	X	X	
Non-CoC Funded Youth Homeless Organizations	X	X	X	X	X	
School Administrators/Homeless Liaisons	X	X		X		
Non-CoC Funded Victim Service Organizations	X	X	X	X		
Street Outreach Team(s)	X	X		X	X	
Homeless or Formerly Homeless Persons	X	X	X	X	X	

CoC and non-CoC Homeless Service Providers (including Youth)	X	X	X	X	X	
Agencies that serve survivors of human trafficking	X	X		X	X	
Youth Advocates	X	X		X	X	

1F. Continuum of Care (CoC) Project Review, Ranking, and Selection

Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

1F-1. For all renewal project applications submitted in the FY 2015 CoC Program Competition complete the chart below regarding the CoC's review of the Annual Performance Report(s).

How many renewal project applications were submitted in the FY 2015 CoC Program Competition?	60

How many of the renewal project applications are first time renewals for which the first operating year has not expired yet?	8

How many renewal project application APRs were reviewed by the CoC as part of the local CoC competition project review, ranking, and selection process for the FY 2015 CoC Program Competition?	52

Percentage of APRs submitted by renewing projects within the CoC that were reviewed by the CoC in the 2015 CoC Competition?	100.00%

1F-2. In the sections below, check the appropriate box(s) for each section to indicate how project applications were reviewed and ranked for the FY 2015 CoC Program Competition. (Written documentation of the CoC's publicly announced Rating and Review procedure must be attached.)

Type of Project or Program (PH, TH, HMIS, SSO, RRH, etc.)	X

Performance outcomes from APR reports/HMIS	
Length of stay	X
% permanent housing exit destinations	X
% increases in income	X
Increase in employment income, non cash mainstream benefits, eviction rate, returns to homelessness, time to access permanent housing (RRH), occupancy rates	X

Monitoring criteria	
Participant Eligibility	X
Utilization rates	X
Drawdown rates	X
Frequency or Amount of Funds Recaptured by HUD	X
Match, client feedback, self evaluation, HUD/City/financial audit findings, CoC participation, data quality, equal access regardless of gender identity/sexual orientation	X

Need for specialized population services	
Youth	
Victims of Domestic Violence	
Families with Children	
Persons Experiencing Chronic Homelessness	X
Veterans	
LGBTQ	X

None	

1F-2a. Describe how the CoC considered the severity of needs and vulnerabilities of participants that are, or will be, served by the project applications when determining project application priority.
(limit 1000 characters)

The CoC's scoring tool for renewal projects allocates 3 points for how projects include and serve participants w/ the highest needs and vulnerability. The scoring tool assigns 5 points for PSH projects (which serve exclusively disabled participants), and 1 point for PSH projects serving 100% CH participants. The Priority Panel (neutral body that evaluates & ranks projects) scores projects based on a narrative submitted by the project describing the population served & other factors that impact program outcomes (e.g. from 2015: participants fleeing sex trafficking, justice system involvement, youth w/ experience in the foster system). The Priority Panel receives a written Evaluation Report for each project, which includes information on the population served during the evaluation period, including: mental, behavioral, & physical health conditions; domestic violence experience, veteran status, senior status, income at entry, and the project's description of their target population.

1F-3. Describe how the CoC made the local competition review, ranking, and selection criteria publicly available, and identify the public medium(s) used and the date(s) of posting. In addition, describe how the CoC made this information available to all stakeholders. (Evidence of the public posting must be attached)
(limit 750 characters)

The CoC has had a robust scoring system since 2005, & it is refined annually to reflect local priorities & initiatives. The CoC developed its 2015 ranking/selection process at public Funding Cmte mtgs on 11/6/15 & 4/23/15; the Local Homeless Coordinating Board (LHCB, CoC Board) adopted it at a public meeting on 5/4/15. Materials were posted on the LHCB website. The CoC held a Bidders Conference on 9/28/15, to train potential applicants in the application/ranking/selection process. Materials, including review, ranking, & selection criteria, were posted on the LHCB's website on 9/28/15 & distributed via the CoC's 600-person email list. All mtgs are publicly noticed (posted at library, etc), open to the public, & announced via the email list.

1F-4. On what date did the CoC and Collaborative Applicant publicly post all parts of the FY 2015 CoC Consolidated Application that included the final project application ranking? (Written documentation of the public posting, with the date of the posting clearly visible, must be attached. In addition, evidence of communicating decisions to the CoC's full membership must be attached.)   11/17/2015

1F-5. Did the CoC use the reallocation process in the FY 2015 CoC Program Competition to reduce or reject projects for the creation of new projects? (If the CoC utilized the reallocation process, evidence of the public posting of the reallocation process must be attached.)   Yes

1F-5a. If the CoC rejected project   11/05/2015
application(s) on what date did the CoC and
Collaborative Applicant notify those project
applicants their project application was
rejected in the local CoC competition
process? (If project applications were
rejected, a copy of the written notification to
each project applicant must be attached.)

1F-6. Is the Annual Renewal Demand (ARD) in   Yes
the CoC's FY 2015 CoC Priority Listing equal
to or less than the ARD on the final HUD-
approved FY 2015 GIW?

1G. Continuum of Care (CoC) Addressing Project Capacity

Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

1G-1. Describe how the CoC monitors the performance of CoC Program recipients.
(limit 1000 characters)

SF Human Services Agency, the Collaborative Applicant (CA) & direct grantee for 80% of renewal grants, oversees APR submission for subrecipients. The CA regularly monitors participant eligibility. All CoC projects must comply w/ SF's CoC Desk Guide, & the CA provided 5 trainings on the Desk Guide in 2015. The CA reviews the Coordinated Entry database regularly for time-to-placement/rate of refused referrals by each CoC PSH project. The CoC monitors projects through rigorous annual evaluations of performance on local & national measures, administrative efficiency, & compliance. The CA collects APRs, audits, HUD monitoring findings, & a local questionnaire. Project data is compiled in written reports, reviewed by projects & the CA, inlcuding: pop. served, housing stability, time to housing placement (RRH), length of participation, exit dest., change in income, mainstream resources, monitoring findings, CoC fund deobligation, draw downs, grant expenditure, utilization, HMIS Data Quality.

1G-2. Did the Collaborative Applicant review and confirm that all project applicants attached accurately completed and current dated form HUD 50070 and form HUD-2880 to the Project Applicant Profile in e-snaps?   Yes

1G-3. Did the Collaborative Applicant include accurately completed and appropriately signed form HUD-2991(s) for all project applications submitted on the CoC Priority Listing?   Yes

2A. Homeless Management Information System (HMIS) Implementation

Intructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

2A-1. Does the CoC have a governance charter that outlines the roles and responsibilities of the CoC and the HMIS Lead, either within the charter itself or by reference to a separate document like an MOU? In all cases, the CoC's governance charter must be attached to receive credit. In addition, if applicable, any separate document, like an MOU, must also be attached to receive credit.   Yes

2A-1a. Include the page number where the roles and responsibilities of the CoC and HMIS Lead can be found in the attached document referenced in 2A-1. In addition, in the textbox indicate if the page number applies to the CoC's attached governance charter or the attached MOU.   GC 40-46

2A-2. Does the CoC have a HMIS Policies and Procedures Manual? If yes, in order to receive credit the HMIS Policies and Procedures Manual must be attached to the CoC Application.   Yes

2A-3. Are there agreements in place that outline roles and responsibilities between the HMIS Lead and the Contributing HMIS Organizations (CHOs)?   Yes

2A-4. What is the name of the HMIS software   Efforts to Outcomes
used by the CoC (e.g., ABC Software)?
Applicant will enter the HMIS software name
(e.g., ABC Software).

2A-5. What is the name of the HMIS software   Social Solutions
vendor (e.g., ABC Systems)?
Applicant will enter the name of the vendor
(e.g., ABC Systems).

2B. Homeless Management Information System (HMIS) Funding Sources

Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

2B-1. Select the HMIS implementation coverage area: Single CoC

* 2B-2. In the charts below, enter the amount of funding from each funding source that contributes to the total HMIS budget for the CoC.

2B-2.1 Funding Type: Federal - HUD

Funding Source	Funding
CoC	$110,712
ESG	$10,000
CDBG	$0
HOME	$0
HOPWA	$0
Federal - HUD - Total Amount	$120,712

2B-2.2 Funding Type: Other Federal

Funding Source	Funding
Department of Education	$0
Department of Health and Human Services	$0
Department of Labor	$0
Department of Agriculture	$0
Department of Veterans Affairs	$0
Other Federal	$0
Other Federal - Total Amount	$0

2B-2.3 Funding Type: State and Local

Funding Source	Funding
City	$69,288
County	$0
State	$0
State and Local - Total Amount	$69,288

2B-2.4 Funding Type: Private

Funding Source	Funding
Individual	$0
Organization	$0
Private - Total Amount	$0

2B-2.5 Funding Type: Other

Funding Source	Funding
Participation Fees	$180,000
Other - Total Amount	$180,000

2B-2.6 Total Budget for Operating Year	$370,000

2C. Homeless Management Information System (HMIS) Bed Coverage

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

2C-1. Enter the date the CoC submitted the 2015 HIC data in HDX, (mm/dd/yyyy): 05/14/2015

2C-2. Per the 2015 Housing Inventory Count (HIC) indicate the number of beds in the 2015 HIC and in HMIS for each project type within the CoC. If a particular housing type does not exist in the CoC then enter "0" for all cells in that housing type.

Project Type	Total Beds in 2015 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter beds	2,018	77	1,471	75.79%
Safe Haven (SH) beds	19	0	0	0.00%
Transitional Housing (TH) beds	465	46	338	80.67%
Rapid Re-Housing (RRH) beds	889	0	323	36.33%
Permanent Supportive Housing (PSH) beds	7,051	0	6,069	86.07%
Other Permanent Housing (OPH) beds	0	0	0	

2C-2a. If the bed coverage rate for any housing type is 85% or below, describe how the CoC plans to increase this percentage over the next 12 months.
(limit 1000 characters)

The Local Homeless Coordinating Board (LHCB), the CoC Board; SF Human Services Agency, the Collaborative Applicant (CA); and the HMIS Lead are currently researching best practices in HMIS bed coverage rate expansion. RRH: The rate of HMIS participation by RRH providers has already increased, and the CoC anticipates higher HMIS participation by RRH providers in the 2016 HIC. PLAN FOR NEXT 12 MONTHS: TH, SH, & ES: The CA and HMIS Lead will conduct targeted outreach to ES, SH, and TH projects not participating in HMIS. In response to feedback at quarterly HMIS Committee meetings, the LHCB and HMIS Lead are planning an expansion to SF's HMIS staffing pattern and exploring a more robust HMIS solution. Additional staffing and a more user-friendly HMIS with robust reporting capabilities will incentivize HMIS participation, particularly by projects not required to participate. These improvements will enable more targeted outreach to ES, SH, and TH.

2C-3. HUD understands that certain projects are either not required to or discouraged from participating in HMIS, and CoCs cannot require this if they are not funded through the CoC or ESG programs. This does NOT include domestic violence providers that are prohibited from entering client data in HMIS. If any of the project types listed in question 2C-2 above has a coverage rate of 85% or below, and some or all of these rates can be attributed to beds covered by one of the following programs types, please indicate that here by selecting all that apply from the list below. (limit 1000 characters)

VA Domiciliary (VA DOM):	X
VA Grant per diem (VA GPD):	
Faith-Based projects/Rescue mission:	X
Youth focused projects:	
HOPWA projects:	
Not Applicable:	

2C-4. How often does the CoC review or assess its HMIS bed coverage? Quarterly

2D. Homeless Management Information System (HMIS) Data Quality

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

2D-1. Indicate the percentage of unduplicated client records with null or missing values and the percentage of "Client Doesn't Know" or "Client Refused" during the time period of October 1, 2013 through September 30, 2014.

Universal Data Element	Percentage Null or Missing	Percentage Client Doesn't Know or Refused
3.1 Name	0%	0%
3.2 Social Security Number	3%	5%
3.3 Date of birth	1%	0%
3.4 Race	5%	1%
3.5 Ethnicity	1%	1%
3.6 Gender	4%	0%
3.7 Veteran status	3%	4%
3.8 Disabling condition	2%	1%
3.9 Residence prior to project entry	0%	0%
3.10 Project Entry Date	0%	0%
3.11 Project Exit Date	0%	0%
3.12 Destination	10%	3%
3.15 Relationship to Head of Household	5%	0%
3.16 Client Location	2%	0%
3.17 Length of time on street, in an emergency shelter, or safe haven	4%	1%

2D-2. Identify which of the following reports your HMIS generates. Select all that apply:

CoC Annual Performance Report (APR):	X
ESG Consolidated Annual Performance and Evaluation Report (CAPER):	X
Annual Homeless Assessment Report (AHAR) table shells:	X

HIC, PIT, CoC Application	X
None	☐

2D-3. If you submitted the 2015 AHAR, how many AHAR tables (i.e., ES-ind, ES-family, etc) were accepted and used in the last AHAR?   12

2D-4. How frequently does the CoC review data quality in the HMIS?   Quarterly

2D-5. Select from the dropdown to indicate if standardized HMIS data quality reports are generated to review data quality at the CoC level, project level, or both?   Both Project and CoC

2D-6. From the following list of federal partner programs, select the ones that are currently using the CoC's HMIS.

VA Supportive Services for Veteran Families (SSVF):	X
VA Grant and Per Diem (GPD):	X
Runaway and Homeless Youth (RHY):	X
Projects for Assistance in Transition from Homelessness (PATH):	☐
Emergency Solutions Grant	X
None:	☐

2D-6a. If any of the federal partner programs listed in 2D-6 are not currently entering data in the CoC's HMIS and intend to begin entering data in the next 12 months, indicate the federal partner program and the anticipated start date.
(limit 750 characters)

The CoC is currently working with PATH providers to integrate them into HMIS. The HMIS Lead will continue outreach to develop an MOU, and begin HMIS system administrator and end user trainings in 2015/16. Project and reporting set-up will begin in early 2016. PATH providers will begin fully participating in HMIS during by 12/2016. The HMIS lead anticipates a smooth transition for PATH providers, based on lessons learned with other federal partners. All SSVF, VA GPD, RHY, and ESG projects are fully participating in HMIS. The HMIS Lead on-boarded 25 new federal partner projects (17 ESG, 2 RHY, 6 SSVF) in 2014/15, including outreach, drafting MOUs for new partnerships, training for administrators and end users, and system set-up.

2E. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

The data collected during the PIT count is vital for both CoCs and HUD. Communities need accurate data to determine the size and scope of homelessness at the local level so they can best plan for services and programs that will appropriately address local needs and measure progress in addressing homelessness. HUD needs accurate data to understand the extent and nature of homelessness throughout the country, and to provide Congress and the Office of Management and Budget (OMB) with information regarding services provided, gaps in service, and performance. This information helps inform Congress' funding decisions, and it is vital that the data reported is accurate and of high quality.

2E-1. Did the CoC approve the final sheltered PIT count methodology for the 2015 sheltered PIT count?   Yes

2E-2. Indicate the date of the most recent sheltered PIT count (mm/dd/yyyy):   01/29/2015

2E-2a. If the CoC conducted the sheltered PIT count outside of the last 10 days of January 2015, was an exception granted by HUD?   Not Applicable

2E-3. Enter the date the CoC submitted the sheltered PIT count data in HDX, (mm/dd/yyyy):   04/29/2015

2F. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count: Methods

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

2F-1. Indicate the method(s) used to count sheltered homeless persons during the 2015 PIT count:

Complete Census Count:	X
Random sample and extrapolation:	X
Non-random sample and extrapolation:	

2F-2. Indicate the methods used to gather and calculate subpopulation data for sheltered homeless persons:

HMIS:	X
HMIS plus extrapolation:	
Interview of sheltered persons:	X
Sample of PIT interviews plus extrapolation:	X

2F-3. Provide a brief description of your CoC's sheltered PIT count methodology and describe why your CoC selected its sheltered PIT count methodology.
(limit 1000 characters)

HMIS: HMIS was the primary data source for the 2013 sheltered PIT. Shelter & transitional programs enter data into HMIS about their clients. In addition to other HMIS data quality processes, before inclusion in the PIT, LHCB staff verified data via detailed provider surveys to confirm HMIS accuracy. Any data quality issues surfaced in the survey were corrected in HMIS prior to submission.
SURVEY PROVIDERS: In some cases, providers (i.e. victim service providers, seasonal providers) do not enter data into HMIS. These programs provided information only via detailed provider survey. To ensure accuracy, LHCB staff provided written instructions, training, examples, and extensive assistance, & followed up to secure any missing information.

This method was selected to ensure high quality and integrate HMIS.

2F-4. Describe any change in methodology from your sheltered PIT count in 2014 to 2015, including any change in sampling or extrapolation method, if applicable. Do not include information on changes to the implementation of your sheltered PIT count methodology (e.g., enhanced training and change in partners participating in the PIT count).
(limit 1000 characters)

In 2015 more community outreach was conducted to gather more comprehensive information from shelter providers, and more providers were responsive, including the San Francisco Homeless Outreach team that do not currently use HMIS as their primary data system.

2F-5. Did your CoC change its provider   No
coverage in the 2015 sheltered count?

2F-5a. If "Yes" in 2F-5, then describe the change in provider coverage in the 2015 sheltered count.
(limit 750 characters)

2G. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count: Data Quality

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

2G-1. Indicate the methods used to ensure the quality of the data collected during the sheltered PIT count:

Training:	X
Provider follow-up:	X
HMIS:	X
Non-HMIS de-duplication techniques:	X

2G-2. Describe any change to the way your CoC implemented its sheltered PIT count from 2014 to 2015 that would change data quality, including changes to training volunteers and inclusion of any partner agencies in the sheltered PIT count planning and implementation, if applicable. Do not include information on changes to actual sheltered PIT count methodology (e.g., change in sampling or extrapolation method). (limit 1000 characters)

While the method did not change, we were able to gather data from some emergency voucher programs. This increase in data available meant that more people were included in the sheltered count.

2H. Continuum of Care (CoC) Unsheltered Point-in-Time (PIT) Count

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

The unsheltered PIT count assists communities and HUD to understand the characteristics and number of people with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground. CoCs are required to conduct an unsheltered PIT count every 2 years (biennially) during the last 10 days in January; however, CoCs are strongly encouraged to conduct the unsheltered PIT count annually, at the same time that it does the annual sheltered PIT count. The last official PIT count required by HUD was in January 2015.

2H-1. Did the CoC approve the final unsheltered PIT count methodology for the most recent unsheltered PIT count?   Yes

2H-2. Indicate the date of the most recent unsheltered PIT count (mm/dd/yyyy):   01/29/2015

2H-2a. If the CoC conducted the unsheltered PIT count outside of the last 10 days of January 2015, was an exception granted by HUD?   Not Applicable

2H-3. Enter the date the CoC submitted the unsheltered PIT count data in HDX (mm/dd/yyyy):   05/15/2015

2I. Continuum of Care (CoC) Unsheltered Point-in-Time (PIT) Count: Methods

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

2I-1. Indicate the methods used to count unsheltered homeless persons during the 2015 PIT count:

Night of the count - complete census:	X
Night of the count - known locations:	
Night of the count - random sample:	
Service-based count:	
HMIS:	X

2I-2. Provide a brief description of your CoC's unsheltered PIT count methodology and describe why your CoC selected its unsheltered PIT count methodology.
(limit 1000 characters)

100% of the geographic area was counted at a single point in time (evening). volunteers, law enforcement and outreach workers conducted the count activities after a training on the count methods. Counters were responsible for covering 100% of their assigned route and for reporting on the family configuration, basic age (child under 18, youth 18-24, or adult over 25) of each person they identified in a place not meant for human habitation. The size and shape of the routes was based on HMIS data about where homeless people tend to spend their evenings. In order to maximize deduplication, the unique youth count was also conducted in the evening and the unsheltered count was conducted after the check in time at local shelters to ensure that sheltered people were not counted twice.

The blitz count method was selected by the CoC to maintain consistency in the count methods, and ensure that 100% of the geographic area was counted in a single day.

2I-3. Describe any change in methodology from your unsheltered PIT count in 2014 (or 2013 if an unsheltered count was not conducted in 2014) to 2015, including any change in sampling or extrapolation method, if applicable. Do not include information on changes to implementation of your sheltered PIT count methodology (e.g., enhanced training and change in partners participating in the count).
(limit 1000 characters)

In 2013, the unique youth count was conducted in the afternoon, and was conducted in a more limited area. In order to expand the breadth of the unique youth count, the count area was expanded and the time was moved to evening in 2015.

San Francisco maintained a long term commitment to a survey. This year the survey was conducted with over 1000 currently homeless people.

2I-4. Does your CoC plan on conducting   No
an unsheltered PIT count in 2016?

(If "Yes" is selected, HUD expects the CoC to conduct an unsheltered PIT count in 2016. See the FY 2015 CoC Program NOFA, Section VII.A.4.d. for full information.)

2J. Continuum of Care (CoC) Unsheltered Point-in-Time (PIT) Count: Data Quality

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

2J-1. Indicate the steps taken by the CoC to ensure the quality of the data collected for the 2015 unsheltered population PIT count:

Training:	X
"Blitz" count:	X
Unique identifier:	
Survey question:	X
Enumerator observation:	X
None:	

2J-2. Describe any change to the way the CoC implemented the unsheltered PIT count from 2014 (or 2013 if an unsheltered count was not conducted in 2014) to 2015 that would affect data quality. This includes changes to training volunteers and inclusion of any partner agencies in the unsheltered PIT count planning and implementation, if applicable. Do not include information on changes to actual methodology (e.g., change in sampling or extrapolation method).
(limit 1000 characters)

the 2015 PIT Count included a more robust participation of partner agencies including the VA and the White House. The participation of these partners increased the number of counters which ensured that count areas were counted quickly by slightly larger teams.

3A. Continuum of Care (CoC) System Performance

Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

3A-1. Performance Measure: Number of Persons Homeless - Point-in-Time Count.

* 3A-1a. Change in PIT Counts of Sheltered and Unsheltered Homeless Persons

Using the table below, indicate the number of persons who were homeless at a Point-in-Time (PIT) based on the 2014 and 2015 PIT counts as recorded in the Homelessness Data Exchange (HDX).

	2014 PIT (for unsheltered count, most recent year conducted)	2015 PIT	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	6,408	6,775	367
Emergency Shelter Total	1,522	1,981	459
Safe Haven Total	54	16	-38
Transitional Housing Total	517	420	-97
Total Sheltered Count	2,093	2,417	324
Total Unsheltered Count	4,315	4,358	43

3A-1b. Number of Sheltered Persons Homeless - HMIS.

Using HMIS data, CoCs must use the table below to indicate the number of homeless persons who were served in a sheltered environment between October 1, 2013 and September 30, 2014.

	Between October 1, 2013 and September 30, 2014
Universe: Unduplicated Total sheltered homeless persons	4,822
Emergency Shelter Total	4,077
Safe Haven Total	0
Transitional Housing Total	745

3A-2. Performance Measure: First Time Homeless.

Describe the CoC's efforts to reduce the number of individuals and families who become homeless for the first time. Specifically, describe what the CoC is doing to identify risk factors for becoming homeless for the first time.
(limit 1000 characters)

ID'ING RISK FACTORS: In 2013, SF's Homeless Prevention Working Group (providers w/ input from the CoC Board) released a report with research-based risk factors for homelessness. SF homeless prevention (HP) providers continually refine targeting criteria based on the Working Group report, research, & experience. Risk factors include: financial instability; paying >70% of income in rent; families living doubled up or in SRO. STEPS TO REDUCE: SF's extensive HP system includes: Approx. $4,067,000 in City funds; 4 ESG HP grants; & private funding. HP offers financial support, case management, legal assistance, & landlord/tenant mediation/advocacy. HP is prioritized for the most financially vulnerable, w/ targeted outreach to those with income at or under 15% AMI. Compass Connecting Point, family CE, refers to HP. Hamilton Family Center (CoC-funded family provider) partners with the SF Unified School District to identify at-risk families & refer for HP case management.

3A-3. Performance Measure: Length of Time Homeless.

Describe the CoC's efforts to reduce the length of time individuals and families remain homeless. Specifically, describe how your CoC has reduced the average length of time homeless, including how the CoC identifies and houses individuals and families with the longest lengths of time homeless.
(limit 1000 characters)

TRACKING: The CoC tracks length of time homeless (LOTH) in HMIS and Coordinated Entry (CE) for Single Adults. CoC & ESG participants are assessed at entry re LOTH, & length of time in homeless services. Referrals to CE for single adults include a provider certification of LOTH, based on the provider's knowledge of the client & shelter/other records, verified by CE team. STRATEGIES TO REDUCE: CE prioritizes adults for PH based on LOTH, currently placing single adults with 13+ years of homelessness. CE walks participants through the housing application process to place long-term CH adults in PSH. The avg. time between housing application & move-in is 7 business days. In 2015, Hamilton Family Center (CoC-funded) developed a training & referral partnership w/ the SF Unified School District, reducing the time families experience homelessness before engaging in services. Each year, Compass Connecting Point (CE for families) diverts approx. 250 families from the ES waitlist directly to PH.

* 3A-4. Performance Measure: Successful Permanent Housing Placement
or Retention.

In the next two questions, CoCs must indicate the success of its projects
in placing persons from its projects into permanent housing.

3A-4a. Exits to Permanent Housing Destinations:

In the chart below, CoCs must indicate the number of persons in CoC funded supportive
services only (SSO), transitional housing (TH), and rapid re-housing (RRH) project types who
exited into permanent housing destinations between October 1, 2013 and September 30, 2014.

	Between October 1, 2013 and September 30, 2014
Universe: Persons in SSO, TH and PH-RRH who exited	235
Of the persons in the Universe above, how many of those exited to permanent destinations?	132
% Successful Exits	56.17%

3A-4b. Exit To or Retention Of Permanent Housing:

In the chart below, CoCs must indicate the number of persons who exited from any CoC funded
permanent housing project, except rapid re-housing projects, to permanent housing destinations
or retained their permanent housing between October 1, 2013 and September 31, 2014.

	Between October 1, 2013 and September 30, 2014
Universe: Persons in all PH projects except PH-RRH	2,124
Of the persons in the Universe above, indicate how many of those remained in applicable PH projects and how many of those exited to permanent destinations?	2,040
% Successful Retentions/Exits	96.05%

3A-5. Performance Measure: Returns to Homelessness:

Describe the CoC's efforts to reduce the rate of individuals and families
who return to homelessness. Specifically, describe at least three
strategies your CoC has implemented to identify and minimize returns to
homelessness, and demonstrate the use of HMIS or a comparable
database to monitor and record returns to homelessness.
(limit 1000 characters)

1)In 2013, the CoC adopted performance measures to track system performance re returns to homelessness: % participants (remaining in or) exiting to PH (ALL); % leavers not exiting to PH/death/institution (PSH); % households evicted (PSH); reentry in HMIS w/in 12 mo. of exit (RRH,TH). The CoC reviews quarterly CoC performance reports and annual project evaluations, using data from HMIS-generated APRs and project databases. 2)The CoC's Legal Services project & ESG & City-funded homelessness prevention provide eviction defense & benefits advocacy city-wide. 3)The CoC ensures that PSH providers access training & tools to implement housing first best practices: in FY 2013/14, 96.05% of participants in CoC PSH projects maintained housing or exited to PH. 4)In 2014, the CoC & ETO (HMIS provider) developed a custom report on reoccurrences of exited clients in HMIS. 5)Compass Connecting Point (family Coordinated Entry) targets returners to intensive supports and/or referral to family PSH.

3A-6. Performance Measure: Job and Income Growth.

Describe specific strategies implemented by CoC Program-funded projects to increase the rate by which homeless individuals and families increase income from employment and non-employment sources (include at least one specific strategy for employment income and one for non-employment related income, and name the organization responsible for carrying out each strategy).
(limit 1000 characters)

EMPLOYMENT: 14/15: 1) ECS, Homeless Employment Collaborative (HEC) member agencies, & MHH leveraged employer networks & City Community Benefits Agmt to secure client jobs in new development 2)ECS & HEC members meet quarterly with Office of Economic & Workforce Devt (OEWD) & industry reps to review projected areas of growth. 3)CoC providers shared outcomes data & successfully advocated to shift City's employment services focus toward foundational skills (see: Con Plan). 4) ECS, HEC, MHH, & Larkin (LSYS) offer job placement, training & certification (hospitality/food/building trades/truck driving/ barber/tech/health care)
NON-EMPLOYMENT: All CoC-funded projects screen participants for benefits eligibility, & family providers (HFC/Compass) implemented 1 application for TANF & GA. Screening & streamlined apps ensure clients access all eligible benefits. LHCB adopted SOAR; implemented by Swords, CHP, Glide, & LSYS. (Every agency in this response but OEWD is CoC-funded)

3A-6a. Describe how the CoC is working with mainstream employment organizations to aid homeless individuals and families in increasing their income.
(limit 1000 characters)

SF OFFICE OF ECONOMIC & WORKFORCE DEVELOPMENT: OEWD funds homeless-targeted services (assessment, job search, work experience, training, education) through grants to CoC-funded agencies; hosts quarterly industry-sector mtgs w/ industry representatives & providers (including CoC providers); & facilitates partnerships between CoC providers & employers. Approx. 90% of CoC PH & TH projects for adults provide/refer to OEWD services. CA EMPLOYMENT DEVELOPMENT DEPARTMENT: EDD funds employment services for low-income households & targets homeless persons through partnership w/ & grants to CoC agencies. Approx. 90% of CoC projects for adults connect participants to EDD services. CALWORKS (TANF): State CalWORKS offers employment services for families. 100% of CoC projects serving families w/children connect clients to CalWORKS. SF COUNTY PERSONAL ASSISTED EMPLOYMENT SERVICES: PAES offers employment services for very low-income SF residents. 45% of CoC projects for adults connect clients to PAES.

3A-7. Performance Measure: Thoroughness of Outreach.

How does the CoC ensure that all people living unsheltered in the CoC's geographic area are known to and engaged by providers and outreach teams?
(limit 1000 characters)

OUTREACH ORGS: Homeless Outreach Team (daily, citywide, multilingual & clinical staff); 211 & 311 hotlines; Neighborhood Community Ambassadors (peer outreach); SF Police Department Homeless Outreach; SF Unified School District; Navigation Ctr (encampments); & VA Outreach Team. ID&TRACK: The Coordinated Entry (CE) for Single Adults database tracks/de-duplicates online referrals from all outreach & providers. CE uses SF Department of Public Health Coordinated Care Mgmt System to ID homeless frequent users of multiple systems. Compass Connecting Point (CCP), family CE database, tracks referrals for family providers. COORD&STRATEGIES: CE for single adult prioritization by length of homelessness increased PSH entry for unsheltered CH adults & vets. The Navigation Ctr offers housing & benefits case mgmt, & placed over 60 adults in PSH in 5/15-11/15. CoC providers work w/ SFUSD to ID homeless families, provide case mgmt & referrals. CCP diverts 250 families/yr from the ES waitlist to PH.

3A-7a. Did the CoC exclude geographic areas   No
from the 2015 unsheltered PIT count where the CoC determined that there were no unsheltered homeless people, including areas that are uninhabitable (e.g., deserts)?

3A-7b. What was the the criteria and decision-making process the CoC used to identify and exclude specific geographic areas from the CoC's unsheltered PIT count?
(limit 1000 characters)

N/A The San Francisco PIT Count covers 100% of the geographic area.

3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 1: Ending Chronic Homelessness

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

Opening Doors, Federal Strategic Plan to Prevent and End Homelessness (as amended in 2015) establishes the national goal of ending chronic homelessness. Although the original goal was to end chronic homelessness by the end of 2015, that goal timeline has been extended to 2017. HUD is hopeful that communities that are participating in the Zero: 2016 technical assistance initiative will continue to be able to reach the goal by the end of 2016. The questions in this section focus on the strategies and resources available within a community to help meet this goal.

3B-1.1. Compare the total number of chronically homeless persons, which includes persons in families, in the CoC as reported by the CoC for the 2015 PIT count compared to 2014 (or 2013 if an unsheltered count was not conducted in 2014).

	2014 (for unsheltered count, most recent year conducted)	2015	Difference
Universe: Total PIT Count of sheltered and unsheltered chronically homeless persons	2,321	1,629	-692
Sheltered Count of chronically homeless persons	811	415	-396
Unsheltered Count of chronically homeless persons	1,510	1,214	-296

3B-1.1a. Using the "Differences" calculated in question 3B-1.1 above, explain the reason(s) for any increase, decrease, or no change in the overall TOTAL number of chronically homeless persons in the CoC, as well as the change in the unsheltered count, as reported in the PIT count in 2015 compared to 2014. To possibly receive full credit, both the overall total and unsheltered changes must be addressed.
(limit 1000 characters)

The numbers of sheltered, unsheltered, and total chronically homeless persons reported in the 2015 PIT count decreased, as compared to the preceding PIT count. Both the unsheltered and total decrease are the result of several factors: 1) In 2014, the CoC moved from planning to implementation of Coordinated Entry for Single Adults. CE prioritizes chronically homeless single adults with the longest histories of homelessness. CE placements housed 50 CH adults in 2014. 2) In 2014, 256 new PSH units serving chronically homeless individuals came online in SF, including 125 CoC-funded units, 131 locally-funded units, and 125 units for CH veterans. All new units participate in Coordinated Entry. 3) Beginning in 7/2014, SF began housing hundreds of CH vets through coordinated entry. CH vets are identified as a priority list within the CE system's by-name list of homeless and CH veterans. CH vets are prioritized by length of time homeless and vulnerability (VI-SPDAT score).

3B-1.2. From the FY 2013/FY 2014 CoC Application: Describe the CoC's two year plan (2014-2015) to increase the number of permanent supportive housing beds available for chronically homeless persons and to meet the proposed numeric goals as indicated in the table above. Response should address the specific strategies and actions the CoC will take to achieve the goal of ending chronic homelessness by the end of 2015.
(read only)

LHCB is strongly committed to ending CH, demonstrated by creation of 2,666 new PSH beds for CH since 2004 & reduction in CH from 62% in 2009 to 31% in 2013. The reduction in CH beds from 2012 to 2013 reflects a change in HIC-eligible beds rather than a change in actual beds. DPH's Direct Access to Housing beds do not use HUD criteria to screen for entry, but do serve extremely vulnerable CH people. Those beds are invisible on the HIC, and at least 300 more will open in 2014.

In 2014/15, LHCB will:
OPEN NEW UNITS:
1: Create 92 CH units through reallocation in 2013/14
2: Open 32 CH veterans units, 141 locally funded CH units, and 61 CoC-funded units.
3: Advocate for prioritization of local Prop C Funds for housing targeting CH
MAKE BETTER USE OF CURRENT UNITS:
4: Through expanding coordinated assessment, target PSH for longest term CH & locate housing for stabilized PSH tenants
5: Create incentives to encourage stable PSH tenants to move on to affordable housing.

3B-1.2a. Of the strategies listed in the FY 2013/FY 2014 CoC Application represented in 3B-1.2, which of these strategies and actions were accomplished?
(limit 1000 characters)

1)EXCEEDED: CoC added: 120 CH units through FY2013 reallocation (awarded 4/2014, lease up complete 10/2015); 8 CH units through FY2014 reallocation (awarded 2/2015, lease up in 2017). 2)DONE: A locally-funded partnership created 125 VASH units for CH vets (lease up started 12/2014). SF added 131 locally-funded CH units (lease up started 7/2014). The CoC added 170 CH units through FY2014 bonus (awarded 2/2015, lease up started 7/2015). 3)DONE: Prop C funds were included in a 2015 award for construction of 50 CH Vet units, open in 2018. 4)DONE: As of 6/2015, all CoC-funded PSH for single adults participate in Coordinated Entry (CE). CE prioritizes based on length of time homeless. CE has placed 160 CH non-Vets & 290 CH Vets since 7/2014. 1,000 PSH tenants are identified for move-up to SF Housing Authority turnover units, as of 6/2015, to be prioritized through a homeless preference. 5)DONE: Client-reported incentives to move-up in SFHA units include: neighborhood choice, larger units.

3B-1.3. Compare the total number of PSH beds (CoC Program and non-CoC Program funded) that were identified as dedicated for use by chronically homeless persons on the 2015 Housing Inventory Count, as compared to those identified on the 2014 Housing Inventory Count.

	2014	2015	Difference
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homelessness persons identified on the HIC.	3,834	3,447	-387

3B-1.3a. Explain the reason(s) for any increase, decrease or no change in the total number of PSH beds (CoC Program and non CoC Program funded) that were identified as dedicated for use by chronically homeless persons on the 2015 Housing Inventory Count compared to those identified on the 2014 Housing Inventory Count.
(limit 1000 characters)

The number of units identified on the 2015 HIC as dedicated for CH decreased, compared to 2014. The decrease is primarily due to respondents to the HIC survey providing better information about the definition of homelessness used. Because these respondent have clarified that they don't use the HUD definition of CH, they are not included as CH dedicated. However, tenants come from places not meant for human habitation or emergency shelter, are identified as high-needs, and are likely to be disabled. A significant percentage of these beds house, and will continue to house through turn-over, long-term homeless adults who meet the HUD definition of CH. A small part of the reduction is likely due to variance in VASH utilization. The CoC has included 355 new dedicated CH beds in its FY2015 Priority Listing (through reallocation and bonus). SF will add 50 new beds for CH veterans with Prop C funds, and new PSH for CH youth and seniors, all in planning stages and scheduled to open in 2018.

3B-1.4. Did the CoC adopt the orders of priority in all CoC Program-funded PSH as described in Notice CPD-14-012: Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status ?   Yes

3B-1.4a. If "Yes", attach the CoC's written standards that were updated to incorporate the order of priority in Notice CPD-14-012 and indicate the page(s) that contain the CoC's update.   3

3B-1.5. CoC Program funded Permanent Supportive Housing Project Beds prioritized for serving people experiencing chronic homelessness in FY2015 operating year.

Percentage of CoC Program funded PSH beds prioritized for chronic homelessness	FY2015 Project Application
Based on all of the renewal project applications for PSH, enter the estimated number of CoC-funded PSH beds in projects being renewed in the FY 2015 CoC Program Competition that are not designated as dedicated beds for persons experiencing chronic homelessness.	1,263
Based on all of the renewal project applications for PSH, enter the estimated number of CoC-funded PSH beds in projects being renewed in the FY 2015 CoC Program Competition that are not designated as dedicated beds for persons experiencing chronic homelessness that will be made available through turnover in the FY 2015 operating year.	57
Based on all of the renewal project applications for PSH, enter the estimated number of PSH beds made available through turnover that will be prioritized beds for persons experiencing chronic homelessness in the FY 2015 operating year.	35
This field estimates the percentage of turnover beds that will be prioritized beds for persons experiencing chronic homelessness in the FY 2015 operating year.	61.40%

3B-1.6. Is the CoC on track to meet the goal of ending chronic homelessness by 2017?   No

This question will not be scored.

3B-1.6a. If "Yes," what are the strategies implemented by the CoC to maximize current resources to meet this goal? If "No," what resources or technical assistance will be implemented by the CoC to reach the goal of ending chronically homeless by 2017?
(limit 1000 characters)

San Francisco (SF) is grateful for the moderate amount of TA provided by the Priority Community TA process. TA has been critical to creating a working Coordinated Entry (CE) system for long term homeless adults in SF. We look forward to re-engaging with the TA team after the NOFA blackout to make the system even more transparent. The CE system has identified >2,000 CH people in SF actively seeking PH. The SF CE process prioritizes the longest term homeless adults for new & turnover units, placing the longest term homeless CH persons first. SF has a clear unmet need for over 2,000 new PSH units for CH adults. While the primary need is extensive funding for new units, TA to improve HMIS & CE in SF will have a marginal impact. Previous HMIS TA was troubled by a TA provider who was neither local nor available. We prefer TA providers who are local & familiar with SF. Also, we have received negative local feedback regarding the NOFA blackout—the timing feels arbitrary & derails progress.

3B. Continuum of Care (CoC) Strategic Planning Objectives

Objective 2: Ending Homelessness Among Households with Children and Ending Youth Homelessness

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

Opening Doors outlines the goal of ending family (Households with Children) and youth homelessness by 2020. The following questions focus on the various strategies that will aid communities in meeting this goal.

3B-2.1. What factors will the CoC use to prioritize households with children during the FY2015 Operating year? (Check all that apply).

Vulnerability to victimization:	
Number of previous homeless episodes:	X
Unsheltered homelessness:	X
Criminal History:	
Bad credit or rental history (including not having been a leaseholder):	
Head of household has mental/physical disabilities:	X
N/A:	

3B-2.2. Describe the CoC's plan to rapidly rehouse every family that becomes homeless within 30 days of becoming homeless on the street or entering shelter.
(limit 1000 characters)

FY2015: 1)Begin community process to evaluate & enhance family coordinated entry (CE). 2)Add 25 new RRH units through FY2015 CoC bonus. 3)Continue to identify homeless families through: Compass Connecting Point (CCP) (family CE); Homeless Outreach Team; Homeless Education Liaison & SFUSD; Project Homeless Connect bi-monthly event w/ targeted family outreach. 5) Continue to prioritize families for RRH who are on the streets/in shelter, very low-income, & have other barriers to housing. COORD ENTRY: CCP uses a comprehensive intake assessment to link families to RRH&PSH for homeless families, & mainstream subsidies. CCP doesn't screen out families on income, subs. abuse, criminal history (except as req'ed by law), or DV. COC/ESG RRH: In addition to 4 ESG and 2 CoC grants, SF funds extensive RRH for families with approx. $3,659,000 in City funds & $21 million in CalWORKS 2014 Housing Support Program subsidies. CoC & ESG funds are prioritized for other priority populations (CH, Veterans).

3B-2.3. Compare the number of RRH units available to serve families from the 2014 and 2015 HIC.

		2014	2015	Difference
RRH units available to serve families in the HIC:		203	248	45

3B-2.4. How does the CoC ensure that emergency shelters, transitional housing, and permanent housing (PSH and RRH) providers within the CoC do not deny admission to or separate any family members from other members of their family based on age, sex, or gender when entering shelter or housing? (check all strategies that apply)

CoC policies and procedures prohibit involuntary family separation:	X
There is a method for clients to alert CoC when involuntarily separated:	X
CoC holds trainings on preventing involuntary family separation, at least once a year:	
Monitoring ensures these policies are functioning and in practice	X
None:	

3B-2.5. Compare the total number of homeless households with children in the CoC as reported by the CoC for the 2015 PIT count compared to 2014 (or 2013 if an unsheltered count was not conducted in 2014).

PIT Count of Homelessness Among Households With Children

	2014 (for unsheltered count, most recent year conducted)	2015	Difference
Universe: Total PIT Count of sheltered and unsheltered homeless households with children:	244	212	-32
Sheltered Count of homeless households with children:	233	201	-32
Unsheltered Count of homeless households with children:	11	11	0

3B-2.5a. Explain the reason(s) for any increase, decrease or no change in the total number of homeless households with children in the CoC as reported in the 2015 PIT count compared to the 2014 PIT count. (limit 1000 characters)

There was no change in the number of unsheltered households with children, and a decrease in the number of sheltered and total homeless households with children in SF. Unsheltered family homelessness is exceptionally rare in SF, because of the city's robust family outreach and ES infrastructure. In a 2-year period (1/2013-1/2015) with an estimated 37% increase in average 2-BR rent in SF, the Compass Connecting Point family CE system & continuum of services, HP, and RRH for families allowed SF to meet any growth in demand for family homelessness prevention and housing. In 2014, SF received $2.1 million in CalWORKS Housing Support Program rental subsidies, which it rapidly began spending down in 9/2014. The 32-household reduction in sheltered homeless families may also be due to differences in family composition; a family ES w/ dormitory-style beds, at capacity, accommodates more households if the household have fewer members. No changes to PIT methods.

3B-2.6. Does the CoC have strategies to address the unique needs of unaccompanied homeless youth (under age 18, and ages 18-24), including the following:

Human trafficking and other forms of exploitation?	Yes
LGBTQ youth homelessness?	Yes
Exits from foster care into homelessness?	Yes
Family reunification and community engagement?	Yes
Positive Youth Development, Trauma Informed Care, and the use of Risk and Protective Factors in assessing youth housing and service needs?	Yes
Unaccompanied minors/youth below the age of 18?	Yes

3B-2.6a. Select all strategies that the CoC uses to address homeless youth trafficking and other forms of exploitation.

Diversion from institutions and decriminalization of youth actions that stem from being trafficked:	X
Increase housing and service options for youth fleeing or attempting to flee trafficking:	X
Specific sampling methodology for enumerating and characterizing local youth trafficking:	X
Cross systems strategies to quickly identify and prevent occurrences of youth trafficking:	X
Community awareness training concerning youth trafficking:	X
N/A:	

3B-2.7. What factors will the CoC use to prioritize unaccompanied youth (under age 18, and ages 18-24) for housing and services during the FY2015 operating year? (Check all that apply)

Vulnerability to victimization:	
Length of time homeless:	
Unsheltered homelessness:	X
Lack of access to family and community support networks:	
Disability	X
Lack of income	X
N/A:	

3B-2.8. Using HMIS, compare all unaccompanied youth (under age 18, and ages 18-24) served in any HMIS contributing program who were in an unsheltered situation prior to entry in FY 2013 (October 1, 2012 - September 30, 2013) and FY 2014 (October 1, 2013 - September 30, 2014).

	FY 2013 (October 1, 2012 - September 30, 2013)	FY 2014 (October 1, 2013 - September 30, 2104)	Difference
Total number of unaccompanied youth served in HMIS contributing programs who were in an unsheltered situation prior to entry:	0	6	6

3B-2.8a. If the number of unaccompanied youth and children, and youth-headed households with children served in any HMIS contributing program who were in an unsheltered situation prior to entry in FY 2014 is lower than FY 2013, explain why.
(limit 1000 characters)

N/A

3B-2.9. Compare funding for youth homelessness in the CoC's geographic area in CY 2015 to projected funding for CY 2016.

	Calendar Year 2015	Calendar Year 2016	Difference
Overall funding for youth homelessness dedicated projects (CoC Program and non-CoC Program funded):	$19,488,766.00	$20,956,760.00	$1,467,994.00
CoC Program funding for youth homelessness dedicated projects:	$445,538.00	$445,538.00	$0.00
Non-CoC funding for youth homelessness dedicated projects (e.g. RHY or other Federal, State and Local funding):	$19,043,228.00	$20,511,222.00	$1,467,994.00

3B-2.10. To what extent have youth housing and service providers and/or State or Local educational representatives, and CoC representatives participated in each other's meetings over the past 12 months?

Cross-Participation in Meetings	# Times
CoC meetings or planning events attended by LEA or SEA representatives:	12
LEA or SEA meetings or planning events (e.g. those about child welfare, juvenile justice or out of school time) attended by CoC representatives:	15
CoC meetings or planning events attended by youth housing and service providers (e.g. RHY providers):	12

3B-2.10a. Given the responses in 3B-2.10, describe in detail how the CoC collaborates with the McKinney-Vento local eduction liaisons and State educational coordinators.
(limit 1000 characters)

COC INVOLVEMENT:The San Francisco Unified School District's (SFUSD) Homeless Education Liaison (HEL) participates in Local Homeless Coordinating Board, CoC Board, meetings. The SFUSD Families & Youth in Transition Council (FYIT), organized by the HEL, meets monthly & includes Head Start, CoC, & non-CoC family & youth providers. FYIT identifies & connects providers to educational resources; supplies uniforms, backpacks, & transit passes; & helps providers advocate w/ schools. Hamilton Family Center (CoC family provider) is involved in planning, w/ the HEL & other partners, to increase homeless family participation in a City-funded Kindergarten to College Initiative (savings match program). ID FAMILIES:In 2015, Hamilton & the HEL planned & implemented a privately-funded partnership between Hamilton & the SFUSD. Hamilton provides in-person & online training for SFUSD staff to identify homeless & at-risk families, & Hamilton case managers respond w/in 3 days to engage identified families.

3B-2.11. How does the CoC make sure that homeless participants are informed of their eligibility for and receive access to educational services? Include the policies and procedures that homeless service providers (CoC and ESG Programs) are required to follow. In addition, include how the CoC, together with its youth and educational partners (e.g. RHY, schools, juvenilee justice and children welfare agencies), identifies participants who are eligible for CoC or ESG programs. (limit 2000 characters)

ID ELIGIBLE YOUTH: Hamilton Family Center (CoC provider) provides in-person & online trainings for SFUSD staff on identifying homeless students, students' rights, & CoC services. CoC & ESG providers ensure that eligible school-aged participants are identified w/ the district & access all educational services, through on-site advocacy w/ school staff; consultation with the San Francisco Unified School District's (SFUSD) Homeless Education Liaison; & participation in SFUSD Families & Youth in Transition (FYIT) group. The FYIT program provides a 1-page form to identify eligibility for educational services under the McKinney-Vento Act, which the Local Homeless Coordinating Board (LHCB), the CoC Board, provides as a resource for all CoC & ESG providers. INFORM CLIENTS: LHCB requires providers serving youth & families to inform participants of their eligibility for educational services. CoC providers post notices of students' rights at program sites, & inform participants of their rights at intake. Providers ensure that clients understand their right to educational services through ongoing counseling & work shops. The CoC ensures compliance w/ this requirement through monitoring. POLICIES: The LHCB adopted an educational policy w/in the CoC's Governance Charter. The LHCB requires CoC family & youth providers providers to have internal policies for ensuring clients enroll in school & provides a model Educational Policy for CoC Agencies. The CoC model policy directs providers to: 1)inform families & youth of their educational rights at intake & through postings; 2)determine at intake whether school-aged children are enrolled; 3)accompany families through the enrollment process; 4)inform the district/school of students' homeless status; 5)offer support to parents to monitor attendance & communicate w/ the school. Children younger than school age are connected to early childhood education through Head Start, program-funding early childhood programs, & community programs.

3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 3: Ending Veterans Homelessness

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

Opening Doors outlines the goal of ending Veteran homelessness by the end of 2015. The following questions focus on the various strategies that will aid communities in meeting this goal.

3B-3.1. Compare the total number of homeless Veterans in the CoC as reported by the CoC for the 2015 PIT count compared to 2014 (or 2013 if an unsheltered count was not conducted in 2014).

	2014 (for unsheltered count, most recent year conducted)	2015	Difference
Universe: Total PIT count of sheltered and unsheltered homeless veterans:	720	557	-163
Sheltered count of homeless veterans:	298	205	-93
Unsheltered count of homeless veterans:	422	352	-70

3B-3.1a. Explain the reason(s) for any increase, decrease or no change in the total number of homeless veterans in the CoC as reported in the 2015 PIT count compared to the 2014 PIT count.
(limit 1000 characters)

The numbers of sheltered, unsheltered, and total homeless veterans in SF decreased from 2013/2014 to 2015. City-wide outreach and identification of homeless veterans, coordinated entry and housing placement, and additional housing opportunities for vets account for this decrease. In CY2014, SF focused intensely on the goal of ending veteran homelessness, particularly for CH vets. In August 2014, the 25 Cities Team (VA Medical Center, ESG, CoC, SSVF providers, and local public health) conducted a city-wide veteran outreach and registration drive, during which the VI-SPDAT was administered to over 100 homeless vets. Veteran outreach and registration continued through 2014 and 2015, resulting in a dynamic by-name Homeless Veteran Priority List of all homeless vets in SF, w/ an embedded priority list of CH vets. The 25 Cities Team collaborates to connect vets from the priority list with housing and resources. In 2014, SF added 130 new units for homeless vets.

3B-3.2. How is the CoC ensuring that Veterans that are eligible for VA services are identified, assessed and referred to appropriate resources, i.e. HUD-VASH and SSVF?
(limit 1000 characters)

OUTREACH & ID: The SF 25 Cities Team (VA Medical Center (VAMC), ESG, CoC, SSVF providers, & local public health) maintains SF's Homeless Veterans Priority List (HVPL), a single by-name list of homeless vets w/ a priority list of CH vets. Outreach & intake workers (SF HOT, CE team, CoC and ESG providers, SSVF) screen homeless adults w/ the question "Did you serve in the United States Military?" & refer to the HVPL. ASSESS ELIGIBILITY: The SF County Veterans Service Office confirms eligibility in the VA eligibility database using the HVPL & signed ROIs. Eligible single adult vets are targeted for HUD-VASH & referred to VA services by the 25 Cities team (VAMC, ESG, CoC, SSVF, local public health). Vets w/ custody of children are referred to SSVF. VA ENGAGEMENT: CoC, ESG, & local public health partner w/ VAMC & SSVF to review the HVPL & refer to VASH & VA resources. 25 Cities Team coordinates w/ VA-GPD & the VAMC's Healthcare for Homeless Veterans to connect vets to housing & services.

3B-3.3. For Veterans who are not eligible for homeless assistance through the U.S Department of Veterans Affairs Programs, how is the CoC prioritizing CoC Program-funded resources to serve this population?
(limit 1000 characters)

REFERRAL: As part of the CE process, when a veteran is determined ineligible for VASH or other VA resources, the CE team walks the vet through the full application process for CoC PSH. The veteran is offered available veteran-targeted CoC-funded housing; if placement in veteran-targeted housing is refused, CE connects the veteran with other appropriate CoC- or city-funded housing. PRIORITIZATION: Of 49 PSH projects, 2 prioritize turnover beds for vets ineligible for VA services. Through reallocation in 2013, the CoC created 26 new units of PSH for chronically homeless vets, adding to 100 existing beds. All 126 units are prioritized for vets who are not VA eligible. In a typical month, 20% of all CoC-funded PSH turnover beds (including beds not prioritized for vets) are used for VA-ineligible vets experiencing CH. The CoC's FY 2015 Priority Listing includes 2 new project applications for 69 PSH beds for CH vets, prioritized for VA-ineligible vets.

3B-3.4. Compare the total number of homeless Veterans in the CoC AND the total number of unsheltered homeless Veterans in the CoC, as reported by the CoC for the 2015 PIT Count compared to the 2010 PIT Count (or 2009 if an unsheltered count was not conducted in 2010).

	2010 (or 2009 if an unsheltered count was not conducted in 2010)	2015	% Difference
Total PIT count of sheltered and unsheltered homeless veterans:	661	557	-15.73%
Unsheltered count of homeless veterans:	461	352	-23.64%

3B-3.5. Indicate from the dropdown whether you are on target to end Veteran homelessness by the end of 2015.

No

This question will not be scored.

3B-3.5a. If "Yes," what are the strategies being used to maximize your current resources to meet this goal? If "No," what resources or technical assistance would help you reach the goal of ending Veteran homelessness by the end of 2015? (limit 1000 characters)

San Francisco(SF) is grateful for extensive TA provided by the VA, HUD, & Community Solutions through the 25 Cities initiative. Active fed'l engagement of mayors, other local fed'l officials & local leaders has been especially valuable. SF has benefitted extensively from the guidance, & has created a by name list of homeless vet & a veteran priority system. This TA has clearly distilled the need in SF. There are 270 CH vets still unhoused, & over 300 other homeless vets in SF. The most significant barrier to ending veteran homelessness, especially among CH vets, is the high level of variance between the HUD VASH payment standard & the SF rental market. The most needed piece of TA is a waiver to the HUD VASH payment standard to the amount requested by the SFHA & supported by the LHCB in 2015. A partial waiver has been granted, & we appreciate that progress. Ongoing TA, especially on the best practices of by name lists from experts w/ real world experience w/ homeless veterans is helpful

4A. Accessing Mainstream Benefits

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed
Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA.
Please submit technical questions to the HUDExchange Ask A Question.

**4A-1. Does the CoC systematically provide   Yes
information
to provider staff about mainstream benefits,
including
up-to-date resources on eligibility and
mainstream
program changes that can affect homeless
clients?**

**4A-2. Based on the CoC's FY 2015 new and renewal project applications,
what percentage of projects have demonstrated that the project is
assisting project participants to obtain mainstream benefits, which
includes all of the following within each project: transportation assistance,
use of a single application, annual follow-ups with participants, and SOAR-
trained staff technical assistance to obtain SSI/SSDI?**

FY 2015 Assistance with Mainstream Benefits

Total number of project applications in the FY 2015 competition (new and renewal):	65
Total number of renewal and new project applications that demonstrate assistance to project participants to obtain mainstream benefits (i.e. In a Renewal Project Application, "Yes" is selected for Questions 3a, 3b, 3c, 4, and 4a on Screen 4A. In a New Project Application, "Yes" is selected for Questions 5a, 5b, 5c, 6, and 6a on Screen 4A).	65
Percentage of renewal and new project applications in the FY 2015 competition that have demonstrated assistance to project participants to obtain mainstream benefits:	100%

**4A-3. List the healthcare organizations you are collaborating with to
facilitate health insurance enrollment (e.g. Medicaid, Affordable Care Act
options) for program participants. For each healthcare partner, detail the
specific outcomes resulting from the partnership in the establishment of
benefits for program participants.
(limit 1000 characters)**

Calif. is a Medicaid expansion State. SF Human Services Agency (Collaborative Applicant or CA) is lead agency for Medicaid & health insurance exchange enrollment. City residents enroll in Medicaid when applying for GA, SNAPs, etc. COLLABORATION W/HEALTHCARE ORGS: 1)RICHMOND AREA MULTI-SERVICES (RAMS): CA partnered with Episcopal Cmty Svcs (ECS, CoC-funded), & RAMS (non-profit mental health provider) to implement a $316,454 State Dep't of Health Care Svcs Outreach & Enrollment grant. POSITIVE OUTCOME: From 4/1/14 to 9/30/15 ECS helped 709 homeless persons apply for Medi-Cal & 481 to retain Medi-Cal. 2)VA MEDICAL CENTER: VAMC partners w/the CoC through coord. entry for vets to enroll in VA health care. 3)DEP'T OF PUBLIC HEALTH CLINICS: Staff at DPH's Tom Waddell Clinic & ES clinics refer clients to CoC providers for Medi-Cal enrollment. 4)SF CMTY CLINIC CONSORTIUM CLINICS (13): ECS Medi-Cal outreach co-locates w/ SFCCC clinics & street outreach to enroll in health insurance.

4A-4. What are the primary ways that the CoC ensures that program participants with health insurance are able to effectively utilize the healthcare benefits available?

Educational materials:	X
In-Person Trainings:	X
Transportation to medical appointments:	X
Referrals to FQHCs	X
Referrals to pediatric/adult primary and dental health care	X
Not Applicable or None:	

4B. Additional Policies

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

4B-1. Based on the CoC's FY 2015 new and renewal project applications, what percentage of Permanent Housing (PSH and RRH), Transitional Housing (TH) and SSO (non-Coordinated Entry) projects in the CoC are low barrier? Meaning that they do not screen out potential participants based on those clients possessing a) too little or little income, b) active or history of substance use, c) criminal record, with exceptions for state-mandated restrictions, and d) history of domestic violence.

FY 2015 Low Barrier Designation

Total number of PH (PSH and RRH), TH and non-Coordinated Entry SSO project applications in the FY 2015 competition (new and renewal):	65
Total number of PH (PSH and RRH), TH and non-Coordinated Entry SSO renewal and new project applications that selected "low barrier" in the FY 2015 competition:	60
Percentage of PH (PSH and RRH), TH and non-Coordinated Entry SSO renewal and new project applications in the FY 2015 competition that will be designated as "low barrier":	92%

4B-2. What percentage of CoC Program-funded Permanent Supportive Housing (PSH), RRH, SSO (non-Coordinated Entry) and Transitional Housing (TH) FY 2015 Projects have adopted a Housing First approach, meaning that the project quickly houses clients without preconditions or service participation requirements?

FY 2015 Projects Housing First Designation

Total number of PSH, RRH, non-Coordinated Entry SSO, and TH project applications in the FY 2015 competition (new and renewal):	65
Total number of PSH, RRH, non-Coordinated Entry SSO, and TH renewal and new project applications that selected Housing First in the FY 2015 competition:	54
Percentage of PSH, RRH, non-Coordinated Entry SSO, and TH renewal and new project applications in the FY 2015 competition that will be designated as Housing First:	83%

4B-3. What has the CoC done to ensure awareness of and access to housing and supportive services within the CoC's geographic area to persons that could benefit from CoC-funded programs but are not currently participating in a CoC funded program? In particular, how does the CoC reach out to for persons that are least likely to request housing or services in the absence of special outreach?

Direct outreach and marketing:	X
Use of phone or internet-based services like 211:	X
Marketing in languages commonly spoken in the community:	X
Making physical and virtual locations accessible to those with disabilities:	X
CE for single adults uses a low-barrier, no wrong door online referral system	X
SF Navigation Center targeted outreach to adults with high barriers to shelter entry	X
Not applicable:	

4B-4. Compare the number of RRH units available to serve any population from the 2014 and 2015 HIC.

		2014	2015	Difference
RRH units available to serve any population in the HIC:		826	809	-17

4B-5. Are any new proposed project applications requesting $200,000 or more in funding for housing rehabilitation or new construction?

No

4B-6. If "Yes" in Questions 4B-5, then describe the activities that the project(s) will undertake to ensure that employment, training and other economic opportunities are directed to low or very low income persons to comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (Section 3) and HUD's implementing rules at 24 CFR part 135?
(limit 1000 characters)

N/A

4B-7. Is the CoC requesting to designate one   No
or more
of its SSO or TH projects to serve families
with children
and youth defined as homeless under other
Federal statutes?

4B-7a. If "Yes" in Question 4B-7, describe how the use of grant funds to serve such persons is of equal or greater priority than serving persons defined as homeless in accordance with 24 CFR 578.89. Description must include whether or not this is listed as a priority in the Consolidated Plan(s) and its CoC strategic plan goals. CoCs must attach the list of projects that would be serving this population (up to 10 percent of CoC total award) and the applicable portions of the Consolidated Plan. (limit 2500 characters)

N/A

4B-8. Has the project been affected by a   No
major disaster, as declared by President
Obama under Title IV of the Robert T. Stafford
Act in the 12 months prior to the opening of
the FY 2015 CoC Program Competition?

4B-8a. If "Yes" in Question 4B-8, describe the impact of the natural disaster on specific projects in the CoC and how this affected the CoC's ability to address homelessness and provide the necessary reporting to HUD.
(limit 1500 characters)

4B-9. Did the CoC or any of its CoC program   Yes
recipients/subrecipients request technical
assistance from HUD in the past two years
(since the submission of the FY 2012
application)? This response does not affect
the scoring of this application.

4B-9a. If "Yes" to Question 4B-9, check the box(es) for which technical assistance was requested.

This response does not affect the scoring of this application.

CoC Governance:	
CoC Systems Performance Measurement:	
Coordinated Entry:	X
Data reporting and data analysis:	X
HMIS:	X
Homeless subpopulations targeted by Opening Doors: veterans, chronic, children and families, and unaccompanied youth:	X
Maximizing the use of mainstream resources:	X
Retooling transitional housing:	
Rapid re-housing:	
Under-performing program recipient, subrecipient or project:	
Not applicable:	

4B-9b. If TA was received, indicate the type(s) of TA received, using the categories listed in 4B-9a, the month and year it was received and then indicate the value of the TA to the CoC/recipient/subrecipient involved given the local conditions at the time, with 5 being the highest value and a 1 indicating no value.

This response does not affect the scoring of this application.

Type of Technical Assistance Received	Date Received	Rate the Value of the Technical Assistance
Priority Community TA	01/01/2014	4
25 Cities TA	03/01/2014	5

4C. Attachments

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed
Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA.
Please submit technical questions to the HUDExchange Ask A Question.

For required attachments related to rejected projects, if the CoC did not reject any projects then
attach a document that says "Does Not Apply".

Document Type	Required?	Document Description	Date Attached
01. 2015 CoC Consolidated Application: Evidence of the CoC's Communication to Rejected Projects	Yes	Evidence of the C...	11/17/2015
02. 2015 CoC Consolidated Application: Public Posting Evidence	Yes	San Francisco 201...	11/17/2015
03. CoC Rating and Review Procedure	Yes	CoC Rating and Re...	11/15/2015
04. CoC's Rating and Review Procedure: Public Posting Evidence	Yes	San Francisco Rat...	11/17/2015
05. CoCs Process for Reallocating	Yes	San Francisco CoC...	11/17/2015
06. CoC's Governance Charter	Yes	CoC Governance Ch...	11/17/2015
07. HMIS Policy and Procedures Manual	Yes	HMIS Policies and...	11/15/2015
08. Applicable Sections of Con Plan to Serving Persons Defined as Homeless Under Other Fed Statutes	No		
09. PHA Administration Plan (Applicable Section(s) Only)	Yes	PHA Admin Plan an...	11/15/2015
10. CoC-HMIS MOU (if referenced in the CoC's Goverance Charter)	No		
11. CoC Written Standards for Order of Priority	No	CoC Written Stand...	11/17/2015
12. Project List to Serve Persons Defined as Homeless under Other Federal Statutes	No		
13. Other	No	CoC-ESG Desk Guide	11/15/2015
14. Other	No		
15. Other	No		

Attachment Details

Document Description: Evidence of the CoC's Communication to Rejected Projects

Attachment Details

Document Description: San Francisco 2015 Consolidated Application Public Posting Evidence

Attachment Details

Document Description: CoC Rating and Review Procedure

Attachment Details

Document Description: San Francisco Rating and Review Procedure Public Posting Evidence

Attachment Details

Document Description: San Francisco CoC Process for Re Allocation

Attachment Details

Document Description: CoC Governance Charter with HMIS Governance Agreement

Attachment Details

Document Description: HMIS Policies and Procedures

Attachment Details

Document Description:

Attachment Details

Document Description: PHA Admin Plan and Admission Policy

Attachment Details

Document Description:

Attachment Details

Document Description: CoC Written Standards for Order of Priority

Attachment Details

Document Description:

Attachment Details

Document Description: CoC-ESG Desk Guide

Attachment Details

Document Description:

Attachment Details

Document Description:

Submission Summary

Page	Last Updated
1A. Identification	11/14/2015
1B. CoC Engagement	11/19/2015
1C. Coordination	11/15/2015
1D. CoC Discharge Planning	11/17/2015
1E. Coordinated Assessment	11/15/2015
1F. Project Review	11/19/2015
1G. Addressing Project Capacity	11/15/2015
2A. HMIS Implementation	11/16/2015
2B. HMIS Funding Sources	11/19/2015
2C. HMIS Beds	11/19/2015
2D. HMIS Data Quality	11/19/2015
2E. Sheltered PIT	11/19/2015
2F. Sheltered Data - Methods	11/19/2015
2G. Sheltered Data - Quality	11/17/2015
2H. Unsheltered PIT	11/19/2015
2I. Unsheltered Data - Methods	11/19/2015
2J. Unsheltered Data - Quality	11/17/2015
3A. System Performance	11/16/2015
3B. Objective 1	11/18/2015
3B. Objective 2	11/18/2015
3B. Objective 3	11/17/2015
4A. Benefits	11/18/2015
4B. Additional Policies	11/18/2015
4C. Attachments	11/17/2015
Submission Summary	No Input Required

SAN FRANCISCO
LOCAL HOMELESS COORDINATING BOARD

Kevin Sharps
Co-Chair

Del Seymour
Co-Chair

Joanne Peters

Richard Springwater

Yoshiko Kennedy

Christine Ma, MD

Erick Brown

Kim Armbruster

Laura Guzman

Megan Owens
Faught, Staff

To Whom it May Concern:

The San Francisco Local Homeless Coordinating Board is the governing body for the San Francisco Continuum of Care.

The Local Homeless Coordinating Board within a "Housing First" model envisions developing a continuum of services whose ultimate goal is to prevent and eradicate homelessness in the City and County of San Francisco. All efforts are aimed at permanent solutions, and the range of services is designed to meet the unique and complex needs of individuals who are threatened with or currently experiencing homelessness.

At the November 2, 2015 Local Homeless Coordinating Board meeting, the Local Homeless Coordinating Board Members voted unanimously (with 3 abstentions due to conflict of interest) to

1. Approve the attached October 30, 2015 San Francisco Local Homeless Coordinating Board Appeals Committee Recommendation Ranked List (B) as the ranked list for the San Francisco 2015 Continuum of Care.
2. Directed staff to continue to refine the budgets of the various New Project Applications with the goal of maximizing the efficiency and effectiveness of new projects and providing new project funding to the Hope House for Homeless Veterans project, if possible.
3. Post a new final ranked list of funded projects on or before November 5, 2017.

Please note that in order to fund new projects for HMIS expansion, Coordinated Entry and Permanent Housing, the LHCB accepted the voluntary re-allocation of 6 renewal projects. Email exchanges documenting these full and partial voluntary renewals are included here.

Summary of attached pages:
- Page 1&2: Cover letter
- Pages 3-5: October 30, 2015 San Francisco Local Homeless Coordinating Board Appeals Committee Recommendation Ranked List (B)

- Page 6: Email November 5th Public Notice Regarding the 2015 San Francisco Continuum of Care Ranked List
- Page 7: Screenshot of Public Notice November 5th 2015 San Francisco Continuum of Care Ranked List
- Pages 8-10: 2015 San Francisco Continuum of Care Ranked List
- Pages 11-18: Correspondence Related to the voluntary full or partial re-allocation of 6 Continuum of Care renewal projects.

If you have any questions about these matters, please contact Megan Owens Faught at megan.faught@sfgov.org.

Thank you,
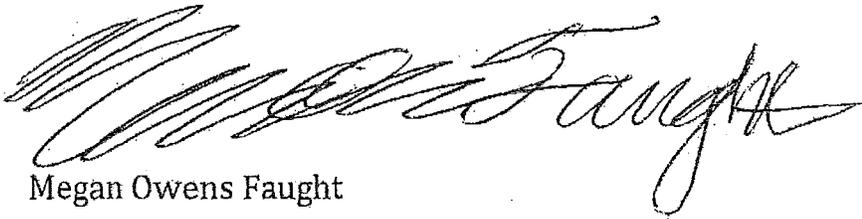
Megan Owens Faught

San Francisco Local Homeless Coordinating Board
Appeals Committee Recommendation Ranked List (B)

						Tier One

Rank	Project	SF Local Performance Score	Type	New/ Renewal	Request Amount	Estimated Tier 2 HUD Viability Score
1	The Henry	99.667	PSH	New	$679,680.00	N/A
2	Rental Assistance for Homeless Veterans II	96.333	PSH	New	$395,865.00	N/A
3	ECS Bishop Swing	94	PSH	Renewal	$273,231.00	N/A
4	Glide Cecil Williams Community House	93.467	PSH	Renewal	$351,783.00	N/A
5	Veterans Academy	91.5	PSH	Renewal	$358,694.00	N/A
6	Cadillac/William Penn	90.967	PSH	Renewal	$959,424.00	N/A
7	Treasure Island Phase 1	90.567	PSH	Renewal	$656,295.00	N/A
8	Lyric	90.5	PSH	Renewal	$695,582.00	N/A
9	CHP Island Bay Homes	89.433	PSH	Renewal	$285,279.00	N/A
10	Folsom/Dore	89.3	PSH	Renewal	$358,404.00	N/A
11	Treasure Island Phase 2 Correct	88.9	PSH	Renewal	$1,084,265.00	N/A
12	TNDC Ambassador	88.567	PSH	Renewal	$599,640.00	N/A
13	FY2014 CoC Salvation Army Harbor House	88.133	TH	Renewal	$434,421.00	N/A
14	Allen Hotel	87.467	PSH	Renewal	$426,538.00	N/A
15	Canon Kip	87.033	PSH	Renewal	$959,424.00	N/A
16	Canon Barcus Community House	86.9	PSH	Renewal	$476,490.00	N/A
17	Direct Access to Housing: Empress/Folsom Dore	86.633	PSH	Renewal	$783,592.00	N/A
18	Parkview Terraces	86.6	PSH	Renewal	$271,832.00	N/A
19	Railton Place	86.4	PSH	Renewal	$271,832.00	N/A
20	New Franciscan Towers	86.175	PSH	Renewal	$651,333.00	N/A
21	Rental Assistance for Homeless Veterans	85.508	PSH	Renewal	$412,612.00	N/A
22	Scattered Sites CCCYO	85.367	PSH	Renewal	$1,076,804.00	N/A
23	Arendt House	85.2	PSH	Renewal	$258,033.00	N/A
24	TNDC Scattered Sites	84.633	PSH	Renewal	$607,914.00	N/A
25	Hazel Betsey 1 Bdr	84.467	PSH	Renewal	$62,446.00	N/A
26	Hazel Betsey Studios	84.433	PSH	Renewal	$95,941.00	N/A
27	Hope House	84.433	PSH	Renewal	$870,852.00	N/A

28	Direct Access to Housing for Chronic Alcoholics	84.367	PSH	Renewal	$884,215.00	N/A
29	Rita de Cascia Positive Match	84.3	PSH	Renewal	$182,676.00	N/A
30	Broadway Sansome Apartments	83.508	PSH	Renewal	$80,141.00	N/A
31	Baldwin House	83.175	PSH	Renewal	$2,123,890.00	N/A
32	Integrated Services Network	82.967	PSH	Renewal	$1,183,342.00	N/A
33	Franciscan Towers	82.7	PSH	Renewal	$651,333.00	N/A
34	Tenant Based Rental Assistance	82.5	PSH	Renewal	$872,278.00	N/A
35	Avenues to Independence	81.833	TH	Renewal	$333,990.00	N/A
36	Hope House expansion	81.175	PSH	Renewal	$265,268.00	N/A
37	Hope House Re-Allocation	81.175	PSH	Renewal	$124,388.00	N/A
38	El Dorado/Midori	80.8	PSH	Renewal	$215,870.00	N/A
39	Leland House	79.4	PSH	Renewal	$146,787.00	N/A
40	Legal Services for Homeless People	79.066	SSO	Renewal	$362,876.00	N/A
41	Supportive Housing Employment Collaborative CHP	78.633	PSH	Renewal	$128,246.00	N/A
42	Iroquois Residence	78.533	PSH	Renewal	$158,804.00	N/A
43	Geary House (formerly G-House)	77.733	TH	Renewal	$111,548.00	N/A
44	Knox	79.01	PSH	Renewal	$215,870.00	N/A
45	Hotel Isabel	78.313	PSH	Renewal	$119,928.00	N/A
46	San Francisco HMIS	Not Scored	HMIS	Renewal	$110,712.00	N/A
47	Bayview Hill Gardens	77.333	PSH	Renewal	$243,993.05	N/A

Tier Two

Rank	Project	SF Local Performance Score	Type	New/ Renewal	Request Amount	Estimated Tier 2 HUD Viability Score
47(a)	Bayview Hill Gardens	77.333	PSH	Renewal	$36,444.95	80.45
48	San Francisco Coordinated Entry	Not Scored	CE	New	$100,000.00	80.29
49	San Francisco HMIS 2015	Not Scored	HMIS	New	$360,000.00	79.72
50	Bel Aire Crowne Layne	99.5	PSH	New	$2,160,104.00	76.59
51	Hamilton Family Rapid Re-Housing	90.33	RRH	New	$777,793.00	72.96
52	Homeless Prenatal Housing Plus	77.167	PSH	New	$1,107,954.95	70.62
53	Compass Clara House	75.5	TH	Renewal	$297,469.00	51.88
54	Homeless Employment Collaborative	75.4	SSO	Renewal	$962,779.00	48.32
55	Juan Pifarre Plaza	75	PSH	Renewal	$97,572.00	66.00

Rank	Project	SF Local Performance Score	Type	New/ Renewal	Request Amount	Estimated Tier 2 HUD Viability Score
56	Dudley Apartments	74.467	PSH	Renewal	$157,706.00	65.69
57	Hamilton Family Transitional Housing Program	74.178	TH	Renewal	$384,907.00	58.02
58	Arnett Watson Apartments	73.367	PSH	Renewal	$94,134.00	64.42
59	San Francisco Training Partnership	73.166	SSO	Renewal	$273,184.00	44.97
60	First Avenues	71.747	RRH	Renewal	$180,515.00	63.41
61	South Park Residences	70.5	PSH	Renewal	$179,892.00	62.96
62	Housing Access Project II	69.508	RRH	Renewal	$324,084.00	62.34
63	Episcopal Community Services – CHEFS	68.9	SSO	Renewal	$133,219.00	42.77
64	AIDS Housing Alliance Housing Project	65.975	PSH	Renewal	$140,985.00	61.43
65	Monterey Boulevard	64.033	PSH	Renewal	$99,571.00	51.13
66	Brennan House	61.767	TH	Renewal	$133,651.00	43.84
67	SafeHouse for Women	60	TH	Renewal	$71,339.00	43.59

		Rejected Applications				
Rank	Project	SF Local Performance Score	Type	New/ Renewal	Request Amount	Tier 2 HUD Viability Score
N/A	Hope House For Veterans	63	PSH	New	$1,640,514.00	N/A

		Reduced Applications				
Rank	Project	SF Local Performance Score	Type	New/ Renewal	Reduced By	Tier 2 HUD Viability Score
52	Homeless Prenatal Housing Plus	77.167	PSH	New	$256,626.00	70.62

From:	Owens, Megan (DSS)
Sent:	Thursday, November 05, 2015 4:54 PM
To:	Owens, Megan (DSS)
Subject:	November 5th Continuum of Care Project Ranked List and Community Announcements
Attachments:	SFHOT- Change in Dispatch number 1.docx; Plan Update_SanFranCouncil_102215.pptx; 2015 Ranked List with Project Viability Score Detail.pdf

Hello All,

I trust you are well.

Updated Continuum of Care Ranked List:

Please see the attached updated ranked list of Continuum of Care Projects. Some technical adjustments to project budgets have made some positive increases to the number of projects in Tier 1 and the HUD Viability Score of some projects. Also, the lowest scoring new project application is no longer rejected. A simplified version of the list is also online here:
https://sfgov.org/lhcb/sites/sfgov.org.lhcb/files/San%20Francisco%20Continuum%20of%20Care%20Ranked%20List.pdf

Community Announcements

New San Francisco Homeless Outreach team contact number

SF HOT has a new dispatch number 415) 355-7401 number (non-emergent). This number replaces the previous number. Please see the attachment for more details.

Houston Presentation

Thank you to the San Francisco Interagency Council on Homelessness for sharing the attached Power Point on the work to end homelessness in Houston.

Thank you,

Megan

Funding Committee - November 5, 2015 - Supporting Documents

Funding Committee - November 5, 2015
San Francisco Continuum of Care Ranked List.pdf

San Francisco Local Homeless Coordinating 2015 Continuum of Care Ranked Funding List

Tier One

Rank	Project	Type
1	The Henry (5th and Harrision Supportive Housing)	PSH
2	Rental Assistance for Homeless Veterans II	PSH
3	ECS Bishop Swing	PSH
4	Glide Cecil Williams Community House	PSH
5	Veterans Academy	PSH
6	Cadillac/William Penn	PSH
7	Treasure Island Phase 1	PSH
8	Lyric	PSH
9	CHP Island Bay Homes	PSH
10	Folsom/Dore	PSH
11	Treasure Island Phase 2 Correct	PSH
12	TNDC Ambassador	PSH
13	FY2014 CoC Salvation Army Harbor House	TH
14	Allen Hotel	PSH
15	Canon Kip	PSH
16	Canon Barcus Community House	PSH
17	Direct Access to Housing: Empress/Folsom Dore	PSH
18	Parkview Terraces	PSH
19	Railton Place	PSH
20	New Franciscan Towers	PSH
21	Rental Assistance for Homeless Veterans	PSH
22	Scattered Sites CCCYO	PSH

23	Arendt House	PSH
24	TNDC Scattered Sites	PSH
25	Hazel Betsey 1 Bdr	PSH
26	Hazel Betsey Studios	PSH
27	Hope House	PSH
28	Direct Access to Housing for Chronic Alcoholics	PSH
29	Rita de Cascia Positive Match	PSH
30	Broadway Sansome Apartments	PSH
31	Baldwin House	PSH
32	Integrated Services Network	PSH
33	Franciscan Towers	PSH
34	Tenant Based Rental Assistance	PSH
35	Avenues to Independence	TH
36	Hope House expansion	PSH
37	Hope House Re-Allocation	PSH
38	El Dorado/Midori	PSH
39	Leland House	PSH
40	Legal Services for Homeless People	SSO
41	Knox	PSH
42	Supportive Housing Employment Collaborative CHP	PSH
43	Iroquois Residence	PSH
44	Hotel Isabel	PSH
45	Geary House (formerly G-House)	TH
46	Bayview Hill Gardens	PSH
47	San Francisco HMIS	HMIS
48	Compass Clara House	TH

	Tier Two	
48(a)	Compass Clara House	TH
49	San Francisco Coordinated Entry	CE
50	San Francisco HMIS 2015	HMIS
51	Bel Aire Crowne Layne	PSH
52	Hamilton Family Rapid Re-Housing	RRH
53	Homeless Prenatal Housing Plus	PSH
54	Homeless Employment Collaborative	SSO
55	Mission Housing Juan Pifarre	PSH
56	Dudley Apartments	PSH
57	Hamilton Family Transitional Housing Program	TH
58	Arnett Watson Apartments	PSH
59	San Francisco Training Partnership	SSO
60	First Avenues	RRH
61	Mission Housing South Park	PSH
62	Housing Access Project II	RRH
63	Episcopal Community Services -- CHEFS	SSO
64	AIDS Housing Alliance Housing Project	PSH
65	Monterey Boulevard	PSH
66	Hope House for Veterans	PSH
67	Brennan House	TH
68	SafeHouse for Women	TH

From:	Shaw, Chris (HSA) (DSS)
Sent:	Tuesday, November 17, 2015 1:54 PM
To:	Owens, Megan (DSS)
Subject:	FW: Dudley Apartments Serving DAH Clients and 2015 NOFA

Hi Megan – At a meeting on 2/10/2015, Collaborative Applicant staff and the Dudley Apartments project staff discussed and agreed to reduce the number of units served from 75 to 50 and re-allocate part of the grant for the site accordingly for the 2015 NOFA application.

Chris Shaw
Grants Manager
Supportive Housing Program (SHP)
1650 Mission Street, 3rd Floor
San Francisco, CA 94103
(Phone) 415-557-6452
(Fax) 415-557-6033

From: Shaw, Chris (HSA)
Sent: Tuesday, February 10, 2015 9:55 AM
To: 'Devra Edelman'
Subject: RE: Dudley Apartments Serving DAH Clients and 2015 NOFA

Hi Devra – Yes, it's included in the agenda I sent yesterday. I'll revise and resend the original e-mail. --Chris

From: Devra Edelman [mailto:dedelman@hamiltonfamilycenter.org]
Sent: Monday, February 09, 2015 3:32 PM
To: Shaw, Chris (HSA)
Cc: Faught, Megan (HSA); Higashi, Daryl (HSA)
Subject: RE: Dudley Apartments Serving DAH Clients and 2015 NOFA

Thanks Chris—

I was about to reply that this issue needs to be addressed with Mercy as well since, as long as our planned transfer of services goes through, they will be the applicant for the 2015 NOFA.

Will we discuss this tomorrow during our phone meeting?

Devra ☺

Devra Edelman| Deputy Director, Programs | Hamilton Family Center | 1631 Hayes St. San Francisco, CA 94117 |415-409-2100 x122 |
FAX: 415-345-0470   dedelman@hamiltonfamilycenter.org   www.hamiltonfamilycenter.org

From: Shaw, Chris (HSA) [mailto:chris.shaw@sfgov.org]
Sent: Monday, February 9, 2015 12:29 PM
To: Devra Edelman

Cc: Faught, Megan (HSA); Higashi, Daryl (HSA)
Subject: RE: Dudley Apartments Serving DAH Clients and 2015 NOFA

One Correction – We will ask Mercy Housing to confirm that the 2015 HUD application will include 50 units for a reduced grant amount. Thanks. --Chris

From: Shaw, Chris (HSA)
Sent: Monday, February 09, 2015 12:22 PM
To: 'Devra Edelman'
Cc: Faught, Megan (HSA); Higashi, Daryl (HSA)
Subject: Dudley Apartments Serving DAH Clients and 2015 NOFA
Importance: High

Hi Devra – The 2015 HUD NOFA is expected to open in spring. Due to the fact that Dudley has been serving the Direct Access to Housing (DAH) Program clients, please confirm that HFC will reduce the units from 75 to 50, and that the grant size will be reduced by one-third accordingly for the 2015 HUD application.

The current contract and the FY 15-16 contact will remain as is; however, please confirm that
1. Staff time spent in serving the DAH clients as well as any undocumented clients should NOT be included in their Personnel Activity Reports,
2. DAH client information should NOT be entered in HMIS, and
3. Any existing DAH or undocumented client records in HMIS should be deleted.

Please let us know if you have any questions. We look forward to your confirmation. Thank you.

Chris Shaw
Grants Manager
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1650 Mission Street, 3rd Floor
San Francisco, CA 94103
(Phone) 415-557-6452
(Fax) 415-557-6033

From:	Owens, Megan (DSS)
Sent:	Friday, October 09, 2015 3:03 PM
To:	'kgruneisen@ecs-sf.org'
Cc:	Balanon, Shane (HSA) (DSS); Walton, Scott (HSA) (DSS); Crum, Joyce (HSA) (DSS); San Francisco NOFA
Subject:	CoC New Project Application at the Henry

Hi Karen,

I understand that you spoke to CHP and you are willing to submit a reallocation project application for the Henry Hotel. I am setting up the new PSH project now. I will call it Henry Hotel, and I can change the name if you like.

I think CHP mentioned to you that the grant being reallocated is a $679,732 leasing grant.

Instead of applying for a new leasing grant, we recommend that ECS apply for 45 units of PSH Rental Assistance (S+C). That configuration will not apply the HUD funds to all of the units in the property and lease up can begin before the HUD grant is executed for the non- S+C grants and the non-S+C units will not be required to maintain S+C level documentation. Do you agree?

Also, as we all know, the Henry Hotel project is slated to be a major source of exits from the Nav Ctr. That aligns closely with HUD's goal of targeting chronically homeless people who are unsheltered.

In order to explicitly align the placements at the Henry with the Nav Ctr. I recommend referencing long term homeless people from an innovative site for unsheltered people and others referred by Coordinated Entry in the CoC Project application narrative. I will recommend that this site serves long term homeless people from the Nav Ctr, and recommend a tweak to the CoC Priority process to include Nav Ctr clients who come from an unsheltered setting with a slightly shorter length of homelessness at the site (ie 5 years homeless) at this site.

A few notes for your budgeting, in addition to the 45 rental subsidies:

- Please request 10% admin (that's allowed this year as you likely know)
- Please request at least 1% of the budget for HMIS (this amount is for H.S.A. HMIS costs for the site, feel free to request more for ECS HMIS staff time for the project)

I will work with Scott and Joyce on your match and cash leverage letters when I return from vacation. I assume you plan to use the H.S.A. services contract for the match and for cash leverage. Go ahead and fill out the chart with that assumption if you like.

I am very impressed that you volunteered to do this, and I look forward to working with you on this.

I am in the office today and then out for the Monday holiday, Tuesday, Wednesday and Thursday. Please feel free to call my cell at 2532199579 if you want to chat about any of this today.

Thanks

Megan

From:	Leon Winston <ldw@stp-sf.org>
Sent:	Tuesday, November 17, 2015 2:23 PM
To:	Owens, Megan (DSS)
Cc:	lwinston@swords-to-plowshares.org; Balanon, Shane (HSA) (DSS)
Subject:	Re: Re Allocation Confirmation

Please accept this as our confirmation that the reallocation of existing HUD grants as expressed in your email were fully voluntary by Swords to Plowshares.

Thank you,

Leon Winston
Chief Operating Officer

On Tuesday, November 17, 2015, Owens, Megan (DSS) <megan.Faught@sfgov.org> wrote:

Hi Leon,

HUD would like a written confirmation of all voluntary re-allocation in the current CoC Application.

Please confirm that Swords to Plowshares is voluntary re allocating the full grant amount of the Transitional Living for Homeless Veterans and also reallocating the rental assistance and admin funds from the Rental Assistance for Homeless Veterans Project.

Of course, we have had several discussions and emails about this plan generally, but I want to provide HUD a clear written communication.

Thank you in advance,

Megan

Megan Owens Faught
San Francisco Human Services Agency
Housing and Homeless
415-557-6007

From:	Beth Mitchell <bmitchell@compass-sf.org>
Sent:	Tuesday, July 28, 2015 5:44 PM
To:	Owens, Megan (DSS)
Cc:	Shaw, Chris (HSA) (DSS); Carrie Hook; Juan Ochoa; Erica Kisch; Joua Lee
Subject:	HAP funding

Hi Megan and Chris,

I'm writing to confirm that we are going to be applying for exactly half of the HAP II funding the next cycle. Joua, please correct me if I'm wrong, but I believe that amount is $305,141.

Also, I think that you are already well aware of this, but we are going to be returning a huge amount of unspent money to HUD for the current fiscal year.

Please let us know if there is anything else that we need to do in advance of the NOFA.

Thanks,
Beth

Upcoming event:
Toast & Taste! Wednesday, July 29th - Details & Tickets HERE!

Beth Mitchell, MBA
Program Director, Compass SF HOME
Compass Family Services

1995 Market Street, 5th floor, San Francisco, CA 94103 | 415-644-0504 x2201 | 415-644-0380 | compass-sf.org
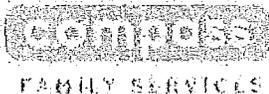
Helping families find their way

Megan Owens Faught

San Francisco Human Services Agency

Housing and Homeless

415-557-6007

--
Leon Winston
Chief Operating Officer & Housing Director
Swords to Plowshares
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415.505.5608 mobile
www.stp-sf.org

From:	Balanon, Shane (HSA) (DSS)
Sent:	Tuesday, November 17, 2015 1:24 PM
To:	Owens, Megan (DSS)
Subject:	THC Baldwin House - supportive services

Hi Megan,

This is to confirm that as of September 1, 2015, Shelter Plus Care has agreed to reallocate the supportive service line item from the THC Baldwin House grant - $73,414.

Thanks,
Shane

ATTACHMENT: CoC RATING AND REVIEW PROCEDURE

DOCUMENT SATISFYING REQUIREMENT	PAGE
2015 Local Community Renewal and New Projects Review Process	2
Appeals Policy and Process	5
Scoring Sheet – Renewal Projects	7
2015 CoC Performance Measures	13
Scoring Sheet – New Projects	15
Application Materials – Renewal Projects	20
Application Materials – New Projects	24
2015 San Francisco Continuum of Care Process and Timeline	40

- CoC designs a project review process and LHCB approves it prior to NOFA release.

- After the NOFA is released, all application documents are updated to address any unexpected elements of the NOFA. All changes are approved by LHCB at next meeting.

- HomeBase completes assessment and review of renewal projects.

- Applicants attend a Bidders' Conference, receive application materials, and have time to complete and submit their applications.

- LHCB staff will recruit Priority Panel members, prioritizing members who have served as Priority Panelists in the past or who have other relevant experience. Priority Panel members will sign "no conflict of interest" and confidentiality statements.

- All projects will submit applications to HSA, including a HUD Project Application, required local application materials, and match/leverage documentation. All documents should be submitted in-person to Megan Owens Faught at 1650 Mission St *and* electronically via the instructions on the Proposal Submission Checklist.

    o Late applications received within 48 hours of the due date/time will receive a 15-point score reduction. A 5-point reduction will be applied to any project that fails to submit either the electronic or paper copy of the application by the application deadline. Incomplete applications cannot be cured for Priority Panel scoring, but, if selected for funding by the Priority Panel, must be corrected prior to HUD submission. The original application (not the copies) will be examined to determine if all pieces of the application have been submitted.

- Priority Panel members are trained, as appropriate, and receive applications. Panelists review applications.

- LHCB staff and HomeBase review project applications and provide technical feedback. HSA/LHCB staff determines whether project thresholds are met.

- If an agency has a grant for a program that it would like to transfer to another program in the agency, perhaps because the original project is not meeting HUD performance expectations or is no longer as needed in the community, that agency may "reallocate to itself."

    o Agencies considering this option should consult with HSA and/or HomeBase, as grant amendment may be a better option. There are some requirements involved in changing a program via reallocation, including the populations that must be served under the 2015 NOFA.

    o In the competition, only that agency may apply for the earmarked funding as long as the reallocated project application is reasonably strong and is compliant

with HUD requirements. The reallocated project application will be scored with the other new projects. The application must score at least on a comparable level with the other new project applications.

- If the application is reasonably strong, an extra 5 points (parallel to the bonus points for renewal permanent housing) will be added to the final score and the project will be placed in rank order with the renewal projects. The project may be in Tier 1 or Tier 2, depending its score.

- If the application is not reasonably strong, the Panel may use the funding for another new project, rank the new project at the bottom of Tier 2, or suggest the agency revert to the old program.

- Priority Panel meets to review and discuss applications together, identify technical assistance needs, and to continue to individually score them. Priority Panel members then finalize individual scores. Scores are added and applications are ranked and placed into either Tier 1 or Tier 2.

  o Renewal projects that are for permanent housing for leasing, rental assistance, or operations will receive 5 bonus points in scoring and will be ranked, and placed in Tiers, with that preference.

  o Staff will propose to the LHCB to place the HMIS and Support Services for Coordinated Entry projects in the bottom of Tier 1.

  o New projects will be placed in Tier 2, except for new reallocated projects where the agency is "reallocating to itself", which will be ranked with the renewal projects by score.

  o Panel members will also place renewal applications that score lower in Tier 2.

- The Priority Panel may also identify projects that should be reallocated, in whole or in part, in favor of a new project. Before making a reallocation decision, the Panel will review the project's past performance and grant spending history for the prior three years.

- Preliminary scoring results are delivered to applicants with a reminder about the appeals process.

- All applicants that are eligible to appeal will receive all Priority Panelist scores and relevant comments in advance of the appeals deadline. Projects facing reallocation will have additional appeal rights. (See separate Appeals Policy for more detail.) In addition, full comments from the Priority Panel will be made available upon written request after the competition closes on November 20, 2015. They can also report any discrepancies in their score sheet, although this is not considered an official appeal.

- Appeals, if any, are reviewed by the Appeals Panel of non-conflicted LHCB Members.

- LHCB meets to consider and approve a final CoC ranked funding list. If any renewal project does not apply for funding or is identified by the Priority Panel as in need of

reallocation, that funding may be reallocated to a new project. **The LHCB will make all final decisions about reallocating funding from any project.**

- Projects will submit copies of letters or documentation for all match/leverage resources listed in their application.

- Applications will be submitted with the City-wide application and applicants will be invited to attend the 2015 Debrief.

The process must be conducted in a manner that is effective for persons with disabilities and persons with limited English proficiency. If you need any accommodations, please contact Megan Owens Faught at megan.faught@sfgov.org or 415-557-6007.

Applicants may appeal if: the project is not funded or receives less funding than the amount in the application; the project is ranked in Tier 2 of the CoC application (in which the applicants funding may be at risk); or if the project falls into the bottom portion of Tier 1, as described below. All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered, unless the project is facing reallocation. Omissions to the application cannot be appealed. The decision of the Appeal Committee will be final.

The Appeal Committee will be made up of three (3) members of the Local Homeless Coordinating Board, along with one non-voting representative from the Priority Panel. The voting members will not have participated on the original Priority Panel or have a conflict of interest with any of the agencies applying for McKinney funding. The role of the Appeal Committee is to read and review only those areas of the application that are being appealed.

PROCESS

- A preliminary ranked CoC Program funding list is posted.

- Each agency will have one (1) business day to request copies of their score sheets, including relevant panel comments. Programs will contact HomeBase at sfNOFA@homebaseccc.org to request score sheets. Once requested, score sheets will be emailed to programs.

- Eligible Appeals: Any project that is 1) not funded or receives less funding than the amount in the application; 2) a renewal project that is ranked in Tier 2 of the CoC application (in which the applicant's funding may be at risk); or 3) falls into the bottom portion of Tier 1 that equals the Tier 2 amount may appeal the application's score based on their score sheets. The preliminary CoC Program project funding list will indicate which applications fall into these categories at the time it is posted.

- Any sponsor agency may report any discrepancies in their score sheet to Megan Owens Faught at (415) 557-6007 for the purpose of avoiding such errors in scoring in future years, and such report will not constitute an appeal.

- Any and all appeals must be received in writing within the two (2) and a half business-day appeal period; therefore, all written appeals for applications that are eligible to appeal at the time the preliminary McKinney project priority list is posted must be received by **October 28, 2015 by 5:00 PM via email.**

- All notices of appeal must be submitted electronically to HomeBase at sfNOFA@homebaseccc.org **AND** Megan Owens Faught at megan.faught@sfgov.org . Please note that appeals sent only to megan.faught@sfgov.org will not be considered.

- The notice of appeal must include a written statement specifying in detail each and every one of the grounds asserted for the appeal. The appeal must be signed by an individual authorized to represent the sponsor agency (i.e., Executive Director) and must include (highlight and/or cite) the specific sections of the application on which the appeal is based. The appeal agency must specify facts and evidence sufficient for the Appeal Committee to determine the validity of the appeal. That is, the notice of appeal must have attached the specific areas of the application being appealed and must also clearly explain why the information provided is adequate enough to gain additional points.

- If a program is facing reallocation, in part or in whole, the appealing agency may submit a more robust appeal. These appeals can include any information the agency feels is relevant, whether or not it was included in the project's original application. The program will also be given the opportunity to make a brief in-person presentation to the Appeal Committee.

- The Appeal Committee will review and evaluate all notices of appeal and decide whether or not the appeal has any validity based on the appeal policy.

- All valid appeals will be read, reviewed and evaluated by the Appeal Committee.

- The Appeal Committee will hear any in-person presentations by projects facing reallocation. The appealing agency can send up to two staff members to the presentation. The presentation is limited to 5 minutes. Following the presentation, the Appeal Committee will have the opportunity to ask questions of the appealing agency. The results of the in-person presentation will not have an affect on the project's rank; it can only be used to reverse a decision to reallocate funds. The decision of the Appeal Committee will be released after deliberation.

- Appeal Committee deliberates.

- Agencies will receive, in writing, the decision of the Appeal Committee within 2 business days.

- **Appeals Panel List is submitted for consideration and approval by LHCB.**

THRESHOLD CRITERIA
(Required but not scored. If "no" for any threshold criteria, the project is ineligible.)

Item	Maximum Available Score
HMIS Implementation – Projects that do not participate in HMIS are not eligible for funding, unless the project is a victim-service agency, serving survivors of domestic violence, or a legal services agency.	N/A
Coordinated Assessment – Projects that have not agreed to participate in Coordinated Assessment, when it is available for the project type, are not eligible for funding, unless the project is a victim-service agency or serving survivors of domestic violence.	N/A
CoC Strategic Plan Compliance Project aligns with the San Francisco CoC Strategic Plan.	N/A
Equal Access - The project ensures equal access for program participants regardless of sexual orientation or gender identify, in compliance with federal law and the 2015 CoC Program NOFA.	N/A

SCORED CRITERIA

Item		Maximum Available Score
1	**Program Performance and Client Outcomes**	**47**
1a Com parat ive Perfo rman ce	Performance on 2015 San Francisco CoC Performance Measures compared to other similar projects.	17 points. If program meets relevant performance measure benchmark, receive full points. If does not meet benchmark, is scored on a scale compared to other similar programs.
1b	**Projects may receive points under any one of the following criteria based on outcomes reported in the APR:**	

Item		Maximum Available Score
1b1	If *Permanent Supportive Housing or Services to Persons in PSH project*: Percentage of project participants that achieve housing stability in an operating year, by remaining in permanent housing or exiting to permanent housing, is at least 80%.	10 pts.* 98-100% 9 pts. 94-97.9% 8 pts. 90-93.9% 7 pts. 86-89.9% 6 pts. 82-85.9% 5 pts. 78-81.9% 4 pts. 75-77.9% 3 pts. 72-74.9% 2 pts. 70-71.9% 0 pts. <70%
1b2	If *Transitional Housing, Rapid Rehousing, or Services to Rapid Rehousing project*: The percentage of project participants that achieve housing stability in an operating year, by exiting to permanent housing, is at least 80%.	10 pts.* 90-100% 9 pts. 85-89.9% 8 pts. 80-84.9% 7 pts. 75-79.9% 6 pts. 70-74.9% 5 pts. 65-69.9% 4 pts. 62-64.9% 3 pts. 59-61.9% 2 pts. 55-58.9% 0 pts. <55%
1b3	If *Services-Only Employment project*: The percentage of leavers that increase employment income from entry to exit is at least 20%.	10 pts.* 40-100% 9 pts. 35-39.9% 8 pts. 30-34.9% 7 pts. 25-29.9% 6 pts. 20-24.9% 5 pts. 15-19.9% 4 pts. 10-14.9% 3 pts. 7-9.9% 2 pts. 4-6.9% 0 pts. <4%
1b4	If *Other Services-Only project*: The percentage of leavers in all CoC-funded projects that obtained or maintained non-cash mainstream benefits at project exit is at least 56%.	10 pts.* 92-100% 9 pts. 83-91.9% 8 pts. 74-82.9% 7 pts. 65-73.9% 6 pts. 56-64.9% 5 pts. 47-55.9% 4 pts. 38-46.9% 3 pts. 29-37.9% 2 pts. 20-28.9% 1 pts. 1-19.9% 0 pts. 0%

1c	**Projects may receive points under any one of the following criteria based on outcomes reported in the APR:**	
1c1	If *Permanent Supportive Housing Project*: The percentage of participants that increase income from entry to follow up/exit is __%.	10 points total Scales created by project type; for each scale, meeting the benchmark will be worth 6 points.
1c2	If *Transitional Housing, Rapid Re-Housing, or Supportive Services Only Project*: The percentage of leavers that increase income from entry to exit is __%.	10 points total Scales created by project type; for each scale, meeting the benchmark will be worth 6 points.
1d	**Projects may receive points under any one of the following criteria based on outcomes reported in the APR:**	
1d1	If *Permanent Supportive Housing Project*: The percentage of participants that obtained or maintained mainstream cash income sources at follow-up or project exit is __%.	**Mainstream Cash Income Sources at Follow-up or Exit:** 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
1d2	If *Transitional Housing, Rapid Re-Housing, or Supportive Services Only Project*: The percentage of leavers that obtained or maintained mainstream cash income sources at project exit is __%.	**Mainstream Cash Income Sources at Exit:** 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
1e	**Projects may receive points under any one of the following criteria based on outcomes reported in the APR:**	

1e1	If **Permanent Supportive Housing Project**: The percentage of participants that obtained or maintained non-cash mainstream resources at follow-up or project exit is __%.	**Non-Cash Mainstream Resources at Exit:** 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
1e2	If **Transitional Housing, Rapid Re-Housing, or Supportive Services Only Project**: The percentage of leavers that obtained or maintained non-cash mainstream resources at project exit is __%.	**Non-Cash Mainstream Resources at Exit:** 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
2	**Budget**	**10**
2a	Program provides the required match and leverages additional resources as part of overall program budget. A 25% match is required for all grant funds, except leasing funds.	**Leverage:*** 10 pts. >150% 9 pts. 140-149.9% 8 pts. 130-139.9% 7 pts. 120-129.9% 6 pts. 110-119.9% 5 pts. 100-109.9% 4 pts. 90-99.9% 3 pts. 80-89.9% 2 pts. 70-79.9% 1 pts. 60-69.9% 0 pts. <60% **Match:** 0 pts. >25% -1 pts. 20-24.9% -2 pts. 15-19.9% -3 pts. 10-14.9% -4 pts. 5-9.9% -5 pts. 0-4.9%

3	Administrative Efficiency	33

3a	**Client Feedback Process:** Project has effective methodology in place to obtain and respond to participant feedback, with particular focus on:
	• A robust process for collecting client feedback that is reliable and non-coercive.
	• A process for responding to client feedback, for example:
	   o Identifying training needs;
	   o Reviewing project policies and procedures; or
	   o Making changes to project operation.
	
	Suggested Basis for Scoring:
	• Program Evaluation: Administrative Efficiency
		3

3b	**Self-evaluation:** Project has effective methodology in place for periodic self-evaluation and program improvement:
	• Processes for eliciting feedback from various stakeholders, including project staff, leadership, board members, and partner organizations.
	• A process for responding to stakeholder feedback, for example:
	   o Identifying training needs;
	   o Reviewing project policies and procedures; or
	   o Making changes to project operation.
	
	Suggested Basis for Scoring:
	• Program Evaluation: Administrative Efficiency
		2

3c	Project has been responsive to outstanding or pending HUD monitoring findings, HSA findings, City-wide joint fiscal monitoring findings, financial audit findings, and has no other indication of major capacity issues. • Projects that do not provide requested documentation of audit(s) and/or monitoring receive 0 points. • Panelists may deduct points for audit findings or other indications of major capacity issues apparent in the application materials. Suggested Basis for Scoring: • Audit and Monitoring documentation • Program Evaluation: Administrative Efficiency	6
3d	Project receives full points if it has: • Drawn down or invoiced at least quarterly; • Drawn down or invoiced grant funds regularly; • Used all grant funds (legacy SHP only); and/or • Maintained full project units (legacy S+C only). Suggested Basis for Scoring: • Program Evaluation: Administrative Efficiency	6

3e	Agency/collaborative participates in Continuum of Care Planning Meetings.	5 pts.* >12 4 pts. 10-12 3 pts. 7-9 2 pts. 4-6 1 pt. 1-3 0 pts. 0	
3f	Data quality is calculated as the percentage of data fields that are complete (there is a response entered in that field). If more than 5% of responses for a given data element are "Don't Know/Refused", then all "Don't Know/Refused" responses for that data element will count as ½ of a complete data field. Otherwise, "Don't Know/Refused" responses will count as a complete data field.	8 pts. 100% 7 pts. 90-99.9% 6 pts. 80-89.9% 5 pts. 70-79.9% 4 pts. 60-69.9% 3 pts. 50-59.9% 2 pts. 40-49.9% 1 pt. 30-39.9% 0 pts. <30%	
3g	Project is inclusive of and serves program participants, within the project's target population, with the highest needs and vulnerability, including but not limited to: • Low or no income at entry; • Current or past experience of substance abuse; • Criminal history (to the extent possible within the requirements of federal, state, and local law); and • Chronic homelessness Suggested Basis for Scoring: • Project narrative on serving high need and vulnerable populations	3	
Community Priority for Permanent Housing		**6**	
4a	If program is a legacy S+C project or SHP Permanent Supportive Housing project for **legacy leasing, rental assistance, or operations,** award full points.	5	
4b	If a program is a legacy S+C or SHP Permanent Supportive Housing project and commits *all* units made available through turnover to housing chronically homeless individuals or families, award full points.	1	
		Total:	**96**

2015 McKinney-Vento Continuum of Care Homeless Assistance Grants
2015 CoC Performance Measures

The performance measures will be incorporated into the Renewal Project Scoring Tool in the following way:
- Each project will only be scored on those measures relevant to its program type.
- Depending on the number of measures relevant to each program type, each relevant measure will be assigned a number of points (so all add up to the 17 points on the scoring tool).

Project Type	# of points/measure
PSH/SSO to PSH Projects	1.7
RRR/SSO to RRH & TH	2.125
SSO Employment	2.429
SSO Legal	2.833

- If a project meets the benchmark, it will receive the full amount of points allocated to that measure.
- If a project does not meet the benchmark, it will be scored on a scale compared to other similar projects.
- The amount of points received on all applicable measures will be added up as the score for Factor 1a of the Renewal Project Scoring Tool.
- Scales will be available, upon request, during the Program Evaluation Report review process.

#	Measure	Defined	PSH	SSO to PSH	RRH	SSO to RRH	TH	SSO Employment	SSO Legal
1	Obtain/Retain PH	% of participants remaining in PH or exited to PH	90%	90%					
		% of participants exited to PH			80%	80%	80%	40%	30%
2	Reduce evictions	% of households evicted this year	< 10%	< 10%					
3	Recidivism	% of participants who did not exit to PH, death,	< 5%	< 5%					

#	Measure	Defined	PSH	SSO to PSH	RRH	SSO to RRH	TH	SSO Employment	SSO Legal
		or institution							
4	Recidivism	% of participants that exited to PH returning to homelessness within 12 months of exit, using HMIS data showing reentry in the system			Collect data in 2015, but will not operate under a set baseline.				
5	Reduce time to access permanent housing	% of participants obtaining permanent housing within 90 days of being accepted into the program.			60%	60%			
6	Increase employment income	% of adults who increased employment income between entry and follow-up/exit	15%	15%	30%	30%	30%	75%	
7	Increase total income	% of participants with increased income between entry and follow up/exit	20%	20%	54%	54%	54%	75%	30%
8	Maintain or increase total income	% of participants that either increased or maintained income between entry and follow up/exit	80%	80%	70%	70%	70%	85%	85%
9	Reduce households with no income	% of households exiting with income (of any amount)	95%	95%	95%	95%	95%	95%	95%
10	Increase enrollment in SSI/SSDI, SDI, CAPI and veterans benefits	% of disabled participants with SSI/SSDI, SDI, CAPI, or veterans benefits	40%	40%	40%	40%	40%	40%	40%
11	Obtain non-cash mainstream benefits	% of participants with non-cash mainstream benefits by follow up/exit (includes health insurance)	95%	95%	95%	95%	95%	95%	95%
12	Occupancy	% reflecting average # of households residing in a program per night relative to capacity	95%	95%			95%		

2015 NEW PROJECT SCORING TOOL

THRESHOLD CRITERIA

(Required but not scored. If "no" for any threshold criteria, the project is ineligible.)

SCORED CRITERIA

Item	Maximum Available Score
HMIS Implementation: Projects that do not participate, or have not agreed to participate, are not eligible for funding, unless it is a victim-service agency, serving survivors of domestic violence, or a legal services agency. Project has agreed to participate in the HSA-administered HMIS and has signed a local Certification of Intent to participate.	N/A
Coordinated Assessment: Projects that have not agreed to participate in Coordinated Assessment, when it is available for the program type, are not eligible for funding, unless the project is a victim-service agency or serving survivors of domestic violence.	N/A
Eligible Applicant: Applicant and subrecipient (if any) are eligible. Eligible project applicants for the CoC Program are nonprofit organizations, States, local governments, and instrumentalities of State and local governments.	N/A
Project qualifies as HUD CoC Permanent Housing	N/A
Project can meet HUD Timeliness Standards: Project has secured or will secure proof of site control, match, environmental review, and the documentation of financial feasibility within 12 months of the announcement of the award.	N/A
Target Populations: The population to be served must meet CoC program eligibility requirements, and the project application must clearly establish eligibility of project applicants.	N/A
Amount of Request: The LHCB retains the right to request that new applicants adjust the amount of their requests.	N/A
Ineligible Activities for New Projects: In order to best optimize the McKinney-Vento Continuum of Care funds, the LHCB has determined that new projects shall not request funds for construction, rehabilitation, or acquisition.	N/A
Masterleased Units: If units are masterleased, lease is for at least 10 years.	N/A
CoC Strategic Plan Compliance: Project aligns with the San Francisco CoC Strategic Plan.	N/A
HMIS Budget: Project has allocated at least 1% of its budget to HMIS, to support San Francisco's HMIS implementation (if applicable).	N/A
Equal Access: The project ensures equal access for program participants regardless of sexual orientation or gender identify, in compliance with federal law and the 2015 CoC Program NOFA.	N/A

Item		Maximum Available Score
1	**Program Description**	**23**
1a	Program design includes provision of appropriate supportive services and type, scale, and location of the supportive services fit the needs of the program participants and the mode of transportation to those services. Program participants are helped to obtain and remain in permanent housing in a manner that fits their needs.	10
1b	Housing where participants will reside is fully described, accessible and appropriate to the program design proposed, and type, scale, and location of the housing fit the needs of the program participants.	4
1c	Linkages to other services or agencies are described.	4
1d	Program will use a "housing first" approach, offering assistance without preconditions (such as sobriety) and rapid placement/stabilization in permanent housing.	5
2	**Mainstream Resources**	**5**
2a	Program has policies and procedures that screen all clients for eligibility for mainstream resources and assist them in accessing mainstream resources, and the specific plan for ensuring clients will be individually assisted to obtain the benefits of the mainstream health, social, and employment programs for which they are eligible to apply meets the needs of the program participants. Participants are assisted to both increase their incomes and live independently using mainstream housing and service programs in a manner that fits their needs.	3
2b	Program conducts or provides access to training for staff on available mainstream resources for which clients may qualify.	2
3	**Project Population**	**6**
3a	Population to be served is all chronically homeless or another high priority population, and process for identifying clients is compatible with Coordinated Assessment and other community values.

For new Rapid Re-Housing projects, other high priority populations include:
• Households with children and transitional age youth coming directly from the streets, emergency shelters, or other places on meant for human habitation, and
• Persons fleeing domestic violence or trafficking. | 6 |

4	Agency Background/Capacity	25
4a	Agency has successfully operated at least one program similar to the one proposed for at least two years and/or has a strong grant management, compliance and performance history. Agency has prior experience: • Providing homeless housing or services; • Administering rental assistance; or • As a landlord or property management entity. If recipient of prior HUD Continuum of Care Grant, project applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s), as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings. **For Rapid Re-Housing projects:** Applications for Rapid Re-Housing from providers specializing in serving families, single adults, and unaccompanied youth are encouraged. These applicants may not have experience providing Rapid Re-Housing or administering a permanent housing project. If an applicant cannot demonstrate adequate experience as described above, the applicant may identify a consultant or partner agency with the necessary experience. The applicant should describe the consultant or partner agency's experience, as outlined above, and indicate how they will partner with the applicant. The relationship with the consulting or partner agency need not be long term, but should be of a reasonable duration to supplement the applicant agency's own expertise. This factor will be evaluated and pre-scored by San Francisco Human Services Agency or HomeBase staff.*	For Permanent Supportive Housing: 10 For Rapid Re-Housing: 15 Points
4b	Other housing programs operated by the sponsor have at least an 80% of project participants that achieve housing stability in an operating year, by remaining in permanent housing or exiting to permanent housing.	5 pts.* >90% 4 pts. 85-89.9% 3 pts. 80-84.9% 2 pts. 75-79.9% 1 pts. 70-74.9% 0 pts <70%
4c	Agency/Collaborative participates in Continuum of Care Planning Meetings. (If agency/collaborative representative attended more than 12 planning meetings in past year (medium attendance), award full points.)	5 pts.* >12 4 pts. 10-12 3 pts. 7-9 2 pts. 4-6 1 pts. 1-3 0 pts. 0
4d	For new Permanent Supportive Housing projects: Agency has identified a site for the proposed project, for which it has site control or an enforceable commitment to obtain site control.	5
5	Housing	5
5a	Housing project to be funded applies to new units in owned or leased housing (and not re-program existing affordable housing units as housing for a McKinney eligible population) and grant funding requested is to be used for housing activities (leasing, rental assistance, operations) instead of supportive services.	5

6	**Budget and Cost Effectiveness**	**15**
6a	Budgeted staff and expenses are adequate to support the proposed program and cost-effective.	4
6b	Budget is clearly articulated, with no unnecessary or unexplained items.	1
6c	Project provides the required match and leverages additional resources as part of overall project budget. *A 25% match is required for all grant funds, except leasing funds.*	**Leverage:*** 10 pts. >150% 9 pts. 140-149.9% 8 pts. 130-139.9% 7 pts. 120-129.9% 6 pts. 110-119.9% 5 pts. 100-109.9% 4 pts. 90-99.9% 3 pts. 80-89.9% 2 pts. 70-79.9% 1 pts. 60-69.9% 0 pts. <60% **Match:** 0 pts. >25% -1 pts. 20-24.9% -2 pts. 15-19.9% -3 pts. 10-14.9% -4 pts. 5-9.9% -5 pts. 0-4.9%
7	**Cultural Competency**	**10**
7a	Program includes involvement of clientele in designing and operating the program, and the program has written policies regarding client participation that align with HEARTH.	2
7b	Method of service delivery described includes culture-specific/sensitive elements, including that for programs serving children the program has policies and procedures that ensure educational needs are met. Program has the most integrated setting appropriate to meet the needs of qualified persons with disabilities. This means that programs or activities must be offered in a setting that enables individuals with disabilities to interact with persons without disabilities to the fullest extent possible.	2
7c	Program design is intentionally inclusive of and accessible to all eligible clients and amenities (e.g., grocery stores, pharmacies, etc.) are accessible in the community.	2
7d	Program materials reflect cultural competency.	2
7e	Program has written policies regarding client confidentiality, especially for special populations such as survivors of domestic violence.	2
8	**Disability Access Checklist**	**5**
8a	Program will be physically accessible to persons with disabilities.	1
8b	Program will provide communications that are accessible to persons with disabilities.	1
8c	Program demonstrates a plan for programmatic accessibility.	2
8d	Program has a plan for informing participants of their rights under the ADA.	1
9	**Community Priority for Permanent Housing**	**6**
9a	If program is "reallocating to itself" to create Permanent Supportive Housing or Rapid Re-Housing using **leasing, rental assistance, or operations funds**, award full points.	5
9b	If the program commits *all* units made available through turnover to housing chronically homeless individuals or families, award full points.	1
	Total:	**100**

Renewal Projects for which HSA is the Recipient

SUBRECIPIENT:
PROJECT NAME:

ON OR BEFORE 12:00 P.M. ON OCTOBER 16, 2015:

Hand deliver items listed below to Megan Owens Faught at 1650 Mission St. _AND_
Email a copy of the documents requested below (PDF format preferred) to the following
address: sfnofa@homebaseccc.org.

NOTE: Please place a sheet of colored paper between each packet.
All copies must be double-sided and _collated!_

✓ Copies Enclosed	PDF Emailed		Number of copies
☐	☐	This Proposal Submission Checklist	1 copy **and** email
☐	☐	HUD Project Application (Formerly Exhibit 2)	1 copy **and** email
☐	☐	Local Project Narrative	1 copy **and** email
☐	☐	2880 Applicant/Recipient Disclosure/Update Report **(leave signature line blank)**	1 copy **and** email
☐	☐	Documentation of match resources	1 original (with signature) **and** email
☐	☐	Completed leverage letters	1 copy **and** email

Contact person's name:
Phone:
E-mail:
FAX:

For Department use only: DATE received: _____ TIME received: _____
Application received by (name): _____

Renewal Direct Recipient Projects

AGENCY:
PROJECT NAME:

ON OR BEFORE 12:00 P.M. ON OCTOBER 16, 2015:

Hand deliver items listed below to Megan Owens Faught at 1650 Mission St. _AND_
Email a copy of the documents requested below (PDF format preferred) to the following
address: sfnofa@homebaseccc.org

NOTE: Please place a sheet of colored paper between each packet.
All copies must be double-sided and _collated!_

Copies Enclosed	PDF Emailed		Number of copies
☐	☐	This Proposal Submission Checklist	1 copy *and* email
☐	☐	HUD Project Application	1 copy *and* email
☐	☐	Local Project Narrative	1 copy *and* email
☐	☐	Documentation of match resources	1 original (with signature) *and* email
☐	☐	Completed leverage letters	1 copy *and* email

ON OR BEFORE 4:00 P.M. ON OCTOBER 16, 2015:
email a PDF copy of the following documents to sfnofa@homebaseccc.org.

PDF Emailed	Not Applicable	
☐		Applicant Profile in e-SNAPS (one per applicant, NOT one per project)
☐		2880 Applicant/Recipient Disclosure/Update Report
☐	☐	SF-LLL Disclosure of Lobbying Activities (if applicable)
☐	☐	Applicant Code of Conduct (if not already on HUD's website)
☐		HUD 50070 Certification of Drug-Free Workplace
☐	☐	Non-profit documentation showing applicant eligibility (if not previously submitted or if any information has changed)
☐	☐	HUD Form SF 424-Supplement (OPTIONAL and for private non-profits only) (with SF-424)

Contact person's name:
Phone:
E-mail:
FAX:

For Department use only: DATE received: _____ TIME received: _____
Application received by (name): _____

2015 PROJECT NARRATIVE
(FOR RENEWAL PROJECTS)

Please answer the following question. Your response to <u>Question 1 should not exceed one page</u>, single-spaced, 12 point, Times New Roman font, one-inch margins. An electronic version of the form, just the questions, is available at <u>www.sfgov.org/lhcb</u>. You will be able to type into that form.

1. The Priority Panel will review this document together with your HUD application and the Program Evaluation. Please review the score sheet factors on which the Panel will score your project and provide a brief narrative to explain to the Panel anything you would like them to keep in mind about your project. Please focus on any issues related to program design, population served, or other factors that impact your program outcomes, as well as any special situations that occurred in the past year that may have impacted outcomes or grant spending.

Please answer the following question. Your response to <u>Question 2 should not exceed 150 words.</u>

2. Please describe how your project meets the threshold requirement of equal access for program participants regardless of sexual orientation or gender identity, in compliance with federal law and the 2015 CoC Program NOFA.

Please answer the following question. Your response to <u>Question 3 should not exceed 150 words.</u>

3. Please describe how your project is inclusive of and serves program participants, within the project's target population, with the highest needs and vulnerability, including but not limited to:
   - Low or no income at entry;
   - Current or past experience of substance abuse;
   - Criminal history (to the extent possible within the requirements of federal, state, and local law); and
   - Chronic homelessness

2015 PROJECT NARRATIVE RESPONSE
(FOR RENEWAL PROJECTS)

AGENCY NAME:	PROJECT NAME:
CONTACT PERSON NAME:	
TELEPHONE:	EMAIL:

Projects: Please refer to the full questions and page limits found on the *2015 Project Narrative (for renewal projects)* before responding here.

1. We want the Priority Panel to understand the following about our project:

2. We meet the threshold requirement of equal access for program participants regardless of sexual orientation or gender identity, in compliance with federal law and the 2015 CoC Program NOFA. Please state yes or no. If necessary, please explain.

3. Our project is inclusive of and serves program participants, within the project's target population, with the highest needs and vulnerability. Please state yes or no. If necessary, please explain.

2015 McKinney-Vento Continuum of Care Homeless Assistance Grants
LOCAL RENEWAL APPLICATION MATERIALS
WHERE TO GET THE DOCUMENTS YOU MAY NEED

Timeline: Please refer to the Submission Checklist (at page 14) and the Timeline (separate document) to see when these documents are due.

Each PROJECT must submit the following:

1. Project application (formerly known as Exhibit 2)
Will be completed on line after the recipient (which may be you) completes the Applicant Documentation at: http://www.hud.gov/esnaps

Training Modules can be found at: https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources/

2. HUD 2880 – Applicant/Recipient Disclosure/Update Report
Available at: http://portal.hud.gov/hudportal/documents/huddoc?id=2880.pdf

3. Local Project Narrative (for Renewal Projects)
Available above (at page 15) or online at: www.sfgov.org/LHCB

4. Leverage/Match letters
You create these using the format provided in Technical Assistance (TA) Handbook for Renewal Projects packet, pg. 33 or found at www.sfgov.org/LHCB. See also the information distributed in the HUD TA Manual in your Bidders' Conference packet.

Trouble downloading?
Contact Megan Owens Faught at 415-557-6007 or Megan.Faught@sfgov.org.

2015 McKinney-Vento Continuum of Care Homeless Assistance Grants
NEW PROJECT SUBMISSION CHECKLIST

| APPLICANT NAME: |
| PROJECT NAME: |

ON OR BEFORE 12:00 P.M. ON OCTOBER 16, 2015:
Hand deliver items listed below to Megan Owens Faught at 1650 Mission St. _AND_
Email a copy of the documents requested below (PDF format preferred) to the following
address: sfnofa@homebaseccc.org.

NOTE: Please place a sheet of colored paper between each packet.
All copies must be double-sided and _collated!_

✓ Copies Enclosed	✓ Emailed		Number of copies
☐	☐	This Proposal Submission Checklist	1 copy _and_ email
☐	☐	HUD Project Application	1 copy _and_ email
☐	☐	Local Project Narrative	1 copy _and_ email
☐	☐	Cultural Competency Narrative and attachments	1 copy _and_ email
☐	☐	Disability Access Checklist and attachments	1 copy _and_ email
☐	☐	2880 Applicant/Recipient Disclosure/Update Report **(leave signature line blank if HSA is recipient)**	1 copy _and_ email
☐	☐	Most recent Agency Audit	1 copy _and_ email
☐	☐	Documentation of match resources	1 original (with signature) _and_ email
☐	☐	Completed leverage letters	1 copy _and_ email

**For Projects that will NOT have HSA as the Applicant/Recipient/Grantee, also confirm the
following has been submitted on e-SNAPS:**

✓ Copies Submitted	✓ Not Applicable	Once per APPLICANT (not per application):
☐	☐	HUD Form SF 424-Supplement (OPTIONAL and for private non-profits only)
☐	☐	Non-profit documentation showing applicant eligibility (non-profits only)
		HUD 50070 (Certification for a Drug-Free Workplace)
☐	☐	SF-LLL Disclosure of Lobbying Activities (if applicable)
☐	☐	Applicant Code of Conduct (if not already on HUD's website)

| Contact person's name: |
| Phone: |
| E-mail: |
| FAX: |

For Department use only: DATE received: _____ TIME received: _____
Application received by (name): _____

2015 PROJECT NARRATIVE
(FOR NEW PROJECTS)

Please answer the following questions. Your response to Questions 1-6 should not exceed three pages, single-spaced, 12 point, Times New Roman font, one-inch margins. An electronic version of the form, just the questions, is available at www.sfgov.org/lhcb. You will be able to type into that form.

1. Please describe your program's policies and procedures for screening clients for appropriate and relevant mainstream programs and resources for which they may be eligible.

2. Please describe how your agency conducts or provides access to training for staff specifically related to accessing mainstream services.

3. Please state yes or no as to whether your project meets the threshold requirement of equal access for program participants regardless of sexual orientation or gender identity, in compliance with federal law and the 2015 CoC Program NOFA. If necessary, please explain. **Please do not exceed 150 words.**

4. Please state yes or no as to whether your project is inclusive of and serves program participants, within the project's target population, with the highest needs and vulnerability, including but not limited to the following below. If necessary, please explain. **Please do not exceed 150 words.**
    - Low or no income at entry;
    - Current or past experience of substance abuse;
    - Criminal history (to the extent possible within the requirements of federal, state, and local law); and
    - Chronic homelessness

5. Has your agency operated at least one program similar to the one proposed for at least two years? If yes, please describe. Applications for Rapid Re-Housing from providers specializing in serving families, single adults, and unaccompanied youth are encouraged. If you cannot demonstrate adequate experience as described above, you may identify a consultant or partner agency with the necessary experience. You should describe the consultant or partner agency's experience, as outlined above, and indicate how they will partner with you. The relationship with the consulting or partner agency need not be long term, but should be of a reasonable duration to supplement your agency's own expertise.

6. If you indicated on your Project Application that there are any unresolved HUD monitoring findings, or outstanding audit findings related to any of the grant listed therein, provide a copy of such findings and any related correspondence.

7. Identify other permanent housing programs which you (applicant and/or sponsor) operate that have at least an 80% of project participants that achieve housing stability in an operating year, by remaining in permanent housing or exiting to permanent housing:

Permanent Housing Program	% of Participants who have Retained Permanent Housing in an operating year.

8. How many Continuum of Care Planning Meetings did someone from your agency attend from January 2014 to the present? (CoC planning meetings include: LHCB meetings, Funding Committee meetings, S+C Oversight meetings, Policy Committee meetings, HEARTH Workgroup, or other like meetings).

Name of Group/Meeting	Number of Meetings Attended

9. Does your project (choose one):
   ☐ Apply to new units in owned or leased housing?
   ☐ Reprogram existing affordable housing units as housing for a McKinney eligible population?

10. Is this application for reallocated funding, Permanent Housing Bonus funding or would you like it to be considered for both opportunities?
    ☐ Reallocated funding
    ☐ Bonus funding
    ☐ Consider for both reallocated funding and bonus funding

11. Please submit one copy (1) of your agency's most recent financial audit.

12. Please list the contact information for your two largest funders.

General Threshold Questions:

1. Will your project participate in HMIS? Yes _____ No _____

2. Will your project participate in Coordinated Assessment? Yes_____ No_____

3. When will your project be ready for occupancy? _____

4. If you are asking for funds for units under a masterlease, indicate the length of the lease (must be for at least 10 years): _____

5. HUD promotes energy efficient housing. Will your project use Energy Star appliances?
   _____ Yes   _____ No

6. This application requests at least 1% of total program funding for HMIS. These funds will be spent by the City/County of San Francisco Human Services Agency on the staff or HMIS license/operations costs associated with the program.
   _____ Yes   _____ No

2015 PROJECT NARRATIVE RESPONSE
(FOR NEW PROJECTS)

AGENCY NAME:	
PROJECT NAME:	
CONTACT PERSON NAME:	
TELEPHONE:	
EMAIL:	
FAX:	

Projects: Please refer to the full questions and page limits found on the *2015 Project Narrative (for new projects)* before responding here.

1. Please describe program's policies and procedures for screening clients for mainstream programs and resources for which they may be eligible.

2. Please describe training for staff specifically related to accessing mainstream services

3. Please state yes or no as to whether your project meets the threshold requirement of equal access for program participants regardless of sexual orientation or gender identity, in compliance with federal law and the 2015 CoC Program NOFA. If necessary, please explain.

4. Please state yes or no as to whether your project is inclusive of and serves program participants, within the project's target population, with the highest needs and vulnerability, including but not limited to the following below. If necessary, please explain.
   a. Low or no income at entry;
   b. Current or past experience of substance abuse;
   c. Criminal history (to the extent possible within the requirements of federal, state, and local law); and
   d. Chronic homelessness

5. Please describe programs similar to the one proposed operated by your agency.

6. If you indicated on your Project Application that there are any unresolved HUD monitoring findings, or outstanding audit findings related to any of the grant listed therein, provide a copy of any unresolved HUD monitoring findings and any related correspondence.

7. Identify other permanent housing programs which you (applicant and/or sponsor) operate that have at least an 80% of project participants that achieve housing stability in an operating year, by remaining in permanent housing or exiting to permanent housing:

Permanent Housing Program	% of Participants who have Retained Permanent Housing in an operating year.

8. How many Continuum of Care Planning Meetings did someone from your agency attend from January 2014 to the present?

Name of Group/Meeting	Number of Meetings Attended

9. Does your project (choose one):
   ☐ Apply to new units in owned or leased housing?
   ☐ Reprogram existing affordable housing units as housing for a McKinney eligible population?

10. Is this application for reallocated funding, Permanent Housing Bonus funding or would you like it to be considered for both opportunities?
    ☐ Reallocated funding
    ☐ Bonus funding
    ☐ Consider for both reallocated funding and bonus funding

11. Please submit one copy (1) of your agency's most recent financial audit.

12. Please list the contact information for your two largest funders.

General Threshold Questions:

7. Will your project participate in HMIS? Yes _____ No _____

8. Will your project participate in Coordinated Assessment? Yes _____ No _____

9. When will your project be ready for occupancy? _____ (Note that Bonus projects must be ready for occupancy within 6 months of award announcement.)

10. If you are asking for funds for units under a masterlease, indicate the length of the lease (must be for at least 10 years): _____

11. HUD promotes energy efficient housing. Will your project use Energy Star appliances?
_____ Yes   _____ No

2015 CULTURAL COMPETENCY NARRATIVE
(FOR NEW PROJECTS)

Please answer the following questions on this document in no more than two pages, single-spaced, 12 point, Times New Roman font, one inch margins. An electronic version of the form is available at www.sfgov.org/lhcb. You will be able to type into that form.

a. Describe the ways in which your current and former clients are involved in the design and operation of the program. Be specific, e.g., advisory board, alumni advisors, resident meetings, regular formal feedback, etc. Please be sure to attach any written policies regarding client participation (to align with HEARTH).

b. How does your method of service delivery take into account the particular characteristics of the clients you will house and serve? For programs serving children in the program, please include information about how you ensure that educational needs of children are met (to align with HEARTH). Please be sure to attach any written policies you have on this issue.

c. How do clients find out about the program?

d. Program design is intentionally inclusive of and accessible to all eligible clients and amenities (e.g., grocery stores, pharmacies, etc.) are accessible in the community.

e. What do clients need in order to enroll in the program? What are the reasons clients are not accepted into the program? Do you document turnaways? Do you maintain waiting lists? Describe.

f. Describe the neighborhood and building where the program is located. How do clients get to the program? (E.g., MUNI access.)

g. Attach the following:

- Outreach materials
- Eligibility criteria
- Rules of the program
- Expulsion criteria
- Denial of Service Policy
- Grievance/complaint procedure
- Client feedback procedures in place
- Client confidentiality, especially for special populations such as survivors of domestic violence
- Attach any other related policies, especially related to:
- Client involvement in program design and operation
- Meeting children's educational needs

2015 CULTURAL COMPETENCY NARRATIVE RESPONSE
(FOR NEW PROJECTS)

AGENCY NAME:	
PROJECT NAME:	
CONTACT PERSON NAME:	
TELEPHONE:	
EMAIL:	
FAX:	

Projects: Please refer to the full questions and page limits found on the *2015 Cultural Competency Narrative (for new projects)* before responding here.

a. Describe the ways in which your current and former clients are involved in the design and operation of the program. Be specific, e.g., advisory board, alumni advisors, resident meetings, regular formal feedback, etc. Please be sure to attach any written policies regarding client participation (to align with HEARTH).

b. How does your <u>method</u> of service delivery take into account the particular characteristics of the clients you will house and serve? For programs serving children in the program, please include information about how you ensure that educational needs of children are met (to align with HEARTH). Please be sure to attach any written policies you have on this issue.

c. How do clients find out about the program?

d. Program design is intentionally inclusive of and accessible to all eligible clients and amenities (e.g., grocery stores, pharmacies, etc.) are accessible in the community.

e. What do clients need in order to enroll in the program? What are the reasons clients are not accepted into the program? Do you document turnaways? Do you maintain waiting lists? Describe.

f. Describe the neighborhood and building where the program is located. How do clients get to the program? (E.g., MUNI access.)

g. Attach the following:
   - Outreach materials
   - Eligibility criteria
   - Rules of the program
   - Expulsion criteria
   - Denial of Service Policy
   - Grievance/complaint procedure
   - Client feedback procedures in place

- Client confidentiality, especially for special populations such as survivors of domestic violence
- Attach any other related policies, especially related to:
- Client involvement in program design and operation
- Meeting children's educational needs

2015 DISABILITY ACCESS CHECKLIST
(For New Projects)

Name of Department or Agency	Name of Program or Service

Address	Phone

Contact Person (ADA Coordinator)	Phone	E-mail

Funding Agency

This grant is intended for activities at:

☐ New site

☐ Existing site

☐ Rehabilitation of existing site

This grant will fund a:

☐ New program or service

☐ Existing program or service

☐ Multiple programs or services

Address of program site: _____

Please answer the following questions *as they apply to the program for which you are applying for funding.*

Physical Access

Have you had professional review of architectural accessibility of your site?   Yes ☐   No ☐

If yes, what was the date of the review? _____

Who conducted the review? _____

The following are major areas for review. If the professional review found any problems, please indicate. Please list additional items at the bottom.

1. The program or service is wheelchair accessible for:

Paths of travel   Yes ☐   No ☐

Restrooms   Yes ☐   No ☐

Areas where services are provided   Yes ☐   No ☐

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2. Signage for people with vision-impairments:

In elevators   Yes ☐   No ☐   Not applicable (no elevators) ☐

Marking paths of travel   Yes ☐   No ☐

---

3. If you provide transportation, is it   Yes ☐   No ☐   Not applicable (not   ☐
    accessible?   provided)

Other identified physical access issues:

_____

_____

_____

Communication Access

1. Program materials are available in:

☐ Large print   ☐ Braille   ☐ Cassette   ☐ Computer disk   ☐ Other _____

---

2. Sign language interpretation is available if needed: Yes ☐   No ☐

---

3. The program has a TTY machine: Yes ☐   No ☐

    If yes, please provide the number: _____

    If no, please explain how you communicate with hearing impaired people by phone.

Programmatic Access **(the answers to the following questions should not exceed three pages (six pages for collaborative projects), single spaced, 12 point, Times New Roman font.)**

1. How do you notify your clients of their rights under disability rights laws? (If you are a new project applicant, please attach any sample language.)

2. How do you train your staff on their obligations under the ADA, the Fair Housing Amendments Act, and other disability rights laws? (If you are a new project applicant, please attach outlines of any trainings and any relevant materials.)

3. Do you have a reasonable accommodation policy? (If yes, and you are a new project applicant, please attach.)   Yes ☐   No ☐

4. We are interested in learning how you have provided, or would provide, reasonable accommodations to clients with a variety of disabilities. If you have actually encountered any of the following situations, please let us know.

   a. What would you do with a client with a hearing impairment who needs your services? How would you communicate on the phone and in person?

   b. What would you do with a client who is blind? How would you provide her with information that is usually given in writing? How would that person collect information or documentation for you?

   c. What would you do with a client who arrived at your door in a wheelchair or who had mobility impairments that made it difficult to get to your office?

   d. What would you do with a client who appears to have a cognitive impairment that made it difficult for him to understand instructions or remember appointments? How would you provide services?

e. What would you do with a client who appears to have a psychiatric impairment that made her paranoid and reluctant to reveal required information? How would you provide services?

f. What would you do with a client who appears to have a psychiatric impairment that made him argumentative? How would you provide services?

5. What percentage of your clients would you estimate have disabilities? _____ %

Please allocate: physical disabilities _____ %   mental disabilities _____ %

6. What steps do you take to ensure that eligibility criteria do not screen out people with disabilities?

7. Do you have a grievance procedure? (If yes, and you are a new project applicant, please attach.)   Yes ☐   No ☐

Verified by: _____   _____
        Executive Director   **Date**

Attachments:

- Sample language for how you notify clients of their rights under disability rights laws (item 1 under Programmatic Access).

- Outlines of ADA and Fair Housing trainings and any other relevant materials (item 2 under Programmatic Access).

- Reasonable accommodation policy (item 3 under Programmatic Access).

- Grievance procedure (item 7 under Programmatic Access).

- Any other related materials that you wish to attach.

Trouble downloading?
Contact Megan Owens Faught at 415-557-6007 or Megan.Faught@sfgov.org.

2015 McKinney-Vento Continuum of Care Homeless Assistance Grants
LOCAL NEW APPLICATION MATERIALS
WHERE TO GET THE DOCUMENTS YOU MAY NEED

Timeline: Please refer to the Submission Checklist (at page 12) and the Timeline (separate document) to see when these documents are due.

Recipients: For more information about where to find the Applicant Documents please see the Technical Assistance (TA) Handbook for New Projects.

Each PROJECT must submit the following:

1. Project application (formerly known as Exhibit 2)
Will be provided in Word format after you tell Megan Owens Faught you intend to apply, either at the Bidders Conference or via email at megan.faught@sfgov.org.

Training Modules can be found at: https://www.hudexchange.info/e-snaps/guides/coc-program-competition-resources/

2. HUD 2880 – Applicant/Recipient Disclosure/Update Report
Available at: http://portal.hud.gov/hudportal/documents/huddoc?id=2880.pdf

3. Local Project Narrative (for New Projects)
Available above (at page 13) or online at: www.sfgov.org/LHCB

4. Cultural Competency Narrative and attachments
Available above (at page 19) or online at: www.sfgov.org/LHCB

5. Disability Access Checklist for New Project Applicants
Available above (at page 22) or online at: www.sfgov.org/LHCB

6. Leverage/Match letters
You create these using the format provided in Technical Assistance (TA) Handbook for New Projects packet, pg. 35 or found at www.sfgov.org/LHCB. See also the information distributed in the HUD TA Manual in your Bidders' Conference packet

7. Documentation of Sponsor Eligibility (applies only if the subrecipient is different than the recipient (that is, if HSA is your recipient, this is you))
　　　　It is in your files.

　　　　What is it?
　　　　Private Nonprofit Status

- A copy of the IRS ruling providing tax-exempt status under section 501(c)(3) of the IRS Code; **or**
- Documentation showing that the applicant/sponsor is a certified United Way agency; **or**
- A certification from a designated official of the organization compliant with the 2010 Continuum of Care Homeless Assistance NOFA

Public Nonprofit Status, aka Community Mental Health Centers

A letter or other document from an authorized official stating that the organization is a public nonprofit organization.

Trouble downloading?
Contact Megan Owens Faught at 415-557-6007 or Megan.Faught@sfgov.org.

September 28, 2015 39

2015 San Francisco McKinney-Vento Continuum of Care Process and Timeline

Event/ Activity	Responsible	Date/Time	Place	Notes
NOFA Released	HUD	September 17, 2015	N/A	HUD releases the Notice of Funding Availability
Bidders Conference	HSA, HomeBase	September 28, 2015 1:00-4:00PM	170 Otis, Born Auditorium	Release information about local priorities and HUD guidelines for proposals. Agencies will be given a proposal package and training on how to complete the application.
Agencies write Proposals	Agencies	September 28, 2015 - October 16, 2015, 12:00 PM	Various	
Proposals are due	Agencies	October 16, 2015, 12:00 PM	Via email + Paper Copy at 1650 Mission	See Proposal Submission Checklist for list of required documents and information about where and how to turn in documents.
Priority Panel Training	HSA, HomeBase	October 19, 2015	Online	Priority Panel receives training for scoring projects.
Priority Panel reviews Proposals	HSA, HomeBase, Priority Panel	October 19, 2015 – October 22, 2015	N/A	Priority Panel reads and scores proposals individually.
Priority Panel meets	HSA, HomeBase	October 22, 2015 – October 23, 2015	1650 Mission St	Panel meets to discuss proposals and determine how projects will be ranked in the 2015 application.
Posting of Preliminary Priority List	HSA	October 26, 2015 before midnight	Via e-mail	Preliminary priority list emailed to agencies.
Sponsor Appeals due	Agencies	October 28, 2015 5:00 PM	Via e-mail	Agencies may inspect their scores and formulate a written appeal based on appeal policy.
Appeal Committee meets	Appeal Committee	October 30, 2015	TBD	Review appeals and recalculate scores, if necessary.
Priority List is distributed to applicants	HSA	October 30 , 2015	Via e-mail	Final priority list to be approved at LHCB meeting and emailed to agencies.
Local Homeless Coordinating Board Approval of Priority List	LHCB	November 2 , 2015, 1:00 PM	170 Otis, Born Auditorium	Present the Final Priority List to Full Local Homeless Coordinating Board for approval. Final Priority List published on LHCB website.
HomeBase and HSA review project applications	HomeBase, HSA	October 16, 2015 – November 17, 2015	N/A	HomeBase and HSA work with agencies to finalize project applications for submission.
San Francisco Board of Supervisors Authorizes Accept and Expend of Continuum of Care Application	HSA; Board of Supervisors	TBD	City Hall	H.S.A. to present to the Board of Supervisors for Approval
CoC Consolidated Application Posting	HSA, HomeBase	November 18, 2015		CoC consolidated application is posted on LHCB website
Application is due to HUD	HSA, HomeBase	November 19, 2015	N/A	Application is packaged and submitted to HUD.

SAN FRANCISCO
LOCAL HOMELESS COORDINATING BOARD

To Whom it May Concern:

The San Francisco Local Homeless Coordinating Board is the governing body for the San Francisco Continuum of Care.

The Local Homeless Coordinating Board within a "Housing First" model envisions developing a continuum of services whose ultimate goal is to prevent and eradicate homelessness in the City and County of San Francisco. All efforts are aimed at permanent solutions, and the range of services is designed to meet the unique and complex needs of individuals who are threatened with or currently experiencing homelessness.

At the September 20, 2015 Local Homeless Coordinating Board meeting, the Local Homeless Coordinating Board Members present voted unanimously (with 2 abstentions due to conflict of interest) to Approve the San Francisco Continuum of Care Scoring Process. These scoring tools are subject to ongoing public review of the LHCB Funding Committee and the Local Homeless Coordinating Board.

Summary of attached pages:
- Page 1: Cover letter
- Pages 2-7: Renewal Project Scoring Tool Adopted by the LHCB on 9/21/2015
- Pages 8-12: New Project Scoring Tool Adopted by the LHCB on 9/21/2015
- Page 13: Email Public Notice on September 16th of the 2015 San Francisco Continuum of Care Bidder's Conference on September 24, 2016
- Page 14: Email Public Notice of Bidder's Conference Materials Posted
- Pages 15: Online public notice screenshot of Bidder's Conference Materials.

If you have any questions about these matters, please contact Megan Owens Faught at megan.faught@sfgov.org.

Thank you,

Megan Owens Faught

RENEWAL PROJECT SCORING TOOL

THRESHOLD CRITERIA
(Required but not scored. If "no" for any threshold criteria, the project is ineligible.)

Item	Maximum Available Score
HMIS Implementation – Projects that do not participate in HMIS are not eligible for funding, unless the project is a victim-service agency, serving survivors of domestic violence, or a legal services agency.	N/A
Coordinated Assessment – Projects that have not agreed to participate in Coordinated Assessment, when it is available for the project type, are not eligible for funding, unless the project is a victim-service agency or serving survivors of domestic violence.	N/A
CoC Strategic Plan Compliance Project aligns with the San Francisco CoC Strategic Plan.	N/A
Equal Access - The project ensures equal access for program participants regardless of sexual orientation or gender identify, in compliance with federal law and the 2015 CoC Program NOFA.	N/A

SCORED CRITERIA

Item		Maximum Available Score
1	Program Performance and Client Outcomes	47
1a Comparative Performance	Performance on 2015 San Francisco CoC Performance Measures compared to other similar projects.	17 points. If program meets relevant performance measure benchmark, receive full points. If does not meet benchmark, is scored on a scale compared to other similar programs.
1b	Projects may receive points under any one of the following criteria based on outcomes reported in the APR:	

* Priority Panelists are discouraged from awarding scores that differ from the scaled scores provided. If Priority Panelists award a score that differs from a scaled score, that score will be discussed amongst the Panel as a whole.

Item		Maximum Available Score	
1b1	If *Permanent Supportive Housing or Services to Persons in PSH project*: Percentage of project participants that achieve housing stability in an operating year, by remaining in permanent housing or exiting to permanent housing, is at least 80%.	10 pts.* 9 pts. 8 pts. 7 pts. 6 pts. 5 pts. 4 pts. 3 pts. 2 pts. 0 pts.	98-100% 94-97.9% 90-93.9% 86-89.9% 82-85.9% 78-81.9% 75-77.9% 72-74.9% 70-71.9% <70%
1b2	If *Transitional Housing, Rapid Rehousing, or Services to Rapid Rehousing project*: The percentage of project participants that achieve housing stability in an operating year, by exiting to permanent housing, is at least 80%.	10 pts.* 9 pts. 8 pts. 7 pts. 6 pts. 5 pts. 4 pts. 3 pts. 2 pts. 0 pts.	90-100% 85-89.9% 80-84.9% 75-79.9% 70-74.9% 65-69.9% 62-64.9% 59-61.9% 55-58.9% <55%
1b3	If *Services-Only Employment project*: The percentage of leavers that increase employment income from entry to exit is at least 20%.	10 pts.* 9 pts. 8 pts. 7 pts. 6 pts. 5 pts. 4 pts. 3 pts. 2 pts. 0 pts.	40-100% 35-39.9% 30-34.9% 25-29.9% 20-24.9% 15-19.9% 10-14.9% 7-9.9% 4-6.9% <4%
1b4	If *Other Services-Only project*: The percentage of leavers in all CoC-funded projects that obtained or maintained non-cash mainstream benefits at project exit is at least 56%.	10 pts.* 9 pts. 8 pts. 7 pts. 6 pts. 5 pts. 4 pts. 3 pts. 2 pts. 1 pts. 0 pts.	92-100% 83-91.9% 74-82.9% 65-73.9% 56-64.9% 47-55.9% 38-46.9% 29-37.9% 20-28.9% 1-19.9% 0%

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1c	Projects may receive points under any one of the following criteria based on outcomes reported in the APR:	
1c1	If *Permanent Supportive Housing Project*: The percentage of participants that increase income from entry to follow up/exit is __%.	10 points total Scales created by project type; for each scale, meeting the benchmark will be worth 6 points.
1c2	If *Transitional Housing, Rapid Re-Housing, or Supportive Services Only Project*: The percentage of leavers that increase income from entry to exit is __%.	10 points total Scales created by project type; for each scale, meeting the benchmark will be worth 6 points.
1d	Projects may receive points under any one of the following criteria based on outcomes reported in the APR:	
1d1	If *Permanent Supportive Housing Project*: The percentage of participants that obtained or maintained mainstream cash income sources at follow-up or project exit is __%.	Mainstream Cash Income Sources at Follow-up or Exit: 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
1d2	If *Transitional Housing, Rapid Re-Housing, or Supportive Services Only Project*: The percentage of leavers that obtained or maintained mainstream cash income sources at project exit is __%.	Mainstream Cash Income Sources at Exit: 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
1e	Projects may receive points under any one of the following criteria based on outcomes reported in the APR:	

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1e1	If **Permanent Supportive Housing Project**: The percentage of participants that obtained or maintained non-cash mainstream resources at follow-up or project exit is __%.	**Non-Cash Mainstream Resources at Exit:** 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
1e2	If **Transitional Housing, Rapid Re-Housing, or Supportive Services Only Project**: The percentage of leavers that obtained or maintained non-cash mainstream resources at project exit is __%.	**Non-Cash Mainstream Resources at Exit:** 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
2	**Budget**	**10**
2a	Program provides the required match and leverages additional resources as part of overall program budget. A 25% match is required for all grant funds, except leasing funds.	**Leverage:*** 10 pts. >150% 9 pts. 140-149.9% 8 pts. 130-139.9% 7 pts. 120-129.9% 6 pts. 110-119.9% 5 pts. 100-109.9% 4 pts. 90-99.9% 3 pts. 80-89.9% 2 pts. 70-79.9% 1 pts. 60-69.9% 0 pts. <60% **Match:** 0 pts. >25% -1 pts. 20-24.9% -2 pts. 15-19.9% -3 pts. 10-14.9% -4 pts. 5-9.9% -5 pts. 0-4.9%
3	**Administrative Efficiency**	**33**

* Priority Panelists are discouraged from awarding scores that differ from the scaled scores provided. If   4
Priority Panelists award a score that differs from a scaled score, that score will be discussed amongst the
Panel as a whole.

3a	**Client Feedback Process:** Project has effective methodology in place to obtain and respond to participant feedback, with particular focus on:
	• A robust process for collecting client feedback that is reliable and non-coercive.
	• A process for responding to client feedback, for example:
	   o Identifying training needs;
	   o Reviewing project policies and procedures; or
	   o Making changes to project operation.
	
	Suggested Basis for Scoring:
	• Program Evaluation: Administrative Efficiency
		3

3b	**Self-evaluation:** Project has effective methodology in place for periodic self-evaluation and program improvement:
	• Processes for eliciting feedback from various stakeholders, including project staff, leadership, board members, and partner organizations.
	• A process for responding to stakeholder feedback, for example:
	   o Identifying training needs;
	   o Reviewing project policies and procedures; or
	   o Making changes to project operation.
	
	Suggested Basis for Scoring:
	• Program Evaluation: Administrative Efficiency
		2

3c	Project has been responsive to outstanding or pending HUD monitoring findings, HSA findings, City-wide joint fiscal monitoring findings, financial audit findings, and has no other indication of major capacity issues. • Projects that do not provide requested documentation of audit(s) and/or monitoring receive 0 points. • Panelists may deduct points for audit findings or other indications of major capacity issues apparent in the application materials. Suggested Basis for Scoring: • Audit and Monitoring documentation • Program Evaluation: Administrative Efficiency	6
3d	Project receives full points if it has: • Drawn down or invoiced at least quarterly; • Drawn down or invoiced grant funds regularly; • Used all grant funds (legacy SHP only); and/or • Maintained full project units (legacy S+C only). Suggested Basis for Scoring: • Program Evaluation: Administrative Efficiency	6

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5

3e	Agency/collaborative participates in Continuum of Care Planning Meetings.	5 pts.*	>12
		4 pts.	10-12
		3 pts.	7-9
		2 pts.	4-6
		1 pt.	1-3
		0 pts.	0
3f	Data quality is calculated as the percentage of data fields that are complete (there is a response entered in that field). If more than 5% of responses for a given data element are "Don't Know/Refused", then all "Don't Know/Refused" responses for that data element will count as ½ of a complete data field. Otherwise, "Don't Know/Refused" responses will count as a complete data field.	8 pts.	100%
		7 pts.	90-99.9%
		6 pts.	80-89.9%
		5 pts.	70-79.9%
		4 pts.	60-69.9%
		3 pts.	50-59.9%
		2 pts.	40-49.9%
		1 pt.	30-39.9%
		0 pts.	<30%
3g	Project is inclusive of and serves program participants, within the project's target population, with the highest needs and vulnerability, including but not limited to: • Low or no income at entry; • Current or past experience of substance abuse; • Criminal history (to the extent possible within the requirements of federal, state, and local law); and • Chronic homelessness Suggested Basis for Scoring: • Project narrative on serving high need and vulnerable populations	3	
	Community Priority for Permanent Housing	**6**	
4a	If program is a legacy S+C project or SHP Permanent Supportive Housing project for **legacy leasing, rental assistance, or operations,** award full points.	5	
4b	If a program is a legacy S+C or SHP Permanent Supportive Housing project and commits *all* units made available through turnover to housing chronically homeless individuals or families, award full points.	1	
	Total:	**96**	

* Priority Panelists are discouraged from awarding scores that differ from the scaled scores provided. If Priority Panelists award a score that differs from a scaled score, that score will be discussed amongst the Panel as a whole.

2015 NEW PROJECT SCORING TOOL

THRESHOLD CRITERIA
(Required but not scored. If "no" for any threshold criteria, the project is ineligible.)

Item	Maximum Available Score
HMIS Implementation: Projects that do not participate, or have not agreed to participate, are not eligible for funding, unless it is a victim-service agency, serving survivors of domestic violence, or a legal services agency. Project has agreed to participate in the HSA-administered HMIS and has signed a local Certification of Intent to participate.	N/A
Coordinated Assessment: Projects that have not agreed to participate in Coordinated Assessment, when it is available for the program type, are not eligible for funding, unless the project is a victim-service agency or serving survivors of domestic violence.	N/A
Eligible Applicant: Applicant and subrecipient (if any) are eligible. Eligible project applicants for the CoC Program are nonprofit organizations, States, local governments, and instrumentalities of State and local governments.	N/A
Project qualifies as HUD CoC Permanent Housing	N/A
Project can meet HUD Timeliness Standards: Project has secured or will secure proof of site control, match, environmental review, and the documentation of financial feasibility within 12 months of the announcement of the award.	N/A
Target Populations: The population to be served must meet CoC program eligibility requirements, and the project application must clearly establish eligibility of project applicants.	N/A
Amount of Request: The LHCB retains the right to request that new applicants adjust the amount of their requests.	N/A
Ineligible Activities for New Projects: In order to best optimize the McKinney-Vento Continuum of Care funds, the LHCB has determined that new projects shall not request funds for construction, rehabilitation, or acquisition.	N/A
Masterleased Units: If units are masterleased, lease is for at least 10 years.	N/A
CoC Strategic Plan Compliance: Project aligns with the San Francisco CoC Strategic Plan.	N/A
HMIS Budget: Project has allocated at least 1% of its budget to HMIS, to support San Francisco's HMIS Implementation (if applicable).	N/A
Equal Access: The project ensures equal access for program participants regardless of sexual orientation or gender identify, in compliance with federal law and the 2015 CoC Program NOFA.	N/A

SCORED CRITERIA

Item		Maximum Available Score
1	**Program Description**	23
1a	Program design includes provision of appropriate supportive services and type, scale, and location of the supportive services fit the needs of the program participants and the mode of transportation to those services. Program participants are helped to obtain and remain	10

* Priority Panelists are discouraged from awarding scores that differ from the scaled scores provided. If Priority Panelists award a score that differs from a scaled score, that score will be discussed amongst the Panel as a whole.

Item		Maximum Available Score
	in permanent housing in a manner that fits their needs.	
1b	Housing where participants will reside is fully described, accessible and appropriate to the program design proposed, and type, scale, and location of the housing fit the needs of the program participants.	4
1c	Linkages to other services or agencies are described.	4
1d	Program will use a "housing first" approach, offering assistance without preconditions (such as sobriety) and rapid placement/stabilization in permanent housing.	5
2	**Mainstream Resources**	**5**
2a	Program has policies and procedures that screen all clients for eligibility for mainstream resources and assist them in accessing mainstream resources, and the specific plan for ensuring clients will be individually assisted to obtain the benefits of the mainstream health, social, and employment programs for which they are eligible to apply meets the needs of the program participants. Participants are assisted to both increase their incomes and live independently using mainstream housing and service programs in a manner that fits their needs.	3
2b	Program conducts or provides access to training for staff on available mainstream resources for which clients may qualify.	2
3	**Project Population**	**6**
3a	Population to be served is all chronically homeless or another high priority population, and process for identifying clients is compatible with Coordinated Assessment and other community values. For new Rapid Re-Housing projects, other high priority populations include: • Households with children and transitional age youth coming directly from the streets, emergency shelters, or other places on meant for human habitation, and • Persons fleeing domestic violence or trafficking.	6
4	**Agency Background/Capacity**	**25**
4a	Agency has successfully operated at least one program similar to the one proposed for at least two years and/or has a strong grant management, compliance and performance history. Agency has prior experience: • Providing homeless housing or services; • Administering rental assistance; or • As a landlord or property management entity. If recipient of prior HUD Continuum of Care Grant, project applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s), as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings. This factor will be evaluated and pre-scored by San Francisco Human Services Agency or HomeBase staff.*	For Permanent Supportive Housing: 10 For Rapid Re-Housing: 15 Points
4b	Other housing programs operated by the sponsor have at least an 80% of project participants that achieve housing stability in an operating year, by remaining in permanent housing or exiting to permanent housing.	5 pts.* >90% 4 pts. 85-89.9% 3 pts. 80-84.9% 2 pts. 75-79.9%

* Priority Panelists are discouraged from awarding scores that differ from the scaled scores provided. If Priority Panelists award a score that differs from a scaled score, that score will be discussed amongst the Panel as a whole.

Item		Maximum Available Score
		1 pts. 70-74.9% 0 pts <70%
4c	Agency/Collaborative participates in Continuum of Care Planning Meetings. (If agency/collaborative representative attended more than 12 planning meetings in past year (medium attendance), award full points.)	5 pts.* >12 4 pts. 10-12 3 pts. 7-9 2 pts. 4-6 1 pts. 1-3 0 pts. 0
4d	For new Permanent Supportive Housing projects: Agency has identified a site for the proposed project, for which it has site control or an enforceable commitment to obtain site control.	5
5	**Housing**	**5**
5a	Housing project to be funded applies to new units in owned or leased housing (and not re-program existing affordable housing units as housing for a McKinney eligible population) and grant funding requested is to be used for housing activities (leasing, rental assistance, operations) instead of supportive services.	5
6	**Budget and Cost Effectiveness**	**15**
6a	Budgeted staff and expenses are adequate to support the proposed program and cost-effective.	4
6b	Budget is clearly articulated, with no unnecessary or unexplained items.	1
6c	Project provides the required match and leverages additional resources as part of overall project budget. *A 25% match is required for all grant funds, except leasing funds.*	Leverage:* 10 pts. >150% 9 pts. 140-149.9% 8 pts. 130-139.9% 7 pts. 120-129.9% 6 pts. 110-119.9% 5 pts. 100-109.9% 4 pts. 90-99.9% 3 pts. 80-89.9% 2 pts. 70-79.9% 1 pts. 60-69.9% 0 pts. <60% Match: 0 pts. >25% -1 pts. 20-24.9% -2 pts. 15-19.9% -3 pts. 10-14.9% -4 pts. 5-9.9% -5 pts. 0-4.9%
7	**Cultural Competency**	**10**
7a	Program includes involvement of clientele in designing and operating the program, and the program has written policies regarding client participation that align with HEARTH.	2
7b	Method of service delivery described includes culture-specific/sensitive elements, including that for programs serving children the program has policies and procedures that ensure educational needs are met. Program has the most integrated setting appropriate	2

*Priority Panelists are discouraged from awarding scores that differ from the scaled scores provided. If Priority Panelists award a score that differs from a scaled score, that score will be discussed amongst the Panel as a whole.

Item		Maximum Available Score
	to meet the needs of qualified persons with disabilities. This means that programs or activities must be offered in a setting that enables individuals with disabilities to interact with persons without disabilities to the fullest extent possible.	
7c	Program design is intentionally inclusive of and accessible to all eligible clients and amenities (e.g., grocery stores, pharmacies, etc.) are accessible in the community.	2
7d	Program materials reflect cultural competency.	2
7e	Program has written policies regarding client confidentiality, especially for special populations such as survivors of domestic violence.	2
8	**Disability Access Checklist**	**5**
8a	Program will be physically accessible to persons with disabilities.	1
8b	Program will provide communications that are accessible to persons with disabilities.	1
8c	Program demonstrates a plan for programmatic accessibility.	2
8d	Program has a plan for informing participants of their rights under the ADA.	1
9	**Community Priority for Permanent Housing**	**6**
9a	If program is "reallocating to itself" to create Permanent Supportive Housing or Rapid Re-Housing using leasing, rental assistance, or operations funds, award full points.	5
9b	If the program commits all units made available through turnover to housing chronically homeless individuals or families, award full points.	1
	Total:	**100**

From:	Owens, Megan (HSA)
Sent:	Tuesday, September 16, 2014 6:03 PM
To:	Owens, Megan (HSA)
Subject:	Continuum of Care San Francisco 2014 Competition Bidder's Conference Sept 24th at 2:00 pm, and Clarification about Continuum of Care Coordinated Assessment Pilot

Hello all,

I trust that you are well.

The Continuum of Care San Francisco 2014 Competition (NOFA) is open.

If you operate a renewal McKinney Vento Continuum of Care Supportive Housing Program (SHP) or Shelter+Care (S+C) project, you are very strongly advised to attend the Continuum of Care San Francisco 2014 Competition Bidder's Conference.

Continuum of Care Bidder's Conference
2:00 pm to 5:00 pm
Sept 24, 2014
Born Auditorium
170 Otis St San Francisco

If you or your agency is interested in applying for Continuum of Care Rental Assistance, Leasing, or Operations Assistance for permanent supportive housing for chronically homeless people or rapid rehousing for homeless families, you are also strongly encouraged to attend the bidder's conference.

Thank you to the over 20 local service providers who recently referred long-term homeless San Francisco single adults with disabling HIV to the Continuum of Care Coordinated Assessment Pilot.

There was a good question about this process that I wanted to clarify:

The ongoing subsidy for the relevant units is Continuum of Care Rental Assistance (Shelter+Care) these units are not being referred to from the HIV Housing Referral List (HHRL). The HHRL is not relevant to the process.

The one week of referrals is now closed, no new referrals will be accepted. I look forward to working with a wide variety of providers when the Continuum of Care Coordinated Assessment Priority list opens for public referrals in 2015.

Thank you,

Megan

Owens, Megan (DSS)

Hello all,

Thanks to everyone who attended yesterday's 2014 Continuum of Care Bidder's Conference NOFA. I look forward to seeing you all with your complete applications before the October 2, 2014 4:00 pm deadline.

Please note that all of the documents distributed at the Bidder's Conference are available online at:
http://sfgov.org/lhcb/funding-committee/meeting/2014-september-24-supporting-documents

Thanks to Joe at TODCO for the excellent question about the "Total Expected Sub Awards" The correct amount for this question for all H.S.A. subrecipients is listed in the attached spreadsheet.

Thank you,

Megan

Funding Committee - September 28, 2015 - Supporting Documents

Funding Committee - September 28, 2015

General Information

How to Create a Profile in esnaps.pdf

SF 2015 Documentation of Leverage or Cash Match.docx

2015 San Francisco NOFA Timeline_0.pdf

2880.pdf

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2015 Project Narrative Response (for New Projects).docx

SF 2015 Local Materials Packet for New Projects.pdf

FINAL SFFY 2015 CoC NOFA TA Handbook_New_0.pdf

FINAL SFFY 2015 CoC NOFA TA Handbook_New_0.pdf

2015 CoC Project Application Submission Checklist (New).docx

Renewal Project Information

- CoC designs a project review process and LHCB approves it prior to NOFA release.

- After the NOFA is released, all application documents are updated to address any unexpected elements of the NOFA. All changes are approved by LHCB at next meeting.

- HomeBase completes assessment and review of renewal projects.

- Applicants attend a Bidders' Conference, receive application materials, and have time to complete and submit their applications.

- LHCB staff will recruit Priority Panel members, prioritizing members who have served as Priority Panelists in the past or who have other relevant experience. Priority Panel members will sign "no conflict of interest" and confidentiality statements.

- All projects will submit applications to HSA, including a HUD Project Application, required local application materials, and match/leverage documentation. All documents should be submitted in-person to Megan Owens Faught at 1650 Mission St *and* electronically via the instructions on the Proposal Submission Checklist.

  o Late applications received within 48 hours of the due date/time will receive a 15-point score reduction. A 5-point reduction will be applied to any project that fails to submit either the electronic or paper copy of the application by the application deadline. Incomplete applications cannot be cured for Priority Panel scoring, but, if selected for funding by the Priority Panel, must be corrected prior to HUD submission. The original application (not the copies) will be examined to determine if all pieces of the application have been submitted.

- Priority Panel members are trained, as appropriate, and receive applications. Panelists review applications.

- LHCB staff and HomeBase review project applications and provide technical feedback. HSA/LHCB staff determines whether project thresholds are met.

- If an agency has a grant for a program that it would like to transfer to another program in the agency, perhaps because the original project is not meeting HUD performance expectations or is no longer as needed in the community, that agency may "reallocate to itself."

  o Agencies considering this option should consult with HSA and/or HomeBase, as grant amendment may be a better option. There are some requirements involved in changing a program via reallocation, including the populations that must be served under the 2015 NOFA.

  o In the competition, only that agency may apply for the earmarked funding as long as the reallocated project application is reasonably strong and is compliant with HUD requirements. The reallocated project application will be scored with

the other new projects. The application must score at least on a comparable level with the other new project applications.

- If the application is reasonably strong, an extra 5 points (parallel to the bonus points for renewal permanent housing) will be added to the final score and the project will be placed in rank order with the renewal projects. The project may be in Tier 1 or Tier 2, depending its score.

- If the application is not reasonably strong, the Panel may use the funding for another new project, rank the new project at the bottom of Tier 2, or suggest the agency revert to the old program.

- Priority Panel meets to review and discuss applications together, identify technical assistance needs, and to continue to individually score them. Priority Panel members then finalize individual scores. Scores are added and applications are ranked and placed into either Tier 1 or Tier 2.

  o Renewal projects that are for permanent housing for leasing, rental assistance, or operations will receive 5 bonus points in scoring and will be ranked, and placed in Tiers, with that preference.

  o Staff will propose to the LHCB to place the HMIS and Support Services for Coordinated Entry projects in the bottom of Tier 1.

  o New projects will be placed in Tier 2, except for new reallocated projects where the agency is "reallocating to itself", which will be ranked with the renewal projects by score.

  o Panel members will also place renewal applications that score lower in Tier 2.

- The Priority Panel may also identify projects that should be reallocated, in whole or in part, in favor of a new project. Before making a reallocation decision, the Panel will review the project's past performance and grant spending history for the prior three years.

- Preliminary scoring results are delivered to applicants with a reminder about the appeals process.

- All applicants that are eligible to appeal will receive all Priority Panelist scores and relevant comments in advance of the appeals deadline. Projects facing reallocation will have additional appeal rights. (See separate Appeals Policy for more detail.) In addition, full comments from the Priority Panel will be made available upon written request after the competition closes on November 20, 2015. They can also report any discrepancies in their score sheet, although this is not considered an official appeal.

- Appeals, if any, are reviewed by the Appeals Panel of non-conflicted LHCB Members.

- LHCB meets to consider and approve a final CoC ranked funding list. If any renewal project does not apply for funding or is identified by the Priority Panel as in need of reallocation, that funding may be reallocated to a new project. **The LHCB will make all final decisions about reallocating funding from any project.**

- Projects will submit copies of letters or documentation for all match/leverage resources listed in their application.
- Applications will be submitted with the City-wide application and applicants will be invited to attend the 2015 Debrief.

The process must be conducted in a manner that is effective for persons with disabilities and persons with limited English proficiency. If you need any accommodations, please contact Megan Owens Faught at megan.faught@sfgov.org or 415-557-6007.

Applicants may appeal if: the project is not funded or receives less funding than the amount in the application; the project is ranked in Tier 2 of the CoC application (in which the applicants funding may be at risk); or if the project falls into the bottom portion of Tier 1, as described below. All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered, unless the project is facing reallocation. Omissions to the application cannot be appealed. The decision of the Appeal Committee will be final.

The Appeal Committee will be made up of three (3) members of the Local Homeless Coordinating Board, along with one non-voting representative from the Priority Panel. The voting members will not have participated on the original Priority Panel or have a conflict of interest with any of the agencies applying for McKinney funding. The role of the Appeal Committee is to read and review only those areas of the application that are being appealed.

PROCESS

- A preliminary ranked CoC Program funding list is posted.

- Each agency will have one (1) business day to request copies of their score sheets, including relevant panel comments. Programs will contact HomeBase at sfNOFA@homebaseccc.org to request score sheets. Once requested, score sheets will be emailed to programs.

- Eligible Appeals: Any project that is 1) not funded or receives less funding than the amount in the application; 2) a renewal project that is ranked in Tier 2 of the CoC application (in which the applicant's funding may be at risk); or 3) falls into the bottom portion of Tier 1 that equals the Tier 2 amount may appeal the application's score based on their score sheets. The preliminary CoC Program project funding list will indicate which applications fall into these categories at the time it is posted.

- Any sponsor agency may report any discrepancies in their score sheet to Megan Owens Faught at (415) 557-6007 for the purpose of avoiding such errors in scoring in future years, and such report will not constitute an appeal.

- Any and all appeals must be received in writing within the two (2) and a half business-day appeal period; therefore, all written appeals for applications that are eligible to appeal at the time the preliminary McKinney project priority list is posted must be received by **October 28, 2015 by 5:00 PM via email.**

- All notices of appeal must be submitted electronically to HomeBase at sfNOFA@homebaseccc.org **AND** Megan Owens Faught at megan.faught@sfgov.org . Please note that appeals sent only to megan.faught@sfgov.org will not be considered.

- The notice of appeal must include a written statement specifying in detail each and every one of the grounds asserted for the appeal. The appeal must be signed by an individual authorized to represent the sponsor agency (i.e., Executive Director) and must include (highlight and/or cite) the specific sections of the application on which the appeal is based. The appealing agency must specify facts and evidence sufficient for the Appeal Committee to determine the validity of the appeal. That is, the notice of appeal must have attached the specific areas of the application being appealed and must also clearly explain why the information provided is adequate enough to gain additional points.

- If a program is facing reallocation, in part or in whole, the appealing agency may submit a more robust appeal. These appeals can include any information the agency feels is relevant, whether or not it was included in the project's original application. The program will also be given the opportunity to make a brief in-person presentation to the Appeal Committee.

- The Appeal Committee will review and evaluate all notices of appeal and decide whether or not the appeal has any validity based on the appeal policy.

- All valid appeals will be read, reviewed and evaluated by the Appeal Committee.

- The Appeal Committee will hear any in-person presentations by projects facing reallocation. The appealing agency can send up to two staff members to the presentation. The presentation is limited to 5 minutes. Following the presentation, the Appeal Committee will have the opportunity to ask questions of the appealing agency. The results of the in-person presentation will not have an affect on the project's rank; it can only be used to reverse a decision to reallocate funds. The decision of the Appeal Committee will be released after deliberation.

- Appeal Committee deliberates.

- Agencies will receive, in writing, the decision of the Appeal Committee within 2 business days.

- **Appeals Panel List is submitted for consideration and approval by LHCB.**

THRESHOLD CRITERIA
(Required but not scored. If "no" for any threshold criteria, the project is ineligible.)

Item	Maximum Available Score
HMIS Implementation – Projects that do not participate in HMIS are not eligible for funding, unless the project is a victim-service agency, serving survivors of domestic violence, or a legal services agency.	N/A
Coordinated Assessment – Projects that have not agreed to participate in Coordinated Assessment, when it is available for the project type, are not eligible for funding, unless the project is a victim-service agency or serving survivors of domestic violence.	N/A
CoC Strategic Plan Compliance Project aligns with the San Francisco CoC Strategic Plan.	N/A
Equal Access - The project ensures equal access for program participants regardless of sexual orientation or gender identify, in compliance with federal law and the 2015 CoC Program NOFA.	N/A

SCORED CRITERIA

Item		Maximum Available Score
1	**Program Performance and Client Outcomes**	**47**
1a Comparative Performance	Performance on 2015 San Francisco CoC Performance Measures compared to other similar projects.	17 points. If program meets relevant performance measure benchmark, receive full points. If does not meet benchmark, is scored on a scale compared to other similar programs.
1b	**Projects may receive points under any one of the following criteria based on outcomes reported in the APR:**	

Item		Maximum Available Score
1b1	If *Permanent Supportive Housing or Services to Persons in PSH project*: Percentage of project participants that achieve housing stability in an operating year, by remaining in permanent housing or exiting to permanent housing, is at least 80%.	10 pts.* 98-100% 9 pts. 94-97.9% 8 pts. 90-93.9% 7 pts. 86-89.9% 6 pts. 82-85.9% 5 pts. 78-81.9% 4 pts. 75-77.9% 3 pts. 72-74.9% 2 pts. 70-71.9% 0 pts. <70%
1b2	If *Transitional Housing, Rapid Rehousing, or Services to Rapid Rehousing project*: The percentage of project participants that achieve housing stability in an operating year, by exiting to permanent housing, is at least 80%.	10 pts.* 90-100% 9 pts. 85-89.9% 8 pts. 80-84.9% 7 pts. 75-79.9% 6 pts. 70-74.9% 5 pts. 65-69.9% 4 pts. 62-64.9% 3 pts. 59-61.9% 2 pts. 55-58.9% 0 pts. <55%
1b3	If *Services-Only Employment project*: The percentage of leavers that increase employment income from entry to exit is at least 20%.	10 pts.* 40-100% 9 pts. 35-39.9% 8 pts. 30-34.9% 7 pts. 25-29.9% 6 pts. 20-24.9% 5 pts. 15-19.9% 4 pts. 10-14.9% 3 pts. 7-9.9% 2 pts. 4-6.9% 0 pts. <4%
1b4	If *Other Services-Only project*: The percentage of leavers in all CoC-funded projects that obtained or maintained non-cash mainstream benefits at project exit is at least 56%.	10 pts.* 92-100% 9 pts. 83-91.9% 8 pts. 74-82.9% 7 pts. 65-73.9% 6 pts. 56-64.9% 5 pts. 47-55.9% 4 pts. 38-46.9% 3 pts. 29-37.9% 2 pts. 20-28.9% 1 pts. 1-19.9% 0 pts. 0%

1c	Projects may receive points under any one of the following criteria based on outcomes reported in the APR:	
1c1	If *Permanent Supportive Housing Project*: The percentage of participants that increase income from entry to follow up/exit is __%.	10 points total Scales created by project type; for each scale, meeting the benchmark will be worth 6 points.
1c2	If *Transitional Housing, Rapid Re-Housing, or Supportive Services Only Project*: The percentage of leavers that increase income from entry to exit is __%.	10 points total Scales created by project type; for each scale, meeting the benchmark will be worth 6 points.
1d	Projects may receive points under any one of the following criteria based on outcomes reported in the APR:	
1d1	If *Permanent Supportive Housing Project*: The percentage of participants that obtained or maintained mainstream cash income sources at follow-up or project exit is __%.	**Mainstream Cash Income Sources at Follow-up or Exit:** 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
1d2	If *Transitional Housing, Rapid Re-Housing, or Supportive Services Only Project*: The percentage of leavers that obtained or maintained mainstream cash income sources at project exit is __%.	**Mainstream Cash Income Sources at Exit:** 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
1e	Projects may receive points under any one of the following criteria based on outcomes reported in the APR:	

1e1	If *Permanent Supportive Housing Project*: The percentage of participants that obtained or maintained non-cash mainstream resources at follow-up or project exit is __%.	**Non-Cash Mainstream Resources at Exit:** 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
1e2	If *Transitional Housing, Rapid Re-Housing, or Supportive Services Only Project*: The percentage of leavers that obtained or maintained non-cash mainstream resources at project exit is __%.	**Non-Cash Mainstream Resources at Exit:** 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
2	**Budget**	**10**
2a	Program provides the required match and leverages additional resources as part of overall program budget. A 25% match is required for all grant funds, except leasing funds.	**Leverage:*** 10 pts. >150% 9 pts. 140-149.9% 8 pts. 130-139.9% 7 pts. 120-129.9% 6 pts. 110-119.9% 5 pts. 100-109.9% 4 pts. 90-99.9% 3 pts. 80-89.9% 2 pts. 70-79.9% 1 pts. 60-69.9% 0 pts. <60% **Match:** 0 pts. >25% -1 pts. 20-24.9% -2 pts. 15-19.9% -3 pts. 10-14.9% -4 pts. 5-9.9% -5 pts. 0-4.9%

3	Administrative Efficiency	33

3a	**Client Feedback Process:** Project has effective methodology in place to obtain and respond to participant feedback, with particular focus on:
	• A robust process for collecting client feedback that is reliable and non-coercive.
	• A process for responding to client feedback, for example:
	   o Identifying training needs;
	   o Reviewing project policies and procedures; or
	   o Making changes to project operation.
	
	Suggested Basis for Scoring:
	• Program Evaluation: Administrative Efficiency
		3

3b	**Self-evaluation:** Project has effective methodology in place for periodic self-evaluation and program improvement:
	• Processes for eliciting feedback from various stakeholders, including project staff, leadership, board members, and partner organizations.
	• A process for responding to stakeholder feedback, for example:
	   o Identifying training needs;
	   o Reviewing project policies and procedures; or
	   o Making changes to project operation.
	
	Suggested Basis for Scoring:
	• Program Evaluation: Administrative Efficiency
		2

3c	Project has been responsive to outstanding or pending HUD monitoring findings, HSA findings, City-wide joint fiscal monitoring findings, financial audit findings, and has no other indication of major capacity issues. • Projects that do not provide requested documentation of audit(s) and/or monitoring receive 0 points. • Panelists may deduct points for audit findings or other indications of major capacity issues apparent in the application materials. Suggested Basis for Scoring: • Audit and Monitoring documentation • Program Evaluation: Administrative Efficiency	6
3d	Project receives full points if it has: • Drawn down or invoiced at least quarterly; • Drawn down or invoiced grant funds regularly; • Used all grant funds (legacy SHP only); and/or • Maintained full project units (legacy S+C only). Suggested Basis for Scoring: • Program Evaluation: Administrative Efficiency	6

3e	Agency/collaborative participates in Continuum of Care Planning Meetings.	5 pts.* >12 4 pts. 10-12 3 pts. 7-9 2 pts. 4-6 1 pt. 1-3 0 pts. 0	
3f	Data quality is calculated as the percentage of data fields that are complete (there is a response entered in that field). If more than 5% of responses for a given data element are "Don't Know/Refused", then all "Don't Know/Refused" responses for that data element will count as ½ of a complete data field. Otherwise, "Don't Know/Refused" responses will count as a complete data field.	8 pts. 100% 7 pts. 90-99.9% 6 pts. 80-89.9% 5 pts. 70-79.9% 4 pts. 60-69.9% 3 pts. 50-59.9% 2 pts. 40-49.9% 1 pt. 30-39.9% 0 pts. <30%	

3g	Project is inclusive of and serves program participants, within the project's target population, with the highest needs and vulnerability, including but not limited to:
	   • Low or no income at entry;
	   • Current or past experience of substance abuse;
	   • Criminal history (to the extent possible within the requirements of federal, state, and local law); and
	   • Chronic homelessness
	
	Suggested Basis for Scoring:
	   • Project narrative on serving high need and vulnerable populations
		3	

	Community Priority for Permanent Housing		**6**
4a	If program is a legacy S+C project or SHP Permanent Supportive Housing project for **legacy leasing, rental assistance, or operations,** award full points.		5
4b	If a program is a legacy S+C or SHP Permanent Supportive Housing project and commits *all* units made available through turnover to housing chronically homeless individuals or families, award full points.		1
	Total:		**96**

Funding Committee - September 28, 2015 - Supporting Documents

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FINAL SFFY 2015 CoC NOFA TA Handbook_New_0.pdf

2015 CoC Project Application Submission Checklist (New).docx

Renewal Project Information

2015 Project Narrative Response (for Renewal Projects)_0.docx

2015 San Francisco CoC Renewal Project Information.xlsx

FINAL SFFY 2015 CoC NOFA TA Handbook_Renewal .pdf

SF 2015 Local Materials Packet for Renewal Projects (Direct Recipients).pdf

SF 2015 Local Materials Packet for Renewal Projects (Subrecipients).pdf

2015 CoC Project Application Submission Checklist Renewal Subs.docx

2015 CoC Project Application Submission Checklist Renewal Direct_0.docx

San Francisco Continuum of Care
LOCAL HOMELESS COORDINATING BOARD
Governance Charter Components

The following policies and procedures have been adopted by the Local Homeless Coordinating Board and comprise its Governance Charter for purposes of the CoC Interim Rule.

San Francisco Continuum of Care Local Homeless Coordinating Board
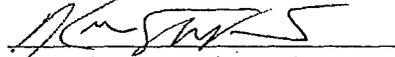
Kevin Sharps, Local Homeless Coordinating Board Co-Chair

11/17/15

Date

Name of Policy	Portion of CoC Interim Rule Policy Implements	Page Number
CoC Geography and Membership (*formally adopted Jan 2014*)	Establishing the Continuum of Care (24 CFR § 578.5(a))	2
LHCB By-laws (*adopted Sept 2006*)	Article III: Establishing the Continuum of Care (24 CFR § 578.5(b)) Article IV, V, VII: Operating the Continuum of Care (24 CFR §578.7(a)(1,3-5))	3 - 6
Project Review Processes (*adopted May 2015*)	Operating the Continuum of Care (24 CFR §578.7(a)(6-7)) Preparing an Application for Funds (24 CFR § 578.9)	7 - 27
ESG Monitoring Policy (*adopted Jan 2014*)	Operating the Continuum of Care (24 CFR §578.7(a)(7))	28
Written Standards for Providing Assistance (*formally adopted July 2015*)	Operating the Continuum of Care (24 CFR §578.7(a)(9))	29 - 38
Recordkeeping Policy (*formally adopted Jan 2014*)	Recordkeeping Requirements (24 CFR § 578.103)	39
San Francisco County HMIS Governance Charter (*originally adopted September 2008, updated Jan 2014*)	Designating and Operating a Homeless Management Information System (HMIS) (24 CFR § 578.7(b))	40 - 46
Educational Policies for The San Francisco Local Homeless Coordinating Board (*Adopted November 1, 2010*)	Awarding Funds (24 CFR § 578.23(b)(4)(ii))	47 - 49

San Francisco Continuum of Care Coordinated Entry Pilot for Single Adults Policies and Procedures Manual	Operating the Continuum of Care (24 CFR §578.7(a)(8))	**50 - 60**

CoC Geographic Area and Membership

The San Francisco CoC covers the geographic area of the City and County of San Francisco, California. Its membership includes all of the individuals and agencies working to end and prevent homelessness in this community who participate in CoC planning with the Local Homeless Coordinating Board or its representatives, whether through meeting participation or other means. Members may vary year to year but always include:

- Nonprofit homeless assistance providers
- Victim service providers
- Faith-based organizations
- Governments
- Businesses
- Advocates
- Public housing agencies
- School districts
- Social service providers
- Mental health agencies
- Hospitals
- Universities
- Affordable housing developers
- Law enforcement
- Organizations that serve veterans
- Affordable housing developers
- Law enforcement
- Homeless and formerly homeless individuals

SF Local Homeless Coordinating Board BYLAWS
passed 9.11.06

Article I: Name
The name of this board shall be the San Francisco Local Homeless Coordinating Board, herein referred to as the "Local Board".

Article II: Purpose
The Local Board, within a Housing First Model, works towards developing a continuum of services where the ultimate goal is to prevent and eradicate homelessness in the City and County of San Francisco. All efforts are aimed at permanent solutions, and the range of services is designed to meet the unique and complex needs of individuals who are threatened or currently experiencing homelessness.

Article III: Membership

Section 1
The Local Board is a nine-member body. All nine voting members gain membership through an appointment process. Other members of the community, both public and private, can be non-voting members and can participate as non-voting members in committees or participate in public comment.

Section 2. Appointment
Pursuant to Board of Supervisor's Resolution 208-05 the Board of Supervisors will appoint four members from the following constituencies: representatives of homeless, formerly homeless, community and advocacy organizations, service provider agencies, business and corporate sectors and the foundation community, but will not involve designating specific seats for specific constituents. The Mayor will appoint four members from the afore mentioned groups. The Controller shall appoint one member from the same constituencies.
Members shall not be from public entities.

Section 3. Attendance
Members are required to attend all Local Board meetings unless excused by the Co-Chairs for good reason. Three unexcused absences in one year are grounds for removal.
Attendance will be kept and recorded by the staff member of the Local Board.

Section 4: Alternates
Members may not send another individual to a meeting to vote in their place.

Section 5: Terms of Office
Pursuant to BOS resolution 209-05 the members of the Local Board shall serve four-year terms at the pleasure of their appointing officer. To stagger the terms, four members shall serve an initial term of two years and five members shall serve an initial term of five years. The Co-Chairs shall each serve a term of one year; these terms shall also be staggered.

Section 6: Co-Chairs
The Local Board shall elect two co-chairpersons annually, by a majority vote. The Local Board may designate alternate acting co-chair persons to preside over meetings during the absence of the elected co-chair.

Section 7: Leaves of Absence
Leaves of absence are submitted by written notice to the co-chairs and granted by the same. A leave of absence may not exceed three months. Persons not returning by the end of the three

month period will be considered to have resigned. Members who are granted a leave of absence may formally designate a representative who can formally participate and vote.

Section 8: Conflict of Interest
A board member must disclose personal, professional, and business relationships when making governmental decisions. If there is a conflict of interest, the member must recluse herself or himself from the role.

Section 9: Dismissal
Members may be dismissed from the Local Board for more than three unexcused absences. Excused absences include, but are not limited to, illness, vacation, and employment obligation. Members can only be officially dismissed by the appointing body (Board of Supervisors, Mayor, the Controller). Discussion and possible action on the dismissal of any member must be properly noticed on an agenda. If a member wishes to resign from his or her seat, she or he must submit a letter of resignation to the appointment agency and the full board.

Section 10: Roles and Responsibilities
Local Board members responsibilities include:
   (a) Attendance to all governing board meetings
   (b) Participation (co-chair) in a minimum of one Board meeting committee or task group
   (c) Oversee the HUD McKinney process
   (d) Review and comment on local homeless legislation
   (e) Monitor the implementation of the Continuum of Care and the Ten Year Plan to End Chronic Homelessness
   (f) Gather community input on homelessness

Section 11: Compensation
The Local Board shall serve without pay, but the Local Board may authorize and recommend the payment of reasonable and necessary expenses incurred by the members of the Board in the performance of their duties.

Article IV: Meetings

Section 1: Regular Meetings
Regular meetings should be publicly noticed and in full accordance of the Sunshine Ordinance. The regular meeting day, time, and place is the first Monday of the month, at 3pm. The location will be at 170 Otis, Born Auditorium, San Francisco. Location, time, and date are subject to change per the schedules of Board members. All changes will be noticed to the public under the requirements of the Sunshine Ordinance.
Extension of meeting times or additional meetings should be scheduled as needed.

Section 2: Quorum
A quorum of fifty percent plus one member of the Local Board, five members, shall be present at any regular or specially scheduled meeting in order for the Local Board to engage in formal decision making. The same quorum must be present at a committee meeting if action is going to be taken.

Section 3: Proceedings
3.1: All Local Board meetings shall be open to the public, in full accordance with the Sunshine Ordinance.

3.2: All agendas will be created and posted by the Local Board staff member at least 72 hours prior to the meetings, in full accordance with the Sunshine Ordinance.

3.3: Local Board staff member will keep minutes for all Local Board meetings, including committee meetings. Minutes will be made available for public review, in full accordance with the Sunshine Ordinance.

Section 4: Procedure
The rules of parliamentary Practice, as set forth in Robert's Rules of Order, shall govern all meetings of the Local Board and its committees.

Section 5: Special Meetings:
Special meetings may be called or scheduled by the co-chairs or three or more members. The agenda, place, and time of such meetings shall be set forth in the meeting notice at least 24 hours before the time of such a meeting.

Section 6: Voting
While the Local Board will strive to achieve consensus, the affirmative vote of a majority of members shall be required for the approval of any matter. Except, a majority present may approve matters of procedure as long as members constitute a quorum.
Absentee votes shall not be permitted.

Article V: Committees

Section 1: Standing Committees and Membership
The Local Board may have some or all of the following committees: Funding Committee, Strategic Planning Committee, Policy and Legislation Committee. Members of the Local Board will be the designated chairs of each committee. The majority of the committee members will be made up of the public.

Section 2: Voting
The members of the committee cannot vote to take action on items. The role of the committees is to partake in discussion and make recommendation to the Full Board for vote.

Section 3: Funding Committee
The Funding Committee shall:
    (a) Coordinate and manage the McKinney-Vento application process
    (b) Explore new revenue streams for existing programs that may be phased out of the McKinney-Vento funding stream
    (c) Make recommendations regarding the budget process to the City
    (d) Establish working relationships regionally and inter-county in order to review regional approaches to homelessness

Section 4: Strategic Planning Committee
The Strategic Planning Committee shall:
    (a) Develop a unified strategy involving the Ten Year Plan to End Chronic Homelessness and the Five Year Continuum of Care Plan
    (b) Develop a third Continuum of Care Five Year Plan
    (c) Monitor and evaluate the Continuum of Care Plan; including implementation of CoC Plan timeline, monitoring implementation of CoC action steps, and assurance that homeless services are in compliance with CoC plan

Section 5: Policy and Legislation Committee
The Policy and Legislation Committee shall
    (a) Review all local homeless initiatives
    (b) Advise the Mayor and Board of Supervisors before any new measure is adopted
    (c) Develop macro level policy statements on homelessness in San Francisco
    (d) Respond to policy issues that are brought forth by community members

Section 6: Ad Hoc
The Chair of the Board and/or the majority of the Board members may form a special committee. Ad Hoc committees are formed for a specific purpose and cease to exist after completion of a designated task.

Article VI: Personal Liability

Section 1:
The members of the Local Board shall not be personally liable for any debt, liability, or obligation of the Local Board. All persons, corporations, or other entities extending credit to, contracting with, or having any claim against the Local Board may look only to the funds and property of the Local Board for payment of such contract or claim or for payment of any debt, damages, judgment or decree, or of any money that may otherwise become due or payable to them from the Local Board.

Article VII: Anti-Discrimination
Section 1:
The Local Board shall not discriminate in any regard to race, creed, color, gender, sexual orientation, marital status, religion, national origin, ancestry, pregnancy, parenthood, custody of a minor child, or physical or mental disability.

Article VIII: Amendment of Bylaws
Section 1:
The bylaws of the Local Homeless Coordinating Board may be amended after presentation of proposed amendments as a scheduled agenda item in a regular meeting of the Local Board. Both one full month's notification of proposed amendments and passage by majority membership vote at the following month's regular meeting are prerequisite to amendment of bylaws.

Available online at: http://www.sfgov3.org/index.aspx?page=1957

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- CoC designs a project review process and LHCB approves it prior to NOFA release.

- After the NOFA is released, all application documents are updated to address any unexpected elements of the NOFA. All changes are approved by LHCB at next meeting.

- HomeBase completes assessment and review of renewal projects.

- Applicants attend a Bidders' Conference, receive application materials, and have time to complete and submit their applications.

- LHCB staff will recruit Priority Panel members, prioritizing members who have served as Priority Panelists in the past or who have other relevant experience. Priority Panel members will sign "no conflict of interest" and confidentiality statements.

- All projects will submit applications to HSA, including a HUD Project Application, required local application materials, and match/leverage documentation. All documents should be submitted in-person to Megan Owens Faught at 1650 Mission St *and* electronically via the instructions on the Proposal Submission Checklist.

    o Late applications received within 48 hours of the due date/time will receive a 15-point score reduction. A 5-point reduction will be applied to any project that fails to submit either the electronic or paper copy of the application by the application deadline. Incomplete applications cannot be cured for Priority Panel scoring, but, if selected for funding by the Priority Panel, must be corrected prior to HUD submission. The original application (not the copies) will be examined to determine if all pieces of the application have been submitted.

- Priority Panel members are trained, as appropriate, and receive applications. Panelists review applications.

- LHCB staff and HomeBase review project applications and provide technical feedback. HSA/LHCB staff determines whether project thresholds are met.

- If an agency has a grant for a program that it would like to transfer to another program in the agency, perhaps because the original project is not meeting HUD performance expectations or is no longer as needed in the community, that agency may "reallocate to itself."

    o Agencies considering this option should consult with HSA and/or HomeBase, as grant amendment may be a better option. There are some requirements involved in changing a program via reallocation, including the populations that must be served under the 2015 NOFA.

    o In the competition, only that agency may apply for the earmarked funding as long as the reallocated project application is reasonably strong and is compliant with HUD requirements. The reallocated project application will be scored with

the other new projects. The application must score at least on a comparable level with the other new project applications.

- If the application is reasonably strong, an extra 5 points (parallel to the bonus points for renewal permanent housing) will be added to the final score and the project will be placed in rank order with the renewal projects. The project may be in Tier 1 or Tier 2, depending its score.

- If the application is not reasonably strong, the Panel may use the funding for another new project, rank the new project at the bottom of Tier 2, or suggest the agency revert to the old program.

- Priority Panel meets to review and discuss applications together, identify technical assistance needs, and to continue to individually score them. Priority Panel members then finalize individual scores. Scores are added and applications are ranked and placed into either Tier 1 or Tier 2.

  o Renewal projects that are for permanent housing for leasing, rental assistance, or operations will receive 5 bonus points in scoring and will be ranked, and placed in Tiers, with that preference.

  o Staff will propose to the LHCB to place the HMIS and Support Services for Coordinated Entry projects in the bottom of Tier 1.

  o New projects will be placed in Tier 2, except for new reallocated projects where the agency is "reallocating to itself", which will be ranked with the renewal projects by score.

  o Panel members will also place renewal applications that score lower in Tier 2.

- The Priority Panel may also identify projects that should be reallocated, in whole or in part, in favor of a new project. Before making a reallocation decision, the Panel will review the project's past performance and grant spending history for the prior three years.

- Preliminary scoring results are delivered to applicants with a reminder about the appeals process.

- All applicants that are eligible to appeal will receive all Priority Panelist scores and relevant comments in advance of the appeals deadline. Projects facing reallocation will have additional appeal rights. (See separate Appeals Policy for more detail.) In addition, full comments from the Priority Panel will be made available upon written request after the competition closes on November 20, 2015. They can also report any discrepancies in their score sheet, although this is not considered an official appeal.

- Appeals, if any, are reviewed by the Appeals Panel of non-conflicted LHCB Members.

- LHCB meets to consider and approve a final CoC ranked funding list. If any renewal project does not apply for funding or is identified by the Priority Panel as in need of reallocation, that funding may be reallocated to a new project. **The LHCB will make all final decisions about reallocating funding from any project.**

- Projects will submit copies of letters or documentation for all match/leverage resources listed in their application.

- Applications will be submitted with the City-wide application and applicants will be invited to attend the 2015 Debrief.

The process must be conducted in a manner that is effective for persons with disabilities and persons with limited English proficiency. If you need any accommodations, please contact Megan Owens Faught at megan.faught@sfgov.org or 415-557-6007.

2015 McKinney-Vento Continuum of Care Homeless Assistance Grants
APPEALS POLICY and PROCESS

Applicants may appeal if: the project is not funded or receives less funding than the amount in the application; the project is ranked in Tier 2 of the CoC application (in which the applicants funding may be at risk); or if the project falls into the bottom portion of Tier 1, as described below. All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered, unless the project is facing reallocation. Omissions to the application cannot be appealed. The decision of the Appeal Committee will be final.

The Appeal Committee will be made up of three (3) members of the Local Homeless Coordinating Board, along with one non-voting representative from the Priority Panel. The voting members will not have participated on the original Priority Panel or have a conflict of interest with any of the agencies applying for McKinney funding. The role of the Appeal Committee is to read and review only those areas of the application that are being appealed.

PROCESS

- A preliminary ranked CoC Program funding list is posted.

- Each agency will have one (1) business day to request copies of their score sheets, including relevant panel comments. Programs will contact HomeBase at sfNOFA@homebaseccc.org to request score sheets. Once requested, score sheets will be emailed to programs.

- Eligible Appeals: Any project that is 1) not funded or receives less funding than the amount in the application; 2) a renewal project that is ranked in Tier 2 of the CoC application (in which the applicant's funding may be at risk); or 3) falls into the bottom portion of Tier 1 that equals the Tier 2 amount may appeal the application's score based on their score sheets. The preliminary CoC Program project funding list will indicate which applications fall into these categories at the time it is posted.

- Any sponsor agency may report any discrepancies in their score sheet to Megan Owens Faught at (415) 557-6007 for the purpose of avoiding such errors in scoring in future years, and such report will not constitute an appeal.

- Any and all appeals must be received in writing within the two (2) and a half business-day appeal period; therefore, all written appeals for applications that are eligible to appeal at the time the preliminary McKinney project priority list is posted must be received by **October 28, 2015 by 3:00 PM via email.**

- All notices of appeal must be submitted electronically to HomeBase at sfNOFA@homebaseccc.org **AND** Megan Owens Faught at megan.faught@sfgov.org . Please note that appeals sent only to megan.faught@sfgov.org will not be considered.

- The notice of appeal must include a written statement specifying in detail each and every one of the grounds asserted for the appeal. The appeal must be signed by an individual authorized to represent the sponsor agency (i.e., Executive Director) and must include (highlight and/or cite) the specific sections of the application on which the appeal is based. The appealing agency must specify facts and evidence sufficient for the Appeal Committee to determine the validity of the appeal. That is, the notice of appeal must have attached the specific areas of the application being appealed and must also clearly explain why the information provided is adequate enough to gain additional points.

- If a program is facing reallocation, in part or in whole, the appealing agency may submit a more robust appeal. These appeals can include any information the agency feels is relevant, whether or not it was included in the project's original application. The program will also be given the opportunity to make a brief in-person presentation to the Appeal Committee.

- The Appeal Committee will review and evaluate all notices of appeal and decide whether or not the appeal has any validity based on the appeal policy.

- All valid appeals will be read, reviewed and evaluated by the Appeal Committee.

- The Appeal Committee will hear any in-person presentations by projects facing reallocation. The appealing agency can send up to two staff members to the presentation. The presentation is limited to 5 minutes. Following the presentation, the Appeal Committee will have the opportunity to ask questions of the appealing agency. The results of the in-person presentation will not have an affect on the project's rank; it can only be used to reverse a decision to reallocate funds. The decision of the Appeal Committee will be released after deliberation.

- Appeal Committee deliberates.

- Agencies will receive, in writing, the decision of the Appeal Committee within 2 business days.

- Appeals Panel List is submitted for consideration and approval by LHCB.

2015 McKinney-Vento Continuum of Care Homeless Assistance Grants
RENEWAL PROJECT SCORING TOOL

THRESHOLD CRITERIA
(Required but not scored. If "no" for any threshold criteria, the project is ineligible.)

Item	Maximum Available Score
HMIS Implementation – Projects that do not participate in HMIS are not eligible for funding, unless the project is a victim-service agency, serving survivors of domestic violence, or a legal services agency.	N/A
Coordinated Assessment – Projects that have not agreed to participate in Coordinated Assessment, when it is available for the project type, are not eligible for funding, unless the project is a victim-service agency or serving survivors of domestic violence.	N/A
CoC Strategic Plan Compliance Project aligns with the San Francisco CoC Strategic Plan.	N/A
Equal Access - The project ensures equal access for program participants regardless of sexual orientation or gender identify, in compliance with federal law and the 2015 CoC Program NOFA.	N/A

SCORED CRITERIA

Item		Maximum Available Score
1.	Program Performance and Client Outcomes	47
1a Comparative Performance	Performance on 2015 San Francisco CoC Performance Measures compared to other similar projects.	17 points. If program meets relevant performance measure benchmark, receive full points. If does

Item			Maximum Available Score
			not meet benchmark, is scored on a scale compared to other similar programs.
1b		Projects may receive points under any one of the following criteria based on outcomes reported in the APR:	
1b1		If *Permanent Supportive Housing or Services to Persons in PSH project*: Percentage of project participants that achieve housing stability in an operating year, by remaining in permanent housing or exiting to permanent housing, is at least 80%.	10 pts.* 98-100% 9 pts. 94-97.9% 8 pts. 90-93.9% 7 pts. 86-89.9% 6 pts. 82-85.9% 5 pts. 78-81.9% 4 pts. 75-77.9% 3 pts. 72-74.9% 2 pts. 70-71.9% 0 pts. <70%
1b2		If *Transitional Housing, Rapid Rehousing, or Services to Rapid Rehousing project*: The percentage of project participants that achieve housing stability in an operating year, by exiting to permanent housing, is at least 80%.	10 pts.* 90-100% 9 pts. 85-89.9% 8 pts. 80-84.9% 7 pts. 75-79.9% 6 pts. 70-74.9% 5 pts. 65-69.9% 4 pts. 62-64.9% 3 pts. 59-61.9% 2 pts. 55-58.9% 0 pts. <55%
1b3		If *Services-Only Employment project*: The percentage of leavers that increase employment income from entry to exit is at least 20%.	10 pts.* 40-100% 9 pts. 35-39.9% 8 pts. 30-34.9% 7 pts. 25-29.9% 6 pts. 20-24.9% 5 pts. 15-19.9% 4 pts. 10-14.9% 3 pts. 7-9.9% 2 pts. 4-6.9% 0 pts. <4%

Item			Maximum Available Score
1b4		If **Other Services-Only project**: The percentage of leavers in all CoC-funded projects that obtained or maintained non-cash mainstream benefits at project exit is at least 56%.	10 pts.* 92-100% 9 pts. 83-91.9% 8 pts. 74-82.9% 7 pts. 65-73.9% 6 pts. 56-64.9% 5 pts. 47-55.9% 4 pts. 38-46.9% 3 pts. 29-37.9% 2 pts. 20-28.9% 1 pts. 1-19.9% 0 pts. 0%
1c		Projects may receive points under any one of the following criteria based on outcomes reported in the APR:	
1c1		If Permanent Supportive Housing Project: The percentage of participants that increase income from entry to follow up/exit is __%.	10 points total Scales created by project type; for each scale, meeting the benchmark will be worth 6 points.
1c2		If Transitional Housing, Rapid Re-Housing, or Supportive Services Only Project: The percentage of leavers that increase income from entry to exit is __%.	10 points total Scales created by project type; for each scale, meeting the benchmark will be worth 6 points.
1d		Projects may receive points under any one of the following criteria based on outcomes reported in the APR:	

Item		Maximum Available Score
1d1	If Permanent Supportive Housing Project: The percentage of participants that obtained or maintained mainstream cash income sources at follow-up or project exit is ___%.	Mainstream Cash Income Sources at Follow-up or Exit: 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
1d2	If Transitional Housing, Rapid Re-Housing, or Supportive Services Only Project: The percentage of leavers that obtained or maintained mainstream cash income sources at project exit is ___%.	Mainstream Cash Income Sources at Exit: 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
1e	Projects may receive points under any one of the following criteria based on outcomes reported in the APR:	
1e1	If Permanent Supportive Housing Project: The percentage of participants that obtained or maintained non-cash mainstream resources at follow-up or project exit is ___%.	Non-Cash Mainstream Resources at Exit: 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%

Item		Maximum Available Score
1e2	If Transitional Housing, Rapid Re-Housing, or Supportive Services Only Project: The percentage of leavers that obtained or maintained non-cash mainstream resources at project exit is __%.	Non-Cash Mainstream Resources at Exit: 5 pts.* 83-100% 4pts. 65-82.9% 3 pts. 47-64.9% 2 pts. 29-46.9% 1 pts. 1-28.9% 0 pts. 0%
2	Budget	10
2a	Program provides the required match and leverages additional resources as part of overall program budget. A 25% match is required for all grant funds, except leasing funds.	Leverage:* 10 pts. >150% 9 pts. 140-149.9% 8 pts. 130-139.9% 7 pts. 120-129.9% 6 pts. 110-119.9% 5 pts. 100-109.9% 4 pts. 90-99.9% 3 pts. 80-89.9% 2 pts. 70-79.9% 1 pts. 60-69.9% 0 pts. <60% Match: 0 pts. >25% -1 pts. 20-24.9% -2 pts. 15-19.9% -3 pts. 10-14.9% -4 pts. 5-9.9% -5 pts. 0-4.9%
3	Administrative Efficiency	33

3a	Client Feedback Process: Project has effective methodology in place to obtain and respond to participant feedback, with particular focus on:
	
	• A robust process for collecting client feedback that is reliable and non-coercive.
	• A process for responding to client feedback, for example:
	   o Identifying training needs;
	   o Reviewing project policies and procedures; or
	   o Making changes to project operation.
		3

Item		Maximum Available Score
	Suggested Basis for Scoring: • Program Evaluation: Administrative Efficiency	

3b	Self-evaluation: Project has effective methodology in place for periodic self-evaluation and program improvement:
	
	• Processes for eliciting feedback from various stakeholders, including project staff, leadership, board members, and partner organizations.
	• A process for responding to stakeholder feedback, for example:
	   o Identifying training needs;
	   o Reviewing project policies and procedures; or
	   o Making changes to project operation.
	
	Suggested Basis for Scoring:
	
	• Program Evaluation: Administrative Efficiency
		2

3c	Project has been responsive to outstanding or pending HUD monitoring findings, HSA findings, City-wide joint fiscal monitoring findings, financial audit findings, and has no other indication of major capacity issues. • Projects that do not provide requested documentation of audit(s) and/or monitoring receive 0 points. • Panelists may deduct points for audit findings or other indications of major capacity issues apparent in the application materials. Suggested Basis for Scoring: • Audit and Monitoring documentation • Program Evaluation: Administrative Efficiency	6

Item		Maximum Available Score	
3d	Project receives full points if it has: • Drawn down or invoiced at least quarterly; • Drawn down or invoiced grant funds regularly; • Used all grant funds (legacy SHP only); and/or • Maintained full project units (legacy S+C only). Suggested Basis for Scoring: • Program Evaluation: Administrative Efficiency	6	
3e	Agency/collaborative participates in Continuum of Care Planning Meetings.	5 pts.* 4 pts. 3 pts. 2 pts. 1 pt. 0 pts.	>12 10-12 7-9 4-6 1-3 0
3f	Data quality is calculated as the percentage of data fields that are complete (there is a response entered in that field). If more than 5% of responses for a given data element are "Don't Know/Refused", then all "Don't Know/Refused" responses for that data element will count as ½ of a complete data field. Otherwise, "Don't Know/Refused" responses will count as a complete data field.	8 pts. 7 pts. 6 pts. 5 pts. 4 pts. 3 pts. 2 pts. 1 pt. 0 pts.	100% 90-99.9% 80-89.9% 70-79.9% 60-69.9% 50-59.9% 40-49.9% 30-39.9% <30%
3g	Project is inclusive of and serves program participants, within the project's target population, with the highest needs and vulnerability, including but not limited to: • Low or no income at entry; • Current or past experience of substance abuse; • Criminal history (to the extent possible within the requirements of federal, state, and local law); and • Chronic homelessness Suggested Basis for Scoring: Project narrative on serving high need and vulnerable populations	3	

Item		Maximum Available Score
	Community Priority for Permanent Housing	6
4a	If program is a legacy S+C project or SHP Permanent Supportive Housing project for legacy leasing, rental assistance, or operations, award full points.	5
4b	If a program is a legacy S+C or SHP Permanent Supportive Housing project and commits all units made available through turnover to housing chronically homeless individuals or families, award full points.	1
	Total:	96

2015 McKinney-Vento Continuum of Care Homeless Assistance Grants
NEW PROJECT SCORING TOOL

THRESHOLD CRITERIA
(Required but not scored. If "no" for any threshold criteria, the project is ineligible.)

Item	Maximum Available Score
HMIS Implementation: Projects that do not participate, or have not agreed to participate, are not eligible for funding, unless it is a victim-service agency, serving survivors of domestic violence, or a legal services agency. Project has agreed to participate in the HSA-administered HMIS and has signed a local Certification of Intent to participate.	N/A
Coordinated Assessment: Projects that have not agreed to participate in Coordinated Assessment, when it is available for the program type, are not eligible for funding, unless the project is a victim-service agency or serving survivors of domestic violence.	N/A
Eligible Applicant: Applicant and subrecipient (if any) are eligible. Eligible project applicants for the CoC Program are nonprofit organizations, States, local governments, and instrumentalities of State and local governments.	N/A
Project qualifies as HUD CoC Permanent Housing	N/A
Project can meet HUD Timeliness Standards: Project has secured or will secure proof of site control, match, environmental review, and the documentation of financial feasibility within 12 months of the announcement of the award.	N/A
Target Populations: The population to be served must meet CoC program eligibility requirements, and the project application must clearly establish eligibility of project applicants.	N/A
Amount of Request: The LHCB retains the right to request that new applicants adjust the amount of their requests.	N/A
Ineligible Activities for New Projects: In order to best optimize the McKinney-Vento Continuum of Care funds, the LHCB has determined that new projects shall not request funds for construction, rehabilitation, or acquisition.	N/A
Masterleased Units: If units are masterleased, lease is for at least 10 years.	N/A

	N/A
CoC Strategic Plan Compliance: Project aligns with the San Francisco CoC Strategic Plan.	N/A
HMIS Budget: Project has allocated at least 1% of its budget to HMIS, to support San Francisco's HMIS implementation (if applicable).	N/A
Equal Access: The project ensures equal access for program participants regardless of sexual orientation or gender identify, in compliance with federal law and the 2015 CoC Program NOFA.	N/A

SCORED CRITERIA

Item		Maximum Available Score
1	Program Description	23
1a	Program design includes provision of appropriate supportive services and type, scale, and location of the supportive services fit the needs of the program participants and the mode of transportation to those services. Program participants are helped to obtain and remain in permanent housing in a manner that fits their needs.	10
1b	Housing where participants will reside is fully described, accessible and appropriate to the program design proposed, and type, scale, and location of the housing fit the needs of the program participants.	4
1c	Linkages to other services or agencies are described.	4
1d	Program will use a "housing first" approach, offering assistance without preconditions (such as sobriety) and rapid placement/stabilization in permanent housing.	5
2	Mainstream Resources	5
2a	Program has policies and procedures that screen all clients for eligibility for mainstream resources and assist them in accessing mainstream resources, and the specific plan for ensuring clients will be individually assisted to obtain the benefits of the mainstream health, social, and employment programs for which they are eligible to apply meets the needs of the program participants. Participants are assisted to both increase their incomes and live independently using mainstream housing and service programs in a manner that fits their needs.	3
2b	Program conducts or provides access to training for staff on available mainstream resources for which clients may qualify.	2
3	Project Population	6

Item		Maximum Available Score
3a	Population to be served is all chronically homeless or another high priority population, and process for identifying clients is compatible with Coordinated Assessment and other community values. For new Rapid Re-Housing projects, other high priority populations include: • Households with children and transitional age youth coming directly from the streets, emergency shelters, or other places on meant for human habitation, and • Persons fleeing domestic violence or trafficking.	6
4	**Agency Background/Capacity**	**25**
4a	Agency has successfully operated at least one program similar to the one proposed for at least two years and/or has a strong grant management, compliance and performance history. Agency has prior experience: • Providing homeless housing or services; • Administering rental assistance; or • As a landlord or property management entity. If recipient of prior HUD Continuum of Care Grant, project applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s), as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings. For Rapid Re-Housing projects: Applications for Rapid Re-Housing from providers specializing in serving families, single adults, and unaccompanied youth are encouraged. These applicants may not have experience providing Rapid Re-Housing or administering a permanent housing project. If an applicant cannot demonstrate adequate experience as described above, the applicant may identify a consultant or partner agency with the necessary experience. The applicant should describe the consultant or partner agency's experience, as outlined above, and indicate how they will partner with the applicant. The relationship with the consulting or partner agency need not be long term, but should be of a reasonable duration to supplement the	For Permanent Supportive Housing: 10 For Rapid Re-Housing: 15 Points

Item	Maximum Available Score
applicant agency's own expertise. This factor will be evaluated and pre-scored by San Francisco Human Services Agency or HomeBase staff.*	

Item		Maximum Available Score
4b	Other housing programs operated by the sponsor have at least an 80% of project participants that achieve housing stability in an operating year, by remaining in permanent housing or exiting to permanent housing.	5 pts.* >90% 4 pts. 85-89.9% 3 pts. 80-84.9% 2 pts. 75-79.9% 1 pts. 70-74.9% 0 pts <70%
4c	Agency/Collaborative participates in Continuum of Care Planning Meetings. (If agency/collaborative representative attended more than 12 planning meetings in past year (medium attendance), award full points.)	5 pts.* >12 4 pts. 10-12 3 pts. 7-9 2 pts. 4-6 1 pts. 1-3 0 pts. 0
4d	For new Permanent Supportive Housing projects: Agency has identified a site for the proposed project, for which it has site control or an enforceable commitment to obtain site control.	5
5	Housing	5
5a	Housing project to be funded applies to new units in owned or leased housing (and not re-program existing affordable housing units as housing for a McKinney eligible population) and grant funding requested is to be used for housing activities (leasing, rental assistance, operations) instead of supportive services.	5
6	Budget and Cost Effectiveness	15
6a	Budgeted staff and expenses are adequate to support the proposed program and cost-effective.	4
6b	Budget is clearly articulated, with no unnecessary or unexplained items.	1
6c	Project provides the required match and leverages additional resources as part of overall project budget. A 25% match is required for all grant funds, except leasing funds.	Leverage:* 10 pts. >150% 9 pts. 140-149.9% 8 pts. 130-139.9% 7 pts. 120-129.9% 6 pts. 110-119.9%

Item	Maximum Available Score
	5 pts. 100-109.9% 4 pts. 90-99.9% 3 pts. 80-89.9% 2 pts. 70-79.9% 1 pts. 60-69.9% 0 pts. <60% Match: 0 pts. >25% -1 pts. 20-24.9% -2 pts. 15-19.9% -3 pts. 10-14.9% -4 pts. 5-9.9% -5 pts. 0-4.9%

Item		Maximum Available Score
7	**Cultural Competency**	10
7a	Program includes involvement of clientele in designing and operating the program, and the program has written policies regarding client participation that align with HEARTH.	2
7b	Method of service delivery described includes culture-specific/sensitive elements, including that for programs serving children the program has policies and procedures that ensure educational needs are met. Program has the most integrated setting appropriate to meet the needs of qualified persons with disabilities. This means that programs or activities must be offered in a setting that enables individuals with disabilities to interact with persons without disabilities to the fullest extent possible.	2
7c	Program design is intentionally inclusive of and accessible to all eligible clients and amenities (e.g., grocery stores, pharmacies, etc.) are accessible in the community.	2
7d	Program materials reflect cultural competency.	2
7e	Program has written policies regarding client confidentiality, especially for special populations such as survivors of domestic violence.	2
8	**Disability Access Checklist**	5
8a	Program will be physically accessible to persons with disabilities.	1
8b	Program will provide communications that are accessible to persons with disabilities.	1
8c	Program demonstrates a plan for programmatic accessibility.	2
8d	Program has a plan for informing participants of their rights under the ADA.	1

Item		Maximum Available Score
9	Community Priority for Permanent Housing	6
9a	If program is "reallocating to itself" to create Permanent Supportive Housing or Rapid Re-Housing using leasing, rental assistance, or operations funds, award full points.	5
9b	If the program commits all units made available through turnover to housing chronically homeless individuals or families, award full points.	1
	Total:	100

San Francisco Local Homeless Coordinating Board (LHCB)
Policy on ESG Monitoring
January 2014

Requirement

The CoC is responsible for monitoring projects that receive funds to ensure that the projects are performing adequately, operated effectively, managed efficiently, and in compliance with HUD requirements.

Policy

CoC staff, in partnership with the Mayor's Office on Housing, will be responsible for monitoring project performance. The Mayor's Office on Housing, as ESG recipient, already undertakes grant monitoring activities.

Process

Quarterly, CoC staff will pull HMIS reports on program outcomes (set in accordance with Consolidate Plan performance measures and goal and CoC performance measures and goals). CoC staff will identify any underperforming projects (taking into account service model and population served) or performance trends and discuss these findings with the Mayor's Office on Housing and the recipients.

To the extent that technical assistance and training is needed, CoC staff will make recommendations to the ESG recipient and/or LHCB. Poor performers may be selected for more intensive, on-site monitoring. This may include site visits, client feedback, and/or grant records. Ongoing poor performers may be selected for targeted technical assistance or other response.

In addition to the quarterly reports, the Funding Committee may undertake an annual review of data included in reports to HUD as well as other local sources to ensure compliance with HUD requirements.

San Francisco Local Homeless Coordinating Board
Written Standards for Providing Assistance
July 2015

I. PURPOSE

Pursuant to the CoC Interim Rule, the San Francisco Continuum of Care (CoC) must have written policies and procedures that govern the provision of assistance to individuals and families under the CoC. These policies and procedures provide guidance to local providers in administering CoC-funded assistance in the following areas:

- Policies and procedures for evaluating individuals' and families' eligibility for CoC assistance
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive CoC transitional housing assistance
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive CoC rapid rehousing assistance and standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance.

The policies and procedures are not intended to be in lieu of or in place of the CoC Interim Rule or the HEARTH Act, but are intended to clarify local decisions regarding program administration. All HUD funded providers must follow all HUD requirements in their entirety.

Homeless families are a significant focus of the CoC. Under these standards, the CoC assists families in every housing track, including through Transitional Housing, Rapid Re-housing, and Permanent Supportive Housing.

II. PARTICIPANT ELIGIBILITY AND DOCUMENTATION STANDARDS

San Francisco CoC funds are used for the following program types:

- Permanent Supportive Housing;
- Rapid Re-Housing;
- Transitional Housing;
- Planning;
- HMIS; and
- Supportive Services Only.

As set forth in the HEARTH Act, there are four categories of participant eligibility for CoC programs:

1) Literally Homeless;
2) Imminent Risk of Homelessness;
3) Homeless Under Other Federal Statutes (subject to cap); and
4) Fleeing/Attempting to Flee Domestic Violence.

Programs in the San Francisco CoC may serve categories 1, 2, and 4.

The San Francisco CoC and its housing and service providers are committed to fostering equal access to housing and services. Programs do not discriminate on the basis of race, color, national origin, religion, sex, sexual orientation, gender identity, age, familial status, or disability. Programs must provide notice of this non-discrimination policy to participants and prospective participants.

Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1) Literally Homeless (in order of preference)

    a) Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or

    b) Written observation by an outreach worker; or

    c) Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;

If the provider is using anything other than a) Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

2) Imminent Risk of Homelessness

    a) A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; <u>or</u>

    b) For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; <u>or</u>

    c) A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; <u>and</u>

    d) Certification that no subsequent residence has been identified; <u>and</u>

    e) Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

3) Homeless Under Other Federal Statute

Persons who are homeless as defined under this category are not eligible to be served by any San Francisco CoC program.

4) Fleeing/Attempting to Flee DV

For victim service providers:

    a) An oral statement by the individual or head of household seeking assistance, which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For non-victim service providers:

a) Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and

b) Certification by the individual or head of household that no subsequent residence has been identified; and

c) Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Eligibility for Permanent Supportive Housing

Per the most recent CoC Program Notice of Funding Availability (NOFA), eligibility for Permanent Supportive Housing is limited to categories 1 and 4. To be eligible for Permanent Supportive Housing, participants must also:

1) Enter from the street or shelter, or a transitional housing program to which they originally entered from the street or shelter (NOTE: if the project is designated for chronically homeless, they may only enter from the street or shelter. Individuals may lose their chronically homeless designation after they enter a transitional housing program); and

2) At least one member of the household must have a disability of long duration, verified either by Social Security or a licensed professional that meets the state criteria for diagnosing and treating that condition.

III. PRIORITIZING AND TARGETING

San Francisco CoC prioritizes chronically homeless individuals and families and has committed to adopting a Housing First approach in all CoC and Emergency Solutions Grant (ESG) programs.

A. FAMILIES WITH CHILDREN

All homeless families with children are initially evaluated through the Connecting Point program, and targeted to the best housing option for the family. San Francisco CoC seeks to mediate/prevent homelessness whenever possible, reduce the homeless episode for families through rapid rehousing (RRH) and shelter/transitional housing focused on moving families from homelessness to permanent housing as soon as possible, and permanently house the most vulnerable families, as resources are available. Information is gathered to determine the "best fit" intervention to prioritize families for more intensive services. Additional details about the procedures for evaluating individuals can be found at the Connecting Point program.

B. INDIVIDUALS

All individuals served with CoC assistance in the San Francisco CoC will be evaluated through the coordinated assessment system, according to the San Francisco Continuum of Care Coordinated Entry Pilot for Single Adults Policies and Procedures Manual, to determine best placement and resource referral, including best housing track. The San Francisco CoC prioritizes housing and services for those who have been homeless the longest, and uses an assessment tool through the coordinated assessment process to identify the most vulnerable people and individual housing interest, so that those that are prioritized for housing are placed into the correct type of housing.

C. HOUSING TRACKS

The San Francisco CoC targets CoC and other homeless assistance using five housing tracks:

Track A (for Affordable)

- Consumers need access to affordable housing, but likely can maintain housing independently.
- Consumers have few barriers to housing and/or may have identified housing they could access if they had resources.
- Track A consumers are prioritized for Rapid Rehousing and public housing options.

Track B (for Basic services)

- Consumers have barriers to housing besides income, but the ability to maintain housing without many services.
- Consumers in this category have more and higher barriers to housing, including barriers like multiple evictions, poor credit history, and criminal issues, but relatively low vulnerability.
- Track B consumers are prioritized for low-service, affordable permanent housing, including, in some cases, public housing.
- Youth in this category will be placed in Transitional Housing.

Track C (for wraparound Care)

- Consumers have barriers to housing besides income, and the need for consistent support to maintain housing.
- Consumers in this category have high barriers to housing and relatively high vulnerability (e.g. medical, mental health, etc.).
- Track C consumers are prioritized for high-service permanent supportive housing.

Track D (for DPH):

- Consumers are extremely vulnerable, and are referred to DPH for further assessment and connection to case management services.

Track E (for Exit):

- Consumers are current residents of PSH and ready to exit to lower-service housing.
- Track E consumers are prioritized for affordable housing.

To determine appropriate track, coordinated assessment staff will consult several local databases, including HMIS, CHANGES, and CCMS, as well as interview the consumer. Additional details about the procedures for evaluating individuals can be found at the coordinated assessment program.

If an individual is not considered a priority household, the coordinated assessment staff will refer that individual to other resources, such as shelter and other community services, and must be careful to manage expectations about housing.

IV. STANDARDS FOR PROVIDING ASSISTANCE: TRANSITIONAL HOUSING

A. TARGET POPULATION FOR ASSISTANCE

The San Francisco CoC recognizes that particular subpopulations benefit from the congregate living environment and intensive services provided under a transitional housing model. Local transitional housing programs will target the following populations families and individuals currently experiencing homelessness:

a) Families experiencing homelessness;
b) Families and individuals with experience of domestic violence;
c) Persons with a history of substance abuse;
d) Transition aged youth; and
e) Veterans.

Transitional housing is prioritized for families and individuals who, with robust short-term supports, will be able to transition into stable and independent permanent housing situations.

Eligibility Criteria

In order to qualify for a CoC-funded Transitional Housing program, participants must be eligible under CoC Participant Eligibilty and Documentation standards in Section I.

B. SERVICES

Duration of Assistance

Transitional Housing facilitates the movement of homeless individuals and families to PH within 24 months of entering TH.

Lease and Occupancy Agreements

All CoC-funded TH programs must enter into a lease or occupancy agreement with tenants that must be at least one month in duration. The lease agreement must observe Fair Housing Act regulations.

Rent and Occupancy Charges

Participants in TH are expected to pay a maximum of 30% of their income (monthly, adjusted) toward rent (including utilities).

- If the participant has zero income, the participant is not required to pay rent, but their supportive services partner is expected to work with them to secure income (either earned or unearned) as soon as possible.
- In no circumstance can a tenant be charged an amount above the Rent Reasonableness standard established by HUD.
- Rents collected from residents of TH may be reserved in whole or in part to assist the residents to move to PH.

Participants in leasing programs may be charged an occupancy charge up to 30% of the monthly adjusted income; 10% of the family's gross income; or the portion of the family's welfare assistance.

V. STANDARDS FOR PROVIDING ASSISTANCE: RAPID RE-HOUSING

These standards were developed based on the work of the San Francisco Homelessness Prevention and Rental Assistance Programs Workgroup in 2012-3, which included a variety of rapid rehousing and prevention providers, including ESG recipients. These standards align with Human Services Agency practice.

A. TARGET POPULATION FOR ASSISTANCE

The local rapid rehousing/prevention programs will target the following populations:

- Families or individuals who are homeless, or
- Living in doubled or tripled up or residing in substandard housing, and at risk of being evicted and/or becoming homeless
- Families or individuals at risk of losing their housing because they are paying more than 70% of their income toward rent
- Living in a Single Room Occupancy Hotel (SRO)

Priority for the subsidy will be given to homeless families or individuals in shelter or on the centralized intake wait list, families receiving San Francisco CalWORKs benefits and/or who have an active San Francisco Child Welfare case. Additional preference will be given to San Francisco families who are residing in shelter or on the family shelter wait list.

Eligibility Criteria

In order to qualify for a CoC-funded Rapid Re-Housing program, participants must be eligible under CoC Participant Eligibilty and Documentation standards in Section I.

B1. SERVICES: RENTAL SUBSIDIES

Rental subsidies will be targeted to families or individuals who are assessed as having the potential to increase their income and transition successfully off the subsidy within a specified timeframe. A rental subsidy is defined as a monthly housing grant over 12 to 24 months, with the possibility of hardship extension not to exceed 36 months. The goal should be for clients to successfully transition off the subsidy within 12 months. After 12 months however, if the client is unable to transition successfully off the subsidy but has demonstrated progress toward service plan goals, the subsidy can be extended for a maximum of 12 additional months. In addition:

- 100% of subsidy clients must have a written socioeconomic plan for replacing the subsidy.
- 100% of subsidy clients will participate in, at minimum, monthly case management meetings, some of which will be home-based visits.
- 100% of subsidy client service plans will be reviewed by case management on a quarterly basis, to evaluate progress toward socioeconomic goals.

Eligibility Criteria

In order to qualify for a rental subsidy, families or individuals must fall within the target population as well as satisfy the following criteria:

Income

- Subsidy applicants must demonstrate at point of program enrollment their ability to increase their income and/or decrease their expenses and transition off the subsidy within the specified timeframe.
- Subsidy clients must remain engaged in program activities in order to maintain eligibility for a subsidy and must demonstrate progress toward achieving the milestones to increase their income, as established in the socioeconomic plan, by month 12 of the subsidy. Clients who have not demonstrated progress will not be eligible for a subsidy extension.

Rent to Income Ratio

- In determining eligibility for assistance, the provider will take into account an applicant's total household income and expenses. For subsidy clients, the tenant portion of the rent cannot exceed 40-50% of net monthly income upon enrollment in the subsidy program.

Plan Development

Each subsidy client must present a transition plan that will demonstrate their ability to be self-sufficient in maintaining adequate housing at the end of the subsidy period, which includes a goal of increasing income to the point at which:

- The rent to income ratio is at or below 70%, or
- The client has increased their income by the amount of the subsidy, or
- The client has met their goal as set forth in the service plan

Other Requirements

- Prior to assistance being approved, subsidy applicants must sign a client agreement and agree to participate in periodic follow-up for 12 months after assistance ends.
- Subsidy clients must show proof of tenancy (i.e., be named on the lease agreement or have a valid sublease agreement that can be verified).
- Subsidy clients must provide proof that they have paid their share of the rent on time each month (i.e., rent receipts). Subsidy clients must pay their share of the rent on time each month, and will be at risk for suspension from program if they become delinquent on their rent.
- Subsidy clients must complete and submit applications for all available subsidized housing opportunities within 3 months of the start of the subsidy, and continue to complete applications for new subsidized housing opportunities throughout the length of the subsidy. Applications will be documented in Housing Logs in client case files.
- Any subsidy client who rejects a valid subsidized housing offer for reasons not expressed at point of program enrollment will be terminated from the subsidy.
- Subsidy programs may assist families who do not currently have physical custody of their child(ren), if documentation from CPS verifies that housing is the only remaining

barrier to reunification, that reunification will occur within 60 days after housing is obtained, and the client demonstrates the ability to begin working toward increasing income while reunification is in process. If reunification has not occurred within 60 days, the provider will work to transition the family off of the subsidy and into more appropriate housing/services.

- Clients are eligible for enrollment in the subsidy once in a lifetime. Once a family or individual has used the subsidy and been exited, they cannot reapply.

Main Service Components

- All clients assessed as having the potential to increase their income through employment will be mandated to participate in employment and training services provided by CFC or SJFC programs or another service provider, enrolled in an educational program or will demonstrate clear goals to increasing income while working.
- An apartment inspection checklist will be utilized to ensure that apartments meet minimum safety guidelines and are child-safe. Case managers will work to ensure the apartment does not possess serious code violations and that any necessary repairs are made, prior to first payment.
- Once a unit is identified the case manager will then assist the family or individual in accessing money for security deposits and other move-in costs and provide any other appropriate assistance to aid the family with the move-in process.

B2. SERVICES: INTENSIVE CASE MANAGEMENT SERVICES

Case Managers will provide intensive case management services in order to assist clients to meet the goals indicated in their transition plans, successfully retain housing and move off the subsidy and into self-sufficiency. Services will be provided at the program offices and Case Managers will conduct home visits when appropriate. Services may include, but are not limited to:

- Intake and assessment
- A minimum of one monthly face-to-face case management meeting
- A minimum of one quarterly home visit
- Assistance with transportation, including accompaniment to appointments, home visits
- Verification of progress toward achievement of short and long term client objectives
- Referral to behavioral health resources
- Job search assistance
- Benefits assistance and advocacy
- Referral to vocational and training programs
- Mediation and negotiation with landlords
- Crisis intervention
- Referral to child care resources
- Referral to other services and resources
- Assistance with housing applications
- Budgeting and money management assistance
- Social and organized activities

B3. SERVICES: EVICTION PREVENTION

Eviction prevention assistance is defined as landlord mediation services and housing advocacy, as well as direct financial assistance in the form of back-rent grants. The maximum grant amount will not exceed $1500 per applicant. The program will target two populations:

1) Formerly homeless families or individuals who were previously residing in the San Francisco family shelter system and have been housed;
2) Housed families or individuals who are at risk of eviction and who would be able to retain their housing with short-term rental assistance (1-3 months).

Clients may be assisted by HSA General Fund programs two times in five years for one-time back rent, security deposit, or short-term rental subsidies.

Rent to Income Ratio

- In determining eligibility for assistance, the provider will take into account an applicant's total household income and expenses.
- Rent cannot exceed 80% of monthly income. However, when a family or individual's rent exceeds 50% of income, provider must ensure that residual income after rent is adequate to cover the family or individual's non-housing needs before providing assistance, assess whether another intervention is indicated, or determine whether the family or individual should be referred to additional services. Exceptions to the rent to income ratio can be made on a case-by-case basis by permission of the Housing & Homeless Program Manager.

Other Requirements

- All applicants must agree to sign a participant agreement and participate in periodic follow-up for 12 months after assistance ends, prior to assistance being approved.
- All clients must be able to document amount owed for back rent payment, move-in, monthly rent, or other critical need.
- All clients must show proof of tenancy (i.e., be named on the lease agreement or have a valid sublease agreement that can be verified).
- Clients who do not currently have physical custody of their child(ren) may be assisted with a grant, if documentation from CPS verifies that obtaining or maintaining housing is the only barrier to reunification, and that reunification will occur within 60 days after the assistance is received.

Criteria for Housed Families and Individuals

- Must be residing in San Francisco.
- Must have a legal lease in applicant's name; and submit a current (within last 30 days) utility bill in their name.
- Income must be less than 35% of AMI in San Francisco.
- Must be "at risk" of becoming homeless, which can include but is not limited to a critical need involving temporary or permanent loss of household income, medical emergency, or death of household member.

VI. STANDARDS FOR PROVIDING ASSISTANCE: PERMANENT SUPPORTIVE HOUSING

A. TARGET POPULATION FOR ASSISTANCE

Through coordinated assessment, local permanent supportive housing (PSH) programs will target the following subpopulations:

- Chronically homeless,
- Chronically homeless veterans,
- Chronically homeless individuals with HIV/AIDs

All individuals are referred to CoC permanent supportive housing through the Coordinated Assessment system. The coordinated assessment system prioritizes placement in permanent supportive housing for individuals based on length of time homeless. The target populations consist of individuals with high vulnerability and high barriers to housing stability.

Eligibility Criteria

In order to qualify for a CoC-funded Permanent Supportive Housing program, participants must be eligible under CoC Participant Eligibilty and Documentation standards in Section I.

Each PSH program in the CoC will provide Coordinated Assessment staff with accurate and up-to-date information on eligibility criteria for the program (i.e. Chronically homeless, disabling HIV/AIDs, etc).

B. SERVICES

Duration Of Assistance
- There can be no predetermined length of stay for a PSH program
- Program participants in PSH must enter into a lease agreement for an initial term of at least one year. The lease must be automatically renewable upon expiration, except on prior notice by either party.

Supportive Services and Housing First

- Supportive services designed to meet the needs of the program participants must be made available to the program participants throughout the duration of stay in PSH
- Permanent supportive programs must adopt a housing first approach

San Francisco Local Homeless Coordinating Board (LHCB)
Recordkeeping Policy
January 2014

Per HUD Regulations, Collaborative Applicants must keep records documenting compliance with HUD requirements (See 24 CFR 578.103). As the Collaborative Applicant, the Human Services Agency will keep evidence of the following according to LHCB-approved record-keeping requirements:

- The LHCB meets board structure requirements:

    o Approved copy of a governance charter establishing the LHCB and including a written process to select a board, and

    o Board roster (including LHCB members' affiliations/ representation(s)).

- The CoC has been established and operated as set forth in the CoC Regulations.

- The CoC has prepared the application for funds.

- The LHCB is compliant with HUD's conflict of interest requirements, including having a conflict of interest policy signed by all LHCB members.

SAN FRANCISCO COUNTY HMIS GOVERNANCE CHARTER

DRAFT PENDING FINALIZATION OF HUD HMIS REQUIREMENTS PROPOSED RULE JANUARY 23, 2014

OVERVIEW AND PURPOSE

The San Francisco County Homeless Management Information System (HMIS) is a web-enabled database used by homeless service providers within the San Francisco Continuum of Care (CoC) to capture, store and analyze information about the persons they serve. San Francisco's HMIS is administered by the San Francisco Human Services Agency ("Lead Agency") on behalf of the San Francisco CoC.

The Collaborative Applicant is the entity that submits a joint applicant on behalf of all applicants for McKinney-Vento Continuum of Care funding in the community. The San Francisco Human Services Agency serves as Collaborative Applicant for the continuum ("Collaborative Applicant").

This is an agreement between the CoC, the Collaborative Applicant, and the HMIS Lead. The purpose of this Governance Charter is to outline the roles, responsibilities, relationship and authority of the Continuum of Care, HMIS Lead Agency, and participating agencies.

DUTIES AND RESPONSIBILITIES OF THE CONTINUUM OF CARE

HMIS POLICYMAKING

The San Francisco County CoC is responsible for drafting, reviewing, revising and approving all policies and procedures related to the operation of the HMIS as required by federal regulation, including but not limited to HMIS Policies and Procedures, Partner Agency Memorandum of Understanding, Privacy Plan, Security Plan, and Data Quality Plan.

Annual Review of This Charter and HMIS Policies

It shall be the responsibility of the San Francisco CoC in consultation with the collaborative applicant to review HMIS policies and procedures within the continuum no less than once every year and update this charter and/or other HMIS policies and plans as necessary to comply with Section 578.7(b) of the McKinney-Vento Act.

HMIS Oversight

The HMIS will be overseen by the CoC board and/or designee as determined by the CoC. The CoC shall ensure the HMIS is administered in compliance with requirements prescribed by HUD.

GUARDIANSHIP OF CLIENT DATA

1

The Continuum of Care holds in trust any and all data entered into HMIS on behalf of the clients served by the community and is responsible for ensuring that appropriate policies, procedures and standards are in place governing the access, use and dissemination of data stored in the system.

It is the responsibility of the CoC to ensure that all records containing protected identifying information of any individual or family who applies for and/or receives Continuum of Care assistance will be kept secure and confidential

PARTICIPATION
It shall be the CoC's responsibility to ensure consistent participation of recipients and subrecipients of applicable HUD grants in the HMIS.

DESIGNATIONS
Pursuant to section 402(f)(2) of the McKinney-Vento Act, the CoC is responsible for designating an HMIS and an eligible agency to manage it. The CoC makes the following designations:

HMIS System
The CoC designates the Social Solutions Efforts to Outcomes (ETO) System operated by the San Francisco Human Services Agency as the official HMIS for the CoC's geographic area.

HMIS LEad Agency
The CoC designates the San Francisco Human Services Agency as the HMIS Lead to operate and maintain the San Francisco HMIS.

DUTIES AND RESPONSIBILITIES OF THE HMIS LEAD AGENCY

ENFORCEMENT OF PRIVACY, SECURITY AND DATA QUALITY PLANS
This agreement incorporates by reference, and the Agency agrees to be bound by, written HMIS policies and procedures for privacy, security and data quality as to be determined by the CoC. These policies will be drafted and updated as required to ensure compliance with HUD HMIS Notices on HMIS Governance, Privacy and Security, Software Functionality, and Data Quality upon release of the HMIS Requirements Final Rule when it becomes effective.

SECURITY
In addition to any duties and responsibilities included in the HMIS Security Plan, the Agency shall be responsible for making all reasonable efforts to maintain and secure client records, HMIS, and supporting services.

User Credentials
The Agency shall assign and maintain user identification and passwords for all HMIS users and monitor and log use of anyone accessing client data.

Network Security

The Agency shall take all reasonable efforts to ensure the security and integrity of the client database, including implementation and maintenance of appropriate firewalls, intrusion prevention systems (IPS), and other security measures as required in order to ensure the integrity of HMIS. The Agency shall conduct regular audits of HMIS security and report any significant vulnerabilities to the CoC.

DATA QUALITY

In addition to any duties and responsibilities included in the HMIS Data Quality Plan, the Agency will be responsible for making all reasonable efforts to ensure the highest level of data quality possible.

Universal Data Elements

The Agency shall ensure the HMIS is capable of managing the collection of each data variable and corresponding response category for each of the Universal Data Elements outlined in the HUD HMIS data and Technical Standards.

Program-Specific Data Elements

The Agency shall ensure the HMIS is capable of managing the collection of each data variable and corresponding response category for each of the Program-specific data elements as outlined in the HMIS Data and Technical Standards.

Unduplicated Client Records

The Agency shall ensure HMIS is capable of generating a summary of the number of unduplicated client records entered into HMIS.

Program Entry and Exit Dates

The Agency shall be responsible for ensuring the accurate entry of program entry and exit dates. Program entry and exit dates should be recorded upon any program entry or exit on all participants. Entry dates should record the first day of service or program entry with a new program entry date for each period/episode of service. Exit dates should record the last day of residence in a program's housing before the participant leaves the shelter or the last day a service was provided.

ENDUSER TRAINING AND SUPPORT

The Agency shall be responsible for providing initial and on-going HMIS training, support and technical assistance to all participating agencies that use HMIS. The Agency shall work with participating agencies serving homeless clients and assist them with the process of entering information into HMIS, and shall strive for real-time, or close to real-time data entry.

SOFTWARE UPDATES, PATCHES AND MAINTENANCE

The Agency shall be responsible for ensuring all software and supporting services are updated, patched and otherwise maintained to the extent required in order to fulfill the agency's obligations under this agreement.

3

Use of HMIS Component Grant Funds
The Agency is the only entity eligible to use grant funds for an HMIS component, and funded activities must comply with HUD HMIS requirements.

SPECIFIC REPORTING REQUIREMENTS

Annual Performance Reports
The Agency shall ensure the HMIS is capable of generating a consistently reliable Annual Performance Report (APR) in compliance with the latest HUD guidance.

Annual Homeless Assessment Reports
The Agency shall prepare and submit Annual Homeless Assessment Reports (AHAR) to HUD.

CoC Competition Community Application
The Agency shall provide all necessary support required for the CoC to fully and accurately complete the community application portion of the HUD McKinney-Vento Continuum of Care competition.

High-Performing Communities Application
The Agency shall at the CoC's request provide all necessary data and support required to support the collaborative applicant's application for designation as a High Performing Community under Section 424 of the McKinney-Vento Act.

CONFIDENTIALITY

COMPLIANCE WITH STATE AND FEDERAL REGULATION
The Agency shall ensure compliance with relevant federal and state confidentiality regulations and laws that protect client records. The Agency shall only release client records with the consent of the client, unless otherwise provided for by law.

SUBSTANCE ABUSE RECORDS
The Agency shall abide specially by federal confidentiality regulations as contained in the Code of Federal Regulations, 42 CFR Part 2 regarding disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by informed written consent of the person whom it pertains to or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is not sufficient for this purpose. The Agency understands that federal rules restrict use of the information to criminally investigate any alcohol or drug abuse patients.

CLIENT CONSENT
The Agency agrees not to release any personally identifiable information stored in HMIS to any organization or individual without the client's proper informed written consent.

CONFIDENTIALITY TRAINING

4

The agency shall ensure that all authorized users of HMIS receive basic confidentiality training before being granted access to the system.

CLIENT PARTICIPATION NOT REQUIRED

The Agency shall not require or imply that services must be contingent upon a Client's participation in HMIS. Services should be provided to a client regardless of HMIS participation, provided the client would otherwise be eligible for services.

REPORTING ACCESSS

AGENCY CLIENTS

The Agency shall retain access to the full records and statistical data on the clients it serves.

NON-AGENCY CLIENTS

The Agency's access to data on Clients it does not serve shall be limited to de-identified and statistical information.

AGGREGATE INFORMATION

The Agency may make aggregate data available to other entities for funding or planning purposes pertaining to providing services to homeless persons. However, such aggregate data shall not contain personally identifiable information about any client. The Agency shall provide reports using aggregate data to CoC upon request.

The Agency shall use only unidentified, aggregate data for homeless policy and planning decisions, in preparing federal, state or local applications for funding, to demonstrate the need for and effectiveness of programs, and to obtain a system-wide view of program utilization in the state.

PROPRIETARY RIGHTS AND ABUSE

COPYRIGHT

The San Francisco HMIS, underlying software, and services are protected by copyright and cannot be copied, except as permitted by law or written agreement with the copyright holder.

UNAUTHORIZED ACCESS AND ABUSE

The Agency shall take reasonable efforts to prevent the unauthorized access, use or modification of HMIS, or interference with normal system operation. This shall include both corruption of the HMIS database in any manner, as well as unauthorized disclosure or sharing of user identification and/or passwords. The Agency shall not use HMIS with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.

OTHER FEDERAL REQUIREMENTS

DRUG-FREE WORKPLACE

S

The HMIS Lead Agency shall adopt drug-free workplace policy in compliance with the requirements of the Drug-Free Workplace Act. This policy must be published and distributed to employees, notifying them that the unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited and specifying actions that shall be taken against employees for violation of such a prohibition.

HOMELESS CLIENT PARTICIPATION

In determining HMIS policy, the CoC Board or designated body shall include at least one homeless person or formerly homeless person in policymaking decisions. Participation can include but is not limited to governing board leadership, advisory committees, staff positions, and sub-committee positions.

CONFLICT OF INTEREST

The HMIS Lead Agency adopts and agrees to abide by the CoC's conflict of interest policy. This policy shall apply to all board members, staff and volunteers.

EQUAL OPPORTUNITY AND NON-DISCRIMINATION

The HMIS Lead Agency adopts an equal opportunity and non-discrimination policy in compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and HUD regulations.

VIOLATIONS

Any individual suspected of violating any of the guidelines outlined in this agreement shall be reported immediately upon discovery to the HMIS System Administrator or designee. The Agency shall investigate fully all allegations of misconduct and report all confirmed violations to the CoC.

Where the Agency believes an individual breach may damage the integrity or HMIS or violate privacy or security requirements, it shall take immediate steps to suspend access to HMIS as necessary and ensure compliance with HMIS policies and procedures.

ACKNOWLEDGEMENTS AND ACCEPTANCE

This Agreement shall be in-force from the date signed until revoked in writing by either party provided funding is available. Termination of this agreement shall in no way impact the Agency's obligations of confidentiality, security and data integrity, which shall survive the termination of this agreement
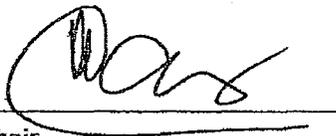
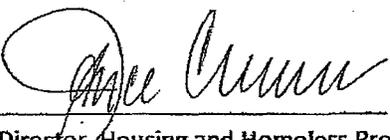**Agreed and accepted:**

San Francisco Continuum of Care

_____
Co-Chair

_____
1/24/14
Date

_____
Co-Chair

_____
1/27/14
Date

San Francisco Human Services Agency

_____
Director, Housing and Homeless Programs

_____
1/31/14
Date

San Francisco Local Homeless Coordinating Board

Educational Policies For The San Francisco Local Homeless Coordinating Board

Adopted November 1, 2010

Due to the myriad of obstacles surrounding homeless families with school-age children and in order to best serve youth and families experiencing homelessness in our community, the San Francisco Local Homeless Coordinating Board has established the following policies:

- The LHCB requires all family and youth homeless assistance providers receiving Continuum of Care funds and encourages all family and youth homeless assistance providers to establish an internal policy (form policy attached) that supports families and youth experiencing homelessness to enroll in school and access appropriate services within the community.
- The LHCB will communicate and coordinate regularly with the Families in Transition Council and the Homeless Education Liaison to ensure that families and youth experiencing homelessness are being served in the best possible way. The LHCB and the Homeless Education Liaison will share data and information. Further, the LHCB encourages the San Francisco Unified School District and other schools to consider the housing situation of children and youth who are homeless and to make accommodations, as appropriate, to assist those children and youth to meet their educational needs.
- The LHCB encourages the Department of Human Services and all agencies serving homeless children and youth to consider the educational needs of children when placing families in interim housing.
- The LHCB encourages mainstream services agencies, including public transportation agencies, to provide services and resources to homeless children and youth that will assist them to meet their educational needs.

San Francisco Local Homeless Coordinating Board
Form Educational Policy for the CoC Agencies
(This policy should be edited to conform to Agency practices.)

Due to the myriad of obstacles surrounding homeless families with school-age children, (Agency Name) has implemented the following policies and practices:

- In order to address the fact that many homeless youth and families do not know their legal rights, the agency will post notice of students' rights under the McKinney-Vento Act at each program site serving homeless youth and families in the appropriate languages for that program site.
- The agency will designate a staff person(s) responsible for ensuring that children are enrolled in school and connected to the appropriate services within the community, including early childhood education programs such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney-Vento education services. This person(s) will join the Families and Youth in Transition Council email list, attend Families and Youth in Transition Council meetings when appropriate, and otherwise stay informed about resources and information relevant to children enrolled in school.
- The agency will ensure that all children 5 years and over are enrolled in school and connected to appropriate services within the community.
- During the intake process:
  - Housing and service providers will inform families and youth about their educational rights under the McKinney-Vento Act upon intake, and assist families and students in exercising those rights.
  - The staff person conducting intake will ascertain if school aged children are enrolled in school. If not, the family/youth will be guided through the enrollment process. For the San Francisco Unified School District, the family/youth will need to go to the Enrollment Placement Center, 555 Franklin Street, San Francisco, CA. When enrolling, the family/youth should note that they are currently/recently homeless.
    - Service providers are encouraged to aid parents by helping them obtain school records, health records, and other documentation. Although the McKinney-Vento Act prevents schools from requiring such documents in enrolling students, this will help facilitate a smoother transition for students enrolling in education programs.
  - The staff person conducting intake will ascertain if the school district/school have been informed enrolled children are currently or recently homeless. If not, the staff person will inform the school liaison of the youth's homeless status. For San Francisco Unified School District, the school liaison will be informed by completing the Families and Youth in Transition Program Questionnaire, attached to this policy, and faxing it to Tatum Wilson at 415-695-5565.
- Children in school will be assisted to access the resources available to them through the McKinney-Vento program, including, as available and appropriate, free breakfast and lunch, tutoring, backpacks, uniforms, after school and summer programs, and bus passes.
- If children in school encounter any issues obtaining the resources or support they need, the program staff, in partnership with the children's parents, will contact the school staff or school liaison as soon as possible for assistance to resolve the problem. (For San Francisco Unified School District, Tatum Wilson at 415-695-5501 x13030).
- Program staff will support children in school, as appropriate and desired by the children's parents, by:
  - Tracking the enrollment and attendance of students in their care,
  - Collaborating with the schools students attend and the school district liaison,
  - Reporting children who are late to school to parents and case managers,
  - Connecting children and youths with additional resources, such as after-school and summer-term programs or medical providers, if appropriate and available, and
  - Gathering students' report cards and grading information, truancy and suspension notices, and other communications with school staff to further the ability of an agency to keep track of its clients' academic progress, and quickly identify potential concerns.

- For young children, program staff will identify Head Start, Even Start, and other available programs, and assist parents in accessing those services, as appropriate and available.
- Program staff will remind parents to inform the school when the family moves to permanent housing to assist the school district to maintain accurate information about who is eligible for McKinney-Vento-related services, and with the parents permission, will email the homeless education liaison when the family moves out of the program.

BACKGROUND

Requirement for Coordinated Assessment

The CoC Interim Rule, which became effective August 30, 2012, governs the new Continuum of Care (CoC) funding program and requires that that each Continuum of Care, in consultation with recipients of Emergency Solutions Grants program funds within the CoC's area, establish and operate either a centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of all individuals and families, from all subpopulations, for housing and services. The CoC must also establish and consistently follow written standards for providing Continuum of Care assistance regarding program eligibility and prioritization.

While CoCs are technically required to have such assessment systems currently, HUD has indicated that it expects CoCs to have functioning systems for all populations in place in the next 2-3 years.

Benefits of Coordinated Assessment

Coordinated Assessment systems have been proven to improve connections between people and the housing and services they need. Common features of Coordinated Assessment across communities that have implemented it are: structures and protocols that streamline and improve screening, assessment, and referrals, and electronic information systems that help agencies and consumers share information.

Coordinated Assessment systems are beneficial to all parties involved in finding solutions to homelessness. The Coordinated Assessment serves the interests of consumers by helping them locate the housing and services they need. It helps housing providers by minimizing time spent assessing people who may not be right for their programs. Finally, the coordinated assessment benefits funders by ensuring that the best housing and services connect to the right people at a community-wide level. Coordinated Assessment systems identify youth, young adults, single adults, and families who are homeless or at risk of homelessness, assess their housing and service needs, and quickly connect them to appropriate housing and services necessary for long-term stability.

Additionally, Coordinated Assessment systems also help communities meet their defined performance on the measures instituted in the HEARTH Act. For example, Coordinated Assessment systems can help consumers move through the system faster by reducing the amount of time people spend in the wrong program or finding the right program that fits. A Coordinated Assessment may also reduce the number of vulnerable populations that become homeless by offering prevention and diversion resources upfront, reducing the number of people who enter the system unnecessarily. Finally, a Coordinated Assessment system can create administrative synergies by improving data collection and quality to provide accurate information on what kind of assistance consumers need.

Coordinated Assessment strategies must work with the current resources as well as the intended housing and services through the implementation of the community's plan to prevent and end homelessness. It is important that communities incorporate the flexibility to make these adjustments as well as build on successes as they respond to a growing and changing system while planning for future needs.

SAN FRANCISCO'S COORDINATED ASSESSMENT FOR SINGLE ADULTS

Overview of Coordinated Assessment Planning in San Francisco

The Coordinated Assessment Workgroup began its work designing the San Francisco coordinated assessment system in June 2012, and has been assisted by HUD Priority Community Technical Assistance since the beginning of 2013. San Francisco's CoC is still planning for the design and implementation of the coordinated assessment system. The policies related to such planning are as follows.

Coordinated Assessment Workgroup

The Coordinated Assessment workgroup will meet monthly in 2014 to finalize planning issues.
While many significant decisions have been made, there are outstanding issues that need to be addressed by the Coordinated Assessment Workgroup.

Coordinated Assessment Planning Staff

Many issues related to system start up will not require additional community feedback and input, and may be done by program staff.

Coordinated Assessment Open Planning Issues

Decisions and recommendations should focus on:

- <u>System Structure</u>: Where are the most appropriate sites to house the coordinated assessment staff? There has been a recommendation to place it at the Resource Centers in the community, but there are concerns about accessibility and desirability of those sites for some subpopulations.
- <u>System Process</u>: While a general structure has been developed, there are some details about how the system will function that need to be addressed. For example, how will the length of time homeless be calculated? There have been arguments for two options – continuous length of homelessness and cumulative length of homelessness. Additionally, while housing choice is guiding principle for the system design, there have been extended conversations about whether consumers should be able to have some say in which housing "track" would fit them best.
- <u>Assessment Tool</u>: The Workgroup provided feedback on the draft tools, but there is additional work that needs to be done to finalize those tools, including a focus on the depth of the assessment at coordinated assessment.
- <u>Marketing and Communications:</u> The Workgroup gave comments on the best ways to reach various targets and begin to market the coordinated assessment system. However, a more detailed communications plan will need to be drafted to ensure the best information is reaching potential consumers and various stakeholder groups.
- <u>Build Participation</u>: The Workgroup has identified partners it would like to participate in coordinated assessment; those partners must be informed and recruited into the system. The Workgroup has noted that some providers may be easier to recruit once the system is running and working well, matching people to units effectively, and freeing up housing provider staff from time spent filling units and maintaining waitlists, so this work will be ongoing.
- <u>Data Needs</u>: MOUs need to be explored and drafted to be able to access data stored in various databases and share information across programs. Additionally, HMIS capacity will need to reach a level where real-time bed availability data can be collected. The HMIS vendor needs to be engaged on the needs of the proposed community assessment system. Also, a decision needs to be made about what information will be collected on non-priority populations.
- <u>Resources</u>: While coordinated assessment is a HEARTH requirement, resources are not provided to fund the system, so resources must be identified and obtained.

- System Operators: After resources are identified, the entity(s) that will operate the system need to be selected, and those entities will need to develop internal policies and procedures. While often there will not be many units open during a month (initial estimates are 3-6/week), the operators will need to have the capacity and procedures to also do large rent-ups in a short period of time.
- Staff training: The entity(s) that operate the coordinated assessment system will need to develop a detailed staff training plan.
- Written Standards for Service: The CoC must have written service standards, and as part of the coordinated assessment start-up, the Workgroup would review and comment on draft service standards.
- System Evaluation: A process for evaluating and improving the system, ongoing, should be developed and presented to the Workgroup for comment.
- Start Up: There has been conversation about the best way to pilot the system, given the priority for individuals with the longest histories of homelessness. One option is to begin with veterans, using the process and tools within that system for that population only. Another suggestion was to pilot the system using a "closed list" (i.e. those that we know through our systems are have the longest histories of homelessness) and do targeted outreach with the individuals on that list. Or, as an alternative, the system can start by being open to anyone that wants to access it.

Current Summary of Possible Coordinated Assessment System Design

The Coordinated Assessment Workgroup has reviewed information and made significant decisions and recommendations about the design of the coordinated assessment system.

Initial Target Population

San Francisco will begin implementation of its coordinated assessment system with a focus on the single adult population. This will include screening tailored to the needs of Transition Aged Youth (TAY), with additional housing options available to that population. The coordinated assessment system may be piloted with veterans.

Services to be Included

The San Francisco coordinated assessment pilot will focus almost exclusively on permanent housing. Specifically, it will serve two target populations: 1) individuals that are currently homeless and seeking permanent housing; and 2) current residents of permanent supportive housing seeking to exit to other less care-

intensive housing. This will require a strong effort to build in linkages to other housing options that are not CoC or ESG funded. Outreach to non-HUD-funded San Francisco housing providers has been ongoing and will need to continue.

System Structure

San Francisco will employ a multi-site coordinated approach for its system. This will involve three to five sites, including one "mobile" site, through which consumers can access the system. The sites will be spread throughout the community to best serve the current homeless population. There has been discussion about housing the access points in the current Resource Centers throughout the city, since existing services access could be leveraged (e.g. shelter, GA, etc.), but there has not yet been a definitive decision made on that point because some homeless subpopulations do not use resource centers. Other locations that might be good points for coordinated assessment include SF General, the veterans resource center, Women's Building (for women), Larkin (for youth), or through SF FIRST. The ultimate sites will need to address population diversity, language concerns, and consumer preference as much as possible.

Any consumer will be able to access the system by walking into one of the system sites. The Workgroup suggested that being able to email to create an appointment for coordinated assessment may be helpful for some consumers, and some consumers may benefit from a case manager helping them call into the system At the most recent community meeting, it was suggested that the best way forward for accessing the system would be in person contact.

System Process

There will be two main interactions between a consumer and the coordinated assessment staff.

During the first interaction, the coordinated assessment staff will start by completing the First Interaction Form (see Appendix A) with the consumer. This form is used for any person seeking assistance through the coordinated assessment system. As mentioned above, this first interaction can take place either in-person or on the phone with the assistance of a case manager. The coordinated assessment staff will also complete a release of information and check HMIS, CHANGES, CCMS and other sources to gather and verify information collected throughout the assessment and referral process. The community has expressed a preference for the coordinated assessment team to ask only non-intrusive questions in the first contact, as most clients who have a first contact will not be

assigned housing and will not develop a relationship with the coordinated assessment team for ongoing services.

If the consumer is clearly extremely medically vulnerable, Coordinated Assessment staff will work to connect the client with an appropriate level of care via the Department of Public Health Placement team. As the placement team is currently re-evaluating their systems, the exact process for this connect is not yet clear.

Through the First Interaction Form, the staff member will be able to determine whether a consumer is a priority for available housing. The coordinated assessment staff will prioritize:
1) Homeless persons who are San Francisco residents based on longest length of time homeless AND
2) Residents seeking to exit PSH with high levels of care for less care-intensive housing.

The first priority is designed to not only to address the need of housing the longest term homeless, but to also set clear expectations for everyone on who will be prioritized. It makes the system more objective and takes out any subjectivity that could affect priority. The community has determined that a person's length of time homeless should be counted cumulatively; for example, a person who was homeless for six years, housed for two years, and homeless again for two years will for the purposes of coordinated assessment be considered as homeless for eight years.

Additionally, the community has determined to consider a person's length of residency in San Francisco cumulatively; for example, a person who was homeless for six years in San Francisco, homeless for two years in another county, and homeless again in San Francisco for two more years will for the purposes of coordinated assessment be considered to have been homeless in San Francisco for eight years.

The community also decided to consider a person's homelessness outside San Francisco using a multiplier (the exact formula is yet to be determined). In the example above, if the multiplier was .5, then the person would be considered to be homeless for nine total years, and placed in a pool of others who had been homeless nine years.

The community also decided to utilize a multiplier when verifying a person's length of homelessness; for example, a person homeless for six years whose

homelessness could be verified through third-party documentation would be considered homeless for six years, while a person homeless for six years whose homelessness is self-reported and unverified would be considered homeless for four years (using a multiplier of .75). These considerations work to ensure fairness without creating incentives for individuals to falsify information or relocate from other geographic areas.

The purpose of the second priority is to create space in high-service units for the people who most need them. As more resources become available (including rapid rehousing for single adults), the priorities of the system will be adjusted to meet that need.

The number of people who are high priority within these two priorities at any given time will be correlated to the number of housing units expected to be available in the next month. The system aims to only focus on the people that it will be able to house in a short period of time. Once someone is prioritized, they will be placed in the most appropriate unit for their needs and eligibility.

If an individual is not considered a priority household, the coordinated assessment staff will refer that individual to other resources, such as shelter and other community services, and must be careful to manage expectations about housing. In addition, coordinated assessment staff will have a process to refer prioritized consumers without case managers to case management to move them through the housing process (e.g. GA worker, etc.)

Once an individual is determined to be a priority to be served by the system, the coordinated assessment staff member will proceed with a further assessment during the first interaction.

There are different assessment tools that will be used depending on whether the consumer is currently homeless or seeking to move to less service-intensive permanent housing. All consumers will also complete a Housing Interest Survey to help determine consumer choice and preference in housing options. All of these tools are described in the following section on Preliminary Needs Assessment/Screening Tool.

Once the staff has completed and scored a consumer's assessment, the consumer will be placed into one of five tracks for housing. These tracks are designed to address the differing levels of service available in San Francisco permanent housing options and the needs of the consumers. The Coordinated Assessment system will

also gather information about income and other technical eligibility criteria on a per housing-development/program basis and place consumers accordingly.

There has been some discussion about the consumer's preferences and what impact they may have on their housing track. The community discussion has not come to clear consensus on this matter, but suggestions to maximize client choice and appropriate service match have included:

- Sharing information with the client about the various housing tracks, and their recommended track to ascertain if the client agrees
- Allowing clients to refuse up to 3 housing units without an impact on their priority level
- Accommodating survivors of domestic violence and other trauma by allowing them to refuse neighborhoods, blocks, and developments where they have been traumatized or fear a former abuser without an impact on their priority level
- Initial discussions included recommendations that clients be allowed to self-select into a lower level of care unit. There is not consensus about this matter, and some housing providers are concerned about the impact on the housing system.

The five housing tracks include:
- Track A (for Affordable)
  - Consumers need access to affordable housing, but likely can maintain housing independently.
  - Consumers have few barriers to housing and/or may have identified housing they could access if they had resources.
  - Track A consumers are prioritized for Rapid Rehousing and public housing options.
- Track B (for Basic services)
  - Consumers have barriers to housing besides income, but the ability to maintain housing without many services.
  - Consumers in this category have more and higher barriers to housing, including barriers like multiple evictions, poor credit history, and criminal issues, but relatively low vulnerability.
  - Track B consumers are prioritized for low-service, affordable permanent housing, including, in some cases, public housing.
  - Youth in this category will be placed in Transitional Housing.
- Track C (for wraparound Care)
  - Consumers have barriers to housing besides income, and the need for consistent support to maintain housing.

- Consumers in this category have high barriers to housing and relatively high vulnerability (e.g. medical, mental health, etc.).
- Track C consumers are prioritized for high-service permanent supportive housing.
- Track D (for DPH):
  - Consumers are extremely vulnerable, and are referred to DPH for further assessment and connection to case management services.
- Track E (for Exit):
  - Consumers are current residents of PSH and ready to exit to lower-service housing.
  - Track E consumers are prioritized for affordable housing.

In order to determine which of the above tracks a given consumer is most appropriate for, the community has come to consensus that a mixture of standard indicators of acuity (such as frequency of interaction with Psychiatric Emergency Services) that is likely to be available in CCMS, HMIS, and CHANGES and information that is only available from client interview, such as client housing preferences should be used.

In order to collect this information, the community has come to consensus that Coordinated Assessment staff should query the relevant data sources and interview clients. The community has expressed a preference for the Coordinated Assessment team to conduct client interviews instead of existing case managers to ensure clarity and consistency of information. Of course, the community supports clients bringing their support networks, including case managers and social workers to the interaction with Coordinated Assessment.

Once a consumer is designated into one of the above tracks, the coordinated assessment team will refer him or her to housing s/he is eligible for as a "hard referral" and all HMIS data for entry to the housing will be completed. The information that the coordinated assessment staff will provide to housing providers should include:
- All eligibility documentation
- All disability information related to housing needs
- Service information

This will happen at the second interaction the consumer has with the coordinated assessment team.

Once referred, the receiving agency will do a complete assessment of the consumer's service needs, building from the information already collected.

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<u>Assessment Tool</u>

San Francisco will design and use its own, unique needs assessment and scoring tool to use in its coordinated assessment system. This will allow the CoC to be thoughtful about the needs of the population it serves as well as the resources available in the community.

As of November 2013, there are drafts of three different tools to be used in the system, but none have been finalized. Drafts are attached at **Appendix A**. They are described below:

1) ***Housing Eligibility and Assessment Tool for Homeless Individuals***: The draft of this tool includes three parts – one to document housing priority (such as homeless status, SF residency, length of homelessness); the second to determine vulnerability and ascertain which housing track is appropriate for the consumer; and the third to determine housing eligibility. The vulnerability aspect of the tool will look at indicators of vulnerability that should already be available in various data systems, such as CHANGES, CCMS or HMIS. They would include things such as interactions with various systems of care (psychiatric emergency services, sobering centers, etc.) and other yet to be determined factors. Depending on certain indicators, such as number of interactions with emergency services over the past year, the consumer will receive points in a given track. The staff will add up the points in each track; the track with the highest number of points is the recommended fit for the consumer.   The third part will determine which housing the consumer is not eligible for based on her/her characteristics and experiences.

2) ***PSH Exit Prioritization Tool***: The draft of this tool relies on both information from the consumer regarding a desire to move to lower-service housing and the consumer's case manager's assessment of whether that is appropriate for the consumer. It also takes into account social networks or mainstream services to which the consumer is connected that can help him or her succeed in lower-service housing. It is more of a subjective assessment, as opposed to giving the consumer a particular score that would indicate readiness for less service-intensive housing.

3) ***Housing Interest Survey***: The draft of this survey is intended for both homeless and PSH-resident consumers. It asks the consumer about housing preferences, such as neighborhoods, willingness to pay rent or live with a roommate, accessibility issues, etc.

All of the above tools are in draft form. They will continue to be revised based on community feedback and as other decisions affecting the system are made.

Staffing/Resource Needs
Based on the expected volume of consumers and number of sites, the coordinated assessment system will most likely need between three and seven full-time staff members to operate it. The exact number will depend on the final structure of the system.

The Workgroup has consensus that coordinated assessment staff will be need to be highly trained in conducting the assessments, sensitivity to consumer issues/needs, and cross training/referrals.

In addition, coordinated assessment staff will need to:
- Use one system that creates a single ranked list of individuals waiting for housing
- Have common training on assessment, community resources, and other issues
- Have common oversight and expectations
- Use consistent messaging and meet frequently across program sites.

Data Needs
The Coordinated Assessment System will depend heavily on existing data systems, such as HMIS, CCMS, CHANGES, or other systems, for information to help complete and document information in the various assessment forms. All necessary information will be collected in the HMIS system. The community has discussed whether it is valuable to collect HMIS data for anyone who comes into contact with the coordinated assessment system, regardless of whether they will be connected to housing. However, there has not yet been consensus on whether the value of collecting that data outweighs the concern about wasting a consumer's time or asking more invasive questions than needed for the purposes of prioritization.

Ideally, the HMIS will eventually house real-time data regarding what units are available so that staff can immediately start connecting consumers with appropriate units. This will require a one-time expense to build that capacity into the current system. At that point, housing providers linked to the coordinated assessment system will need to update the system frequently about housing availability.

MOUs, policies, and other documents need to be developed regarding sharing consumer information across programs, user confidentiality, personal release of information, and other procedural issues.

Marketing and Community Communications Plan

HUD requires that the coordinated assessment system cover the geographic area, be easily accessed by individuals and families seeking housing or services, and be well advertised. The Workgroup discussed preliminary questions to develop a comprehensive communications plan for the coordinated assessment system. Through that plan, homeless people will be informed of and connected to the coordinated assessment system by:

- Flyers posted at all homeless service sites in San Francisco, including all CHANGES sites, food pantries, and congregate meal sites
- Flyers posted at neighborhood centers or other public sites, such as hospital emergency rooms, libraries, churches, the Housing Authority, CalWORKS, Tenderloin convenience stores, etc.
- Website referrals, including from Project Homeless Connect's website, SFhomeless.net, HSA's website, and others
- In traditional media, including radio, media targeting homeless individuals (such as Street Sheet) and newspapers printed in Chinese and Spanish
- Staff of homeless-service sites, including non-city-funded sites, that have attended briefings on the coordinated assessment system
- Seeing the mobile coordinated assessment site in the community

These communications will be available in several languages, including English, Spanish and Cantonese/Mandarin.

Community members, including mainstream service providers and local government agencies, also need to understand how the new coordinated assessment system works and who the initial target and priority populations for the housing coordinated assessment system are. Coordinated assessment staff will do an initial big push to disseminate this information, and then regularly continue to advertise, using informational briefings, flyers, and social media. They will work particularly closely with and target those city employees that contact homeless individuals at their greatest times of need—such as police officers, EMTs, and case managers at SF General—to encourage them to refer potential consumers to the system. Information distributed to community members will be carefully worded to describe the system and its purposes very precisely.

Going forward, staff will also share information regularly with referring community members about the success of the system and how its alleviating problems. Having a coordinated assessment system will result in a greater understanding of our community's needs.

The coordinated assessment system should produce:
- Monthly summary reports of the system's work, including:
    o Use of referral points
    o System efficiencies, e.g. unit turnover rates
    o Success of matching consumer to best units
- Quarterly systemic needs assessment reports, including:
    o Reports on evictions and eviction prevention
    o Barriers to housing (e.g. credit requirements, immigration status)
    o Changes in housing needs

<u>Roles and Responsibilities of Housing Providers</u>

Housing providers will play a central role in the coordinated assessment process, and their effective participation is critical to the system's overall success. Their responsibilities include:
- Planning and Governance- Housing providers should participate to the fullest extent possible in the planning and governance of the coordinated assessment system.
- Regularly Update Records- The coordinated assessment process will rely on the availability of up-to-date information from each provider. In addition to the initial confirmation of the units in the coordinated assessment system, including all requirements related to those units, housing providers must commit to maintaining a current inventory of available housing, including:
    - A weekly update via online system (HMIS) of possible units becoming available in the next month
    - Updates at unit vacancy (expecting a unit turnover rate of 10-14 days)
    - A daily update when units are actually available
- Full Participation in HMIS- Housing providers must participate fully in San Francisco's HMIS, including regularly inputting and updating consumer records. In order to ensure the most effective coordination of services across the system, providers must have access to current, up-to-date consumer records.
- Update Internal Processes to Align with Coordinated Assessment- Where necessary, providers must revise internal policies and procedures to match

the process and priorities of the coordinated assessment process. This includes updating internal messaging and marketing materials.

- Train and Supervise Staff- Participating providers must provide adequate training, supervision and on-going support to the staff tasked with implementing the system within their organization.
- Promote the System- Participating providers have an obligation to promote the coordinated assessment system to consumers and targeted sub-populations.

The Workgroup recommended providing free technical assistance to housing providers, especially non-HUD-funded ones, regarding aligning their internal processes with the coordinated assessment system and supporting HMIS participation.

ATTACHMENT: HMIS POLICIES AND PROCEDURES MANUAL

DOCUMENT SATISFYING REQUIREMENT	PAGE
San Francisco County HMIS Governance Charter	2 – 8
HMIS Desk Guide: City and County of San Francisco	9 – 45
HMIS Data Sharing Agreement for Research and Evaluation Purposes Only	46 – 52
HMIS Data Quality Plan	53 – 56

SAN FRANCISCO COUNTY HMIS GOVERNANCE CHARTER

DRAFT PENDING FINALIZATION OF HUD HMIS REQUIREMENTS PROPOSED RULE JANUARY 23, 2014

OVERVIEW AND PURPOSE

The San Francisco County Homeless Management Information System (HMIS) is a web-enabled database used by homeless service providers within the San Francisco Continuum of Care (CoC) to capture, store and analyze information about the persons they serve. San Francisco's HMIS is administered by the San Francisco Human Services Agency ("Lead Agency") on behalf of the San Francisco CoC.

The Collaborative Applicant is the entity that submits a joint applicant on behalf of all applicants for McKinney-Vento Continuum of Care funding in the community. The San Francisco Human Services Agency serves as Collaborative Applicant for the continuum ("Collaborative Applicant").

This is an agreement between the CoC, the Collaborative Applicant, and the HMIS Lead. The purpose of this Governance Charter is to outline the roles, responsibilities, relationship and authority of the Continuum of Care, HMIS Lead Agency, and participating agencies.

DUTIES AND RESPONSIBILITIES OF THE CONTINUUM OF CARE

HMIS POLICYMAKING

The San Francisco County CoC is responsible for drafting, reviewing, revising and approving all policies and procedures related to the operation of the HMIS as required by federal regulation, including but not limited to HMIS Policies and Procedures, Partner Agency Memorandum of Understanding, Privacy Plan, Security Plan, and Data Quality Plan.

Annual Review of This Charter and HMIS Policies

It shall be the responsibility of the San Francisco CoC in consultation with the collaborative applicant to review HMIS policies and procedures within the continuum no less than once every year and update this charter and/or other HMIS policies and plans as necessary to comply with Section 578.7(b) of the McKinney-Vento Act.

HMIS Oversight

The HMIS will be overseen by the CoC board and/or designee as determined by the CoC. The CoC shall ensure the HMIS is administered in compliance with requirements prescribed by HUD.

GUARDIANSHIP OF CLIENT DATA

The Continuum of Care holds in trust any and all data entered into HMIS on behalf of the clients served by the community and is responsible for ensuring that appropriate policies, procedures and standards are in place governing the access, use and dissemination of data stored in the system.

It is the responsibility of the CoC to ensure that all records containing protected identifying information of any individual or family who applies for and/or receives Continuum of Care assistance will be kept secure and confidential

PARTICIPATION
It shall be the CoC's responsibility to ensure consistent participation of recipients and subrecipients of applicable HUD grants in the HMIS.

DESIGNATIONS
Pursuant to section 402(f)(2) of the McKinney-Vento Act, the CoC is responsible for designating an HMIS and an eligible agency to manage it. The CoC makes the following designations:

HMIS System
The CoC designates the Social Solutions Efforts to Outcomes (ETO) System operated by the San Francisco Human Services Agency as the official HMIS for the CoC's geographic area.

HMIS LEad Agency
The CoC designates the San Francisco Human Services Agency as the HMIS Lead to operate and maintain the San Francisco HMIS.

DUTIES AND RESPONSIBILITIES OF THE HMIS LEAD AGENCY

ENFORCEMENT OF PRIVACY, SECURITY AND DATA QUALITY PLANS
This agreement incorporates by reference, and the Agency agrees to be bound by, written HMIS policies and procedures for privacy, security and data quality as to be determined by the CoC. These policies will be drafted and updated as required to ensure compliance with HUD HMIS Notices on HMIS Governance, Privacy and Security, Software Functionality, and Data Quality upon release of the HMIS Requirements Final Rule when it becomes effective.

SECURITY
In addition to any duties and responsibilities included in the HMIS Security Plan, the Agency shall be responsible for making all reasonable efforts to maintain and secure client records, HMIS, and supporting services.

User Credentials
The Agency shall assign and maintain user identification and passwords for all HMIS users and monitor and log use of anyone accessing client data.

Network Security

2.

The Agency shall take all reasonable efforts to ensure the security and integrity of the client database, including implementation and maintenance of appropriate firewalls, intrusion prevention systems (IPS), and other security measures as required in order to ensure the integrity of HMIS. The Agency shall conduct regular audits of HMIS security and report any significant vulnerabilities to the CoC.

DATA QUALITY

In addition to any duties and responsibilities included in the HMIS Data Quality Plan, the Agency will be responsible for making all reasonable efforts to ensure the highest level of data quality possible.

Universal Data Elements

The Agency shall ensure the HMIS is capable of managing the collection of each data variable and corresponding response category for each of the Universal Data Elements outlined in the HUD HMIS data and Technical Standards.

Program-Specific Data Elements

The Agency shall ensure the HMIS is capable of managing the collection of each data variable and corresponding response category for each of the Program-specific data elements as outlined in the HMIS Data and Technical Standards.

Unduplicated Client Records

The Agency shall ensure HMIS is capable of generating a summary of the number of unduplicated client records entered into HMIS.

Program Entry and Exit Dates

The Agency shall be responsible for ensuring the accurate entry of program entry and exit dates. Program entry and exit dates should be recorded upon any program entry or exit on all participants. Entry dates should record the first day of service or program entry with a new program entry date for each period/episode of service. Exit dates should record the last day of residence in a program's housing before the participant leaves the shelter or the last day a service was provided.

ENDUSER TRAINING AND SUPPORT

The Agency shall be responsible for providing initial and on-going HMIS training, support and technical assistance to all participating agencies that use HMIS. The Agency shall work with participating agencies serving homeless clients and assist them with the process of entering information into HMIS, and shall strive for real-time, or close to real-time data entry.

SOFTWARE UPDATES, PATCHES AND MAINTENANCE

The Agency shall be responsible for ensuring all software and supporting services are updated, patched and otherwise maintained to the extent required in order to fulfill the agency's obligations under this agreement.

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Use of HMIS Component Grant Funds

The Agency is the only entity eligible to use grant funds for an HMIS component, and funded activities must comply with HUD HMIS requirements.

SPECIFIC REPORTING REQUIREMENTS

Annual Performance Reports

The Agency shall ensure the HMIS is capable of generating a consistently reliable Annual Performance Report (APR) in compliance with the latest HUD guidance.

Annual Homeless Assessment Reports

The Agency shall prepare and submit Annual Homeless Assessment Reports (AHAR) to HUD.

CoC Competition Community Application

The Agency shall provide all necessary support required for the CoC to fully and accurately complete the community application portion of the HUD McKinney-Vento Continuum of Care competition.

High-Performing Communities Application

The Agency shall at the CoC's request provide all necessary data and support required to support the collaborative applicant's application for designation as a High Performing Community under Section 424 of the McKinney-Vento Act.

CONFIDENTIALITY

COMPLIANCE WITH STATE AND FEDERAL REGULATION

The Agency shall ensure compliance with relevant federal and state confidentiality regulations and laws that protect client records. The Agency shall only release client records with the consent of the client, unless otherwise provided for by law.

SUBSTANCE ABUSE RECORDS

The Agency shall abide specially by federal confidentiality regulations as contained in the Code of Federal Regulations, 42 CFR Part 2 regarding disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by informed written consent of the person whom it pertains to or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is not sufficient for this purpose. The Agency understands that federal rules restrict use of the information to criminally investigate any alcohol or drug abuse patients.

CLIENT CONSENT

The Agency agrees not to release any personally identifiable information stored in HMIS to any organization or individual without the client's proper informed written consent.

CONFIDENTIALITY TRAINING

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The agency shall ensure that all authorized users of HMIS receive basic confidentiality training before being granted access to the system.

CLIENT PARTICIPATION NOT REQUIRED

The Agency shall not require or imply that services must be contingent upon a Client's participation in HMIS. Services should be provided to a client regardless of HMIS participation, provided the client would otherwise be eligible for services.

REPORTING ACCESSS

AGENCY CLIENTS

The Agency shall retain access to the full records and statistical data on the clients it serves.

NON-AGENCY CLIENTS

The Agency's access to data on Clients it does not serve shall be limited to de-identified and statistical information.

AGGREGATE INFORMATION

The Agency may make aggregate data available to other entities for funding or planning purposes pertaining to providing services to homeless persons. However, such aggregate data shall not contain personally identifiable information about any client. The Agency shall provide reports using aggregate data to CoC upon request.

The Agency shall use only unidentified, aggregate data for homeless policy and planning decisions, in preparing federal, state or local applications for funding, to demonstrate the need for and effectiveness of programs, and to obtain a system-wide view of program utilization in the state.

PROPRIETARY RIGHTS AND ABUSE

COPYRIGHT

The San Francisco HMIS, underlying software, and services are protected by copyright and cannot be copied, except as permitted by law or written agreement with the copyright holder.

UNAUTHORIZED ACCESS AND ABUSE

The Agency shall take reasonable efforts to prevent the unauthorized access, use or modification of HMIS, or interference with normal system operation. This shall include both corruption of the HMIS database in any manner, as well as unauthorized disclosure or sharing of user identification and/or passwords. The Agency shall not use HMIS with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.

OTHER FEDERAL REQUIREMENTS

DRUG-FREE WORKPLACE

The HMIS Lead Agency shall adopt drug-free workplace policy in compliance with the requirements of the Drug-Free Workplace Act. This policy must be published and distributed to employees, notifying them that the unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited and specifying actions that shall be taken against employees for violation of such a prohibition.

HOMELESS CLIENT PARTICIPATION

In determining HMIS policy, the CoC Board or designated body shall include at least one homeless person or formerly homeless person in policymaking decisions. Participation can include but is not limited to governing board leadership, advisory committees, staff positions, and sub-committee positions.

CONFLICT OF INTEREST

The HMIS Lead Agency adopts and agrees to abide by the CoC's conflict of interest policy. This policy shall apply to all board members, staff and volunteers.

EQUAL OPPORTUNITY AND NON-DISCRIMINATION

The HMIS Lead Agency adopts an equal opportunity and non-discrimination policy in compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and HUD regulations.

VIOLATIONS

Any individual suspected of violating any of the guidelines outlined in this agreement shall be reported immediately upon discovery to the HMIS System Administrator or designee. The Agency shall investigate fully all allegations of misconduct and report all confirmed violations to the CoC.

Where the Agency believes an individual breach may damage the integrity or HMIS or violate privacy or security requirements, it shall take immediate steps to suspend access to HMIS as necessary and ensure compliance with HMIS policies and procedures.

ACKNOWLEDGEMENTS AND ACCEPTANCE

This Agreement shall be in-force from the date signed until revoked in writing by either party provided funding is available. Termination of this agreement shall in no way impact the Agency's obligations of confidentiality, security and data integrity, which shall survive the termination of this agreement
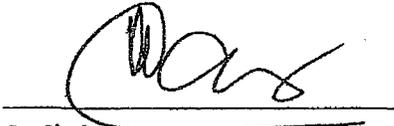
Agreed and accepted:

San Francisco Continuum of Care

Co-Chair

1/24/14

Date
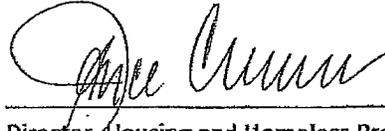
Co-Chair

1/27/14

Date

San Francisco Human Services Agency

Director, Housing and Homeless Programs

1/31/14

Date

HMIS DESK GUIDE

City and County of
San Francisco

July 2015

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I. INTRODUCTION TO HMIS

A. What is HMIS and What is it Used For?

The Homeless Management Information System (HMIS) is an electronic database that stores information about a community's or region's system of care and the homeless, formerly homeless, or people at risk of homelessness served by that system. HMIS is required by the US Department of Housing and Urban Development (HUD), and is used nationally and locally to measure outcomes and evaluate efforts to end homelessness.

Specifically, HMIS collects three kinds of data:

1) **Client data** for each person served in specific programs, such as name, date of birth, Social Security number, and characteristics (household type, veteran status, disabilities, etc.)
2) **Project data** for each program that serves homeless clients, such as project name, type of intervention (shelter, outreach, rapid re-housing, permanent supportive housing, etc.), address of facility, bed and unit capacity, and target populations
3) **Meta data** about the client and project level data, such as when data were first entered, the user entering the data, and when data were updated

Because this data can be examined for a program, groups of programs, or across the system for any timeframe, HMIS can be used to generate performance data at program, program-type (e.g., all participating emergency shelters) and system levels. With data that gets submitted from communities, HUD can generate aggregate data for a region, a state, or nationally.

HMIS is the official method for measuring outcomes under the federal *Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act*. National data (from local communities' HMIS data) are produced annually for Congress about households and individuals experiencing homelessness and are used to monitor trends.

Locally, San Francisco receives approximately $25 million of federal housing and service dollars from HUD through the Continuum of Care (CoC) program. One of the criteria in the national competition for these dollars is the quality of San Francisco's HMIS, the degree of participation among homeless providers, the completeness of the data, and the infrastructure to monitor compliance with local and federal HMIS regulations. As HUD moves forward to implement "selection criteria" in the *HEARTH Act* for awarding CoC funds to communities, HMIS data is likely to increase in importance.

In San Francisco, the local HMIS software product is Efforts to Outcomes (ETO). The company that owns and maintains ETO is Social Solutions. The Human Services Agency (HSA) is designated by the Local Homeless Coordinating Board to be the "HMIS Lead" and operate the ETO HMIS locally. The terms ETO and HMIS may be referred to interchangeably locally and within this manual. Other communities have HMIS systems, and may use ETO, other software products, or locally developed data systems as their HMIS.

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B. Information Stored in HMIS and Potential Uses

Type of Data	Fields of Data		Frequency of Collection	Uses for this Data
Client Identifying Information*	• Name • Social Security Number • Date of Birth		• Once, at first intake when HMIS record created	• Track individuals and households • Ensure deduplication • Use HMIS data sets with other data sets for analysis
Client Demographic Information	• Race • Ethnicity • Gender • Veteran status		• Once, at first intake when record created	• Demographic reports and analysis • Population analysis (e.g. veterans, children, families, singles, transgender, seniors)
Household Information	• Head of household (HOH) • Relationship to HOH		• Every project entry • As change occurs	• Types of households in system • Number and unit sizes of housing needed
Client Characteristics	• Disabling condition • Prior residence • Duration of prior residence • Homeless 1 year or more • Number times homeless last 3 years • Housing status • Income sources & amount • Health insurance & source	• Non-cash benefits • Physical disability • Developmental disability • Chronic health condition • HIV/AIDS • Mental health condition • Substance abuse & type • Domestic violence history & recentness	• Every project entry	• Analysis of chronic homelessness • Utilization of programs by housing status (literally homeless and persons not literally homeless) • Number and types of health conditions • Potential referrals to mainstream system's cash and non-cash benefits programs
Changes in Client Situation	• Project entry date • Current income sources and amount, including employment • Current non-cash benefits	• Current health/ disability status • Project exit date • Destination at end of program	• Annually while in project • At project exit • Ideally as a change occurs	• Lengths of stay in programs • Outcomes about housing, benefits, employment, and income • Changes in health conditions
Program Data	• Organization name • Project names • Project type • Funding start & end dates	• Funding sources • Bed and unit inventory • Dedicated beds • Target population	• Initial setup in HMIS • When changes occur • Reviewed annually	• Inventory of homeless housing & service stock • Occupancy/vacancy/program utilization • Program gaps and needs analysis • Inventory of population-specific housing/services

*Each client and household receives unique ID numbers auto-generated by the software. Additional data fields are required for specific project types (outreach or rapid re-housing) and different federal programs such as PATH, HOPWA, etc.

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C. What Rules Govern HMIS?

Many areas of HMIS implementation and usage are governed by regulations and guidance issued by HUD and other federal agencies. On some matters, HUD designates the local Continuum of Care (CoC) as the lead agency for HMIS governance.

HUD published the first *HMIS Data and Technical Standards* in 2004. The HMIS data standards were revised and updated in 2010 and again in 2014. Revised and updated technical standards are anticipated in 2015, following a proposed rule that was published in 2012.

Relevant HUD regulations and key guidance are as follows:

- *HMIS Data Standards Manual* (published August 2014) is designed for CoCs and HMIS lead agencies, system administrators, and users to help them understand the data elements that are required in an HMIS to meet participation and reporting requirements established by HUD and the federal partners.
- The *HMIS Data Dictionary* (published August 2014) lists all the required data collection fields, the parameters of each field, frequency of collection, and funder-specific data elements.
- The CoC Interim Final Rule (24 CFR Part 578) (published July 2012) details the responsibilities of the Continuum of Care entity, including the designation and oversight of an HMIS, requirements for the HMIS lead, eligible HMIS-related activities for funding, and other regulations related to the Continuum of Care and Emergency Solutions Grant programs.
- The HMIS Proposed Rule (published in December 2011) is designed to provide for uniform technical requirements of an HMIS, for proper collection of data and maintenance of the database, and to ensure confidentiality of the information in the database. The comment period closed in February 2012. A final rule has not been issued and is anticipated in 2015; therefore, the technical standards of the 2004 standards are still in effect.
- HMIS Program Guides support data collection and reporting efforts for each of the federal programs currently requiring HMIS, including the Continuum of Care, Emergency Solutions Grant, HOPWA, PATH, Runaway and Homeless Youth, and Veterans Affairs programs. These guides are not intended to replace the *HMIS Data Dictionary* or the *HMIS Data Manual*, but to provide additional information about specific HMIS requirements for different programs. See Section III. Setting up New Programs and Users in this manual for more detail on each of these guides.

As new standards are developed, an interim rule is commonly issued that invites public comment, to which HSA can respond. The applicable regulations are found in the HUD Exchange (www.hudexchange.info). It is strongly recommended to sign up for "email updates" which can be tailored to the topics of relevance (e.g. HMIS, etc.)

Additional information specific to San Francisco's HMIS system can be found in the ETO User Manual stored on the shared "O" Drive.

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D. San Francisco HMIS Governance Structure

As the Continuum of Care governing body in San Francisco, the Local Homeless Coordinating Board (LHCB) is responsible for designating the party responsible for HMIS in the City and providing oversight of the system. LHCB designated the San Francisco Human Services Agency (HSA) as the party responsible for HMIS in San Francisco.

The LHCB also established the HMIS Committee to provide a platform for ongoing community input on the system. The committee is comprised of LHCB members, staff and members of the public, and all meetings are open to the public. The committee reviews and recommends policy documents for the HMIS system, including information sharing agreements. It is also a forum for gathering community input about the policy direction of the local HMIS system, including vendor selection, outcome tracking and data quality expectations.

The San Francisco HMIS Committee is not a forum for basic HMIS training, which should be provided at regular intervals to relevant parties. However, the committee is an excellent forum for reinforcing information and priorities included in trainings.

E. Who Must Use HMIS?

Three federal departments currently require use of HMIS for projects using specific funding streams. These departments and their programs/funding streams are noted below.

US Department of Housing and Urban Development

- Continuum of Care (CoC), (including Shelter Plus Care projects)
- Emergency Solutions Grant (ESG)
- Housing Opportunities for People with AIDS (HOPWA)
- Rural Housing Stability Assistance Program (RHSP)

US Department of Health and Human Services

- Runaway and Homeless Youth (RHY)
- Projects for Assistance in Transition from Homelessness (PATH)

US Department of Veteran Affairs

- Supportive Services for Veteran Families (SSVF)

All projects that receive funding from any these programs either directly or indirectly (as a subrecipient or subcontractor, for example), except those operated by victims services providers and legal services providers who can document that entering client-level data would violate client-attorney privilege, are required to ensure data about the project and the clients it serves is entered in HMIS for the duration of time the project is funded, and for up to seven years after the client no longer receives services from the project.

The following HUD and VA programs are required to be included in the HIC and PIT, but not required to use HMIS.

- Health Care for Homeless Veterans (HCHV)

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- VA-funded Transitional Housing [Grant and Per Diem (GPD) and Compensated Work Therapy Transitional Residences]
- HUD-VASH

In San Francisco, most agencies required to use HMIS enter their data directly into Efforts to Outcomes (ETO). Others do direct uploads from Excel or other databases into ETO. All methods are currently acceptable. (See Section IV below for information on important data, and Appendix B for a list of participating projects and the method of data entry.)

Minimum data field requirements: Requirements about which data fields must be collected by different types of programs (or similar project types with different funding sources such as ESG or CoC) are minimum requirements. Additional fields may be added.

Note: If communities adopt only the federal directives about the data fields required for each type of program, it may result in incomparable data between program types and/or potentially incomparable data between projects of the same program type that are funded by different programs, making system-level analysis challenging. The simplicity of having a single standard intake or standard set of fields collected of *all* people in *all* program types can also add simplify creating and maintaining training for users, streamlining operations of HMIS, and producing a reliable, predictable data set for extraction and analysis.

F. Types of Projects with Data in HMIS

The homeless service delivery system includes a variety of types of interventions, referred to within HMIS as "project types." The chart below shows the project types with data in HMIS and those that are not required but may be encouraged to be in HMIS. Although HUD has no way to require local, state, or privately funded projects to enter data into HMIS, it has an expectation and strongly recommends that at least 75% of the community's programs in each project type contribute data to HMIS in order for the data to be representative of that project type. This threshold of HMIS participation which signifies "representative" data shows up in the CoC application and the Annual Homeless Assessment Report (AHAR), although threshold levels may vary.

Project Types in HMIS	Must Be in HMIS	Can Be/Encouraged to Be in HMIS
Street Outreach	Outreach that is HUD, PATH or VA funded	Outreach not funded by HUD, PATH or VA; Coordinated entry and assessment system programs
Safe Haven	N/A in San Francisco	N/A in San Francisco
Emergency Shelter	Shelter that is funded by ESG; Short-term housing and Hotel/Motel funded by HOPWA; Basic Center Program funded by RHY	Health Care for Homeless Veterans (HCHV) Emergency Housing and Domiciliary Care; Shelters funded by other resources
Transitional Housing	Transitional housing that is HUD or RHY funded	Transitional housing funded by VA and other resources
Permanent Supportive Housing	Permanent supportive housing funded by HUD, including COC, Shelter Plus Care, and HOPWA	Permanent supportive housing funded by other resources including VASH

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Project Types in HMIS	Must Be in HMIS	Can Be/Encouraged to Be in HMIS
Rapid Re-housing	Rapid re-housing funded by SSVF, CoC or ESG funds	Rapid re-housing funded by other resources
Permanent Housing	None currently	Permanent housing dedicated to formerly homeless households
Homelessness Prevention	Prevention funded by SSVF, ESG, HOPWA or RHY	Prevention funded by other resources
Support Services Only	Specific homeless services programs funded by HUD	Legal services programs funded by HUD; other services programs
Coordinated Assessment	Coordinated assessment projects funded by HUD	Coordinated assessment projects or programs for people experiencing homelessness not funded by HUD

G. Which Projects and Providers Use Other Data Systems?

1. Domestic violence/ victim service providers

The *Violence Against Women Act* is federal legislation that protects the data of survivors of domestic violence who are receiving services from a victim services provider. The law and its many protections have resulted in parallel data systems for the domestic violence system of care and the homeless system of care. Victim services providers are prohibited from entering data into HMIS, and HUD regulations state that where victim services providers are the recipients of HUD funding they must operate a "comparable" database inclusive of all the same data fields and reporting capabilities. There is no oversight body or monitoring that ensures comparability.

HMIS users and homeless service agencies should take care in handling all client data, but especially that for survivors of domestic violence, since many survivors of domestic violence seek services within the homeless system of care.

2. Legal Services Providers

Legal services providers that are recipients or subrecipients under the CoC Program are required to collect client-level data, consistent with HMIS data collection requirements. To protect clients, legal services providers may choose instead to enter data into a comparable database that complies with HMIS requirements. They may use CoC Program funds to establish and operate a comparable database. Legal services providers who do not use the CoC's HMIS, must provide aggregate data to the CoC for reporting purposes.

3. Shelters

Some shelters that do not receive federal funding do not enter data about clients into HMIS. For single serving shelters, the city uses the database CHANGES to record utilization (see Section II.B.1.) Family shelters that do not enter data into HMIS retain their own agency data systems, as described below.

4. Agency data systems

Many service provider agencies in San Francisco who are required to enter data into HMIS also maintain a separate data information system where they enter all the same data fields about clients as HMIS (and

possibly even more case management level data) for clients in all the programs the agency operates. These agency-wide data systems allow the agency to generate its own monthly, quarterly, or annual reports for each program it operates or agency-wide. Some agencies use ETO, while others use similar off-the-shelf HMIS-compliant database programs, and still other agencies use proprietary database systems or Excel worksheets they have created that serve similar purposes of creating distinct agency-specific aggregate data.

H. Administration of San Francisco's HMIS

1. HMIS dedicated staff

Local administration of the HMIS is managed by San Francisco's Human Services Agency (HSA). Two primary positions support HMIS operations and management: the HMIS Program Manager and the HMIS Analyst.

HMIS Program Manager: A full-time position responsible for the coordination and management of the San Francisco HMIS as prescribed by HUD. The HMIS Program Manager reports to the Federal Supportive Housing Manager. Major responsibilities consist of:

- Implementation of the HMIS program in San Francisco, including

  o Ongoing review and development of HMIS program procedures and practices as needed
  o Maintaining and annually updating the Housing Inventory Count (HIC)
  o Submission of the Annual Homeless Assessment Report (AHAR)
  o Working with/training provider staff on use of new database to support HMIS as needed

- Assisting selected individual CoC-funded housing providers with preparation of the client data portion of the Annual Progress Report
- Attending meetings of the Local Homeless Coordinating Board (LHCB) and committees; and establishing effective working relationships with staff of the Mayor's Office of Housing and Community Development (MOHCD), Department of Public Health, HUD, Abt Associates (or other HUD-TA providers), and the San Francisco Department Information Technology staff
- Managing software vendor contract, negotiating/developing scope of services and budget, and monitoring eligible activities and expenditures
- Coordinating with other departments required to use HMIS for federally funded projects

HMIS Analyst: A full-time position that reports to the HMIS Program Manager, under whose direction the position is responsible for HMIS data collection and analyses, data quality review, and preparation of mandated HMIS reports. The position also assists the program manager in updating homeless housing and service providers regarding HMIS requirements. Responsibilities include:

- Assisting in the administration of the Homeless Management Information System (HMIS)
- Maintaining working knowledge/expertise of HMIS data standards and other HMIS-related policies and procedures
- Assisting in the development/delivery of HMIS training
- Providing help-desk support to HMIS users
- Assisting providers with inputting and maintaining data in HMIS as needed

- Generating reports from HMIS for HUD and as requested by the department and partner agencies
- Analyzing reports for data quality, identifying data inconsistencies and helping to resolve them; tracking/monitoring HMIS sites, projects, and users with data quality issues related to timeliness of data entry, completeness of data, and accuracy/consistency of data; follow-up with additional training to assist users in resolving data quality issues
- Attending meetings of the Local Homeless Coordinating Board (LHCB) and other HMIS-related meetings
- Completing special projects, as required

2. Other key players

Other key players that interact with HMIS include:

- **Leads at participating agencies** – For operations, data entry, troubleshooting, and agency compliance, two key people for each participating agency are the agency's executive director or project director and the agency's HMIS lead person or liaison.
- **CoC chair** – The CoC Chairperson on behalf of the CoC Collaborative Applicant has authority and responsibility to adopt policy about HMIS and to ensure optimal functioning of the system, including but not limited to HMIS Policies and Procedures, Partner Agency Memorandum of Understanding, Privacy Plan, Security Plan, and the Data Quality Plan.
- **CoC liaison** – A staff person within HSA that manage the CoC relationship and role as the Collaborative Applicant. This position also oversees the Point-in-Time (PIT) Count.
- **VA contact person** – The Veterans Affairs contact person will help verify the inventory of veterans' services and is a resource person for other veteran-specific data or reports.
- **ESG manager** – The ESG contact person can coordinate with HMIS staff when regulations change, different providers are awarded annual funding, or when ESG regulations are not entirely identical to HMIS regulations but HMIS is obligated to capture all ESG data. ESG is administered by the Mayor's Office of Housing and Community Development (MOHCD).
- **Single adult shelter manager** – This position oversees the CHANGES database for reserving beds and tracking utilization of single shelter.
- **Family shelter manager** – Oversees the family shelter and Housing First Family Services program within HMIS.
- **HSA planning staff** – Staff of the HSA planning division may use HMIS data for research and reporting purposes.
- **HSA federal reporting team** – Staff of the HSA Housing & Homeless Division (McKinney Program Manager and McKinney Program Analyst) will use HMIS data for research and reporting purposes.
- **HomeBase policy consultants** – HomeBase consultants work directly with the HSA Housing & Homeless Division (McKinney Program Manager and McKinney Program Analyst) to provide guidance with HUD regulations and policy, and facilitate discussions with the HMIS Committee.
- **Abt Associates** – Abt is a national consulting firm that provides HUD-funded technical assistance to CoCs across the country. San Francisco's HMIS staff work with Abt analysts in preparation and completion of the Annual Homeless Assessment Report (AHAR).

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II. DATABASES

A. Efforts to Outcomes (ETO) Database: San Francisco's HMIS

1. Basic elements of the system

Effort to Outcomes (ETO) is the primary HMIS software system for San Francisco and its federally-funded homeless programs. ETO is an internet-based case management database that captures all the basic information required to be compliant with federal mandates. ETO is designed to measure program outcomes and also capture information regarding client demographics, assessment, program entry, program exit, and annual updates. In addition to entering and viewing client level information, ETO can also generate reports about a client, a program or groups of programs, or about the entire system of programs.

Two primary types of users utilize HMIS and experience different elements of the ETO system based on their roles:

- **User** – A person with a unique license to ETO with a unique username and password. Most commonly a user is a case manager or other staff of a service provider who collects intake, update, and exit information from clients and enters it into the system. Sometimes, the user is in a data entry or quality assurance role and not in direct service.
- **HMIS Administrator** – Also a user of the system with all user access and rights, but also with access to additional system features and responsibilities including giving licenses to users, resetting forgotten passwords, configuring new or additional programs within ETO, and querying system-wide or ad hoc data requests.

ETO software features five components:

1) **Intake** – Data collected as a person enters a program including eligibility, basic demographics, enrollment information, family/household, and data fields unique to the covered funding streams
2) **Survey and Assessment "TouchPoints"** – Information collected at various points to measure progress over time, such as baseline, annual updates, and regular reassessments
3) **Case management** – Tracks all services needed by and given to clients including service plans, individual or group services received by a person, matching an activity to a desired outcome to be measured, and progress in meeting service plans
4) **Referral** – Collaborative interaction with other providers serving clients in common, including tools for collaborative case management, multi-agency service planning, collective impact, and permission-based data sharing
5) **Analytics** – Reporting option to understand the impact of services provided, including benchmarking, correlation reporting, target populations, comparing programs, measuring progress, service delivery trends, and other service insight

The data are organized and stored in records for each individual person served. Each person is also recorded as part of a household, including their relationship to all other household members, and which household members are also being served. If someone is being served in multiple programs throughout

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the community, all programs will be collecting data and entering it for the person served. As the administrator of the system, HMIS staff can view all data across all programs for an individual.

ETO is compliant with HUD regulations for HMIS and the federal programs that require HMIS utilization. Continuum of Care and ESG funded projects are the longest standing programs in HMIS and represent the majority of HMIS programs. The 2014 HMIS regulations and federal partnership initiatives moved four other funding streams used in San Francisco under the umbrella of HMIS so that all data collection would be stored in HMIS; periodic and annual reporting can be properly programmed and contained in HMIS; and local and federal oversight and regulations can govern the programs and data. These four funding streams are: Supportive Services for Veteran Families (SSVF), Projects for Assistance in Transition from Homelessness (PATH), the Runaway and Homeless Youth Management Information System (RHYMIS), and Housing Opportunities for Persons with AIDS (HOPWA).

- In San Francisco, SSVF grantees are experienced HMIS agencies and are collecting all the SSVF HMIS data in their own systems and importing it into ETO.
- RHYMIS, PATH, and HOPWA data systems predated the HMIS system. Providers will transition to use of HMIS instead of the historical data systems in fall 2015. Historical data collected prior to 2015 will not be migrated to HMIS so historical information cannot be extracted from HMIS, but may be available from the predecessor databases.

2. Relationship to Social Solutions

Social Solutions is the proprietor of the Efforts to Outcomes software. HSA pays annual fees to Social Solutions to maintain ETO, host it via the web, provide technical support for HSA and other users, ensure compliance with HUD regulations and other federal partners' reporting requirements, maintain secure and encrypted data, and continue all user licenses.

The structure of the database is coded and maintained by Social Solutions, but certain features, such as the layout of the Home page and reports, can be customized.

Relevant Resources and Reading:

⇒ Review the terms of the contract with Social Solutions for specific detail about what services are contracted with Social Solutions, the quantity of support hours available to HMIS staff, the annual renewal schedule, and other terms and conditions.

B. Other San Francisco Data Systems

ETO is not the only data system in use in San Francisco for homeless services, but rather one of several. When data from ETO is combined with the other data systems, a total picture of those served can be constructed. While HUD envisions HMIS to be the core central data system, others operate independently of HMIS and still need to be taken into account for needs analysis and certain reporting.

1. CHANGES

The CHANGES data system holds information about single adult shelter stayers (not the family shelter system). CHANGES also functions as the bed reservation system for non-family shelters.

HMIS staff tasks related to CHANGES include:

- Assisting the single adult shelter program manager with CHANGES reporting, and
- Uploading CHANGES' data into ETO on a quarterly basis via an IT request filed with HSA IT Department, an HMIS analyst formatting the data within an Excel Spreadsheet, and then data sent to ETO for upload

2. Connecting Point – family shelter access system

The family shelter system operates using a coordinated entry system known as Connecting Point. The Connecting Point data system holds data about families seeking to access shelter space; a common assessment; referrals and to which specific project and the waitlist for family shelter beds. However, it does not track the time families spend in shelter or where they go when they leave shelter.

HMIS staff tasks related to the family shelter access system include:

- Providing data entry/data quality training to family shelter access project users
- Assisting HSA planning staff with accessing HMIS data for research and reporting purposes

3. HomeLink

HomeLink is a platform developed by Palintir to make matches between homeless individuals or households and available housing resources. In San Francisco it is currently being tested with the Veteran population.

4. Comparable databases operated by providers

As described above, victims' services providers and some legal services providers operate "comparable" databases which collect data similar to HMIS. These providers are only required to provide aggregate data to the HMIS administering agency.

HMIS staff tasks related to comparable databases include:

- Ensuring that providers mandated or permitted to use a "comparable" database maintain one that meets all of the required standards
- Work with providers with comparable databases to get aggregate data no less than once a year

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III. SETTING UP NEW PROGRAMS AND USERS

Accommodating program creation, expansion or closure, and staff turnover are job functions for the HMIS team. Program changes mean adding new projects in HMIS or making programs inactive as they shut down or convert to a new program type. Staff turnover necessitates deactivation of ETO licenses for staff who leave, and the training for and setup of a user license for new HMIS users.

A. Getting Programs Set Up

Adding new programs can be periodic and infrequent (e.g., one new SSVF program from a round of new grant monies) or can include multiple programs at a time (e.g., new CoC projects or a new agency with multiple programs decides to begin using HMIS). Careful attention should be paid to collecting all the program descriptor data needed by HUD regulations and for the Housing Inventory Count (HIC) prior to setting up the new program in HMIS.

If a program is the first from an agency to be set up in HMIS, a detailed setup process is required which includes signing a participation agreement, signing an agency/site/project participation agreement (i.e., grant agreement, contract, and/or MOU), verifying all privacy standards have been met, conducting privacy training for all staff who handle data intended for or generated by HMIS, ensuring hardware security, conducting user training for all staff who handle data intended for or generated by HMIS, and determining data entry and workflow responsibilities.

In March 2015, HUD published six program-level HMIS manuals, one for each of the federal programs under the HMIS umbrella, which are intended to clarify the *HMIS Data Dictionary* and other HUD guides and complement them. All six manuals are structured similarly with an introductory/purpose section and then four core content areas: a succinct description of the eligible activities of each program, clarification about setup of the program-specific projects in HMIS, the scope of data collection for various project types within the program, and special data collection issues.

The *CoC Program HMIS Manual* is especially helpful in understanding the breadth of project types within the CoC program, how to categorize the projects in HMIS, the options (where applicable) for the structure of a project in HMIS and its corresponding workflow for data collection, and clarification of the options for challenging situations such as outreach where data collection may happen over the course of multiple client contacts.

The *ESG Program HMIS Manual* is especially helpful in understanding types of shelter programs that may be funded with ESG (such as day shelters/drop-in centers, night-by-night shelters, and other "regular" shelters), how to structure the projects within HMIS and the corresponding workflow, and the relationship to performance measures.

The *HOPWA Program HMIS Manual* is particularly helpful for cross-walking the HMIS project type to HOPWA's several unique eligible activities, and further cross-walking that information to IDIS, the reporting database used for HOPWA.

The *PATH Program HMIS Manual* is notable because it explains PATH's unique logic for categorizing program types and detailing the current data collection requirements and those new fields pending approval but not required as of March 2015.

The *RHY Program HMIS Manual* is very brief, easy to understand, and lays out the additional data fields required for RHY-funded projects.

The *VA Programs HMIS Manual* provides a brief overview of Veterans Affairs programs and the conventions required for naming projects in HMIS. It also contains a link to the SSVF HMIS Data Collection guide and page references for special data collection instructions for prevention and rapid re-housing programs. Review the SSVF HMIS Data Collection guide as well.

In getting programs set up, HMIS staff's roles and responsibilities encompass several steps:

- Ensure agency/site/project participation agreements are in place prior to setup in HMIS
- Ensure user agreements are in place prior to setup in and access to HMIS
- Establish roles and responsibilities of end users of the HMIS system
- Set up sites/projects/users in HMIS system
- Software vendor completes setup of projects for software vendor-specific HMIS system setup protocols
- HMIS staff and software vendor test HMIS system to determine system readiness of end-user interface
- Reconcile any system issues with software vendor prior to user interface
- Provide end user training to sites/projects/users of HMIS system
- HMIS staff, lead agency and/or software vendor provide ongoing technical assistance to end users per agency/site/project participation agreement
- HMIS staff, lead agency and/or software vendor provide ongoing training to end users per agency/site/project participation agreement

B. Deactivating Licenses

Before a user leaves the employment of an agency, it is important for the agency to coordinate with HMIS staff about the date the user will be concluding his/her employment, the estimated arrival of a replacement person, and whether there are any concerns about a backlog of data entry, data correction, or breach of confidentiality protocols.

Licenses should be deactivated as soon as possible once someone leaves their position to avoid any potential breaches of security, or sooner if instructed by the agency or warranted by circumstances.

IV. TRAINING USERS

All intake and data entry workers are encouraged to complete an initial online training (http://www.socialsolutions.com/about-us/customer-training/) before accessing the live HMIS system. All users must provide a demonstration of basic data entry functions in TouchPoint: Find/view; Update; Enter new client record; Exit. Users with reporting and/or data migration responsibilities must also provide a demonstration of these basic functions. Ongoing training will be provided on an annual basis and as needed. Users may also contact the HMIS team for additional assistance.

All HMIS users must recertify their knowledge of accurate and correct HMIS practices on an annual basis. In addition to in-person training sessions, HSA is moving to develop electronic trainings that will be used for annual recertification.

The process for licensing users includes participation in ongoing annual training.

Relevant Resources and Reading:

⇒ Social Solutions' training website at http://www.socialsolutions.com/about-us/customer-training/ provides downloadable manuals and demo recordings for various user types and functions of the data base.
⇒ HMIS staff have an internal set of screenshots and training materials on the shared "O" drive.

V. DAILY TASKS AND RESPONSIBILITIES

A. Enforcement of Privacy and Security

HMIS protocols and the monitoring by HMIS staff are designed to ensure compliance with relevant federal and state confidentiality regulations and laws that protect client data. Each agency and user must undergo privacy and security trainings to handle client information. Clients must sign Release of Information (ROI) forms which allow their data to be entered into the system. HMIS staff must ensure that programs follow privacy and security standards and require ROI's from clients before entering data.

Client records shall only be released to clients and to other parties under specific circumstances and other conditions provided for by law. If an individual client record data is being requested, confer with the agency that worked with the client to complete an HMIS Consent Form signed/dated by the client, which authorizes the disclosure and/or use of individual identifiable information between the San Francisco Human Services Agency (HSA) and agencies participating in the San Francisco Homeless Management Information System (SF HMIS).

Note: HMIS Consent Form authorizations expire three years from the date client signed/dated the form.

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B. Resolving User Issues

1. Deleting client records

It is critical that each individual in HMIS only has one record per program that contains all his/her data. When a user creates a duplicate record, HMIS staff are responsible for deleting the duplicate client record. However, site/project/user clarification or confirmation is required to reconcile the record in question before it can be deleted. Every request to delete a client record is caused by a user not following the proper search procedures before adding a client to the system. Care must be taken to review both client records to determine the proper one for deletion, ensure no other projects have entered data on the record to be deleted, and whether corrections to household need to be made. Another error that a user can't correct is the data entry date; HMIS staff can make such corrections upon request. These may be opportunities to offer additional training to users to avoid such errors in the future.

It is also part of HMIS' workload to regularly search for duplicate records at least quarterly and make corrections according to the Data Quality Plan.

Relevant Resources and Reading:

⇒ Review the ETO manual for specific instructions on the mechanics of deleting a client record. Review the Policy and Procedures Manual for protocols about duplicate client records including timeliness and the process for notifying HMIS staff.

2. Resetting passwords

There are two primary reasons user passwords in HMIS get changed: 1) periodically when there is enforced password expiration for maintaining optimal data security, and 2) when a user tries to log in multiple times with an erroneous password. When a user tries unsuccessfully to log in too many times, their password and account are frozen until reset by an HMIS system administrator. Staff must deal with these requests in a timely manner so that the user can resume access to ETO.

3. Preparing tickets for Social Solutions

When Social Solutions is needed to do some work to ETO, a ticket is prepared (similar to a work order) that describes the issue or work to be completed and gets it in a queue with Social Solutions for completion. Some work is completed at no additional charge to HSA since it is covered by the annual fees paid to Social Solutions. Other work may be outside that scope and the ticket may trigger a price quote from Social Solutions for the work.

Items related to HUD data changes do not require a ticket since Social Solutions will be completing such work for all its clients.

Items that require a ticket for Social Solutions include:

- Mapping of old data fields to the new fields
- Creation of custom reports
- Troubleshooting an error in ETO that is not functioning as it is supposed to
- Creating custom assessments or other functionalities for local use

The HMIS Program Manager must review and approve a ticket if the software vendor service requires an additional funding charge as he/she must confirm funding availability via the HSA Contracts Unit staff.

C. Receiving Data from Providers not Using HMIS

Data is being collected by agencies on a daily basis and should also be entered into HMIS on a timely basis according to HMIS policy: either within two or seven days for projects that do self-data entry (variation in time based on project type) or at least once per quarter for agencies that upload data to HMIS.

Projects that import from other data systems (whether ETO or not) must coordinate in advance to ensure proper mapping of all fields planned for import and scheduling of a time that is minimally impactful to other users. Prior to the first upload, in addition to mapping all data fields and values appropriately between the sending data system and HMIS, it may be prudent to do a test upload with a smaller data set to test results and monitor the impediments to HMIS. The project is responsible for ensuring accurate data quality and completeness prior to upload.

D. Developing and Maintaining Policies and Procedures

HUD requires local CoCs to adopt policies and procedures for HMIS. The policies and procedures must comply with HUD regulations and reflect the most current policy and technological decisions. At minimum, policies and procedures should be reviewed and amended as needed annually (per HUD) and at any time of a change to the data or system management processes, the methods of receiving data into HMIS, or new data and technical requirements by HUD, federal partners, or local funders.

Changes to policies and procedures will need to be reviewed by HSA as the HMIS lead, and adopted by the CoC lead.

VI. DATA QUALITY ASSURANCE

HUD regulations require Continuums of Care to establish HMIS Data Quality Plans. This staff manual is intended to complement San Francisco's data quality plan. The required Data Quality Plan and its implementation help prepare data for the CoC NOFA (Notice of Funding Availability) process, *HEARTH Act* implementation, and coordinated assessment, as well as for the AHAR and other community-level reports being requested. The plan must include guidelines for timeliness and completeness, benchmarks for monitoring and compliance, as well as tools for checking and improving data quality.

When the HMIS Data Quality Plan is adopted or revised, each agency participating in HMIS should create or revise their own internal policies and procedures to conform to the plan and to ensure the highest level of data quality possible. Supervisors and/or management within participating agencies should regularly monitor and confirm staff compliance with these policies. Failure to conform to the plan and failure to ensure the highest level of data quality could result in the loss of points on the scoring tool for CoC funded projects. Agencies struggling to implement the data quality plan should contact the HMIS staff for support and technical assistance as needed.

A. Data Quality Reports

ETO contains standard data quality reports that should be run on a monthly basis with cleanup performed either by project or HMIS staff, depending on the user that entered the erroneous client data and what the error is. Running data quality reports on a more frequent basis (e.g., weekly) and correcting errors at that time promotes fewer errors at each time for correction.

The most utilitarian reports look for missing data values, inconsistent data (e.g., chronically homeless individuals without a disability), or duplicate records, and easily illuminate the anomalies.

A larger scale data cleanup should be orchestrated at least once annually to be timed in coordination with the Homeless Inventory Count (HIC) and Point-in-Time Count (PIT) in January. If the data set remains clean, little additional cleanup will be needed for the CoC application.

B. Checking Client Records

Annual monitoring should include cross checking a few client hard-copy files (HUD CoC HMIS Data Collection Templates) with the HMIS client record to assure consistency within HMIS. This monitoring should be of a random sample, selected on the spot with no advance notice to the project staff regarding which files will be audited.

Relevant Resources and Reading:

⇒ Review the most up-to-date San Francisco HMIS Data Quality Plan as adopted by the CoC.
⇒ The annual CoC application includes a section on HMIS data quality, where the proportion of null values for a specific set of basic data elements is reported to HUD and scored competitively. This chart from the application is a quick snapshot of the minimum criteria HUD is evaluating relative to data quality.

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VII. REPORTING

HMIS data are the basis for numerous federal and local reports, planning, program and system evaluations, and ad hoc queries. These reports include only unidentified, deduplicated, aggregate data. The most common reports and their purposes are noted below. Appendix C shows the time frame and partners for these reports. Reports for HUD are submitted through HDX (Homelessness Data Exchange) or eSNAPS, online data submission portals used by all Continuums of Care nationally.

Preparing a report should always include a review of several key data quality and completeness points:

- Which projects should be included in the report
- Is the proportion of null data at a suitable level (between 3% and 5% of all data elements)
- Is the level of inconsistent data at a suitable level (between 3% and 5% of all data elements)
- Are there glaring outliers or anomalies that should be investigated and/or resolved
- Will the report be run within a time frame that gives users ample opportunity to complete their data entry and data cleaning according to the policies and reality of other tasks or planning processes that take precedence
- Is this a first time or newer report that needs others to review draft data and offer context and feedback

There is an inherent tension between data perfection and reportable data. While data quality is the foundation of good reporting, it must not be the excuse for not reporting or using data. The best data is that which gets used, published, circulated, and infused into community conversations. The more data gets used, the better quality it will become.

A. Annual Performance Report (APR)

The Annual Performance Report (APR) is a project-level report required by HUD of all CoC-funded projects that is due no later than 90 days after the completion of the operating year. CoC projects have funding cycles that start throughout the year, so there is no single annual date on which APRs are due (see Appendix B for a list of operating years). The APR requires different types of data for the different types of projects (permanent housing including rapid re-housing, transitional housing, supportive services only, street outreach, and HMIS). The fields in the APR are designed to align with the data standards, which means that when data standards are modified, the APR soon follows with a modification. Sometimes there is a transitional year APR that bridges the old data set with the new standards for data collection.

The APR section generated from HMIS data includes counts of people served, their household composition and demographics, and outcome information. Many of the data are sorted into two groups of participants: stayers and leavers.

- **Stayers** – People who are enrolled in the program on or before the last day of the operating year and are still enrolled in the project on the last day of the operating year.
- **Leavers** – People who were enrolled at least one day during the operating year and exited the program on or before the last day of the operating year.

Of all those who left the program during the operating year, the APR further delineates them by their length of enrollment (length of stay) in the program using 90 days as the cutoff period:

- Leavers participating more than 90 days
- Leavers participating 90 days or less

For people who have been in the program for longer than one year, an "annual update" is required, which updates information that might have changed over the course of enrollment in a program such as income sources and non-cash benefits. This information is to be recollected and updated in HMIS within 30 days before or after the anniversary of each person's program entry.

Careful reading of the APR is required because some fields are reported for all persons, others for adults only, and some by household.

ETO contains a vendor-authored APR report and data quality measures to ensure some mechanisms to identify null or inconsistent data.

There are three general areas of the APR, only one of which is generated by HMIS:

1) Client and client outcomes section generated by HMIS
2) Financial expenditure section (not generated by HMIS), and
3) Project goals and project outcomes sections (not generated by HMIS, although some performance information generated by HMIS)

After the provider completes all three sections of the APR and ensures full and accurate representation of the content of its program's APR, a final draft of the APR is submitted to HSA Reporting Team staff who enter the information into eSnaps for official submittal to HUD within the 90-day deadline.

While the APR contains a significant portion of demographic data, it also contains a notable portion of data about the outcomes of program participants and therefore the performance of the program. The APR can therefore be used in local rating and ranking processes in the annual CoC competition or in other performance review processes using the APR data fields such as:

- Rate of exit to permanent destinations
- Rate of exit to permanent destinations by lengths of stay (90 days or less and more than 90 days)
- Changes in participant cash income between entry and either exit or annual update

1. Processes for APR and role of HSA Reporting Team staff

HSA Reporting Team staff will communicate with the project's point person for the APR by emailing a reminder about the APR, the due date to HSA, and relevant forms and guidance about any changes to the forms or content since the prior year.

HSA Reporting Team staff will assist project staff in running a draft APR and providing support to troubleshoot unusual or erroneous client files. HSA Reporting Team staff will also request a participant roster as a source to double check the proper number of entries and exits for the program year. Project staff should review all information provided by the project on a timely basis, following up with any questions or discovered inconsistencies.

When HSA Reporting Team staff and the project point person are satisfied with the accuracy of the data and all three portions of the APR are turned in, HSA Reporting Team staff enter the complete APR data for each project into eSnaps. eSnaps requires an account and a login; it will auto-calculate some fields for

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totals (as a data quality check) and notify the user of errors. It will also store and allow access to historical APRs. <u>NOTE:</u> HMIS staff has an ongoing role in the monitoring of data quality. However, individual site/project/user staff will have the best access to the data from their site/project, which originates with the participant.

Key Dates:

- APRs due in eSnaps no later than 90 days after completion of grant operating year

Relevant Resources and Reading:

⇒ The *Guidance for the 2015 APR for CoC-funded Programs* is at:
https://www.hudexchange.info/resource/1850/e-snaps-coc-apr-guidebook-for-coc-grant-funded-programs/

⇒ Additional guidance is available for HUD HMIS projects and Planning grant projects

⇒ "A Checklist to Completing your APR" document produced by SF Shelter + Care and Supportive Housing Program staff

⇒ "A Complete New APR Template Word Version SSO – S+C – SHP" in HSA files

⇒ "APR Financial data – FY 00-00-0000" in HSA files

B. Point-in-Time (PIT) Count

The Point-in-Time Count (PIT) is an annual census of homeless people who are staying in shelters or transitional housing programs (sheltered) and who are unsheltered living in places such as the streets, vehicles, parks, abandoned buildings, and/or transit stations. The PIT takes place in every community across the country with CoC funding and occurs in the last ten days of January. In San Francisco, the count is followed by a survey that facilitates the collection of data about household, gender, ethnicity, race, disabilities, veteran status, chronic homelessness, and other conditions. Communities are scored in the national CoC competition for the quality of their PIT process and the results (whether homelessness is increasing, decreasing, or remaining flat).

PIT data from all communities nationally are uploaded into HDX (Homelessness Data Exchange) and are aggregated on a national level. This compiled data is then used in the first of two annual federal reports on homelessness: the *Annual Homeless Assessment Report (AHAR)*. AHAR *Part 1 – Point-in-Time Estimates of Homelessness in the US* is typically released late in the same calendar year as the count. Part 2 of the AHAR covers greater detail about subpopulations and services provided. (See Section C below for more detail on the AHAR.)

Data from HMIS is used to prepare a core component of the PIT: the sheltered count, and to provide subpopulation data on persons and households staying in shelters and transitional housing programs on the night of the count by household and program type, and their demographic and characteristic data. This data are queried from HMIS and then added with the unsheltered count and subpopulation data for a complete PIT data set. Because not all shelter and transitional housing programs are included in HMIS, additional processes are implemented to gather the same data fields from the shelter and transitional housing programs that do not participate in HMIS.

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Most common issues to rectify in the HMIS data set are duplicate client records, duplicate project entries, projects appearing over occupancy due to a lag of exits being entered into HMIS, erroneous or duplicate households, and null data values for demographics or characteristics.

Only specific methodologies are allowable for the sheltered and unsheltered counts and subpopulation data collection. Annually HUD hosts a webinar describing the expectations for the PIT and changes from the prior year. Plan to view the webinar. Other resources about the PIT can be found at https://www.hudexchange.info/resource/4036/point-in-time-count-methodology-guide/.

Sheltered counts are required annually. Unsheltered counts are required every other year on the odd-numbered years.

Key Dates:

- November/December – guidance, including webinars about PIT, is issued
- Last ten days in January – PIT count must be conducted (waivers granted by HUD)
- Early March – approximate time HDX opens to receive PIT data
- April – approximate date final PIT is due in HDX

Relevant Resources and Reading:

⇒ Review the most recent CoC application's section about HMIS sheltered count

C. AHAR and Veterans AHAR

As described above, the Annual Homeless Assessment Report (AHAR) is an annual national report that provides the national, state, and CoC level counts of who is homeless and counts of subpopulations such as chronically homeless, veterans, and homeless youth and children. AHAR data can be used to generate a Veterans AHAR and the All Persons AHAR.

AHAR: Part 1 (described above) is aggregated from the PIT counts conducted in the same year. AHAR: *Part 2 – Estimates of Homelessness in the US* is based on the AHAR data from all communities across the country that meet the thresholds of sufficient participation in HMIS from local emergency shelter, transitional housing, and permanent supportive housing projects and demonstrate an acceptable data quality. The initial steps focus on HMIS participation (or coverage) rates for six categories: the three residential types of projects (shelter, transitional housing, and permanent supportive housing) for individuals and for families. At least 50% of the community's beds must be participating in HMIS in order for the community's data for that category to be used in the national AHAR report.

AHAR: Part 2 is typically published about 12 to 15 months after the submission of local AHAR data sets to HUD, and presents the most updated national estimates of homelessness, focused on the types of households, other subpopulations including veterans and chronically homeless, the trends over time, demographic profiles, prior stay prior to program entry, lengths of stay in program, and patterns of bed usage. This report is presented to Congress each year and used to inform federal, state, and local policies to prevent and end homelessness. AHAR reports since 2007 can be found at https://www.hudexchange.info/hdx/guides/ahar.

The term "AHAR" is often used in multiple ways that may be confusing unless you listen for the context to understand whether the local or national "AHAR" is being referenced. To enable the creation of the

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national AHAR report noted above, local communities submit AHAR data, often through running an AHAR report in HMIS, which then gets uploaded through HDX. The HMIS team prepares initial and draft data from ETO using the AHAR template provided within the software. After review of the draft data, HMIS staff troubleshoot anomalies and ensure the best possible data quality. A draft data set is required to be submitted that will be reviewed by HUD staff to determine areas of error and the reliability of the overall data set. Once sufficient data quality is achieved or the final deadline arrives, the data set is uploaded to HDX for both the Veterans AHAR and the All Persons AHAR.

The way that the data from HMIS is mapped to the AHAR report can be different than ways it is sorted for other reports. More time should be allotted for the AHAR process every time a significant software version upgrade occurs, data has been migrated from one software product to another vendor, or new HUD data standards have been implemented. To assist with monitoring the data quality year round or testing the AHAR submission process, HUD maintains an "AHAR Sandbox" where communities can "play around" with their HMIS data.

Key Dates:

- October 1 through September 30 of the following year – the time period covered in the national AHAR report and the local AHAR data set
- October 1 – HDX opens to receive AHAR data
- Mid November – deadline for draft data for veterans and all persons
- Mid December – deadline for final data for veterans and all persons

Relevant Resources and Reading:

⇒ The *Introductory Guide to the Annual Homeless Assessment Report (AHAR)* is at: https://www.hudexchange.info/resource/1227/introductory-guide-to-the-annual-homeless-assessment-report-ahar/
⇒ To access the Sandbox, begin at http://sandbox.hudhdx.info.

D. Housing Inventory Count (HIC)

The Housing Inventory Count (HIC) is a point-in-time inventory of projects in the San Francisco CoC that provide beds and units dedicated to serving people who are homeless. It occurs on the same night as the PIT Count. The types of projects included in the HIC are emergency shelters, transitional housing, safe havens, permanent supportive housing, rapid re-housing, and other permanent housing for the homeless, as well as projects of these types that are under development and expected to come online in the upcoming year. All such beds that are funded even in part by the US Department of Veterans Affairs are included in the HIC with a special designation. Additionally, it is critical to include all Runaway and Homeless Youth (RHY) programs in the HIC. The HIC serves as a snapshot of homeless-dedicated temporary and permanent housing resources in a community. The PIT sheltered count captures information about the users of a subset of the inventory -- data about people in the emergency shelter and transitional housing beds inventoried in the HIC. The key dates of the HIC are typically identical to the PIT due to the interconnection of these two snapshots.

Data in the HIC include but are not limited to organization name, project name, project type, whether funded by McKinney-Vento programs, the project's geocode, target population, inventory status (current,

new, or under development), housing type, bed and unit counts and availability, number of beds dedicated to special populations (chronically homeless, veterans, and unaccompanied youth), and the number of beds participating in HMIS.

HUD strongly encourages HMIS to be the starting point of the HIC. CoCs must collect and enter project descriptor data for all projects in the CoC, which forms a majority of the data in the HIC. Not all HIC data fields are recorded in HMIS and therefore additional steps are needed to identify the remaining data fields, collect those remaining fields, validate the HMIS-generated fields, and consolidate the data to ensure complete data. It is also useful as an alternative or companion process to export the HIC data from HMIS and compare it to the prior year's HIC submitted to HUD to ensure the two align.

ETO contains a vendor-authored report for querying the HIC data fields from HMIS.

The tasks of HMIS staff related to HIC include:

- Ensure the relevant annual HIC and the HMIS data fully align and are accurate
- Enter new project descriptor data into HMIS as new projects are funded and/or come on line in San Francisco
- Work with CoC lead to complete HIC, and upload HIC data into HDX

Key Dates:

- November/December – guidance, including webinars about HIC, is issued
- Last ten days in January – HIC must be generated matching the PIT date
- Early March – approximate time HDX opens to receive HIC data
- April – approximate date final HIC is due in HDX

Relevant Resources and Reading:

⇒ The *Guidance for the 2015 HIC and PIT Data Collection for CoC and ESG* is at https://www.hudexchange.info/resource/4061/notice-cpd-14-014-2015-hic-pit-data-collection-for-coc-and-esg-programs/.

E. Conference of Mayor's Report on Homelessness

This report presents the results of a survey of 25 of the cities whose mayors serve on the U.S. Conference of Mayors' Task Force on Hunger and Homelessness. Officials are asked to provide information on the extent and causes of hunger and homelessness in their cities, and the emergency food assistance and homeless services provided, between September 1, 2013 and August 31, 2014. They also are asked for their assessment of the demand for services and the resources available to them in the year ahead. This report is generated in response to a series of questions provided by the Task Force on Hunger and Homelessness, and includes data about local incidence of:

- Hunger
- Homelessness

Key Dates:

- Draft data due in October of each year
- Final due in November of each year

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⇒ Review the most recent report and the HMIS-generated information provided as the basis for the report data.

⇒ http://www.usmayors.org/pressreleases/uploads/2014/1211-report-hh.pdf

F. CoC Application

The HMIS team provides support required for the CoC to fully and accurately complete the community application portion of the HUD McKinney Vento Continuum of Care (CoC) competition. The primary sections which intersect with or directly pertain to HMIS include whether or not the HIC was uploaded in HDX; HMIS administration and governance; HMIS bed participation (coverage); length of stay in housing for the homeless; HMIS data quality (percentage of missing values) and processes for monitoring and addressing data quality concerns; usage of HMIS data in other CoC activities; PIT sheltered count methodologies and data quality; and performance and strategic planning objectives.

Prior to submission of the CoC application, HMIS staff need to coordinate with the CoC lead to prioritize and set a process and deadline for data quality improvement efforts (data cleanup), submission of additional HMIS data necessary for the local rating and ranking process, and examination of new expectations for HMIS or additional data exports needed from HMIS for the application.

The timing of the release of the application Notice of Funding Availability (NOFA) and the deadline for the application submission has fluctuated significantly between 2012 and 2014. HUD's stated intention is to release the NOFA in the spring, with applications due 60 days after the release of the NOFA.

G. Performance Reports

In 2009 when the _Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act_ was enacted, performance-based selection criteria were established that were intended to quantify communities' efforts toward ending homelessness. In 2010, Congress adopted the Opening Doors Federal Plan to End Homelessness, creating greater priority to quantify system-level outcomes for each community and by subpopulations. These two events mark a shift away from the performance of individual projects and toward examining the results and impact of the work collectively being done in the community in a systems approach. In July 2014 the first additional guidance was issued about how to measure the system-level performance requirements articulated in _HEARTH._

The system-level performance criteria are:

1) Length of time individuals and families remain homeless
2) Extent to which individuals and families who leave homelessness experience additional spells of homelessness (sometimes referred to as "return to homelessness")
3) Thoroughness of grantees in reaching homeless individuals and families
4) Overall reduction in the number of homeless individuals and families
5) Jobs and income growth for homeless individuals and families
6) Success at reducing the number of individuals and families who become homeless

HMIS is the sole data source for the metrics of these performance measures with the exception of #4 above, which also uses PIT data. The *System Performance Measures Introductory Guide* is available at https://www.hudexchange.info/resource/3894/system-performance-measures-introductory-guide/.

Not all of these performance measures are yet embedded into the CoC application or other annual requests by HUD (such as return to homelessness), but the remaining ones are likely to be in the near future. ETO will have standard vendor-authored report(s) query to derive these performance measures.

HMIS data will be used to prepare quarterly reports about CoC performance for LHCB on a one quarter lag (e.g., reporting on quarter one halfway through quarter two). The utilization of HMIS data on a quarterly basis will spotlight data quality gaps for identification of data quality concerns and creation of a corrective plan, as well as help build attention to and proficiency with data-informed performance evaluation on a system level.

H. Other Funding Source Reports

As new federal programs coming into HMIS such as Runaway and Homeless Youth (RHY), HOPWA and SSVF, new reports may be required. HMIS staff may need to support the development of these reports, but HSAN is not responsibility for ensuring that providers receiving funds from other sources produce the reports in a timely fashion, or that the underlying data included in the reports is accurate.

I. Handling Special Requests

Special requests may come from the CoC or its subcommittees, the CoC lead, city departments, elected officials, providers, or other partners. With the breadth of data inherent in the vendor-authored reports and the ability to modify time frames and the projects included in each report, a great deal of information about the homeless services system is readily available. Periodically, HMIS staff may be asked to query data from HMIS that are not part of these regular and predictable data runs. When a special request for data is made, HMIS staff need to first understand the parameters of the request, including what is the question that is being asked. Staff should set out a plan for the report including:

- Which programs and types of programs are included in the query
- Time period covered
- Which data fields to include, and
- Any special treatment of answer values

This information should be shared with the requestor prior to running or developing a report. Failure for the requestor and HMIS staff to be in agreement about what is needed can result in reports that are inaccurate or not useful to the purpose. As an example, for a report about how long people remain in homeless programs in the city, it is very important to establish which programs are included. Including "permanent supportive housing" in reports about lengths of stay in the same report as "shelters" produces results that may be misleading.

Once the parameters of the request are understood, staff will be able to identify whether the request can be queried through any of the existing or vendor-authored reports or by applying different filtering or analytical tools (for example, to filter a data set to include only veterans). Creating custom queries or asking the vendor to do so should only be the last resort.

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VIII. SYSTEM UPGRADES AND CHANGES TO DATA STANDARDS

There are two types of system upgrades initiated by the vendor, minor and major, that have corresponding impacts on San Francisco's HMIS system, necessary preparation for the upgrade, and post-upgrade issues.

- **Minor upgrades** – Typically a version upgrade such as v. x.3 to v x.4 or x.3.7 to x.3.8 to fix a bug or improve functioning of the software in some small distinct way(s). For these minor upgrades, the vendor will notify the HMIS lead in advance about the upgrade, its purpose, and the anticipated impact to users. While most version upgrades happen in non-peak hours (e.g. 2 a.m.), there may be a minimal impact to users such as longer load time of the software the first time a user logs in following an upgrade. Depending upon the purpose of the upgrade or its timing, HMIS users may need to be notified.
- **Major upgrades** – Typically include a platform change (from version 4 to 5) and have a much more extensive impact on the software, historic data, and users. While vendors may be offering the opportunity to upgrade as soon as the new version becomes available, it is often prudent to forego immediate upgrades if at all possible until other communities upgrade, identify bugs in the new platform, and the vendor improves the version.

Major upgrades benefit from advanced preparation that addresses the following areas:

1) **Scope of the upgrade** – What changes are being made and how critical are they to San Francisco's users?
2) **Workflow** – What is the impact of the upgrade to the existing workflow and the existing data collection fields/forms?
3) **Historic data** – Will data need to be mapped to new fields in order to be useable?
4) **Access** – Will the software go offline during the upgrade, and if so, for how long?
5) **Timing** – When is the best time to conduct the upgrade both in terms of the day of the week if the system has to go offline (e.g., Sunday) and within the calendar year (e.g., not occurring during the close out of the fiscal year or when a sizeable number of APRs are due)?
6) **Other user impact** – How will the upgrade be communicated to users? Will printed instructions disseminated to every user about the upgrade be sufficient? Will users need to be retrained or need to attend a meeting to visually see the revised fields or workflow?

One driver of the need for and frequency of software upgrades is the HUD data standards and the construction of vendor-authored reports to extract data compliant with the HUD standards and expectations. HUD convenes forums with and issues guidance directly to vendors describing the changes needed and how to properly configure those changes within the HMIS software. HUD also issues deadlines by which all vendors' software products need to be compliant with new standards. The HUD Exchange Mailing List allows users to request emails intended for HMIS software providers that are helpful in understanding the guidance told to software vendors, the programming within the software, and the logic utilized to produce HUD's intended results.

Appendices

Appendix A – List of Acronyms & Terms

Appendix B – List of Projects, Operating Year & Method of Data Entry

Appendix C – Reports & Frequency

Appendix A List of Acronyms & Terms

Acronym	Full Name	Brief Description
AHAR	Annual Homeless Assessment Report	An annual report published by the US Department of Housing and Urban Development for Congress that tracks the count of people and households who are homeless, utilization of certain federally funded programs, and many demographics and trends about homelessness. The AHAR is typically published in two parts.
CA	Collaborative Applicant	The entity that submits the Continuum of Care application on behalf of the community. In San Francisco, HSA plays this role.
CHO	Contributory HMIS Organization	An organization that operates a project that contributes data to an HMIS.
CoC	Continuum of Care	Refers to both the federal funding source for certain homeless programs and the designated region identified for receiving this federal funding. The City and County of San Francisco are the geographic region for a continuum of care. The Continuum of Care also refers to a Board or planning body comprised of a specific list of members with terms of service and organizational infrastructure responsible for planning the community's coordinated system for addressing homelessness and mitigating housing crises. In San Francisco this board is referred to as the Local Homeless Coordinating Board, LHCB or Local Board.
ESG	Emergency Solutions Grant	A federal block grant program administered by HUD to provide shelter, rapid re-housing and other support to people experiencing homelessness. In San Francisco, ESG is administered by MOHCD.
eSNAPS	Electronic Special Needs Assistance Programs	An electronic grants management system and portal that gathers information uploaded or entered in by users in Continuums of Care to submit annual reporting about projects funded with CoC funds or to apply for new or renewal of CoC funds annually from HUD's Office of Special Needs Assistance Programs.
ETO	Efforts to Outcomes	The software product used for San Francisco's HMIS program. ETO is a product of the company Social Solutions.
GPD	Grant Per Diem	Veterans Affairs program funding stream for transitional housing exclusively for military veterans.
HDX	Homelessness Data Exchange	A web-based electronic portal that receives and stores AHAR, HIC, and PIT information uploaded from users in Continuums of Care .
HIC	Housing Inventory Count	An annual bed and unit inventory of all emergency, transitional, and permanent supportive housing, and rapid re-housing in a continuum of care for homeless people. Includes geocodes, target populations, dedicated beds, and occupancy for the PIT Count.
HMIS	Homeless Management Information System	A federally mandated data collection system used for storing client and program data and reporting about both clients and programs.
HOPWA	Housing Opportunities for Persons with AIDS	A federal block grant program administered by HUD to provide housing and selected services to persons living with HIV/AIDS. In San Francisco HOPWA is administered by MOHCD.

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Acronym	Full Name	Brief Description
HSA	(San Francisco) Human Services Agency	The entity within San Francisco government responsible for overseeing the CoC and HMIS.
HUD	US Department of Housing and Urban Development	A federal department with many housing-related functions including the management of federal CoC and ESG funds, and oversight of HMIS.
LHCB	Local Homeless Coordinating Board	The Continuum of Care board in San Francisco responsible for planning the community's coordinated system for addressing homelessness and mitigating housing crises. This board is also referred to as the Local Board.
MOHCD	Mayor's Office of Housing and Community Development	San Francisco agency that administers many federal funding sources for housing including HOPWA and ESG.
PATH	Projects for Assistance in Transition from Homelessness	Funding/program through the federal Substance Abuse Mental Health Services Administration (SAMHSA) via a formula grant to the State of California for homeless people with severe mental illness to provide outreach and specific services that promote exit to housing.
PIT	Point-in-Time Count	A federally mandated community effort to conduct a one-day enumeration of people within a CoC who are unsheltered or living in a shelter, transitional housing program, or hotels or motels provided by rapid re-housing programs or other community-based programs. The PIT Count also includes data about household types; gender, ethnicity, and race of homeless persons; veteran and youth household information; and subpopulation data including chronic homelessness, severe mental illness, chronic substance abuse, and HIV/AIDS.
PIT	Point-in-Time	Referring to data that covers a one-day period as a snapshot, instead of data that is for a larger time frame such as a month or a fiscal year.
RHY	Runaway and Homeless Youth	The eligible target population served with funding from RHYA.
RHYA	Runaway and Homeless Youth Act	Typically refers to the targeted federal funding stream (rather than the legislation) that specifically serves homeless youth by meeting their immediate needs, providing residential services, and conducting outreach efforts that move youth out of homelessness.
RHYMIS	Runaway and Homeless Youth Management Information System	The database system previously required to be used by all projects receiving RHYA funding.
SAMHSA	Substance Abuse and Mental Health Services Administration	A division of the US Department of Health and Human Services and funder of programs serving persons with mental health and substance abuse needs.
SNAPS	Office of Special Needs Assistance Programs	The office within HUD that oversees and implements the CoC grants and grant-funded programs.
SSVF	Supportive Services for Veteran Families	Veterans Affairs funding stream for rapid re-housing and prevention services for veterans and their families.
TH	Transitional Housing	Temporary housing where homeless people live for up to twenty-four months, paying a portion of their income for rent, and participating in services designed to help them move into permanent housing.

Appendix B List of Projects, Operating Year & Method of Data Entry

Legend for HMIS Data Entry Type:

U = Upload data into HMIS

H = HSA does data entry either from paper forms or Excel spreadsheet

S = Self entry by agency/organization

D = Domestic Violence organization or program and does not enter data into HMIS

L= Legal Services provider that does not enter data into HMIS due to a determination that doing so would violate attorney client privilege

C= Data is entered into CHANGES system and imported into HMIS

Agency/Organization	Project Name	Operating Year	HMIS Data Entry Type
AIDS Housing Alliance	Eviction Prevention		U
AIDS Housing Alliance	AIDS Housing Alliance Rental Assistance	7/1-6/30	TBD
Asian Women's Shelter	Case Management and Shelter Services		D
Catholic Charities CYO	Leland House	2/1-1/31	S
Catholic Charities CYO	Rita da Cascia Positive Match	11/1-10/31	S
Catholic Charities CYO	Scattered Sites	8/1-7/31	S
Catholic Charities CYO	Tenant Based Rental Assistance		S
Catholic Charities CYO	Treasure Island (Phase I)	7/1-6/30	S
Catholic Charities CYO	Treasure Island (Phase II)	2/1-1/31	S
Chinatown Community Development Center	Parkview Terrace	8/9-8/8	S
Community Awareness Treatment Services	A Woman's Place	7/1-6/30	C
Community Awareness Treatment Services	Coronado Hotel		H
Community Housing Partnership	Arnett Watson Apartments	9/9-9/8	H
Community Housing Partnership	Iroquois	12/1-11/30	H
Community Housing Partnership	Island Bay Homes	8/9-8/8	S
Community Housing Partnership	SHEC	7/1-6/30	S
Community Housing Partnership	Zygmunt Arendt House	9/1-8/31	H
Community Housing Partnership	5th and Harrison Supportive Housing	5/1-4/30	S
Compass Community Services	Clara House	11/1-10/31	U
Compass Community Services	Connecting Point	7/1-6/30	U
Compass Community Services	Eviction Prevention		S
Compass Community Services	Housing Access Project II	3/1-2/28	U

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Agency/Organization	Project Name	Operating Year	HMIS Data Entry Type
Compass Community Services	Shelter		S
Conard House	Allen Hotel	5/1-4/30	S
Conard House	El Dorado/Midori	7/1-6/30	S
Conard House	Lyric	4/1-3/31	S
DHS	Integrated Services Network	1/2-1/1	S
Dolores Street Community Services	Shelter		C
DPH	DAH - Chronic Alcoholics	8/1-7/31	S
DPH	DAH - Empress Folsom/Dore	7/1-6/30	S
Episcopal Community Services	Bishop Swing Community House	10/28-10/27	S
Episcopal Community Services	Canon Barcus Community House	7/1-6/30	S
Episcopal Community Services	Canon Kip	12/1-11/30	S
Episcopal Community Services	CHEFS	1/2-1/1	S
Episcopal Community Services	Shelter		C
Eviction Defense Collaborative	Eviction Prevention		L
Friendship House Assoc. of Amer. Indians	Case Management		S
Glide Community Housing Inc.	Cecil Williams Glide Community House	7/1-6/30	S
Goodwill Industries	San Francisco Training Partnership	4/1-3/31	S
GP/TODCO	Hotel Isabel	7/1-6/30	S
GP/TODCO	Knox SRO	7/1-6/30	S
Gum Moon Residence Hall	Transitional Housing		D
Hamilton Family Center	First Avenues: Housing Solutions for Families	9/1-8/31	U
Hamilton Family Center	Hamilton Transitional Housing Project	1/1-12/31	U
Hamilton Family Center	Shelter		S
Hamilton Family Center	Tenant Based Rental Assistance		S
Housing Services Affiliate of Bernal Heights	Hazel Betsey Apartments (1-bedroom)	7/1-6/30	S
Housing Services Affiliate of Bernal Heights	Hazel Betsey Apartments (studios)	8/1-7/31	S
Housing Services Affiliate of Bernal Heights	Monterey Blvd.	5/1-4/30	S
Iris Center, Jelani, AARS	Tenant Based Rental Assistance	7/1-6/30	H
La Casa de las Madres	Shelter		D
Larkin Street Youth Center	G House	1/1-12/31	S
Mary Elizabeth Inn	Mary Elizabeth Inn		H
Mary Elizabeth Inn	Verona Hotel		H/D
Mercy Housing	Dudley Apartments	11/1-10/31	U
Mission Housing Development Corporation	Juan Pifarre Plaza	4/1-3/31	S

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Agency/Organization	Project Name	Operating Year	HMIS Data Entry Type
Mission Housing Development Corporation	South Park Residence	9/1-8/31	S
Salvation Army	Harbor House	7/1-6/30	S
Salvation Army	Railton Place GPD		H
Salvation Army	Railton Place Housing First		H
Salvation Army	Railton Place S+C	8/8-8/7	H
San Francisco Bar Association	Volunteer Legal Services Project	3/1-2/28	L
San Francisco Network Ministries	Safe House for Women	3/1-2/28	S
SF DHS	Homeless Employment Collaborative	10/1-9/30	S
St. Vincent DePaul	Brennan House	7/1-6/30	D
Swords to Plowshares	Rental Assistance for Homeless Veterans	4/1-3/31	S
Swords to Plowshares	Transitional Living Program for Homeless Veterans	8/1-7/31	S
Swords to Plowshares	Veterans Academy at the Presidio	7/1-6/30	U
Tenderloin Housing Clinic	THC Scattered Sites	7/1-6/30	S
Tenderloin Neighborhood Development Corporation	Folsom/Dore Apartments	4/21-4/20	S
Tenderloin Neighborhood Development Corporation	Franciscan Towers	8/1-7/31	S
Tenderloin Neighborhood Development Corporation	Scattered Sites	9/1-8/31	S
United Council of Human Services	Hope House	6/1-5/31	S

Appendix C Reports & Frequency

Report	Frequency	Time Frame	Sources
Annual Performance Report (APR)	Monthly – Rolling	• Monthly – due to HUD 90 days after end of program operating year for every CoC-funded project	• ETO
Point-in-Time Count (PIT)	Annually	• January – count date • February – due locally for publication • April – due to HUD	• ETO • CHANGES • Family
AHAR and Veterans AHAR	Annually	• Mid November – deadline for draft data for veterans and all persons • Mid December – deadline for final data for veterans and all persons	• ETO • CHANGES • Family
Housing Inventory Count (HIC)	Annually	• January – date of inventory • April – due to HUD	• ETO
CoC Application	Annually	• Spring/Summer – due to HUD (historically between July to December)	• ETO
Mayor's Report on Homelessness	Annually		• ETO • CHANGES • Family
Performance Reports	Quarterly and Annually	• November for July – September • February for October – December • May for January – March • August for April – June • Annual report	• ETO

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SAN FRANCISCO
LOCAL HOMELESS COORDINATING BOARD
HMIS Data Sharing Agreement for Research and Evaluation Purposes Only

Please review this document carefully.

This agreement describes the rules and regulations governing access to and use of information contained in San Francisco's Homeless Management Information System (HMIS) for authorized academic research purposes. This agreement must be executed prior to the disclosure of data from the San Francisco Human Services Agency (HSA). Once the agreement is received, reviewed, and approved by HSA a completed and signed copy will be sent to the Researcher for their files. **The Researcher may not access or use any information stored in HMIS before receiving this completed and signed copy of the agreement.**

This research agreement (1) establishes rules and limitations for process and maintaining the security of protected personal information (PPI) stored in San Francisco's Homeless Management Information System (HMIS); (2) mandates the return or disposal of all such information at the end of the research; and (3) prohibits further use of HMIS data beyond the scope of this written agreement.

1. Purpose

In order to secure the information stored in HMIS; maintain compliance with local, state and federal laws and regulations; and to ensure the integrity, security and confidentiality of the information maintained by HMIS, HSA and

_____ enter into this agreement to comply with the following terms and conditions.

2. Parties

This Agreement is by and between the San Francisco Human Services Agency (HSA), acting in its capacity as the HMIS Lead Agency for the San Francisco Continuum of Care, and _____, hereinafter termed "Researcher." The acceptable parties to this agreement are: public agencies or non-profit organization serving homeless and formerly homeless people and their evaluation and research partners, including: universities, consulting firms, and research organizations.

3. Scope of Agreement and Modification

This Agreement sets forth the conditions under which HSA will disclose and the Researcher will obtain, use, and disclose the HMIS data specified in this agreement and/or any derivative file(s) that contain Private Protected Information (PPI) or elements that can be used in concert with other information to identify individual persons. This agreement supersedes any and all agreements between the parties with respect to the use of San Francisco HMIS data and overrides any instructions, directions, agreements, or other understanding in or pertaining to any prior agreement or communication from HSA or any of its components with respect to the data specified herein. Further, the terms of this Agreement can be changed only by written modification to this Agreement or by the parties adopting a new agreement. The parties further agree that instructions or interoperations issued to the Researcher concerning this Agreement or the data specified

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herein shall not be valid unless issued in writing by the HSA point-of-contact or HSA signatory to this Agreement.

4. Ownership of San Francisco HMIS Data

The parties mutually agree that HSA retains all ownership rights and control over the data referenced in this agreement, and that the Researcher does not obtain any right, title or interest in any of the data furnished by HSA or it's partners.

5. Data Requested

The following San Francisco HMIS data is covered under this Agreement:

Data Element or Report	Timeframe	Population(s)

6. Restrictions on use

Scope of Use

The Researcher represents, and in furnishing or providing access to the data HSA relies upon such representation, that such data will be used solely for the following academic research purposes.

_____

_____

_____

Accuracy and completeness of proposal

The Researcher further represents that the facts and statements made in any study or research protocol or project plan submitted to HSA and/or the San Francisco Continuum of Care for each purpose are complete and accurate. Further, the Researcher represents that said study protocol(s) or project plan(s), that have been approved by HSA, represent the total uses(s) to which the data will be put.

SAN FRANCISCO
LOCAL HOMELESS COORDINATING BOARD
SAN FRANCISCO HOMELESS MANAGEMENT INFORMATION SYSTEM
(HMIS)

Confidentiality

The Researcher agrees not to disclose, use or reuse the data covered by this agreement except as specified in this Agreement or except as HSA shall authorize in writing or as otherwise required by law, sell, rent, lease, loan or otherwise grant access to the data covered by this Agreement. The Researcher affirms that the requested data is the minimum necessary to achieve the purposes stated in this section. The Researcher further agrees that within the Researcher organization and organizations of its agents, access to the data covered by this Agreement shall be limited to the minimum amount of data and minimum number of individuals necessary to achieve the purpose stated in this section (i.e., on a need-to-know basis).

Publication of Protected Personal Information (PPI) Prohibited

Local regulations and federal law protect the confidentiality of protected personal information (PPI) stored in HMIS. The Researcher is expressly prohibited from publishing any and all personally identifiable information in whole or part. PPI includes any information that:

- Identifies, directly or indirectly, a specific individual;
- Can be manipulated by a reasonably foreseeable method to identify an individual; or
- Can be linked with other available information to identify an individual.

The Researcher agrees not to disclose direct findings, listings, or other information derived from the data covered in this Agreement if such findings, listings or information can, by themselves or in combination with other data, be used to deduce an individual's identity.

Reuse Prohibited

The Researcher understands and agrees that they may not reuse the original data or derivative file(s) without prior written approval from HSA.

7. Information Security

The Researcher agrees to establish appropriate administrative, technical and physical safeguards to protect the confidentiality of the data and to prevent unauthorized use or access to it. The safeguards shall provide a level and scope of security that is not less than the level and scope of security established by local and federal HMIS Privacy and Security policies and regulations. The Researcher acknowledges that the use of unsecured telecommunications, including unsecured Internet connections, to transmit individually identifiable or deducible information from the data covered in this Agreement is prohibited.

Breach or Misuse

The Researcher agrees that in the event HSA or its agents determine or has a reasonable belief that the Researcher has made or may have made a use, reuse, or disclosure of the data covered in this Agreement may require the Researcher to:

a. Promptly investigate and report to HSA the Researcher's determinations regarding the alleged or actual unauthorized use, reuse or disclosure
b. Promptly resolve any problems identified by the investigation
c. Submit a formal response to the allegation of authorized use, reuse, or disclosure, if requested by HSA
d. Submit a corrective action plan with steps designed to prevent any future unauthorized uses, reuses, or disclosures, if requested by HSA
e. Return all data covered by this Agreement and destroy all derivative files, if requested by HSA

The Researcher understands that as a result of HSA's sole determination or reasonable belief that unauthorized uses, reuses, or disclosures have taken place, HSA may refuse to release further HMIS data to the Researcher for a period of time to be determined by HSA.

The Researcher agrees to immediately report any breach of Protected Personal Information (PPI) from the data covered under this Agreement, loss of data or derivative files, or disclosure to any unauthorized persons to the HSA point-of-contact and to fully cooperate in HSA's investigation of the incident. Although HSA retains all ownership rights to the data specified in this Agreement, the Researcher shall bear the cost and liability for any breaches of PPI from the data they are entrusted to. If HSA determines that the breach requires notification of affected individuals and/or other remedies, the User agrees to carry out these remedies without cost to HSA of the San Francisco Continuum of Care.

8. Costs

Reasonable payments for staff time and cost of gathering data or compiling reports as determined by the Human Services Agency and the San Francisco Continuum of Care may be applied for all requests.

9. Attachments

The parties mutually agree that the following specified Attachments are part of this Agreement:

_____

_____

_____

_____

HMIS Data Sharing Agreement
Research and Evaluation Purposes Only

SAN FRANCISCO
LOCAL HOMELESS COORDINATING BOARD
SAN FRANCISCO HOMELESS MANAGEMENT INFORMATION SYSTEM
(HMIS)

10. Signatories

Researcher

By signing this Agreement, the Researcher agrees to abide by all provisions set out in this Agreement and acknowledges having received notice of the potential liabilities for violation of the terms of this Agreement.

On behalf of the Researcher the undersigned individual hereby attests that he or she is authorized to legally bind the user to the terms of this Agreement and agrees to all terms specified herein.

Name and Title of Researcher

Institution/Organization

Street Address

City	State	Zip Code

Office Telephone (/w Area Code)

Email Address

Signature	Date

SAN FRANCISCO
LOCAL HOMELESS COORDINATING BOARD
SAN FRANCISCO HOMELESS MANAGEMENT INFORMATION SYSTEM
(HMIS)

Custodian

The parties mutually agree that the following named individual is designated as Custodian of the HMIS data on behalf of the Researcher and will be the person responsible for observance of all conditions of use and for establishment of maintenance and security arrangements as specified in this Agreement to prevent unauthorized use. The user agrees to notify HSA within fifteen days (15) of any change in custodianship. The parties mutually agree that HSA may disapprove the appointment of a custodian or may require the appointment of a new custodian at any time.

The custodian hereby acknowledges his/her appointment as Custodian of the data covered by this Agreement on behalf of the Researcher and agrees to comply with all of the provisions of this Agreement on behalf of the Researcher.

Name and Title of Researcher

Institution/Organization

Street Address

City	State	Zip Code

Office Telephone (/w Area Code)

Email Address

Signature	Date

HMIS Data Sharing Agreement
Research and Evaluation Purposes Only

SAN FRANCISCO
LOCAL HOMELESS COORDINATING BOARD
SAN FRANCISCO HOMELESS MANAGEMENT INFORMATION SYSTEM
(HMIS)

HSA Point-of-contact and CoC Representative

The parties mutually agree that the following individual will be designated as point-of-contact for the Agreement on behalf of HSA.

On behalf of HSA and the San Francisco Local Homeless Coordinating Board the undersigned individual hereby attests that he or she is authorized to enter into this Agreement and agrees to all the terms specified herein.

Name and Title of HSA Point-of-Contact		
Street Address		
City	State	Zip Code
Office Telephone (/w Area Code)		
Email Address		

Signature of HSA Point-of-Contact	Date
Signature of HMIS Lead (if different)	Date
Signature of Local Homeless Coordinating Board Representative	Date

<center>
Data Quality Plan
July 21, 2014
</center>

Background: HUD regulations require Continuums of Care to establish HMIS Data Quality Plans. Developing a Data Quality plan will:

- Helps with meeting HUD requirements (APR, AHAR, etc)
- Help implement coordinated assessment
- Help agencies report accurately

FIRST TOPIC: Timeliness

Requirements:

- An HMIS should have the most current client information available for every person being actively served by service providers.
- All HMIS participants should strive to minimize the gap between when information is collected and when it is entered into HMIS, with the goal of real-time data entry whenever feasible.

Proposal:

Client information should always be entered into HMIS within the following initial guidelines, based on project type (including McKinney and non-McKinney providers):

- Emergency Shelter projects: All Universal Data Elements entered <u>within two (2) days of intake</u>.
- Transitional Housing projects: All Universal and Program-Specific Data Elements entered <u>within seven (7) days of intake</u>.
- Permanent Housing projects: All Universal and Program-Specific Data Elements entered <u>within seven (7) days of intake</u>.
- Outreach projects: Limited data elements entered <u>within two (2) days of the first outreach encounter</u>. Upon engagement for services, all remaining Universal Data Elements entered <u>within two days</u>.
- Rapid Rehousing and Prevention projects: All Universal and Program- Specific Data Elements entered <u>within two (2) days of intake</u>.

For agencies that upload data to HMIS, correct, updated information should be uploaded at least <u>monthly</u>.

SECOND TOPIC: Completeness

Requirements:

- Complete HMIS data is necessary to fully understand the demographic characteristics and service use of persons in the system.

- Complete data facilitates confident reporting and analysis on the nature and extent of homelessness, such as:
  - Unduplicated counts of clients served at the local level;
  - Patterns of use of people entering and exiting the homeless assistance system; and
  - Evaluation of the effectiveness of homeless systems.
- At the client level, more complete HMIS data improves quality of services and ability of provider staff to meet client needs, efficiently and effectively.

Proposal:

The Continuum's goal is to collect 100% of all data elements. However, the Continuum recognizes that this may not be possible in all cases. Therefore, the Continuum has established a data quality benchmark of between 3% and 6% as an acceptable range of null/missing and unknown/don't know/refused responses for all UDEs and program specific data elements.

The Continuum would like to prioritize fields by program type as follows:
- Housing outcomes for TH and SSO programs
- Fields relied upon to de-duplicate client records such as DOB, SSN, etc...
- Mainstream benefits and income related fields for all programs
- UDEs should be at less than 6% for all program types
- CoC funded projects should be at less than 6% for all data
- TH and PSH projects should be at less than 6% for all exit data

THIRD TOPIC: Accuracy & Consistency

Requirements:
- The purpose of accuracy is to ensure that the data in the CoC's HMIS is the best possible representation of reality as it relates to homeless people and the programs that serve them.
- All data in HMIS shall be collected and entered in a common and consistent manner across all programs.

Proposal:
- All data entered into the CoC's HMIS shall be a reflection of information provided by the client, as documented by the intake worker or otherwise updated by the client and documented for reference. Recording inaccurate information is strictly prohibited.
- The CoC will undertake system-wide accuracy checks, require end user training, and maintain a consistent intake form.

- **System Checks**: HMIS staff will conduct accuracy and consistency checks, including quarterly de-duplication efforts, and automatic searches for information that is likely inconsistent.

- **Training:** All intake and data entry workers will complete an initial training before accessing the live HMIS system. All HMIS users must recertify their knowledge of consistency practices on an annual basis. HSA will develop electronic trainings that can be taken when staff are available on an annual basis.

- **Intake Form:** A basic intake form that collects data in a consistent manner will be available to all programs, which they can alter to meet their additional needs, provided the base document does not change. A document that outlines the basic data elements collected on the intake form, their response categories, rationale, and definitions will be made available in paper and via the HMIS website as a quick reference to ensure consistent data collection. New agencies that join the CoC are required to review this document as part of the HMIS Agency Agreement execution process.

FOURTH TOPIC: Monitoring & Enforcement

Requirements:
- The data produced from the HMIS is critical to meet the reporting and compliance requirements of individual agencies and the CoC as a whole.

Proposal:
- All HMIS agencies are expected to meet the data quality benchmarks described in this document.
- The HMIS data will be monitored periodically to quickly identify and resolve issues that affect the timeliness, completeness, and accuracy of the data.
- Data completeness will be evaluated using an automated reports generated by the HMIS Lead on a quarterly basis.
  - o In the future, the HMIS Lead may then generate an overall data quality score, reflecting compliance with the Data Quality Plan's benchmarks for timeliness, completeness, accuracy, and consistency and publish the scores to the community.
- Each participating agency must assess their data compliance at the agency-, project- and user-level on a monthly basis by running the data quality reports built into the HMIS. These reports shall be submitted to HSA on a quarterly basis with an explanation the steps the Agency took to review and mitigate any identified performance gaps.

- The purpose of monitoring is to ensure that the agreed-upon data quality benchmarks are met to the greatest possible extent and that data quality issues are quickly identified and resolved.

  Examples of incentives and enforcements for providers meeting or failing to meet HMIS data quality standards are:
  - Awarding extra points in NOFA application

- Awarding points and/or subtracting points in funding applications
- Be required to retake electronic HMIS user training
- Develop a workout plan to correct the issue

ATTACHMENT: PHA ADMINISTRATION PLAN (APPLICABLE SECTIONS ONLY)

DOCUMENT SATISFYING REQUIREMENT	PAGE
San Francisco Housing Authority Administrative Plan, Chapter 4: Applications, Waiting List, and Tenant Selection	2 – 25
Admissions and Continued Occupancy Policy of The San Francisco Housing Authority	26 – 36

San Francisco Housing Authority

Housing Choice Voucher

Administrative Plan

Revised July 2013

Chapter 4
APPLICATIONS, WAITING LIST AND TENANT SELECTION

PART I: THE APPLICATION PROCESS

PART II: MANAGING THE WAITING LIST

PART III: SELECTION FOR HCV ASSISTANCE

Chapter 4

APPLICATIONS, WAITING LIST AND TENANT SELECTION

INTRODUCTION

When a family wishes to receive Section 8 HCV assistance, the family must submit an application that provides the PHA with the information needed to determine the family's eligibility. HUD requires the PHA to place all families that apply for assistance on a waiting list. When HCV assistance becomes available, the PHA must select families from the waiting list in accordance with HUD requirements and PHA policies as stated in the administrative plan and the annual plan.

The PHA is required to adopt a clear approach to accepting applications, placing families on the waiting list, selecting families from the waiting list and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or the PHA to receive preferential treatment. Funding earmarked exclusively for families with particular characteristics may also alter the order in which families are served.

HUD regulations require that all families have an equal opportunity to apply for and receive housing assistance, and that the PHA affirmatively further fair housing goals in the administration of the program [24 CFR 982.53, HCV GB p. 4-1]. Adherence to the selection policies described in this chapter ensures that the PHA will be in compliance with all relevant fair housing requirements, as described in Chapter 2.

This chapter describes HUD and PHA policies for taking applications, managing the waiting list and selecting families for HCV assistance. The policies outlined in this chapter are organized into three sections, as follows:

> Part I: The Application Process. This part provides an overview of the application process, and discusses how applicants can obtain and submit applications. It also specifies how the PHA will handle the applications it receives.

> Part II: Managing the Waiting List. This part presents the policies that govern how the PHA's waiting list is structured, when it is opened and closed, and how the public is notified of the opportunity to apply for assistance. It also discusses the process the PHA will use to keep the waiting list current.

> Part III: Selection for HCV Assistance. This part describes the policies that guide the PHA in selecting families for HCV assistance as such assistance becomes available. It also specifies how in-person interviews will be used to ensure that the PHA has the information needed to make a final eligibility determination.

PART I: THE APPLICATION PROCESS

4-I.A. OVERVIEW

This part describes the policies that guide the PHA's efforts to distribute and accept applications, and to make preliminary determinations of applicant family eligibility that affect placement of the family on the waiting list. This part also describes the PHA's obligation to ensure the accessibility of the application process to elderly persons, people with disabilities, and people with limited English proficiency (LEP).

4-I.B. APPLYING FOR ASSISTANCE [HCV GB, pp. 4-11 – 4-16, Notice PIH 2009-36]

Any family that wishes to receive HCV assistance must apply for admission to the program. HUD permits the PHA to determine the format and content of HCV applications, as well how such applications will be made available to interested families and how applications will be accepted by the PHA. However, the PHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the PHA's application.

> SFHA Policy
>
> At the time of the application, the family must provide all of the information necessary to establish family eligibility and level of assistance.
>
> The PHA will use the following process to update applicants on their status as they reach the top of the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and level of assistance when the family is selected from the waiting list.
>
> Families may obtain application forms from the PHA's office during normal business hours. Families may also request – by telephone or by mail – that a form be sent to the family via first class mail.
>
> Completed applications must be returned to the PHA by mail, by fax, or submitted in person during normal business hours. Applications must be complete in order to be accepted by the PHA for processing. If an application is incomplete, the PHA will notify the family of the additional information required.

4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

Elderly and Disabled Populations [24 CFR 8 and HCV GB, pp. 4-11 – 4-13]

The PHA must take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the normal, standard PHA application process. This could include people with disabilities, certain elderly individuals, as well as persons with limited English proficiency (LEP). The PHA must provide reasonable accommodation to the needs of individuals with disabilities. The application-taking facility and the application process must be fully accessible, or the PHA must provide an alternate approach that provides full access to the application process. Chapter 2 provides a full discussion of the PHA's policies related to providing reasonable accommodations for people with disabilities.

Limited English Proficiency

PHAs are required to take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency [24 CFR 1]. Chapter 2 provides a full discussion on the PHA's policies related to ensuring access to people with limited English proficiency (LEP).

4-I.D. PLACEMENT ON THE WAITING LIST

The PHA must review each complete application received and make a preliminary assessment of the family's eligibility. The PHA must accept applications from families for whom the list is open unless there is good cause for not accepting the application (such as denial of assistance) for the grounds stated in the regulations [24 CFR 982.206(b)(2)]. Where the family is determined to be ineligible, the PHA must notify the family in writing [24 CFR 982.201(f)]. Where the family is not determined to be ineligible, the family will be placed on a waiting list of applicants.

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list [24 CFR 982.202(c)].

Ineligible for Placement on the Waiting List

SFHA Policy

If the PHA can determine from the information provided that a family is ineligible, the family will not be placed on the waiting list. Where a family is determined to be ineligible, the PHA will send written notification of the ineligibility determination within 30 calendar days of receiving a complete application. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal review and explain the process for doing so (see Chapter 16).

Eligible for Placement on the Waiting List

SFHA Policy

The PHA will send written notification of the preliminary eligibility determination within 30 calendar days of receiving a complete application.

Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list.

Applicants will be placed on the waiting list according to any preference(s) for which they qualify, and the date and time their complete application is received by the PHA.

PART II: MANAGING THE WAITING LIST

4-II.A. OVERVIEW

The PHA must have policies regarding various aspects of organizing and managing the waiting list of applicant families. This includes opening the list to new applicants, closing the list to new applicants, notifying the public of waiting list openings and closings, updating waiting list information, purging the list of families that are no longer interested in or eligible for assistance, as well as conducting outreach to ensure a sufficient number of applicants.

In addition, HUD imposes requirements on how a PHA may structure its waiting list and how families must be treated if they apply for assistance from a PHA that administers more than one assisted housing program.

4-II.B. ORGANIZATION OF THE WAITING LIST [24 CFR 982.204 and 205]

The PHA's HCV waiting list must be organized in such a manner to allow the PHA to accurately identify and select families for assistance in the proper order, according to the admissions policies described in this plan.

The waiting list must contain the following information for each applicant listed:

- Applicant name;

- Family unit size;

- Date and time of application;

- Qualification for any local preference;

- Racial or ethnic designation of the head of household.

HUD requires the PHA to maintain a single waiting list for the HCV program unless it serves more than one county or municipality. Such PHAs are permitted, but not required, to maintain a separate waiting list for each county or municipality served.

> SFHA Policy
>
> The PHA will maintain a single waiting list for the HCV program. , including the Project-Based Voucher Program.
>
>
> Site Based Waiting List
>
> The San Francisco Housing Authority has implemented site-based waiting lists for the following locations:
>
> [Bayinihan House, Citizens Housing Corporation, SOMA/Family Apts., Dalt Hotel, L.P.

Dalt Hotel, Dudley Apartments, Folsom/Dore Apt. (Citizen Housing), Tenderloin

Neighborhood Development Corporation (TNDC),

421 Leavenworth St./Sierra Madre Apts.; 481-85 Eddy Street/Cameo Apts.;

480 Eddy Street/Yosemite Apts.; West Hotel, 141-145 Eddy Street;

Curran House, 145 Taylor Street; 460 Ellis Street/Kimm Apts.;

250-60 McAllister Street/Plaza Ramon Apts.

HUD directs that a family that applies for assistance from the HCV program must be offered the opportunity to be placed on the waiting list for any public housing, project-based voucher or moderate rehabilitation program the PHA operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs.

HUD permits, but does not require, that PHAs maintain a single merged waiting list for their public housing, Section 8, and other subsidized housing programs.

A family's decision to apply for, receive, or refuse other housing assistance must not affect the family's placement on the HCV waiting list, or any preferences for which the family may qualify.

SFHA Policy

The PHA will not merge the HCV waiting list with the waiting list for any other program the PHA operates.

4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]

Closing the Waiting List

A PHA is permitted to close the waiting list if it has an adequate pool of families to use its available HCV assistance. Alternatively, the PHA may elect to continue to accept applications only from certain categories of families that meet particular preferences or funding criteria.

SFHA Policy

The PHA will close the waiting list when the estimated waiting period for housing assistance for applicants on the list reaches 120 months for the most current applicants. Where the PHA has particular preferences or funding criteria that require a specific category of family, the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

Reopening the Waiting List

If the waiting list has been closed, it cannot be reopened until the PHA publishes a notice in local newspapers of general circulation, minority media, and other suitable media outlets. The notice must comply with HUD fair housing requirements and must specify who may apply, and where and when applications will be received. The notice must provide the criteria defining what families may apply.

SFHA Policy

The PHA will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice.

The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:

- o The San Francisco Chronicle
- o Minority-owned and foreign language newspapers
- o Posting in the lobby of the PHA office at 1815 Egbert Ave, San Francisco, CA
- o Posting in the lobby of the PHA Leased Housing Division office
- o Radio and television stations in order to inform the visually impaired
- o Notices circulated for posting at social service agencies, community centers and the Bay Area public housing agencies

4-II.D. FAMILY OUTREACH [HCV GB, pp. 4-2 to 4-4]

The PHA must conduct outreach as necessary to ensure that the PHA has a sufficient number of applicants on the waiting list to use the HCV resources it has been allotted.

Because HUD requires the PHA to serve a specified percentage of extremely low income families (see Chapter 4, Part III), the PHA may need to conduct special outreach to ensure that an adequate number of such families apply for assistance [HCV GB, p. 4-20 to 4-21].

PHA outreach efforts must comply with fair housing requirements. This includes:

- Analyzing the housing market area and the populations currently being served to identify underserved populations

- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program

- Avoiding outreach efforts that prefer or exclude people who are members of a protected class

PHA outreach efforts must be designed to inform qualified families about the availability of assistance under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers

- Developing informational materials and flyers to distribute to other agencies

- Providing application forms to other public and private agencies that serve the low income population

- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

> SFHA Policy
>
> The PHA will monitor the characteristics of the population being served and the characteristics of the population as a whole in the PHA's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

<u>SFHA Policy</u>

While the family is on the waiting list, the family must immediately inform the PHA within 10 business days, of changes in family size or composition, preference status, or contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing.

4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204]

HUD requires the PHA to establish policies to use when removing applicant names from the waiting list.

Purging the Waiting List

The decision to withdraw an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to a PHA request for information or updates because of the family member's disability, the PHA must reinstate the applicant family to their former position on the waiting list [24 CFR 982.204(c)(2)].

<u>SFHA Policy</u>

The waiting list will be updated as needed to ensure that all applicants and applicant information is current and timely.

To update the waiting list, the PHA will send an update request via first class mail to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's response must be in writing and may be delivered in person, by mail, or by fax. Responses should be postmarked or received by the PHA not later than 15 business days from the date of the PHA letter.

If the family fails to respond within 15 business days, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 15 business days to respond from the date the letter was re-sent. If the family fails to respond within this time frame, the family

will be removed from the waiting list without further notice.

The family may request to be reinstated to the waitlist within one year of the withdraw date. The family may request an informal review resulting from removal of the waitlist.

Removal from the Waiting List

SFHA Policy

If at any time an applicant family is on the waiting list, the PHA determines that the family is not eligible for assistance (see Chapter 3), the family will be removed from the waiting list.

If a family is removed from the waiting list because the PHA has determined the family is not eligible for assistance, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding the PHA's decision (see Chapter 16) [24 CFR 982.201(f)].

PART III: SELECTION FOR HCV ASSISTANCE

4-III.A. OVERVIEW

As vouchers become available, families on the waiting list must be selected for assistance in accordance with the policies described in this part.

The order in which families receive assistance from the waiting list depends on the selection method chosen by the PHA and is impacted in part by any selection preferences that the family qualifies for. The source of HCV funding also may affect the order in which families are selected from the waiting list.

The PHA must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 982.204(b) and 982.207(e)].

4-III.B. SELECTION AND HCV FUNDING SOURCES

Special Admissions [24 CFR 982.203]

HUD may award funding for specifically-named families living in specified types of units (e.g., a family that is displaced by demolition of public housing; a non-purchasing family residing in a HOPE 1 or 2 projects). In these cases, the PHA may admit families that are not on the waiting list, or without considering the family's position on the waiting list. The PHA must maintain records showing that such families were admitted with special program funding.

SFHA Policy

At its sole discretion, the SFHA may offer a HUD-VASH family that the Veterans Affairs Medical Center (VAMC) certifies no longer needs case management services continued housing choice voucher (HCV) assistance through one of its regular vouchers in order to free up the HUD-VASH voucher for another HUD-VASH eligible family.

At its sole discretion, the SFHA may offer a FUP family that the San Francisco Human Services (HSA) Agency certifies no longer needs case management services continued housing choice voucher (HCV) assistance through one of its regular vouchers in order to free up the FUP voucher for another FUP eligible family.

Regular HCV Funding

Regular HCV funding may be used to assist any eligible family on the waiting list. Families are selected from the waiting list according to the policies provided in Section 4-III.C.

4-III.C. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

Local Preferences [24 CFR 982.207; HCV p. 4-16]

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

> SFHA Policy
>
> The SFHA adopted the following local preferences during the Annual Plan Process in 2012. All preferences must be verified at the time of intake. If an applicant is unable to provide verification at the time of intake, the applicant will be placed back on the waitlist according to the date and time of application.
>
> - **Absolute Preference(s)**
>   - Veteran /Surviving Spouse of Veteran
>   - San Francisco District Attorney Referrals
>   - Public Housing residents who have been approved for an emergency transfer
> - **Involuntary Displacement from residence in San Francisco (5 points)**
> - **Homeless Family in San Francisco (5 points)**
> - **Homeless Senior or Person with Disability in San Francisco (5 points)**
> - **Homeless Adult in San Francisco (3 points)**
> - **Substandard Non-Homeless in San Francisco (2 points)**
> - **Resident in San Francisco Paying more than 70% of household income in rent (1 point)**

Absolute Preference(s)

Veteran/Surviving Spouse of Veteran

California Health and Safety Code section 34322.2(b) states that "[p]riority shall be given with each preference category to families of veterans and servicemen." A veteran is someone who is recognized by a local, state or federal government agency as a veteran, and he or she receives or qualifies for veteran's benefits. Therefore, veterans and families of veterans shall receive preference within each of SFHA's preference categories.

San Francisco District Attorney Referrals (Witness Relocation Preference)
Notwithstanding all preferences indicated below, participants in the Witness Relocation and
Protection (WRAP) Program will have an absolute Preference on the wait list and be considered
for a Housing Choice Voucher ahead of all other applicants on the wait list.

The SFHA in cooperation with the San Francisco District Attorney's Office (—DA‖) and the San
Francisco Police Department (—SFPD‖) has established an absolute preference on its Housing
Choice Voucher Wait List to assist witnesses of violent crimes who are being assisted by the
Witness Relocation and Assistance Program (—WRAP‖) in exchange for testimony leading to
the conviction of the violent criminal(s) arrested in connection with the witnessed crime.

The absolute Preference will enable a family on the Housing Choice Voucher Wait List who
participates in WRAP to rise to the top of the waitlist and be eligible for immediate assistance.
Strict guidelines must be met to ensure continued assistance for WRAP participants. In order for
WRAP families to be eligible for assistance, the following conditions must be met:

1. The witness MUST testify in all trials held for the alleged crime. Eligibility for the WRAP
   must be initiated by the SFDA's Office who must present credible evidence, of the danger or
   of retaliatory violence to the family, to the SFHA;

2. All family members MUST NOT violate any conditions or responsibilities of the WRAP;

3. All household members MUST agree to move out of the City and County of San Francisco;

4. The Relocating family must be in good standing with the SFHA and not owe any balance for
   rent or unpaid tenant damages;

5. All family members MUST NOT return to the City and County of San Francisco while
   assisted under the Voucher Program as a participant of the WRAP unless required by the
   SFDA's office or the SFPD;

6. The family MUST cooperate with all requirements of the Section 8 Program and the
   —receiving‖ housing authority's policies and procedures; and

7. If the family reveals the location of its new unit or their status in the California WRAP, the
   Voucher, at the discretion of the initial or the receiving Public Housing Agency (—PHA‖)
   may be forfeited. Circumstances will be reviewed on a case by case basis.

If the household is absorbed by the receiving PHA, the voucher will be released for use by another
family on the Housing Choice Voucher wait list. The SFHA will administer any Voucher that is not
absorbed by the receiving PHA to the extent funding permits.

Public Housing Residents Who Have Been Approved for an Emergency Transfer
The SFHA will provide a maximum of ten (10) vouchers per fiscal year for Public Housing Residents who have been approved for an emergency transfer. The resident family must be on the Housing Choice Voucher Waitlist to qualify for this preference. The family must show that there is good cause reason to deny any or all Public Housing unit(s) that have been offered prior to qualifying for the Housing Choice Voucher. Good cause for refusal of a unit offer under this preference includes demonstration by the family that accepting previously offered unit(s) would place a family or family member's life, health or safety in immediate jeopardy. Reasons must be specific to the family. Compelling documentation such as court orders or restraining orders will be requested. Refusals due to the location of the unit alone are not considered "good cause."
The final decision as to whether the family receives a voucher under this preference will be made by the Executive Director or his/her designee.

Preferences

The following preferences are mutually exclusive. An applicant family is limited to selecting one of the following:

Involuntary Displacement *(5 points)*
An applicant is or will be involuntarily displaced if the applicant has vacated or will have to vacate his or her housing unit as a result of one or more of the following actions:

- *Natural Disaster*: A disaster such as a fire, flood or earthquake that resulted in the inhabitability of the applicant's unit.
- *Domestic Violence*: An applicant who has vacated due to actual or threatened physical violence directed against the applicant or one or more members of the applicant's family by a spouse or other household member, who lives in housing with an individual who engages in such violence.
- *Victim of Hate Crime/Violent Crime*: Actual or threatened physical violence or intimidation directed against an applicant and his/her property that is based on the person's race, color, creed, religion, national origin, ancestry, age, height, weight, sex, sexual orientation, gender identity, domestic partner status, marital status, disability or Acquired Immune Deficiency Syndrome or HIV status (AIDS/HIV status), or association with members of such protected classes, that is documented by law enforcement agency stating that the applicant is in an immediate life-threatening situation and that an immediate transfer would minimize the problem.
- *Government Action*: an action of a government agency related to code enforcement or public improvement or development.
- *Landlord Action*: an action by a housing owner that results in an applicant's having to vacate his or her unit, where the reason for the owner's action was beyond the applicant's

ability to control or prevent, and despite the applicant having met all previously imposed conditions of occupancy, and the action is other than a rent increase.

Homeless Families in San Francisco (5 points)
An applicant family qualifies for this preference when the family:

- Lacks a fixed regular, and adequate nighttime residence; and/or
- Has a primary residence that is:
    - A supervised publicly or privately operated shelter or transitional housing residence designed to provide temporary living accommodations; or
    - An institution that provides a residence for an individual; or
    - A public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
- Families with minor children in a Single Room Occupancy (SRO) unit.

Homeless Seniors or Persons with Disability (5 points)
An applicant senior or person with disability qualifies for this preference when the applicant:

- Lacks a fixed regular, and adequate nighttime residence; and/or
- Has a primary residence that is:
    - A supervised publicly or privately operated shelter or transitional housing residence designed to provide temporary living accommodations; or
    - An institution that provides a residence for an individual; or
    - A public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
    - Not accessible

Homeless Adult in San Francisco (3 points)
An applicant homeless adult qualifies for this preference when the applicant:

- Lacks a fixed regular, and adequate nighttime residence; and/or
- Has a primary residence that is:
    - A supervised publicly or privately operated shelter or transitional housing residence designed to provide temporary living accommodations; or
    - An institution that provides a temporary residence for an individual; or
    - A public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;

Substandard Non-Homeless in San Francisco

An applicant who is a "Non-Homeless: A non-homeless applicant is living in substandard housing if their present unit meets any of the following criteria: it is "dilapidated;" it does not have operable indoor plumbing; it does not have a usable flush toilet and a usable bathtub or shower inside the unit for the exclusive use of the family; it does not have electricity, or has inadequate or unsafe electrical service; it does not have a safe or adequate source of heat; it should, but does not have a kitchen, or it has been declared unfit for habitation by a government agency. A housing unit is "dilapidated" if it does not provide safe and adequate shelter, and in its present condition endangers the health, safety, or well-being of a family or it has one or more critical defects or a combination of intermediate defects in sufficient number or extent to require considerable repair or rebuilding. The defects may have resulted from the original construction, or from continued neglect or lack of repair, or from serious damage to the structure. For purposes of this section, Single Room Occupancy (SRO) units are not automatically considered substandard due to the lack of a kitchen and/or bathroom. SROs do not generally have these features and are thus considered standard housing unless in dilapidated physical condition.

Paying More than 70% of Income for Housing
An applicant shall qualify for this local preference if the family is paying more than 70 percent of the total family income for rent. However, an applicant may not qualify for a preference under this section if the applicant is paying more than 70 percent of family income to rent a unit because his or her housing assistance under the public housing, Housing Choice Voucher program, or any program under the Housing and Urban Development Act of 1965 with respect to that unit has been terminated as a result of the applicant's refusal to comply with applicable program policies and procedures with respect to the occupancy of under-occupied and overcrowded units.

Prohibition of Preference if Applicant was evicted for drug-related and/or criminal activity
The SFHA will not give any preference to an applicant if any member of the family is a person who was evicted within the three years prior to applying because of drug-related criminal activity from any assisted housing program. The SFHA may consider granting a preference in any of the following cases:

- If the SFHA determines that the evicted person has successfully completed a rehabilitation program approved by the SFHA; or
- If the SFHA determines that the evicted person clearly did not participate in or knew about the drug related criminal activity; or
- If the SFHA determines that the evicted person no longer participates in any drug-related criminal activity

Income Targeting Requirement [24 CFR 982.201(b)(2)]

HUD requires that extremely low-income (ELI) families make up at least 75% of the families

admitted to the HCV program during the PHA's fiscal year. ELI families are those with annual incomes at or below 30% of the area median income. To ensure this requirement is met, a PHA may skip non-ELI families on the waiting list in order to select an ELI family.

Low income families admitted to the program that are "continuously assisted" under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

SFHA Policy

The PHA will monitor progress in meeting the ELI requirement throughout the fiscal year. Extremely low-income families will be selected ahead of other eligible families on an as-needed basis to ensure the income targeting requirement is met.

Order of Selection

The PHA system of preferences may select families either according to the date and time of application, or by a random selection process [24 CFR 982.207(c)]. When selecting families from the waiting list PHAs are required to use targeted funding to assist only those families who meet the specified criteria, and PHAs are not permitted to skip down the waiting list to a family that it can afford to subsidize when there are not sufficient funds to subsidize the family at the top of the waiting list [24 CFR 982.204(d) and (e)].

Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with the PHA's hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA. Documentation will be maintained by the PHA as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not interested in targeted funding, there will be a notation maintained so that the PHA does not have to ask higher placed families each time targeted selections are made.

4-III.D. NOTIFICATION OF SELECTION

When a family has been selected from the waiting list, the PHA must notify the family.

SFHA Policy

The PHA will notify the family by first class mail when it is selected from the waiting list. The notice will inform the family of the following:

Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview

Who is required to attend the interview

Documents that must be provided at the interview to document the legal identity of household members, including information about what constitutes acceptable documentation

Other documents and information that should be brought to the interview

If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list. A notice of denial (see Chapter 3) will be sent to the family's address of record, as well as to any known alternate address.

The family may request to be reinstated to the waitlist within one year of the withdraw date. The family may request an informal review resulting from the removal of the waitlist.

4-III.E. THE APPLICATION INTERVIEW

HUD recommends that the PHA obtain the information and documentation needed to make an eligibility determination though a private interview [HCV GB, pg. 4-16]. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if the PHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period of time determined by the PHA [Notice PIH 2012-10]

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability.

SFHA Policy

Families selected from the waiting list are required to participate in an eligibility interview.

The head of household and the spouse/co-head shall attend the interview together. However, either the head of household or the spouse/co-head may attend the interview on behalf of the family. Verification of information pertaining to adult members will not

begin until all release forms are submitted to the PHA.

The interview will be conducted only if the head of household or spouse/co-head provides appropriate documentation of legal identity. (Chapter 7 provides a discussion of proper documentation of legal identity). If the family representative does not provide the required documentation, the appointment may be rescheduled when the proper documents have been obtained.

Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for 90 days. If not all household members have disclosed their SSNs at the next time the PHA is issuing vouchers, the PHA will issue a voucher to the next eligible applicant family on the waiting list.

The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, as well as completing required forms, providing required signatures, and submitting required documentation. If any materials are missing, the PHA will provide the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

Interviews will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.

If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, the PHA will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without PHA approval will be denied assistance based on the family's failure to supply information needed to determine eligibility. A notice of denial will be issued in accordance with policies contained in Chapter 3.

4-III.F. COMPLETING THE APPLICATION PROCESS

The PHA must verify all information provided by the family (see Chapter 7). Based on verified information, the PHA must make a final determination of eligibility (see Chapter 3) and must confirm that the family qualified for any special admission, targeted admission, or selection preference that affected the order in which the family was selected from the waiting list.

> SFHA Policy
>
> If the PHA determines that the family is ineligible, the PHA will send written notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal review (Chapter 16).
>
> If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list (e.g. targeted funding, extremely low-income), the family will be returned to its original position on the waiting list ('original' for purposes of the waiting list is defined as the place the participant would have been had s/he not had any preferences or advantages at the time of eligibility determination). The PHA will notify the family in writing that it has been returned to the waiting list, and will specify the reasons for it.
>
> If the PHA determines that the family is eligible to receive assistance, the PHA will invite the family to attend a briefing in accordance with the policies in Chapter 5.

ADMISSIONS AND CONTINUED OCCUPANCY POLICY

The San Francisco Housing Authority

Board Approved: December 18, 2014
Effective: January 1, 2015

PART III: TENANT SELECTION

4-III.A. OVERVIEW

The PHA must establish tenant selection policies for families being admitted to public housing [24 CFR 960.201(a)]. The PHA must not require any specific income or racial quotas for any developments [24 CFR 903.2(d)]. The PHA must not assign persons to a particular section of a community or to a development or building based on race, color, religion, sex, disability, familial status or national origin for purposes of segregating populations [24 CFR 1.4(b)(1)(iii) and 24 CFR 903.2(d)(1)].

The order in which families will be selected from the waiting list depends on the selection method chosen by the PHA and is impacted in part by any selection preferences that the family qualifies for. The availability of units also may affect the order in which families are selected from the waiting list.

The PHA must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 960.206(e)(2)]. The PHA's policies must be posted any place where the PHA receives applications. The PHA must provide a copy of its tenant selection policies upon request to any applicant or tenant. The PHA may charge the family for providing a copy of its tenant selection policies [24 CFR 960.202(c)(2)].

> SFHA Policy
>
> When an applicant or resident family requests a copy of the PHA's tenant selection policies, the PHA will provide copies to them free of charge.

4-III.B. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

Local Preferences [24 CFR 982.207; HCV p. 4-16]

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

SFHA Policy

The SFHA adopted the following local preferences during the Annual Plan Process in 2014. All preferences must be verified at the time of intake. If an applicant is unable to provide verification at the time of intake, the applicant will be placed back on the waitlist according to the date and time of application. All preferences are mutually exclusive except for the Absolute Veteran/Surviving Spouse of Veteran, which may be combined with any other preference. Applicants with an equal preference value will be selected based on the earliest date and time of application.

(An applicant family includes, but not limited to: 1) family with or without children; 2) an elderly family; 3) a near-elderly family; 4) a disabled family; 5) a displaced family; 6) the remaining member of a tenant family and 7) a single person who is not elderly or displaced person with disabilities, or the remaining member of a tenant family. [24 CFR 5.403].

- **Veteran /Surviving Spouse of Veteran (1 Point)**
- **Homeless in Permanent Supportive Housing Preference (7 points)**
- **Involuntary Displacement from residence in San Francisco (5 points)**
- **Homeless in San Francisco (5 points)**
- **Resident in San Francisco Paying more than 70% of household income in rent** (1 point)

Veteran/Surviving Spouse of Veteran

California Health and Safety Code section 34322.2(b) states that "[p]priority shall be given with each preference category to families of veterans and servicemen." A veteran is someone who is recognized by a local, state or federal government agency as a veteran, and he or she receives or qualifies for veteran's benefits. Therefore, veterans and families of veterans shall receive preference within each of SFHA's preference categories.

Preferences

The following preferences are mutually exclusive. An applicant family is limited to selecting one of the following:

Homeless in Permanent Supportive Housing Preference *(7 points)*

Preference for families referred by the City and County of San Francisco that are transitioning from Permanent Supportive Housing units who were previously homeless and are no longer in need of those supportive services. These families are still considered homeless for reporting purposes to HUD. This "move up" preference will contribute significantly to the community's overall efforts to end homelessness by freeing up other units for currently homeless families and individuals with disabilities who need housing combined with services

Involuntary Displacement *(5 points)*

An applicant is or will be involuntarily displaced if the applicant has vacated or will have to vacate his or her housing unit as a result of one or more of the following actions:

- *Natural Disaster*: A disaster such as a fire, flood or earthquake that resulted in the inhabitability of the applicant's unit.
- *Domestic Violence*: An applicant who has vacated due to actual or threatened physical violence directed against the applicant or one or more members of the applicant's family by a spouse or other household member,

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who lives in housing with an individual who engages in such violence.

- *Victim of Hate Crime/Violent Crime*: Actual or threatened physical violence or intimidation directed against an applicant and his/her property that is based on the person's race, color, creed, religion, national origin, ancestry, age, height, weight, sex, sexual orientation, gender identity, domestic partner status, marital status, disability or Acquired Immune Deficiency Syndrome or HIV status (AIDS/HIV status), or association with members of such protected classes, that is documented by law enforcement agency stating that the applicant is in an immediate life-threatening situation and that an immediate transfer would minimize the problem.
- *Government Action*: an action of a government agency related to code enforcement or public improvement or development.
  Landlord Action: an action by a housing owner that results in an applicant's having to vacate his or her unit, where the reason for the owner's action was beyond the applicant's ability to control or prevent, and despite the applicant having met all previously imposed conditions of occupancy, and the action is other than a rent increase.

Homeless in San Francisco *(5 points)*
An applicant family qualifies for this preference when the family:
- Lacks a fixed regular, and adequate nighttime residence; and/or
- Has a primary residence that is:
  o A supervised publicly or privately operated shelter or transitional housing residence designed to provide temporary living accommodations; or
  o An institution that provides a residence for an individual; or
  o A public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
- Families with minor children in a Single Room Occupancy (SRO) unit.
  o Not accessible
- Seniors and/or Disabled Individuals living in SRO's

Paying More than 70% of Income for Housing *(1 point)*
An applicant shall qualify for this local preference if the family is paying more than 70 percent of the total family income for rent. However, an applicant may not

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qualify for a preference under this section if the applicant is paying more than 70 percent of family income to rent a unit because his or her housing assistance under the public housing, Housing Choice Voucher program, or any program under the Housing and Urban Development Act of 1965 with respect to that unit has been terminated as a result of the applicant's refusal to comply with applicable program policies and procedures with respect to the occupancy of under-occupied and overcrowded units.

Prohibition of Preference if Applicant was evicted for drug-related and/or criminal activity

The SFHA will not give any preference to an applicant if any member of the family is a person who was evicted within the three years prior to applying because of drug-related criminal activity from any assisted housing program. The SFHA may consider granting a preference in any of the following cases:

- If the SFHA determines that the evicted person has successfully completed a rehabilitation program approved by the SFHA; or
- If the SFHA determines that the evicted person clearly did not participate in or knew about the drug related criminal activity; or
- If the SFHA determines that the evicted person no longer participates in any drug-related criminal activity

Income Targeting Requirement [24 CFR 960.202(b)]

HUD requires that extremely low-income (ELI) families make up at least 40% of the families admitted to public housing during the PHA's fiscal year. ELI families are those with annual incomes at or below 30% of the area median income. To ensure this requirement is met, the PHA may skip non-ELI families on the waiting list in order to select an ELI family.

If a PHA also operates a housing choice voucher (HCV) program, admissions of extremely low-income families to the PHA's HCV program during a PHA fiscal year that exceed the 75% minimum target requirement for the voucher program, shall be credited against the PHA's basic targeting requirement in the public housing program for the same fiscal year. However, under these circumstances the fiscal year credit to the public housing program must not exceed the lower of: (1) ten percent of public housing waiting list admissions during the PHA fiscal year; (2) ten percent of waiting list admissions to the PHA's housing choice voucher program during the PHA fiscal year; or (3) the number of qualifying low-income families who commence occupancy during the fiscal year of PHA public housing units located in census tracts with a poverty rate of 30 percent or more. For this purpose, qualifying low-income family means a low-income family other than an extremely low-income family.

SFHA Policy

The PHA will monitor progress in meeting the ELI requirement throughout the fiscal year. ELI families will be selected ahead of other eligible families on an as-needed basis to ensure that the income targeting requirement is met.

Mixed Population Developments [24 CFR 960.407]

A mixed population development is a public housing development or portion of a development that was reserved for elderly families and disabled families at its inception (and has retained that character) or the PHA at some point after its inception obtained HUD approval to give preference in tenant selection for all units in the development (or portion of a development) to elderly and disabled families [24 CFR 960.102]. Elderly family means a family whose head, spouse, co-head, or sole member is a person who is at least 62 years of age. Disabled family means a family whose head, spouse, co-head, or sole member is a person with disabilities [24 CFR 5.403]. The PHA must give elderly and disabled families equal preference in selecting these families for admission to mixed population developments. The PHA may not establish a

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limit on the number of elderly or disabled families that may occupy a mixed population development. In selecting elderly and disabled families to fill these units, the PHA must first offer the units that have accessibility features for families that include a person with a disability and require the accessibility features of such units. The PHA may not discriminate against elderly or disabled families that include children (Fair Housing Amendments Act of 1988).

Units Designated for Elderly or Disabled Families [24 CFR 945]

The PHA may designate projects or portions of a public housing project specifically for elderly or disabled families. The PHA must have a HUD-approved allocation plan before the designation may take place.

Among the designated developments, the PHA must also apply any preferences that it has established. If there are not enough elderly families to occupy the units in a designated elderly development, the PHA may allow near-elderly families to occupy the units [24 CFR 945.303(c)(1)]. Near-elderly family means a family whose head, spouse, or co-head is at least 50 years old, but is less than 62 [24 CFR 5.403].

If there are an insufficient number of elderly families and near-elderly families for the units in a development designated for elderly families, the PHA must make available to all other families any unit that is ready for re-rental and has been vacant for more than 60 consecutive days [24 CFR 945.303(c)(2)].

The decision of any disabled family or elderly family not to occupy or accept occupancy in designated housing shall not have an adverse effect on their admission or continued occupancy in public housing or their position on or placement on the waiting list. However, this protection does not apply to any family who refuses to occupy or accept occupancy in designated housing because of the race, color, religion, sex, disability, familial status, or national origin of the occupants of the designated housing or the surrounding area [24 CFR 945.303(d)(1) and (2)].

This protection does apply to an elderly family or disabled family that declines to accept occupancy, respectively, in a designated project for elderly families or for disabled families, and requests occupancy in a general occupancy project or in a mixed population project [24 CFR 945.303(d)(3)].

SFHA Policy

The SFHA has designated senior and/or disabled housing at this time.

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Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

The PHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be in included in its annual plan [24 CFR 903.7(b)].

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

Step 1. The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

> SFHA Policy
>
> The PHA will determine the average income of all families in all covered developments on an annual basis.

Step 2. The PHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

> SFHA Policy
>
> The PHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. The PHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low income family (30% of median income).

Step 4. The PHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities

- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments

- Establishing a preference for admission of working families in developments below the EIR

- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration

- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

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Order of Selection [24 CFR 960.206(e)]

The PHA system of preferences may select families either according to the date and time of application or by a random selection process.

SFHA Policy

Families will be selected from the waiting list based on preference(s). Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA.

When selecting applicants from the waiting list the PHA will match the characteristics of the available unit (unit size, accessibility features, unit type/designation) to the applicants on the waiting lists. The PHA will offer the unit to the highest ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status.

Factors such as deconcentration or income mixing and income targeting will also be considered in accordance with HUD requirements and PHA policy.

Preference	Points
Veteran/Surviving Spouse	*(+1)*
Homeless In Permanent Supportive Housing	7
Involuntarily Displacement from residence in San Francisco	5
Homeless In San Francisco	5
Substandard Non-Homeless in San Francisco	2
Resident in San Francisco Paying More than 70% of household Income in rent	1
No Local Preference	0

Note: Applicants with same point value will be pulled according to date and time.
The above preferences are specifically described in the Local Preference Section of this policy

Public Housing Resident Transfer List Preferences   (Order of Moves)

Reasonable Accommodations	Exhaust list
Emergency Transfers	First 5
Waiting List in Order of Preference	Next 5

Note: The SFHA has the discretion to move non-emergency, administrative transfers as deemed necessary.

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ATTACHMENT: CoC Written Standards for Order of Priority

DOCUMENT SATISFYING REQUIREMENT	PAGE
Local Homeless Coordinating Board Written Standards for Providing Assistance	2 – 11
San Francisco Continuum of Care Coordinated Entry Pilot for Single Adults Policies and Procedures Manual	12 – 23

San Francisco Local Homeless Coordinating Board
Written Standards for Providing Assistance
July 2015

I. PURPOSE

Pursuant to the CoC Interim Rule, the San Francisco Continuum of Care (CoC) must have written policies and procedures that govern the provision of assistance to individuals and families under the CoC. These policies and procedures provide guidance to local providers in administering CoC-funded assistance in the following areas:

- Policies and procedures for evaluating individuals' and families' eligibility for CoC assistance
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive CoC transitional housing assistance
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive CoC rapid rehousing assistance and standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance.

The policies and procedures are not intended to be in lieu of or in place of the CoC Interim Rule or the HEARTH Act, but are intended to clarify local decisions regarding program administration. All HUD funded providers must follow all HUD requirements in their entirety.

Homeless families are a significant focus of the CoC. Under these standards, the CoC assists families in every housing track, including through Transitional Housing, Rapid Re-housing, and Permanent Supportive Housing.

II. PARTICIPANT ELIGIBILITY AND DOCUMENTATION STANDARDS
San Francisco CoC funds are used for the following program types:

- Permanent Supportive Housing;
- Rapid Re-Housing;
- Transitional Housing;
- Planning;
- HMIS; and
- Supportive Services Only.

As set forth in the HEARTH Act, there are four categories of participant eligibility for CoC programs:

1) Literally Homeless;
2) Imminent Risk of Homelessness;
3) Homeless Under Other Federal Statutes (subject to cap); and

4) Fleeing/Attempting to Flee Domestic Violence.

Programs in the San Francisco CoC may serve categories 1, 2, and 4.

The San Francisco CoC and its housing and service providers are committed to fostering equal access to housing and services. Programs do not discriminate on the basis of race, color, national origin, religion, sex, sexual orientation, gender identity, age, familial status, or disability. Programs must provide notice of this non-discrimination policy to participants and prospective participants.

Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1) Literally Homeless (in order of preference)

a) Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
b) Written observation by an outreach worker; or
c) Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;

If the provider is using anything other than a) Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

2) Imminent Risk of Homelessness

a) A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; or
b) For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
c) A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; and
d) Certification that no subsequent residence has been identified; and
e) Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

3) Homeless Under Other Federal Statute

Persons who are homeless as defined under this category are not eligible to be served by any San Francisco CoC program.

4) Fleeing/Attempting to Flee DV

For victim service providers:

a) An oral statement by the individual or head of household seeking assistance, which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For non-victim service providers:

a) Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; <u>and</u>

b) Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u>

c) Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Eligibility for Permanent Supportive Housing

Per the most recent CoC Program Notice of Funding Availability (NOFA), eligibility for Permanent Supportive Housing is limited to categories 1 and 4. To be eligible for Permanent Supportive Housing, participants must also:

1) Enter from the street or shelter, or a transitional housing program to which they originally entered from the street or shelter (NOTE: if the project is designated for chronically homeless, they may only enter from the street or shelter. Individuals may lose their chronically homeless designation after they enter a transitional housing program); <u>and</u>

2) At least one member of the household must have a disability of long duration, verified either by Social Security or a licensed professional that meets the state criteria for diagnosing and treating that condition.

III. PRIORITIZING AND TARGETING

San Francisco CoC prioritizes chronically homeless individuals and families and has committed to adopting a Housing First approach in all CoC and Emergency Solutions Grant (ESG) programs.

A. FAMILIES WITH CHILDREN

All homeless families with children are initially evaluated through the Connecting Point program, and targeted to the best housing option for the family. San Francisco CoC seeks to mediate/prevent homelessness whenever possible, reduce the homeless episode for families through rapid rehousing (RRH) and shelter/transitional housing focused on moving families from homelessness to permanent housing as soon as possible, and permanently house the most vulnerable families, as resources are available. Information is gathered to determine the "best fit" intervention to prioritize families for more intensive services. Additional details about the procedures for evaluating individuals can be found at the Connecting Point program.

B. INDIVIDUALS

All individuals served with CoC assistance in the San Francisco CoC will be evaluated through the coordinated assessment system, according to the San Francisco Continuum of Care Coordinated Entry Pilot for Single Adults Policies and Procedures Manual, to determine best placement and resource referral, including best housing track. The San Francisco CoC prioritizes housing and services for those who have been homeless the longest, and uses an assessment tool through the

coordinated assessment process to identify the most vulnerable people and individual housing interest, so that those that are prioritized for housing are placed into the correct type of housing.

C. HOUSING TRACKS

The San Francisco CoC targets CoC and other homeless assistance using five housing tracks:

Track A (for Affordable)

- Consumers need access to affordable housing, but likely can maintain housing independently.
- Consumers have few barriers to housing and/or may have identified housing they could access if they had resources.
- Track A consumers are prioritized for Rapid Rehousing and public housing options.

Track B (for Basic services)

- Consumers have barriers to housing besides income, but the ability to maintain housing without many services.
- Consumers in this category have more and higher barriers to housing, including barriers like multiple evictions, poor credit history, and criminal issues, but relatively low vulnerability.
- Track B consumers are prioritized for low-service, affordable permanent housing, including, in some cases, public housing.
- Youth in this category will be placed in Transitional Housing.

Track C (for wraparound Care)

- Consumers have barriers to housing besides income, and the need for consistent support to maintain housing.
- Consumers in this category have high barriers to housing and relatively high vulnerability (e.g. medical, mental health, etc.).
- Track C consumers are prioritized for high-service permanent supportive housing.

Track D (for DPH):

- Consumers are extremely vulnerable, and are referred to DPH for further assessment and connection to case management services.

Track E (for Exit):

- Consumers are current residents of PSH and ready to exit to lower-service housing.
- Track E consumers are prioritized for affordable housing.

To determine appropriate track, coordinated assessment staff will consult several local databases, including HMIS, CHANGES, and CCMS, as well as interview the consumer. Additional details about the procedures for evaluating individuals can be found at the coordinated assessment program.

If an individual is not considered a priority household, the coordinated assessment staff will refer that individual to other resources, such as shelter and other community services, and must be careful to manage expectations about housing.

IV. STANDARDS FOR PROVIDING ASSISTANCE: TRANSITIONAL HOUSING

A. TARGET POPULATION FOR ASSISTANCE

The San Francisco CoC recognizes that particular subpopulations benefit from the congregate living environment and intensive services provided under a transitional housing model. Local transitional housing programs will target the following populations families and individuals currently experiencing homelessness:

a) Families experiencing homelessness;
b) Families and individuals with experience of domestic violence;
c) Persons with a history of substance abuse;
d) Transition aged youth; and
e) Veterans.

Transitional housing is prioritized for families and individuals who, with robust short-term supports, will be able to transition into stable and independent permanent housing situations.

Eligibility Criteria

In order to qualify for a CoC-funded Transitional Housing program, participants must be eligible under CoC Participant Eligibilty and Documentation standards in Section I.

B. SERVICES

Duration of Assistance

Transitional Housing facilitates the movement of homeless individuals and families to PH within 24 months of entering TH.

Lease and Occupancy Agreements

All CoC-funded TH programs must enter into a lease or occupancy agreement with tenants that must be at least one month in duration. The lease agreement must observe Fair Housing Act regulations.

Rent and Occupancy Charges

Participants in TH are expected to pay a maximum of 30% of their income (monthly, adjusted) toward rent (including utilities).

- If the participant has zero income, the participant is not required to pay rent, but their supportive services partner is expected to work with them to secure income (either earned or unearned) as soon as possible.
- In no circumstance can a tenant be charged an amount above the Rent Reasonableness standard established by HUD.
- Rents collected from residents of TH may be reserved in whole or in part to assist the residents to move to PH.

Participants in leasing programs may be charged an occupancy charge up to 30% of the monthly adjusted income; 10% of the family's gross income; or the portion of the family's welfare assistance.

V. STANDARDS FOR PROVIDING ASSISTANCE: RAPID RE-HOUSING

These standards were developed based on the work of the San Francisco Homelessness Prevention and Rental Assistance Programs Workgroup in 2012-3, which included a variety of rapid rehousing and prevention providers, including ESG recipients. These standards align with Human Services Agency practice.

A. TARGET POPULATION FOR ASSISTANCE

The local rapid rehousing/prevention programs will target the following populations:

- Families or individuals who are homeless, or
- Living in doubled or tripled up or residing in substandard housing, and at risk of being evicted and/or becoming homeless
- Families or individuals at risk of losing their housing because they are paying more than 70% of their income toward rent
- Living in a Single Room Occupancy Hotel (SRO)

Priority for the subsidy will be given to homeless families or individuals in shelter or on the centralized intake wait list, families receiving San Francisco CalWORKs benefits and/or who have an active San Francisco Child Welfare case. Additional preference will be given to San Francisco families who are residing in shelter or on the family shelter wait list.

Eligibility Criteria

In order to qualify for a CoC-funded Rapid Re-Housing program, participants must be eligible under CoC Participant Eligibilty and Documentation standards in Section I.

B1. SERVICES: RENTAL SUBSIDIES

Rental subsidies will be targeted to families or individuals who are assessed as having the potential to increase their income and transition successfully off the subsidy within a specified timeframe. A rental subsidy is defined as a monthly housing grant over 12 to 24 months, with the possibility of hardship extension not to exceed 36 months. The goal should be for clients to successfully transition off the subsidy within 12 months. After 12 months however, if the client is unable to transition successfully off the subsidy but has demonstrated progress toward service plan goals, the subsidy can be extended for a maximum of 12 additional months. In addition:

- 100% of subsidy clients must have a written socioeconomic plan for replacing the subsidy.
- 100% of subsidy clients will participate in, at minimum, monthly case management meetings, some of which will be home-based visits.
- 100% of subsidy client service plans will be reviewed by case management on a quarterly basis, to evaluate progress toward socioeconomic goals.

Eligibility Criteria

In order to qualify for a rental subsidy, families or individuals must fall within the target population as well as satisfy the following criteria:

Income

- Subsidy applicants must demonstrate at point of program enrollment their ability to increase their income and/or decrease their expenses and transition off the subsidy within the specified timeframe.
- Subsidy clients must remain engaged in program activities in order to maintain eligibility for a subsidy and must demonstrate progress toward achieving the milestones to increase their income, as established in the socioeconomic plan, by month 12 of the subsidy. Clients who have not demonstrated progress will not be eligible for a subsidy extension.

Rent to Income Ratio

- In determining eligibility for assistance, the provider will take into account an applicant's total household income and expenses. For subsidy clients, the tenant portion of the rent cannot exceed 40-50% of net monthly income upon enrollment in the subsidy program.

Plan Development

Each subsidy client must present a transition plan that will demonstrate their ability to be self-sufficient in maintaining adequate housing at the end of the subsidy period, which includes a goal of increasing income to the point at which:

- The rent to income ratio is at or below 70%, or
- The client has increased their income by the amount of the subsidy, or
- The client has met their goal as set forth in the service plan

Other Requirements

- Prior to assistance being approved, subsidy applicants must sign a client agreement and agree to participate in periodic follow-up for 12 months after assistance ends.
- Subsidy clients must show proof of tenancy (i.e., be named on the lease agreement or have a valid sublease agreement that can be verified).
- Subsidy clients must provide proof that they have paid their share of the rent on time each month (i.e., rent receipts). Subsidy clients must pay their share of the rent on time each month, and will be at risk for suspension from program if they become delinquent on their rent.
- Subsidy clients must complete and submit applications for all available subsidized housing opportunities within 3 months of the start of the subsidy, and continue to complete applications for new subsidized housing opportunities throughout the length of the subsidy. Applications will be documented in Housing Logs in client case files.
- Any subsidy client who rejects a valid subsidized housing offer for reasons not expressed at point of program enrollment will be terminated from the subsidy.
- Subsidy programs may assist families who do not currently have physical custody of their child(ren), if documentation from CPS verifies that housing is the only remaining

barrier to reunification, that reunification will occur within 60 days after housing is obtained, and the client demonstrates the ability to begin working toward increasing income while reunification is in process. If reunification has not occurred within 60 days, the provider will work to transition the family off of the subsidy and into more appropriate housing/services.

- Clients are eligible for enrollment in the subsidy once in a lifetime. Once a family or individual has used the subsidy and been exited, they cannot reapply.

Main Service Components

- All clients assessed as having the potential to increase their income through employment will be mandated to participate in employment and training services provided by CFC or SJFC programs or another service provider, enrolled in an educational program or will demonstrate clear goals to increasing income while working.
- An apartment inspection checklist will be utilized to ensure that apartments meet minimum safety guidelines and are child-safe. Case managers will work to ensure the apartment does not possess serious code violations and that any necessary repairs are made, prior to first payment.
- Once a unit is identified the case manager will then assist the family or individual in accessing money for security deposits and other move-in costs and provide any other appropriate assistance to aid the family with the move-in process.

B2. SERVICES: INTENSIVE CASE MANAGEMENT SERVICES

Case Managers will provide intensive case management services in order to assist clients to meet the goals indicated in their transition plans, successfully retain housing and move off the subsidy and into self-sufficiency. Services will be provided at the program offices and Case Managers will conduct home visits when appropriate. Services may include, but are not limited to:

- Intake and assessment
- A minimum of one monthly face-to-face case management meeting
- A minimum of one quarterly home visit
- Assistance with transportation, including accompaniment to appointments, home visits
- Verification of progress toward achievement of short and long term client objectives
- Referral to behavioral health resources
- Job search assistance
- Benefits assistance and advocacy
- Referral to vocational and training programs
- Mediation and negotiation with landlords
- Crisis intervention
- Referral to child care resources
- Referral to other services and resources
- Assistance with housing applications
- Budgeting and money management assistance
- Social and organized activities

B3. SERVICES: EVICTION PREVENTION

Eviction prevention assistance is defined as landlord mediation services and housing advocacy, as well as direct financial assistance in the form of back-rent grants. The maximum grant amount will not exceed $1500 per applicant. The program will target two populations:

1) Formerly homeless families or individuals who were previously residing in the San Francisco family shelter system and have been housed;
2) Housed families or individuals who are at risk of eviction and who would be able to retain their housing with short-term rental assistance (1-3 months).

Clients may be assisted by HSA General Fund programs two times in five years for one-time back rent, security deposit, or short-term rental subsidies.

Rent to Income Ratio

- In determining eligibility for assistance, the provider will take into account an applicant's total household income and expenses.
- Rent cannot exceed 80% of monthly income. However, when a family or individual's rent exceeds 50% of income, provider must ensure that residual income after rent is adequate to cover the family or individual's non-housing needs before providing assistance, assess whether another intervention is indicated, or determine whether the family or individual should be referred to additional services. Exceptions to the rent to income ratio can be made on a case-by-case basis by permission of the Housing & Homeless Program Manager.

Other Requirements

- All applicants must agree to sign a participant agreement and participate in periodic follow-up for 12 months after assistance ends, prior to assistance being approved.
- All clients must be able to document amount owed for back rent payment, move-in, monthly rent, or other critical need.
- All clients must show proof of tenancy (i.e., be named on the lease agreement or have a valid sublease agreement that can be verified).
- Clients who do not currently have physical custody of their child(ren) may be assisted with a grant, if documentation from CPS verifies that obtaining or maintaining housing is the only barrier to reunification, and that reunification will occur within 60 days after the assistance is received.

Criteria for Housed Families and Individuals

- Must be residing in San Francisco.
- Must have a legal lease in applicant's name; and submit a current (within last 30 days) utility bill in their name.
- Income must be less than 35% of AMI in San Francisco.
- Must be "at risk" of becoming homeless, which can include but is not limited to a critical need involving temporary or permanent loss of household income, medical emergency, or death of household member.

VI. STANDARDS FOR PROVIDING ASSISTANCE: PERMANENT SUPPORTIVE HOUSING

A. TARGET POPULATION FOR ASSISTANCE

Through coordinated assessment, local permanent supportive housing (PSH) programs will target the following subpopulations:

- Chronically homeless,
- Chronically homeless veterans,
- Chronically homeless individuals with HIV/AIDs

All individuals are referred to CoC permanent supportive housing through the Coordinated Assessment system. The coordinated assessment system prioritizes placement in permanent supportive housing for individuals based on length of time homeless. The target populations consist of individuals with high vulnerability and high barriers to housing stability.

Eligibility Criteria

In order to qualify for a CoC-funded Permanent Supportive Housing program, participants must be eligible under CoC Participant Eligibilty and Documentation standards in Section I.

Each PSH program in the CoC will provide Coordinated Assessment staff with accurate and up-to-date information on eligibility criteria for the program (i.e. Chronically homeless, disabling HIV/AIDs, etc).

B. SERVICES

Duration Of Assistance
- There can be no predetermined length of stay for a PSH program
- Program participants in PSH must enter into a lease agreement for an initial term of at least one year. The lease must be automatically renewable upon expiration, except on prior notice by either party.

Supportive Services and Housing First

- Supportive services designed to meet the needs of the program participants must be made available to the program participants throughout the duration of stay in PSH
- Permanent supportive programs must adopt a housing first approach

San Francisco Local Homeless Coordinating Board
Written Standards for Providing Assistance
July 2015

I. PURPOSE

Pursuant to the CoC Interim Rule, the San Francisco Continuum of Care (CoC) must have written policies and procedures that govern the provision of assistance to individuals and families under the CoC. These policies and procedures provide guidance to local providers in administering CoC-funded assistance in the following areas:

- Policies and procedures for evaluating individuals' and families' eligibility for CoC assistance
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive CoC transitional housing assistance
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive CoC rapid rehousing assistance and standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance.

The policies and procedures are not intended to be in lieu of or in place of the CoC Interim Rule or the HEARTH Act, but are intended to clarify local decisions regarding program administration. All HUD funded providers must follow all HUD requirements in their entirety.

Homeless families are a significant focus of the CoC. Under these standards, the CoC assists families in every housing track, including through Transitional Housing, Rapid Re-housing, and Permanent Supportive Housing.

II. PARTICIPANT ELIGIBILITY AND DOCUMENTATION STANDARDS
San Francisco CoC funds are used for the following program types:

- Permanent Supportive Housing;
- Rapid Re-Housing;
- Transitional Housing;
- Planning;
- HMIS; and
- Supportive Services Only.

As set forth in the HEARTH Act, there are four categories of participant eligibility for CoC programs:

1) Literally Homeless;
2) Imminent Risk of Homelessness;
3) Homeless Under Other Federal Statutes (subject to cap); and

4) Fleeing/Attempting to Flee Domestic Violence.

Programs in the San Francisco CoC may serve categories 1, 2, and 4.

The San Francisco CoC and its housing and service providers are committed to fostering equal access to housing and services. Programs do not discriminate on the basis of race, color, national origin, religion, sex, sexual orientation, gender identity, age, familial status, or disability. Programs must provide notice of this non-discrimination policy to participants and prospective participants.

Documentation
Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1) Literally Homeless (in order of preference)

   a) Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
   b) Written observation by an outreach worker; or
   c) Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;

If the provider is using anything other than a) Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

2) Imminent Risk of Homelessness

   a) A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; or
   b) For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
   c) A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; and
   d) Certification that no subsequent residence has been identified; and
   e) Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

3) Homeless Under Other Federal Statute

Persons who are homeless as defined under this category are not eligible to be served by any San Francisco CoC program.

4) Fleeing/Attempting to Flee DV

   For victim service providers:

   a) An oral statement by the individual or head of household seeking assistance, which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For non-victim service providers:

a) Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and

b) Certification by the individual or head of household that no subsequent residence has been identified; and

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Eligibility for Permanent Supportive Housing

Per the most recent CoC Program Notice of Funding Availability (NOFA), eligibility for Permanent Supportive Housing is limited to categories 1 and 4. To be eligible for Permanent Supportive Housing, participants must also:

1) Enter from the street or shelter, or a transitional housing program to which they originally entered from the street or shelter (NOTE: if the project is designated for chronically homeless, they may only enter from the street or shelter. Individuals may lose their chronically homeless designation after they enter a transitional housing program); and

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III. PRIORITIZING AND TARGETING

San Francisco CoC prioritizes chronically homeless individuals and families and has committed to adopting a Housing First approach in all CoC and Emergency Solutions Grant (ESG) programs.

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All homeless families with children are initially evaluated through the Connecting Point program, and targeted to the best housing option for the family. San Francisco CoC seeks to mediate/prevent homelessness whenever possible, reduce the homeless episode for families through rapid rehousing (RRH) and shelter/transitional housing focused on moving families from homelessness to permanent housing as soon as possible, and permanently house the most vulnerable families, as resources are available. Information is gathered to determine the "best fit" intervention to prioritize families for more intensive services. Additional details about the procedures for evaluating individuals can be found at the Connecting Point program.

B. INDIVIDUALS

All individuals served with CoC assistance in the San Francisco CoC will be evaluated through the coordinated assessment system, according to the San Francisco Continuum of Care Coordinated Entry Pilot for Single Adults Policies and Procedures Manual, to determine best placement and resource referral, including best housing track. The San Francisco CoC prioritizes housing and services for those who have been homeless the longest, and uses an assessment tool through the coordinated assessment

process to identify the most vulnerable people and individual housing interest, so that those that are prioritized for housing are placed into the correct type of housing.

C. HOUSING TRACKS

The San Francisco CoC targets CoC and other homeless assistance using five housing tracks:

Track A (for Affordable)

- Consumers need access to affordable housing, but likely can maintain housing independently.
- Consumers have few barriers to housing and/or may have identified housing they could access if they had resources.
- Track A consumers are prioritized for Rapid Rehousing and public housing options.

Track B (for Basic services)

- Consumers have barriers to housing besides income, but the ability to maintain housing without many services.
- Consumers in this category have more and higher barriers to housing, including barriers like multiple evictions, poor credit history, and criminal issues, but relatively low vulnerability.
- Track B consumers are prioritized for low-service, affordable permanent housing, including, in some cases, public housing.
- Youth in this category will be placed in Transitional Housing.

Track C (for wraparound Care)

- Consumers have barriers to housing besides income, and the need for consistent support to maintain housing.
- Consumers in this category have high barriers to housing and relatively high vulnerability (e.g. medical, mental health, etc.).
- Track C consumers are prioritized for high-service permanent supportive housing.

Track D (for DPH):

- Consumers are extremely vulnerable, and are referred to DPH for further assessment and connection to case management services.

Track E (for Exit):

- Consumers are current residents of PSH and ready to exit to lower-service housing.
- Track E consumers are prioritized for affordable housing.

To determine appropriate track, coordinated assessment staff will consult several local databases, including HMIS, CHANGES, and CCMS, as well as interview the consumer. Additional details about the procedures for evaluating individuals can be found at the coordinated assessment program.

If an individual is not considered a priority household, the coordinated assessment staff will refer that individual to other resources, such as shelter and other community services, and must be careful to manage expectations about housing.

IV. STANDARDS FOR PROVIDING ASSISTANCE: TRANSITIONAL HOUSING

A. TARGET POPULATION FOR ASSISTANCE

The San Francisco CoC recognizes that particular subpopulations benefit from the congregate living environment and intensive services provided under a transitional housing model. Local transitional housing programs will target the following populations families and individuals currently experiencing homelessness:

a) Families experiencing homelessness;
b) Families and individuals with experience of domestic violence;
c) Persons with a history of substance abuse;
d) Transition aged youth; and
e) Veterans.

Transitional housing is prioritized for families and individuals who, with robust short-term supports, will be able to transition into stable and independent permanent housing situations.

Eligibility Criteria

In order to qualify for a CoC-funded Transitional Housing program, participants must be eligible under CoC Participant Eligibilty and Documentation standards in Section I.

B. SERVICES

Duration of Assistance

Transitional Housing facilitates the movement of homeless individuals and families to PH within 24 months of entering TH.

Lease and Occupancy Agreements

All CoC-funded TH programs must enter into a lease or occupancy agreement with tenants that must be at least one month in duration. The lease agreement must observe Fair Housing Act regulations.

Rent and Occupancy Charges

Participants in TH are expected to pay a maximum of 30% of their income (monthly, adjusted) toward rent (including utilities).

- If the participant has zero income, the participant is not required to pay rent, but their supportive services partner is expected to work with them to secure income (either earned or unearned) as soon as possible.
- In no circumstance can a tenant be charged an amount above the Rent Reasonableness standard established by HUD.
- Rents collected from residents of TH may be reserved in whole or in part to assist the residents to move to PH.

Participants in leasing programs may be charged an occupancy charge up to 30% of the monthly adjusted income; 10% of the family's gross income; or the portion of the family's welfare assistance.

V. STANDARDS FOR PROVIDING ASSISTANCE: RAPID RE-HOUSING

These standards were developed based on the work of the San Francisco Homelessness Prevention and Rental Assistance Programs Workgroup in 2012-3, which included a variety of rapid rehousing and prevention providers, including ESG recipients. These standards align with Human Services Agency practice.

A. TARGET POPULATION FOR ASSISTANCE
The local rapid rehousing/prevention programs will target the following populations:

- Families or individuals who are homeless, or
- Living in doubled or tripled up or residing in substandard housing, and at risk of being evicted and/or becoming homeless
- Families or individuals at risk of losing their housing because they are paying more than 70% of their income toward rent
- Living in a Single Room Occupancy Hotel (SRO)

Priority for the subsidy will be given to homeless families or individuals in shelter or on the centralized intake wait list, families receiving San Francisco CalWORKs benefits and/or who have an active San Francisco Child Welfare case. Additional preference will be given to San Francisco families who are residing in shelter or on the family shelter wait list.

Eligibility Criteria

In order to qualify for a CoC-funded Rapid Re-Housing program, participants must be eligible under CoC Participant Eligibilty and Documentation standards in Section I.

B1. SERVICES: RENTAL SUBSIDIES
Rental subsidies will be targeted to families or individuals who are assessed as having the potential to increase their income and transition successfully off the subsidy within a specified timeframe. A rental subsidy is defined as a monthly housing grant over 12 to 24 months, with the possibility of hardship extension not to exceed 36 months. The goal should be for clients to successfully transition off the subsidy within 12 months. After 12 months however, if the client is unable to transition successfully off the subsidy but has demonstrated progress toward service plan goals, the subsidy can be extended for a maximum of 12 additional months. In addition:

- 100% of subsidy clients must have a written socioeconomic plan for replacing the subsidy.
- 100% of subsidy clients will participate in, at minimum, monthly case management meetings, some of which will be home-based visits.
- 100% of subsidy client service plans will be reviewed by case management on a quarterly basis, to evaluate progress toward socioeconomic goals.

Eligibility Criteria

In order to qualify for a rental subsidy, families or individuals must fall within the target population as well as satisfy the following criteria:

Income

- Subsidy applicants must demonstrate at point of program enrollment their ability to increase their income and/or decrease their expenses and transition off the subsidy within the specified timeframe.
- Subsidy clients must remain engaged in program activities in order to maintain eligibility for a subsidy and must demonstrate progress toward achieving the milestones to increase their income, as established in the socioeconomic plan, by month 12 of the subsidy. Clients who have not demonstrated progress will not be eligible for a subsidy extension.

Rent to Income Ratio

- In determining eligibility for assistance, the provider will take into account an applicant's total household income and expenses. For subsidy clients, the tenant portion of the rent cannot exceed 40-50% of net monthly income upon enrollment in the subsidy program.

Plan Development

Each subsidy client must present a transition plan that will demonstrate their ability to be self-sufficient in maintaining adequate housing at the end of the subsidy period, which includes a goal of increasing income to the point at which:

- The rent to income ratio is at or below 70%, or
- The client has increased their income by the amount of the subsidy, or
- The client has met their goal as set forth in the service plan

Other Requirements

- Prior to assistance being approved, subsidy applicants must sign a client agreement and agree to participate in periodic follow-up for 12 months after assistance ends.
- Subsidy clients must show proof of tenancy (i.e., be named on the lease agreement or have a valid sublease agreement that can be verified).
- Subsidy clients must provide proof that they have paid their share of the rent on time each month (i.e., rent receipts). Subsidy clients must pay their share of the rent on time each month, and will be at risk for suspension from program if they become delinquent on their rent.
- Subsidy clients must complete and submit applications for all available subsidized housing opportunities within 3 months of the start of the subsidy, and continue to complete applications for new subsidized housing opportunities throughout the length of the subsidy. Applications will be documented in Housing Logs in client case files.
- Any subsidy client who rejects a valid subsidized housing offer for reasons not expressed at point of program enrollment will be terminated from the subsidy.

- Subsidy programs may assist families who do not currently have physical custody of their child(ren), if documentation from CPS verifies that housing is the only remaining barrier to reunification, that reunification will occur within 60 days after housing is obtained, and the client demonstrates the ability to begin working toward increasing income while reunification is in process. If reunification has not occurred within 60 days, the provider will work to transition the family off of the subsidy and into more appropriate housing/services.
- Clients are eligible for enrollment in the subsidy once in a lifetime. Once a family or individual has used the subsidy and been exited, they cannot reapply.

Main Service Components

- All clients assessed as having the potential to increase their income through employment will be mandated to participate in employment and training services provided by CFC or SJFC programs or another service provider, enrolled in an educational program or will demonstrate clear goals to increasing income while working.
- An apartment inspection checklist will be utilized to ensure that apartments meet minimum safety guidelines and are child-safe. Case managers will work to ensure the apartment does not possess serious code violations and that any necessary repairs are made, prior to first payment.
- Once a unit is identified the case manager will then assist the family or individual in accessing money for security deposits and other move-in costs and provide any other appropriate assistance to aid the family with the move-in process.

B2. SERVICES: INTENSIVE CASE MANAGEMENT SERVICES

Case Managers will provide intensive case management services in order to assist clients to meet the goals indicated in their transition plans, successfully retain housing and move off the subsidy and into self-sufficiency. Services will be provided at the program offices and Case Managers will conduct home visits when appropriate. Services may include, but are not limited to:

- Intake and assessment
- A minimum of one monthly face-to-face case management meeting
- A minimum of one quarterly home visit
- Assistance with transportation, including accompaniment to appointments, home visits
- Verification of progress toward achievement of short and long term client objectives
- Referral to behavioral health resources
- Job search assistance
- Benefits assistance and advocacy
- Referral to vocational and training programs
- Mediation and negotiation with landlords
- Crisis intervention
- Referral to child care resources
- Referral to other services and resources
- Assistance with housing applications
- Budgeting and money management assistance
- Social and organized activities

B3. SERVICES: EVICTION PREVENTION

Eviction prevention assistance is defined as landlord mediation services and housing advocacy, as well as direct financial assistance in the form of back-rent grants. The maximum grant amount will not exceed $1500 per applicant. The program will target two populations:

1) Formerly homeless families or individuals who were previously residing in the San Francisco family shelter system and have been housed;
2) Housed families or individuals who are at risk of eviction and who would be able to retain their housing with short-term rental assistance (1-3 months).

Clients may be assisted by HSA General Fund programs two times in five years for one-time back rent, security deposit, or short-term rental subsidies.

Rent to Income Ratio

- In determining eligibility for assistance, the provider will take into account an applicant's total household income and expenses.
- Rent cannot exceed 80% of monthly income. However, when a family or individual's rent exceeds 50% of income, provider must ensure that residual income after rent is adequate to cover the family or individual's non-housing needs before providing assistance, assess whether another intervention is indicated, or determine whether the family or individual should be referred to additional services. Exceptions to the rent to income ratio can be made on a case-by-case basis by permission of the Housing & Homeless Program Manager.

Other Requirements

- All applicants must agree to sign a participant agreement and participate in periodic follow-up for 12 months after assistance ends, prior to assistance being approved.
- All clients must be able to document amount owed for back rent payment, move-in, monthly rent, or other critical need.
- All clients must show proof of tenancy (i.e., be named on the lease agreement or have a valid sublease agreement that can be verified).
- Clients who do not currently have physical custody of their child(ren) may be assisted with a grant, if documentation from CPS verifies that obtaining or maintaining housing is the only barrier to reunification, and that reunification will occur within 60 days after the assistance is received.

Criteria for Housed Families and Individuals

- Must be residing in San Francisco.
- Must have a legal lease in applicant's name; and submit a current (within last 30 days) utility bill in their name.
- Income must be less than 35% of AMI in San Francisco.
- Must be "at risk" of becoming homeless, which can include but is not limited to a critical need involving temporary or permanent loss of household income, medical emergency, or death of household member.

VI. STANDARDS FOR PROVIDING ASSISTANCE: PERMANENT SUPPORTIVE HOUSING

A. TARGET POPULATION FOR ASSISTANCE

Through coordinated assessment, local permanent supportive housing (PSH) programs will target the following subpopulations:

- Chronically homeless,
- Chronically homeless veterans,
- Chronically homeless individuals with HIV/AIDs

All individuals are referred to CoC permanent supportive housing through the Coordinated Assessment system. The coordinated assessment system prioritizes placement in permanent supportive housing for individuals based on length of time homeless. The target populations consist of individuals with high vulnerability and high barriers to housing stability.

Eligibility Criteria

In order to qualify for a CoC-funded Permanent Supportive Housing program, participants must be eligible under CoC Participant Eligibilty and Documentation standards in Section I.

Each PSH program in the CoC will provide Coordinated Assessment staff with accurate and up-to-date information on eligibility criteria for the program (i.e. Chronically homeless, disabling HIV/AIDs, etc).

B. SERVICES

Duration Of Assistance
- There can be no predetermined length of stay for a PSH program
- Program participants in PSH must enter into a lease agreement for an initial term of at least one year. The lease must be automatically renewable upon expiration, except on prior notice by either party.

Supportive Services and Housing First

- Supportive services designed to meet the needs of the program participants must be made available to the program participants throughout the duration of stay in PSH
- Permanent supportive programs must adopt a housing first approach

San Francisco Continuum of Care

Coordinated Entry Pilot for Single Adults

Policies and Procedures Manual

I. PURPOSE

A. The San Francisco Coordinated Entry pilot process establishes a system for placing single adults into housing according to their level of priority. The system includes all CoC-funded housing programs, including those previously funded under the SHP and Shelter Plus Care programs.

This Coordinated Entry pilot process complies with HUD regulations, requiring that the local CoC governing body establish a Coordinated Entry and referral process that ensures that persons with the longest history of homelessness and most severe needs are prioritized.

II. GUIDING PRINCIPLES

A. The Coordinated Entry pilot process is designed to facilitate access to housing by single adults who are homeless, based on the following principles:

- *Length of Time Homeless*: Priority for housing is determined based on length of time homeless. Time homeless in San Francisco is prioritized over time homeless in other localities.

- *Housing First:* Individuals will be provided with access to housing as soon as openings become available. While engagement with health and social services is encouraged, it is not required as a condition of obtaining housing.

- *Simple Referral Process:* The Coordinated Entry pilot process is designed to be simple for both providers and homeless individuals. Access to the system is made easy through a short, one-page referral form that is not burdensome for either party.

- *Client Choice:* Individuals will be given information about housing as it becomes available, and will have some degree of choice as to whether to accept a particular placement or not. And indv with – have opp to turn down 3 times; de-prioritized for 30 days.

- *Accountable:* The functioning of the Coordinated Entry pilot process will be periodically evaluated by the Local Homeless Coordinating Board (LCHB). Evaluation will include input from providers and clients.

III. PROCESS
  A. Client is referred to the system
  B. Client is placed in a priority group
  C. Client eligibility is reviewed
  D. Housing Application is filled out
  E. Client is referred to housing
  F. Client moves into housing

IV. STRUCTURE AND STAFFING

  A. Structure

    1. The Coordinated Entry pilot system includes: 1) all CoC-funded housing programs, 2) referring agencies, including all San Francisco providers and advocates serving homeless single adults, 3) a priority order list, and 4) system staffing, as described below.

  B. Staffing

    1. The City has contracted with a local agency, Episcopal Community Services (ECS), to staff and operate the Coordinated Entry pilot system. ECS will dedicate specific staff for this function.

    2. Coordinated Entry staff will match individuals on the priority list with available housing units, locate those individuals, and work with them to submit the applications necessary to access the units.

  C. Governance / Oversight

    1. The Coordinated Entry pilot system and process will be overseen by the Local Homeless Coordinating Board (LCHB). The LCHB will oversee periodic evaluations of the Coordinated Entry process, and recommend changes and improvements, as needed.

V. TARGET POPULATION

  A. Eligibility for Referral into the Coordinated Entry Pilot System

    1. The eligible population is *Homeless Adults Without Children Who Live in San Francisco*. This includes adults who usually sleep in a place not meant for human habitation (including on the street), in a shelter, or in a transitional housing program who are seeking housing. It also includes adults who usually sleep in one of the aforementioned locations who are currently staying in an institution, including jail, or the hospital for a short period of time (less than 6 months).

    2. People are not eligible, and should not be referred into the Coordinated Entry pilot system, if they are not a resident of San Francisco, have

children in their custody, or have a lease or are living permanently with friends or family.

VI. REFERRAL INTO THE COORDINATED ENTRY PILOT SYSTEM

A. Referral Form Submittal

1. Single adults who are homeless and who want to enter a housing program must fill out the "*San Francisco Continuum of Care Coordinated Entry Pilot Homeless Single Adults Referral Form*".

2. The referral form is a simple one page form that includes:
   - identifying information about the applicant
   - information to help locate the person including contact information and locations they are likely to be found
   - length of time the applicant has been homeless
   - the name, title and organization of the person who is certifying that the information on the form is accurate, including the length of time homeless.

   See appendix for a copy of the referral form.

3. Referrals can be submitted by any San Francisco service provider or advocate.

4. The referral form can be submitted in two ways:
   - On paper : fill out hard copy and then mail the completed form to the Local Homeless Coordinating Board at the San Francisco Human Services Agency (HSA), at P.O. Box 7988, San Francisco,, CA 94120, Attn: ZB25

   - Electronically at https://homebaseccc.org/sf: fill out the form and submit via computer.

5. Referred individuals (now called Applicants) are added to the CoC system-wide Coordinated Entry Pilot Priority List. This happens automatically for referrals using the e-form, and on a weekly basis for those sending the form by mail.

B. Documentation of Length of Homelessness

1. The referral form requires third party certification of the length of time homeless. Third parties can include case managers, service providers and advocates.

2. Certification of length of homelessness is established by signature on the paper referral from and by filling out the relevant fields on the e-form. **No**

additional documents with information about the length of homelessness are required with the referral form.

3. It is expected that third party certifications be based on supporting evidence in the client's file. Providers submitting referrals with fraudulent or exaggerated lengths of homelessness will have their referring privileges suspended or revoked. [See XI-C-1.]

4. Referrals submitted without a third party documentation of the length of homelessness will not be processed.

D. Veterans

1. In addition to the *"San Francisco Continuum of Care Coordinated Entry Pilot Homeless Single Adults Referral Form"*, homeless veterans should be asked to sign up for the San Francisco Homeless Veterans Registry. This registry is being used to prioritize the most vulnerable homeless veterans for placement into housing. Signing up for the registry is optional, but should be encouraged as it may help ensure an appropriate placement.

2. To be placed on the registry, veterans must:

   - Sign the 25 Cities Release of Information Form (OMB Form # 2900-0620, the Department of Veterans Affairs Request for and Authorization to Release Medical Records or Health Information)

   - Work with a case manager or other eligible worker to complete the Vulnerability Index-Service Prioritization Decision Making Assistance Tool (VI-SPDAT). The VI-SPDAT can be completed online in the HomeLinks system. For providers without a personal HomeLink account, the community account is: Web address: https://sunglow.palantircloud.com User name: user1s2p Password: Veterans1! The release of information must be given to the 25 Cities team or mailed to: ZB25 PO Box 7988 San Francisco, CA 94120.

E. Immigrants

1. Proof of citizenship or immigration status is not required in order to enter the Coordinated Entry system. While some housing does require such proof, not all units in the system have this requirement. All San Francisco homeless residents, regardless of citizenship or immigration status, are encouraged to submit referral forms.

2. Individuals who prefer communication in a language other than English, should indicate their preferred language in the appropriate space on the referral form.

VII. APPLICANT PRIORITIZATION & PRIORITIZATION LIST MANAGEMENT

A. Prioritization Process

1. Applicant prioritization for the system-wide list occurs automatically based on the individual's length of time homeless, which is provided on the referral form.

2. Prioritization is based on length of time homeless in San Francisco. For individuals who have been homeless outside of San Francisco, that time counts for half as much.

Example			
Person A	**Total Time**	**Factor**	**Counts As...**
Homeless in SF	7 years, 5 months	100%	7 years, 5 months
Homeless outside SF	6 years, 8 months	50%	3 years, 4 months
Years Counting Toward Priority: 10 years, 9 months			

3. For people whose chronic homelessness has been punctuated by stays in permanent housing, prison, jails, hospitals or other institutions, the calculation of length of time homeless for the prioritization process is as follows:

   - For stays in the aforementioned settings of more than 6 months: these time periods will be subtracted from the overall duration of homelessness.

   - For stays of 6 months or less: these time periods will not be subtracted.

B. Priority List Management

1. Housing is awarded based on the prioritization order, except for housing with specific sub-population requirements. For example, individuals who are veterans, living with HIV/AIDS or are seniors, may be housed more quickly than someone else who has been homeless longer (and is higher on the priority list) if the next bed that opens is targeted to that sub-population.

2. Members of subpopulations, including veterans, individuals living with HIV/AIDS and seniors, are eligible for both housing targeted to their subpopulation as well as housing for the general population.

3. Due to the limited supply of housing, most of those referred will not receive a placement through the Coordinated Entry process. As of January 9, 2015, the Coordinated Entry team is targeting people who have been homeless in San Francisco for 13 years or more and have a disability.

Individuals who submit referrals should be encouraged to continue to seek other housing options as well.

VIII. APPLICANT REFERRAL TO HOUSING

A. Staffing

1. The City has contracted with a local agency, Episcopal Community Services (ECS), to staff and operate the Coordinated Entry system. ECS will dedicate specific staff for this function. The function of Coordinated Entry staff is to locate eligible clients and available housing and place the clients into housing. Staff's role includes helping clients through the placement process; however, staff do not provide ongoing assistance after placement.

B. Unit Availability and Applicant Matching

1. Coordinated Entry Staff will be alerted when a unit within the system becomes available. Property managers (for prior Supportive Housing Program units) and HSA (for prior Shelter Plus Care units) report vacancies directly in the Homelink system.

2. Staff will review the priority list and identify the Applicant with highest priority (longest time homeless) for the type of unit that has become available, for example, one targeted for the general population, for veterans, for those with HIV/AIDS, or for seniors. Note: Members of these subpopulations are eligible for both units targeted to their subpopulation as well as units for the general population.

3. Within each priority group, clients are randomly prioritized. Acceptable randomization methods include:
   i. Alphabetically by first name
   ii. Alphabetically by last name

C. Contacting and Assisting the Applicant

1. Based on information from the referral form, staff will work to contact the Applicant. Staff will use all available contact information to locate the household before moving on to the next client. Clients retain their priority group status when they are unreachable. Coordinated Entry staff continue outreach efforts to unreachable clients approximately every four months. Providers and clients are encouraged to submit new referrals forms when client contact information changes.

2. Staff will assist the Applicant in filling out and submitting the housing application and supporting materials that documents their eligibility for the unit, as required by the particular agency with the opening.

3. If the Applicant does not like the placement that they are offered, they may turn down the placement. Applicants may turn down up to three placements. When an applicant declines a placement, their application is considered inactive during that month. If, during that month, the client decides they would like to accept one of the offers they previously turned down and it is still available, they may be referred to that unit.

4. If an individual loses their housing after being placed in a unit, they can fill out a new referral form, as long as they are literally homeless.

D. Appeals

5. If the applicant's placement is denied by the housing program, Coordinated Entry staff should determine if there were grounds to appeal the placement. While each property management company has different denial policies and appeals processes, Coordinated Entry staff will actively engage clients in the appeals process and encourage property management companies to work with the clients to accommodate as much as possible.

E. Confidentiality

1. No personal information collected through the referral forms will be shared with the public. All referral forms will be securely transmitted to Coordinated Entry staff. Referral forms may be reviewed only by staff of the San Francisco Human Services Agency, HomeBase and the Coordinated Entry staff, with the following exception:

   - Referral form information about individuals who served in the US Military will be shared with the Department of Veterans Affairs and the San Francisco Housing Authority if and only if the VA 25 Cities Release of Information is signed.

   See the appendix for the VA 25 Cities Release of Information.

2. Personal referral form information will only be used for the purpose of locating Applicants in the community and placing them in housing. De-identified information will be used to facilitate evaluation of the Coordinated Entry system.

3. Personal information gathered through assessments conducted by Coordinated Entry staff or in the process of assisting individuals in putting together housing applications will be governed by Coordinated Entry confidentiality policies.

IX. GRIEVANCES AND SANCTIONS

A. Client Grievances

1. When a client has a problem with the functioning of the Coordinated Entry referral process, ECS greivance policies apply.

2. Any client grievances with Coordinated Entry staff will be governed by Coordinated Entry staff grievance procedures.

B. Systems Evaluation

1. If a provider shows a pattern of refusing numerous clients, HSA staff will evaluate the Coordinated Entry system to provide information to Local Homeless Coordinating Board and stakeholders regarding timeliness of refer processing and frequency of denials. HSA will work with providers on a per situation basis with the intent of improving the Coordinated Entry system.

C. Fraudulent or Exaggerated Referral Forms

1. Any individual provider who submits a seemingly fraudulent or exaggerated referrals will first be warmed that their assessments are suspicious by H.S.A. staff. If more suspicious assessments are submitted after the warning, that individual provider will no longer be welcome to submit referrals. Further, if any group of staff, or local agency demonstrates a pattern of submitting fraudulent or exaggerated referrals, that team will no longer be welcome to submit assessments.

X. DATA COLLECTION AND EVALUATION

A. Data Collection

1. Documentation of disability is stored both in paper files at ECS and within the Homelink system, and is then given to property management (if a prior Supportive Housing Program unit) or HSA (if a prior Shelter Plus Care unit). Data with Protected Personal Information or protected health information is not shared in that network.

2. VI-SPDATs are collected previous to housing placement and stored in Homelink. These assessments are not shared publicly.

B. Evaluation

1. The Coordinated Entry process will be evaluated regularly to ensure its effectiveness and efficiency. During the pilot phase, monthly meetings

were held to gather feedback. Post-pilot, the system will be assessed annually, and evaluation will include key information such as the impact of the implementation, client feedback, and demographics about the individuals referred and housed.

2. Reports will be reviewed by the LHCB at its regular meetings. Changes and improvements will be implemented as indicated by the evaluation.

Appendices

i. San Francisco Continuum of Care Coordinated Entry Pilot Homeless Single Adults Referral Form
ii. 25 Cities VA Release of Information

ATTACHMENT: Examples of CoC Collaboration with Con Plan Jurisdiction and ESG Recipient

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City and County of San Francisco

CoC and ESG Desk Guide

A Comprehensive Reference Guide for San Francisco's Nonprofit
Agencies Funded under the Federal Continuum of Care (CoC) and
Emergency Solutions Grants (ESG) Programs

June 15, 2015
Version 2

TABLE OF CONTENTS

I. INTRODUCTION

This manual provides a comprehensive reference guide for San Francisco's nonprofit agencies funded under the federal Continuum of Care (CoC) and the Emergency Solutions Grants (ESG) programs.

Both of these federal programs administered by the US Department of Housing and Urban Development (HUD) provide funding to eligible entities to address homelessness. However the eligible persons, expenses, and activities are different between the two programs. The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) significantly amended the legislation which authorizes both programs, updating and adding new requirements for compliance. Over the past five years HUD has issued regulations, notices and guidance, which elaborate upon the legislative changes in the Act. The purpose of this Manual is to unite in one place the relevant content of these rules and guidance for nonprofit providers to be used for training and reference purposes.

Under the CoC program, the City's Human Service Agency (HSA) acts as the HUD-recognized "Collaborative Applicant," submitting an annual consolidated application of all programs on behalf of San Francisco. HSA is also the direct recipient for a majority of the projects funded through this program, and contracts with nonprofit agencies, known as "subrecipients," to carry out the contracted activities. When HSA is not the direct recipient, a nonprofit agency receives a grant directly from HUD and operates as recipient of that grant.

The ESG program is a block grant using a nationally applicable formula to allocate funds to localities for certain eligible activities to serve people experiencing homelessness. The Mayor's Office of Housing and Community Development (MOHCD) receives the funding directly from HUD. MOHCD uses a competitive application process to select local organizations to carry out programs and activities with the ESG funds.

The guidance provided in this manual is intended to support non-profit contractors receiving CoC and/or ESG funding in understanding and complying with federally imposed requirements and locally established implementation policies which the City has adopted to meet its responsibilities as a recipient of funding and as the entity managing the Continuum of Care coordinating body. Questions regarding any content of this manual should be directed to a contract manager at the appropriate City department.

A. FREQUENTLY USED TERMS

The terms below are used throughout this manual. Additional terminology used within the manual is defined in the Glossary of Terms located in Appendix A of this document.

Continuum of Care (CoC) program means the program funded by HUD under the Federal HEARTH Act to end homelessness. The CoC program consolidated three separate

programs—the Supportive Housing, Shelter Plus Care, and Single Room Occupancy grant programs—into one grant program.

Continuum of Care (CoC) governing body means the local group of stakeholders organized to carry out the policy-setting and coordinating responsibilities required under the Continuum of Care program. In San Francisco this group is known as the Local Homeless Coordinating Board (LHCB).

Emergency Solutions Grants (ESG) program means the program funded by HUD to provide emergency shelter for the homeless, essential services related to emergency shelters and street outreach for the homeless, as well as homelessness prevention and rapid re-housing assistance.

Family per HUD regulations includes, but is not limited to, a group of persons residing together, regardless of actual or perceived sexual orientation, gender identity, or marital status. A child who is temporarily away from the home because of placement in foster care is considered a member of the family. Any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such.[1]

Family With Children means a household that includes at least one parent or guardian and one child under the age of 18, a pregnant woman, an individual in the process of securing legal custody of any person who has not attained the age of 18 years, an individual with a dependent child over the age of 18 who is mentally or physically disabled, or an individual who has actual custody of, and is responsible for, the care of a child.

HEARTH Act is the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009, which amended and reauthorized the McKinney-Vento Homeless Assistance Act of 1987.

Homeless Management Information System (HMIS) is the information system designated by the Continuum of Care to comply with HUD's data collection, management, and reporting standards. It is used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

Household means an individual or family receiving assistance as a single unit.

HUD is the US Department of Housing and Urban Development.

Human Services Agency (HSA) is the unit of local government that manages the local Continuum of Care program in San Francisco.

Mayor's Office of Housing and Community Development (MOHCD) is the unit of local government that manages the local ESG program in San Francisco.

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[1] 24 CFR §5.105

NOFA refers to the annual Notice of Funding Availability issued by HUD for CoC funds.

Program component means the particular project type as defined by HUD in the grant agreement under which a project is funded. In San Francisco, CoC-funded program components are permanent housing (which includes permanent supportive housing and rapid re-housing), transitional housing or supportive services only. ESG-supported components are emergency shelter, homelessness prevention, and rapid re-housing.

Program operator refers to the agency operating a specific program or project funded by CoC or ESG funds and covered by this manual. The program operator is likely to have the responsibilities generally associated with a subrecipient under ESG, a CoC subrecipient contracted with HSA, or a direct recipient in the case of CoC programs awarded from HUD directly to a nonprofit agency.

Program participant means an individual (including an unaccompanied youth) or family who is assisted with Continuum of Care or ESG program funds.

Project refers to a set of connected eligible programmatic activities, identified in an application to HUD for Continuum of Care funds, and also identified by a single designation within HMIS. A project can include structures that are leased, payments for operating costs, or funding for rental assistance. A project may also include supportive services connected to a site secured through one of the above means, or eligible supportive services that are not associated with a specific site. In common language, and within the ESG program, a "project" is usually referred to as a "program" and in this manual the use of the term "program" to refer to a set of programmatic activities, is the same as a HUD "project."

Recipient means an entity that enters into a direct grant agreement with HUD. Under the CoC program, a recipient can be a private nonprofit organization or a unit of local government. Under the ESG program, a recipient is a governmental entity. In the past, the term "grantee" was often used to describe a recipient.

Reevaluation means the periodic review of eligibility for ESG homelessness prevention or rapid re-housing services required by HUD regulations in order to continue to provide assistance. In San Francisco, this is also sometimes referred to as recertification.

Subcontractor is an entity that has a contract with a recipient or a subrecipient to do a discrete piece of a project. (Note that an entity that has a subcontract with HSA or MOHCD with primary responsibility for a CoC or ESG-funded project is considered a subrecipient.)

Subrecipient means a private nonprofit organization, or unit of local government that receives a contract for CoC or ESG funds from a recipient to carry out a project. The term subrecipient replaces the terms "project sponsor" and "subgrantee." Although the term subrecipient is used throughout this manual, in other contexts, MOHCD may refer to ESG subrecipients as "nonprofit contractors."

B.   HOW TO USE THIS MANUAL

Use the charts below to determine which sections of the manual are relevant to your agency's programs.

The applicable rules for any specific project depend on both the source of funds (Continuum of Care funds through HSA or Emergency Solutions Grants funds through MOHCD) and the particular program component for which the funds are designated. As such, not every section of this manual is applicable to every program.

The tables below highlight key sections of the manual that are most relevant to each program component type in order to provide easy access to applicable sections for any given provider. Readers who are unsure under which component their project is funded should refer to their grant agreement and the descriptions of CoC Program Components and/or ESG Program Components, provided later in this manual.

Continuum of Care – Permanent Supportive Housing

Topic	Requirement
Eligibility	Limited to literally homeless and fleeing domestic violence. Must have a disability. Some programs limited to chronic homeless. Homeless status must be documented.
Rent	Recipients and subrecipients may charge rent in the amount of 30% of household's adjusted gross income. Projects receiving rental assistance must charge rent to participants. Specific guidelines apply for calculating and documenting income. Rent and income must be reassessed annually or at change in family composition.
Intake/ occupancy rules	Lease agreement for a minimum of one year required. Dwelling size restrictions, HQS inspection requirements and rent reasonableness requirements apply. When leasing funds are used, CoC funds used for leasing cannot exceed Fair Market Rent (FMR). HMIS intake (or record in a comparable system for DV providers) required at entry. See requirements applicable to PSH/TH, Permanent Housing, and All Programs. If the program receives funds for rental assistance, additional rules apply.
Ongoing program operations	Support services must be provided and participation may be required. Program fees are prohibited. HQS inspections must take place annually. When a unit is vacated, payment of rental assistance may continue for a maximum of 30 days from the end of the month in which the unit was vacated.
Exit	Due process required for termination. HMIS record (or record in a comparable system for DV providers) must be updated at exit.
Recordkeeping	Programs must maintain records regarding participant eligibility and income, services provided, HQS inspections and rent reasonableness, documentation of match funds, documentation of expenditures, and required agency policies.
Annual recertification	Rent/income, HQS inspection, HMIS record (or record in a comparable system for DV providers), and services plan must be updated annually.
Expense guidelines	Can include leasing, rental assistance, supportive services, operating costs, HMIS and/or administrative costs as allowed in the project grant agreement.
Match	HUD funds (other than leasing costs) must be matched by no less than a 25% cash or in-kind contribution.
Financial management	Project must comply with fiscal management guidelines including cost allocation and personnel time tracking requirements consistent with OMB Omni-circular. All expenditures must be documented.
Grant management	Recipient must provide technical submission, follow local and federal invoicing protocols, submit Annual Performance Report, submit all required close-out documentation upon completion of the grant and are subject to monitoring by HUD and/or HSA. Significant changes to the grant can only be made in consultation with HUD and HSA.
General policies	Agency must include homeless individuals on board of directors or similar policy-making body. Project must comply with fiscal management guidelines including cost allocation and personnel time tracking requirements. Project is subject to San Francisco fair chance policy; fair housing, reasonable accommodation and non-discrimination provisions; conflict of interest restrictions; confidentiality restrictions; drug free workplace requirements; and faith-based activity limitations.

Continuum of Care – Rapid Re-Housing

Topic	Requirement
Eligibility	Limited to literally homeless and fleeing domestic violence. Homeless status must be documented.
Rent	Participants must pay a minimum of 30% of adjusted income towards rent. Specific guidelines apply for calculating and documenting income. Rent and income must be reassessed annually or at change in family composition.
Duration of assistance	Short-term rental assistance may be provided for up to 3 months and medium-term may be provided for 3 to 24 months.
Intake/ occupancy rules	Lease agreement for a minimum of one month required. Dwelling size restrictions, HQS inspection requirements and rent reasonableness requirements apply. HMIS intake (or record in a comparable system for DV providers) required at entry. See requirements applicable to Permanent Housing, Rapid Re-Housing and All Programs. If the program receives funds for rental assistance, additional rules apply.
Ongoing program operations	Programs must require participants to meet with a case manager at least once per month (with exceptions for DV providers). Program fees are prohibited. HQS inspections must take place annually. Need for continued assistance must be reevaluated at least annually. Recipients and subrecipients may provide supportive services for up to 6 months after rental assistance stops.
Exit	Due process required for termination. HMIS record (or record in a comparable system for DV providers) must be updated at exit.
Recordkeeping	Programs must maintain records regarding participant eligibility and income, services provided, HQS inspections and rent reasonableness, documentation of match funds, documentation of expenditures, and required agency policies.
Annual recertification	Rent/income, HQS inspection and a services plan must be updated annually. Need for assistance must be reevaluated annually. HMIS record (or record in a comparable system for DV providers) must be updated annually.
Expense guidelines	Can include rental assistance, support services, HMIS and/or administrative costs as allowed in the project grant agreement.
Match	HUD funds must be matched by no less than a 25% cash or in-kind contribution.
Financial management	Project must comply with fiscal management guidelines including cost allocation and personnel time tracking requirements consistent with OMB Omni-Circular. All expenditures must be documented.
Grant management	Recipient must provide technical submission, follow local and federal invoicing protocols, submit Annual Performance Report, submit all required close-out documentation upon completion of the grant and are subject to monitoring by HUD and/or HSA. Significant changes to the grant can only be made in consultation with HUD and HSA.
General policies	Agency must include homeless individuals on board of directors or similar policy-making body. Project is subject to San Francisco fair chance policy; fair housing, reasonable accommodation and non-discrimination provisions; conflict of interest restrictions; confidentiality restrictions; drug free workplace requirements; and faith-based activity limitations.

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Continuum of Care – Transitional Housing

Topic	Requirement
Eligibility	Limited to literally homeless, at imminent risk of homelessness and fleeting DV. Homeless status must be documented.
Rent	Recipients and subrecipients may charge rent in the amount of 30% of adjusted participant income. Projects receiving rental assistance must charge rent to participants. Specific guidelines apply for calculating and documenting income. Rent and income must be reassessed annually or at change in family composition.
Occupancy rules	Lease agreement with a minimum term of one month is required. Residency in program limited to 24 months. Dwelling size restrictions. HQS inspection requirements and rent reasonableness requirements apply. When leasing funds are used, CoC funds used for leasing cannot exceed FMR. Recipients must take the educational needs of children into account when families are placed in transitional housing. See requirements applicable to PSH/TH and All Programs. If the program receives funds for rental assistance, additional rules apply.
Ongoing program operations	Support services must be provided and participation may be required. Program fees are prohibited. HQS inspections must take place annually. When a unit is vacated, payment of rental assistance may continue for a maximum of 30 days from the end of the month in which the unit was vacated.
Exit	Due process required for termination. HMIS record (or record in a comparable system for DV providers) must be updated at exit.
Recordkeeping	Programs must maintain records regarding participant eligibility and income, services provided, HQS inspections and rent reasonableness, documentation of match funds, documentation of expenditures, and required agency policies.
Annual recertification	Rent/income, HQS inspection, HMIS record (or record in a comparable system for DV providers), and services plan must be updated annually.
Expense guidelines	Can include leasing, rental assistance, support services, operating costs, HMIS and/or administrative costs as allowed in the project grant agreement.
Match	HUD funds (other than leasing costs) must be matched by no less than a 25% cash or in-kind contribution.
Financial management	Project must comply with fiscal management guidelines including cost allocation and personnel time tracking requirements consistent with OMB Omni-Circular. All expenditures must be documented.
Grant management	Recipient must provide technical submission, follow local and federal invoicing protocols, submit Annual Performance Report, submit all required close-out documentation upon completion of the grant and are subject to monitoring by HUD and/or HSA. Significant changes to the grant can only be made in consultation with HUD and HSA.
General policies	Agency must include homeless individuals on board of directors or similar policy-making body. Project is subject to San Francisco fair chance policy; fair housing, reasonable accommodation and non-discrimination provisions; conflict of interest restrictions; confidentiality restrictions; drug free workplace requirements; and faith-based activity limitations.

Continuum of Care – Support Services Only

Topic	Requirement
Eligibility	Limited to literally homeless, at imminent risk of homelessness and fleeing DV. Homeless status must be documented.
Ongoing program operations	Support services must be provided and participation may be required. Program fees are prohibited.
Exit	Due process required for termination. HMIS record (or record in a comparable system for DV providers) must be updated at exit.
Recordkeeping	Programs must maintain records regarding participant eligibility and income, services provided, documentation of match funds, documentation of expenditures, and required agency policies.
Annual recertification	HMIS record (or record in a comparable system for DV providers), and services plan must be updated annually.
Expense guidelines	Can include support services, HMIS and/or administrative costs as allowed in the project grant agreement.
Match	HUD funds must be matched by no less than a 25% cash or in-kind contribution.
Financial management	Project must comply with fiscal management guidelines including cost allocation and personnel time tracking requirements consistent with OMB Omni-Circular. All expenditures must be documented.
Grant management	Recipient must provide technical submission, follow local and federal invoicing protocols, submit Annual Performance Report, submit all required close-out documentation upon completion of the grant and are subject to monitoring by HUD and/or HSA. Significant changes to the grant can only be made in consultation with HUD and HSA.
General policies	Agency must include homeless individuals on board of directors or similar policy-making body. Project is subject to San Francisco fair chance policy; fair housing, reasonable accommodation and non-discrimination provisions; conflict of interest restrictions; confidentiality restrictions; drug free workplace requirements; and faith-based activity limitations.

Emergency Solutions Grant – Homelessness Prevention and Rapid Re-Housing

Topic	Requirement
Eligibility	RRH limited to literally homeless and fleeing DV. Prevention limited to fleeing DV, at imminent risk of homelessness or at risk of homelessness and must have income below 30% AMI. Homeless status and income must be documented.
Intake	Participants must be entered into HMIS (or a comparable system for DV and legal service providers).
Rent amount	ESG subrecipients may provide shallow subsidies (payment of a portion of costs), payment of 100 percent of the costs, a set dollar amount, or graduated or declining subsidies.
Housing requirements	When provided with rental assistance, participants must have a lease, units must meet rent reasonableness standards and be below FMR, and programs must enter into a rental assistance agreement with owners before making any rental assistance payments. All assisted units must meet habitability standards.
Ongoing program operations	Services limited to housing stability case management, housing search and placement, mediation, credit repair and legal services. Housing stability case management services cannot exceed 30 days during the period the program participant is seeking permanent housing. Programs must coordinate with other homeless services and mainstream resources.
Exit	A formal process is required for termination. HMIS record (or record in a comparable system for DV and legal service providers) must be updated at exit.
Recordkeeping	Programs must maintain records regarding participant eligibility and income, services provided, unit inspections and rent reasonableness determinations, documentation of match funds, documentation of expenditures, and required agency policies.
Recertification	HMIS record must be updated annually. Homelessness prevention programs must reevaluate eligibility every 3 months. RRH must reevaluate eligibility annually.
Expense guidelines	Funds may be used for rental assistance (including up to 6 months arrears), direct financial assistance related to Housing Relocation and Stabilization (rental application fees, security deposits/last month's rent, utility deposits and payments, moving costs) and services related to Housing Relocation and Stabilization, as allowed in the project grant agreement.
Match	Program requires a 100% match.
Financial management	Project must comply with fiscal management guidelines including cost allocation and personnel time tracking requirements consistent with OMB Omni-Circular. All expenditures must be documented.
General policies	Agency must include homeless individuals on board of directors or similar policy-making body. Project is subject to San Francisco fair chance policy; fair housing, reasonable accommodation and non-discrimination provisions; conflict of interest restrictions; confidentiality restrictions; drug free workplace requirements; and faith-based activity limitations.

Emergency Solutions Grant – Emergency Shelter

Topic	Requirement
Eligibility	Limited to literally homeless, at imminent risk of homelessness and fleeing DV. Homeless status must be documented, however more flexibility in documentation requirements is allowed than other programs. Shelters that serve families with minor children under the age of 18 may not refuse to serve a family based on the age of children in the household.
Intake	Participants must be entered into HMIS (or a comparable system for DV and legal service providers).
Ongoing program operations	Buildings must meet minimum habitability standards. Programs must coordinate with other homeless services and mainstream resources.
Exit	A formal process is required for termination. HMIS record (or record in a comparable system for DV and legal service providers) must be updated at exit.
Recordkeeping	Programs must maintain records regarding participant eligibility and income; services provided; documentation of match funds; documentation of expenditures; and required agency policies.
Annual recertification	HMIS record (or record in a comparable system for DV and legal service providers) must be updated annually.
Expense guidelines	Costs limited to Shelter Operations and Essential Services as allowed in the project grant agreement.
Match	Program requires a 100% match.
Financial management	Project must comply with fiscal management guidelines including cost allocation and personnel time tracking requirements consistent with OMB Omni-Circular. All expenditures must be documented.
General policies	Agency must include homeless individuals on board of directors or similar policy-making body. Project is subject to San Francisco fair chance policy; fair housing, reasonable accommodation and non-discrimination provisions; conflict of interest restrictions; confidentiality restrictions; drug free workplace requirements; and faith-based activity limitations.

C. REGULATORY LANDSCAPE

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) was enacted into law on May 20, 2009. The HEARTH Act amended and reauthorized the McKinney-Vento Homeless Assistance Act, which was originally enacted in 1987. HEARTH creates a single Continuum of Care (CoC) Funding Program that consolidates the set of programs originally created under McKinney Vento (Shelter Plus Care or S+C, Supportive Housing Program or SHP, and SRO Program). The HEARTH Act also codifies into law the Continuum of Care planning and application process and revises the old Emergency Shelter Grants Program, which is now named the Emergency Solutions Grant Program (ESG). Substantial changes to the CoC and ESG programs resulting from HEARTH Act are detailed in the next section.

While HEARTH establishes the **statutory framework** governing the CoC and ESG programs, it is the US Department of Housing and Urban Development (HUD)'s regulations and notices that provide the **regulatory framework** with which CoC and ESG funding recipients must comply. In other words, the regulations and notices are the mechanism by which the requirements of the law are clarified and enforced.

After HEARTH was enacted, HUD began the process of issuing **regulations**. This rule-making process is time-consuming and is still ongoing. Implementing regulations, also known as "rules," have been issued in multiple parts and many of them are still "interim"—meaning they are open or have been open for comment and are not yet finalized. In 2015 HUD announced they will re-issue the Interim CoC rule for additional public comment. In June 2015 HUD re-issued the Interim ESG rule for additional public comment. These regulations may change significantly when finalized.

Other important pieces of regulatory guidance have been established through **notices**. A HUD notice is considered binding unless there is a conflict with regulations. Additional clarification on HUD rules is also provided through "Frequently Asked Question" notices issued by HUD for both the CoC and ESG programs. These FAQs often provide expanded explanations beyond the language included in regulations and notices. A searchable directory of FAQs for the CoC program is available at www.hudexchange.info/coc/faqs and for the ESG program at www.hudexchange.info/esg/faqs. As the regulatory framework for CoC and ESG is still evolving, this manual can only summarize those regulations in place at the time of writing. Although the manual will be updated periodically, CoC and ESG grantees should monitor any new regulations or notices that are issued to ensure ongoing compliance.

The table below summarizes the main regulations and notices that currently apply to CoC and ESG grantees. Footnotes throughout the manual cite relevant sections of the regulations. Other implementing regulations can be found at www.hudexchange.info.

Name & Code Section	Date	Description	Status & Applicability
Regulations			
Homeless Definition Final Rule	December 5, 2011	Defines four categories of "homeless" and sets forth recordkeeping requirements for documentation of homelessness. Also establishes the definition and recordkeeping requirements for "homeless individual with a disability."	Final rule. Applies to all CoC grants, including those originally awarded under the S+C or SHP programs. This Rule is incorporated into CoC Program Interim Rule.
Continuum of Care Program Interim Rule 24 CFR 578	July 31, 2012	Establishes the regulations for the Continuum of Care Program, including requirements for the CoC planning process and regulations governing use of CoC funds. Establishes definition of chronic homelessness for CoC program.	Rule is not yet final; Interim Rule applies to all CoC grants, including those originally awarded under S+C or SHP.
Emergency Shelter Grants Program Interim Rule and Consolidated Plan Conforming Amendments 24 CFR Parts 91 and 576	December 5, 2011	Establishes the regulations for the Emergency Solutions Grants program, which replaces the Emergency Shelter Grants program.	Rule is not yet final, but Interim Rule applies to all recipients of ESG funds.
Name & Code Section	Date	Description	Status & Applicability
Notices			
Notice CPD-14-012. Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status	July 28, 2014	Provides guidance to Continuums of Care (CoCs) and recipients of CoC funding for permanent supportive housing (PSH) regarding the order in which eligible households should be served in all CoC Program-funded PSH. Also establishes recordkeeping requirements for documenting chronic homelessness.	Requirements relating to establishing systems for prioritization impact CoC Lead Agency and CoC governing body. Policies adopted by CoC must apply to all CoC-funded PSH projects in a CoC. Chronic homeless documentation requirements apply to CoC funded PSH projects.

Name & Code Section	Date	Description	Status & Applicability
Notice CPD 12-001. Notice on Limitation on Use of Funds to Serve Persons Defined as Homeless Under Other Federal Laws	January 17, 2012	Provides guidance to CoCs on the limitations imposed on serving people in "Category 3" of the homeless definition – people defined as homeless under other federal laws.	Applies to all CoC lead agencies and governing bodies, as well as all recipients of HUD CoC funding.
CoC Program Competition Notices	Annual	HUD's annual CoC competition Notice of Funding Availability (NOFA) typically includes rules and guidelines governing grants renewed or awarded in that funding cycle.	Applies to any CoC grant funded through the particular NOFA. Grantees should read the NOFA each year at the time they apply for funding to ensure they are aware of any special rules or restrictions that will apply to their grant(s) if awarded.
Notice CPD 15-02. Appropriate Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities	February 20, 2015	Provides guidance to communities and to single sex shelter programs on making shelter placement decisions and other consideration based on client identification and preference.	Applies to ESG funded single sex shelters and to coordinated entry programs.
Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity 24 CFR Part 5	February 3, 2012	Clarifies that programs cannot discriminate against a group of people presenting as a family based on the composition of the family, age, disability status, marital status, actual or perceived sexual orientation, or gender identity.	Applies to all HUD funded programs including CoC and ESG.

D. KEY CHANGES WITH HEARTH ACT

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act in a variety of ways. The chart below provides an overview of key changes about which recipients and subrecipients should be aware.[2] This chart does not encompass every change made by the HEARTH Act, but rather highlights those that are most relevant to providers.

General	
Emphasis on outcomes	Requires HUD to consider system outcomes in making funding awards.
Protecting teenage family members	Prohibits programs that serve families with children from excluding children younger than 18 based on their age or gender.
Administrative costs	Increased the allowable funding for administrative costs.
Coordinated entry	Requires communities to create a coordinated entry system covering at least all CoC and ESG funded projects.
Collaboration	Requires coordination between ESG and CoC recipients on planning and implementation.
Written standards	Requires CoC bodies and ESG recipients to establish written standards for determined eligibility for assessing, prioritizing, and re-assessing individuals and families for assistance in each program component and procedures for determining levels and duration of assistance in certain programs.
Eligibility	
Expansion of chronically homeless definition	Expanded definition of chronically homeless to include both single adults and households headed by a member who meets the definition of chronically homeless.
Expansion of definition of homelessness	Expanded definition of homeless to include individuals or families who will lose housing within 14 days and who have no subsequent resource identified and lack resources or support networks to obtain other permanent housing.
CoC	
Streamlined match requirements	For CoC program, replaces the previous complicated array of different matching requirements with a single, 25% matching requirement for all activities other than leasing.
Streamlining programs	Merged SHP, S+C, SRO Mod Rehab programs into a single CoC program.
Addition of rapid re-housing	Added rapid re-housing as an eligible program type.
No overlap in assistance types	Prohibits use of funds for rental assistance and operating costs in the same project.

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[2] National Alliance to End Homelessness, 'The HEARTH Act" by Steve Berg, Cityscape, March 2013 and presentation by Suzanne Wagner, Housing Innovations at March 16, 2009 Planning Council Regional Conference.

ESG	
Refocusing of ESG program	Renamed Emergency Shelter Grant program Emergency Solutions Grant and expanded program to include rapid re-housing.
Added definition of "at-risk of homelessness"	Added definition of "at-risk of homelessness," based on income and stability factors for homelessness prevention programs.
Addition of rapid re-housing	Added rapid re-housing as a program component.
Expanded prevention	Permits more ESG funding to be used for homelessness prevention, and expands eligibility to a larger group of persons at-risk of becoming literally homeless.
HMIS participation	Requires programs receiving ESG funding to enter data into HMIS (or a comparable system for DV providers).

II. CONTINUUM OF CARE (COC) PROGRAM

A.   OVERVIEW OF CoC PROGRAM

The Continuum of Care (CoC) is a funding source authorized by Congress under the HEARTH Act and managed by the Department of Housing and Urban Development (HUD). CoC program funds are designed to:

- promote communitywide commitment to the goal of ending homelessness;

- provide funding for efforts by nonprofit providers, states, and local governments to quickly re-house homeless individuals (including unaccompanied youth) and families, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;

- promote access to and effective utilization of mainstream programs by homeless individuals and families; and

- optimize self-sufficiency among individuals and families experiencing homelessness.[3]

In recent years, HUD has emphasized the importance of communities using CoC and ESG funds to create systems to help quickly resolve housing crises and ensure that those with the greatest needs are prioritized. Key policy priorities include: (1) a focus on system-wide performance measures such as reducing the numbers of homeless people, shortening the time people are homeless, and other key metrics; (2) requirements for coordinated entry systems that provide a common method of assessment and targeting resources across programs within a community; and (3) incentives that direct new and existing CoC funds to expand permanent supportive housing for chronically homeless people and rapid re-housing programs for families.

Under the CoC program, HUD awards funds to nonprofit organizations, states, units of local governments, and/or instrumentalities of state or local government, collectively known as *recipients*. Recipients may directly carry out the activities in the funded application, or they may contract with other organizations or government entities, known as *subrecipients*, to carry out day-to-day project operations. To receive CoC funds, recipients do not apply directly to HUD. Instead, each community must establish a process and oversight body, also known as a *Continuum of Care (CoC) body*. The CoC has a range of planning responsibilities as set forth in the CoC Interim Rule. The CoC must designate a lead agency to serve as the community's *Collaborative Applicant* for CoC funds. The Collaborative Applicant must submit a single collaborative application to HUD that includes all the funding requests from applicants to support their projects. CoC funds can be used for a variety of projects providing housing and services to homeless people. More detail regarding eligible uses of funds is provided in the CoC Expense Guidelines section below.

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[3] 24 CFR §578.1

B.   SAN FRANCISCO CoC STRUCTURE

In San Francisco, the Human Services Agency (HSA) serves as the Collaborative Applicant for CoC funding. HSA staffs the Local Homeless Coordinating Board (LHCB), which is the governing body for the San Francisco Continuum of Care. The LHCB works to ensure a unified homeless strategy that is supported by the Mayor, the Board of Supervisors, City departments, nonprofit agencies, people who are homeless or formerly homeless, and the community at large. The LHCB performs the CoC planning functions required under the CoC Interim Rule, including:

- establishing and updating a governance charter;

- evaluating the performance of projects funded by the CoC and ESG programs; and,

- developing and adopting CoC policies and procedures (including policies relating to coordinated assessment and referral, written standards for assistance, performance measurement, and HMIS system operation), and overseeing the bi-annual point-in-time homeless count.[4]

In addition to serving as the Collaborative Applicant, HSA is the recipient of many of the CoC grants, and enters into a grant agreement with HUD for each project for which it is the direct recipient. In many cases, HSA contracts with providers (subrecipients) to carry out the grant functions.

As noted above, the HEARTH Act consolidated the Supportive Housing Program (SHP) and Shelter Plus Care (S+C) program into a single funding program, now known as the Continuum of Care (CoC) program. However, in San Francisco the Shelter Plus Care (S+C) terminology continues to be utilized to identify the City-administered rental assistance program for homeless persons with disabilities and as such is used in this manual.

TIP! *The regulations governing San Francisco's S+C program are the same as those governing all other CoC-funded programs and activities.*

C.   HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

All projects funded with COC or ESG funds, except those that are specifically for survivors of domestic violence, must participate in the Homeless Management Information System (HMIS). An HMIS is a locally managed database covering all HUD-funded homeless-serving programs within the Continuum of Care geography, and often other programs as well. In San Francisco, this database uses the software Efforts to Outcomes developed by the company Social Solutions. The San Francisco HMIS is administered by HSA. Data from the HMIS is necessary to meet several federal reporting requirements, including the production of Annual Performance Reports for each program, as well as system-wide reporting such as the Annual Homeless Assessment Report (AHAR), the bi-annual Point-in-Time count, and other reports.

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[4] 24 CFR §§578.7 and 578.9

Most San Francisco providers are expected to have staff who are licensed users of the database collect the required information from participants at specified times and enter the information directly into the database. Some providers have been given permission to use a different approved database and periodically upload specific required information from their own data systems into the HMIS.

Domestic violence providers are exempted and prohibited from entering data into HMIS, and must maintain a comparable database that collects similar information in order to provide aggregate data to HSA for reporting purposes.

Also, some legal service providers may determine that entering client data into HMIS violates the attorney/client privilege of their clients. These providers may decide to use a comparable database to maintain records and maintain attorney/client privilege.

D. OVERVIEW OF ELIGIBLE COSTS[5]

The CoC Interim Rule provides detailed descriptions of allowable costs under the CoC program. Eligible project costs can include:

- *Acquisition, rehabilitation and new construction* – the costs of acquiring and rehabilitating existing property to provide housing or services for homeless people, or developing new housing units for homeless people

- *Leasing* – the costs of leasing a structure or structures to provide housing or services to homeless people

- *Rental assistance* – the costs of providing a rent subsidy directly to a landlord on behalf of a program participant

- *Supportive services* – eligible costs of supportive services that address the needs of program participants

- *Operating costs* – costs related to the day-to-day operation of housing in a single structure or in individual housing units

- *HMIS* – the costs of contributing data to the HMIS designated by the CoC

- *Administrative costs* – costs related to the overall administration of the grant such as management, coordination, monitoring, and evaluation activities

- *Planning costs* – costs relating to the planning and execution of CoC activities by the Collaborative Applicant

- *Relocation costs* – costs of relocating housing residents in certain circumstances as required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

- *Indirect costs* – in accordance with Omni-Circular (2 CFR §200)

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[5] 24 CFR §§578.43 though 578.63

Specific project selection criteria and funding priorities are determined by the Local Homeless Coordinating Board (LHCB) within parameters determined by HUD in the CoC Interim Rule and annual Notice of Funding Availability (NOFA) for CoC funds. For instance, the LHCB does not currently accept new project applications for acquisition, rehabilitation or new construction. These priorities may change in the future as determined by the LHCB.

For additional information regarding allowable costs, see the Description of Program Components and Expense Guidelines sections of this manual.

E. DESCRIPTION OF PROGRAM COMPONENTS[6]

In the CoC program, eligible program types are referred to as "program components." There are five program components defined in the CoC Interim Rule. However, there are only three components under which San Francisco agencies can receive funding: (1) Permanent Housing (PH), which includes both Permanent Supportive Housing (PSH) and Rapid Re-housing (RRH); Transitional Housing (TH); and Supportive Services Only (SSO). In addition to these three program components, HUD permits funding for HMIS as a program component. In San Francisco, these funds go directly to HSA as the CoC's HMIS lead. Homelessness Prevention is the fifth program component, but is only permitted for certain very high-performing communities. San Francisco is not eligible to receive CoC funds for this purpose.[7]

1. Permanent Housing (PH)

Permanent Housing (PH) is defined as community-based housing without a designated length of stay, in which formerly homeless individuals and families live as independently as possible. The CoC program may fund two types of permanent housing: Permanent Supportive Housing (PSH) and Rapid Re-housing (RRH).

a) Permanent Supportive Housing (PSH)

Permanent Supportive Housing (PSH) is housing with an indefinite length of stay paired with services to help homeless people with disabilities achieve housing stability. PSH can only be used to house individuals with disabilities and families in which one adult or child has a disability. Supportive services designed to meet the needs of the program participants must be made available to the program participants, though HUD discourages programs from requiring service participation as a condition of tenancy and encourages adoption of "Housing First" policies. Some PSH programs are exclusively for persons who meet the definition of chronic homelessness.

In San Francisco, PSH programs secure units either through leasing or rental assistance. When leasing funds are used, the program leases a property, or portions of a property, not

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[6] 24 CFR §578.37
[7] Only communities that can demonstrate there are no literally homeless people are eligible to use CoC funds for prevention.

owned by the recipient/subrecipient. The program in turn has an occupancy agreement or sublease with the program participant. Leasing funds are used to make lease payments to the property owner. The sublease between the program and the program participant may require an occupancy payment, which is considered program income. Programs are not required to impose occupancy payments (resident rent payments), but if they do, the rent must be calculated in accordance with HUD requirements (see Rent Calculation).

Rental assistance may be tenant-based, project-based or sponsor-based. In *tenant-based rental assistance (TRA)*, program participants are responsible for locating housing in the private rental market. If a program participant later moves to another unit, s/he can take the rental assistance and use it in the new unit. In *project-based rental assistance (PRA)*, program participants must reside in housing provided through a contract with the owner of existing specific structure(s) whereby the owner agrees to rent subsidized units to program participants. Program participants do not retain the rental assistance if they relocate to a unit outside the project; the subsidy remains with the project. In *sponsor-based rental assistance (SRA)*, program participants must reside in housing owned or leased by a sponsor organization and arranged through a contract between the recipient and the sponsor organization (subrecipient). A sponsor may be a private, nonprofit organization, or a community mental health agency established as a public nonprofit organization.[8]

The program operator must sign occupancy agreements (which may also be referred to as rental agreements, leases or subleases) with all program participants. Program participants must enter into an occupancy agreement for a term of at least one year, which is terminable for cause. The occupancy agreement must be automatically renewable upon expiration for a minimum term of one month.

Under the PH components, grant funds may be used for any eligible activity (rental assistance, leasing, operations, services, HMIS and/or administration). However, annually the CoC NOFA may impose some additional restrictions on how grant funds may be spent. For example, in some years HUD has limited the amount of the total grant that can be used for services.

San Francisco currently has a number of PSH grants, including all the S+C grants plus many grants funded under the old SHP program.

b) **Rapid Re-housing (RRH)**

Rapid Re-housing (RRH) is a program model that emphasizes housing search and relocation services and short- and medium-term rental assistance to move homeless people as rapidly as possible into permanent housing. Funds may be used to provide supportive services and up to 24 months of rental assistance as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing.

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[8] HUD CoC FAQ #1528, 1530, 1531 (7/8/14)

Grant funds may only be used for rental assistance and supportive services. The program must follow the CoC's policies about who is eligible to receive RRH assistance and the program must establish written standards describing the maximum amount and duration of rental assistance. Other key features include:

- The program may provide supportive services for up to six months after rental assistance ends

- The program must reevaluate participants at least annually to ensure they still need RRH assistance

- Participants must meet with a case manager at least once per month

2. Transitional Housing (TH)

The *Transitional Housing (TH)* project component may be used to cover the costs of up to 24 months of housing with accompanying supportive services, providing a period of stability to enable homeless people to transition successfully to and maintain permanent housing. TH programs may provide up to six months of supportive services to program participants after they leave the housing portion of the program.

Grant funds may be used for leasing, rental assistance, operating costs, and/or supportive services. Eligible uses of grant funds for any particular project are specified in the grant agreement.

TH program operators must sign occupancy agreements with all program participants residing in housing, including TH. When CoC leasing funds are used to pay rent on units, there must be a lease between the program operator and the property owner, with a sublease or occupancy agreement with the program participant. Program operators may not use CoC funds to lease units they own.

3. Supportive Services Only (SSO)

The *Supportive Services Only (SSO)* program component is limited to recipients and subrecipients providing services to individuals and families not residing in housing operated by the recipient. SSO program operators may use the funds to conduct outreach to sheltered and unsheltered homeless persons, link clients with housing or other necessary services, and provide ongoing support. SSO projects may be offered in a structure(s) at one central site, or in multiple buildings at scattered sites where services are delivered. Projects may also be operated independent of a building (e.g., street outreach) and in a variety of community-based settings, including in homeless programs operated by other agencies. The only eligible cost for SSO grants is supportive services.

F.   <u>COORDINATED ASSESSMENT AND REFERRAL PROCESS</u>

HUD regulations require that each local CoC governing body establish a coordinated assessment and referral process that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services.[9] HUD further specifies that for permanent supportive housing specifically, communities must ensure that the homeless individuals and families with the longest histories of homelessness and most severe service needs are prioritized for PSH.[10]

HUD Notice CPD-14-012 provides a detailed description of considerations for prioritization and how to balance these.

San Francisco has established a centralized assessment and referral process for all CoC-funded PSH for single individuals, including those previously funded under the SHP and Shelter Plus Care programs. It has also established a registry for homeless Veterans connected to a number of Veteran-serving programs. Homeless Veterans should complete the Continuum of Care referral. In addition, a vulnerability registry is available for veterans. If a veteran prefers to complete the vulnerability registry referral, that is welcome. Many providers report, however, that it is simpler to complete the Continuum of Care referral for both veterans and non-veterans.

1.   San Francisco CoC Coordinated Assessment Pilot – Homeless Single Adults

For single adults seeking PSH, the referral process begins with the submission of a single page referral form. Applicants must either submit a completed paper form by mail or an online application to https://homebaseccc.org/sf/form.cfm. The referral includes:

- identifying information about the applicant;

- information to help locate the person including contact information and locations they are likely to be found: and,

- the name, title and organization of a person who is certifying that the information on the form is accurate, including the length of time that the person being referred has been homeless.

Any providers submitting an application that is found to be fraudulent will have their referring privileges suspended or revoked.

Priority for available housing is established based on length of time spent homeless, with every year a person has been homeless in San Francisco counting as 100 percent and every year that a person has been homeless outside of San Francisco counting as 50 percent.

For more information, please visit: https://sfgov.org/lhcb/coordinated-assesment/meeting/2015-january-12-supporting-documents.

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[9] 24 CFR §578.7(a)(8)
[10] HUD Notice CPD-14-012

Example			
Person A:	**Total time**	**Factor**	**Counts as...**
Homeless in SF	7 years, 5 months	100%	7 years, 5 months
Homeless outside SF	6 years, 8 months	50%	3 years, 4 months
	Years counting toward priority for PSH		10 years, 9 months

For units with specific subpopulation requirements, such as units designated for Veterans or for persons living with HIV/AIDS, persons with the longest time homeless may be skipped in order to reach the most highly prioritized person who also meets the subpopulation requirement.

The City has contracted with a local agency, Episcopal Community Services, to operate the coordinated entry program. When there is an appropriate opening, designated staff of Episcopal Community Services (ECS) attempt to locate the next eligible person(s) in the priority order. When an eligible applicant is located, the ECS team works with the applicant to get all necessary documentation to demonstrate eligibility and to move into the unit.

2.   San Francisco Homeless Veterans Registry

San Francisco is currently using the San Francisco Homeless Veterans Registry to prioritize the most vulnerable homeless veterans for placement in permanent supportive housing and conduct housing placement outreach. Completion of this referral is optional. Veterans referred to the Continuum of Care Coordinated Assessment will be considered for a variety of housing options.

To place a Veteran on the registry, the Veteran must:

- sign the 25 Cities Release of Information Form (Department of Veterans Affairs Request for Authorization to Release Medical Records or Health Information); and

- work with a case manager or other eligible worker to complete the Vulnerability Index-Service Prioritization Decision Making Assistance Tool (VI-SPDAT).

The VI-SPDAT can be completed online in the HomeLinks system. For providers without a personal HomeLink account, the community account is:

Web address: https://sunglow.palantircloud.com
User name: user1s2p
Password: Veterans1!

The release of information must be given to the 25 Cities team or mailed to:

ZB25
PO Box 7988
San Francisco, CA 94120

G. PARTICIPANT ELIGIBILITY GUIDELINES

1. Homeless Status[11]

The CoC program is intended specifically to serve people who are experiencing homelessness. Verifying homeless status is a core provider responsibility.

> **TIP!** *CoC funded programs should also be aware that each year the CoC NOFA may further restrict or define who may be served in which program components. For example, for several years new PSH projects have been required to serve only chronically homeless people, and in 2014 must target those chronically homeless people with the greatest service needs. Program operators should be familiar with both the regulations regarding the applicable homeless definition and with any specific requirements imposed by the NOFA under which their grant is operating. These requirements may change as grants are renewed, so program operators should carefully read NOFA requirements each year when they submit their renewal applications to be in compliance with participant eligibility requirements.*

In San Francisco, many providers are now receiving referrals through the coordinated assessment process and are therefore not the primary agency responsible for determining and documenting eligibility. Additional information about San Francisco's coordinated assessment protocols are included above. Program operators, however, are still responsible for checking any eligibility documentation provided by the coordinated assessment agency to ensure all HUD requirements are satisfied. Providers must therefore understand the eligibility criteria for their program and verify that all required documentation is in place upon intake.

Documentation Requirements

There must be a completed Certification of Homeless Status form for each client, with an attached third-party verification document. In situations where it is not possible to obtain third-party verification of homelessness or chronic homelessness, staff may assist the client to complete the Self-Declaration of Homeless Status form. This should be used only when all other means to obtain verification have failed. HUD also specifies certain limitations on using self-report to document chronic homeless status.[12]

HUD specifies requirements related to how homeless status is documented. Details regarding the requirements for documentation of eligibility are included in Appendix B.

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[11] 24 CFR §578.3, §91.5; HUD Notice: CPD-14-012, Sections V(B) & (C)
[12] HUD Notice CPD-012, July 28, 2014.

2. Categories of Homeless Status[13]

The homeless definition defines four categories of homeless status. Three of these, "literally homeless," "imminent risk of homeless," and "fleeing/attempting to flee domestic violence" are applicable in San Francisco. One category of homeless status, "Unaccompanied youth and families with children who are defined as homeless under other federal statutes" does not apply in San Francisco. This category applies only if the CoC applies to its appropriate HUD Field Office to serve such populations and HUD approves the request. In addition, a separate definition exists to characterize those who are considered "chronically homeless."

a) Literally homeless (also known as "Category 1")

Literally homeless is defined as an individual or family who lacks a fixed, regular, and adequate nighttime residence. This includes households with a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation (such as a car, park, abandoned building, bus or train station) or who are living in a supervised, publicly or privately operated shelter designed to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs). An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution also qualifies.

b) Imminent risk of homeless (also known as "Category 2")

Imminent risk of homeless is defined as an individual or family who will imminently lose their primary nighttime residence. Qualifying under this criteria requires that the household's primary nighttime residence will be lost within 14 days of the date of application for homeless assistance, no subsequent residence has been identified, and the individual or family lacks the resources or support networks (e.g. family, friends, faith-based or other social networks) needed to obtain other permanent housing.

c) Fleeing/attempting to flee domestic violence (also known as "Category 4")

Category 4 is defined as *fleeing, or attempting to flee, domestic violence*, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence. The household must also have no other residence and lack the resources or support networks (e.g. family, friends, faith-based or other social networks) to obtain other permanent housing.

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[13] 24 CFR §91.5

d) Chronically homeless

Chronically homeless is defined as an individual or a family with a head of household who:

- is homeless and lives in a place not meant for human habitation, a safe haven, or an emergency shelter; and

- has been homeless and living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter continuously for at least one year or on at least four separate occasions in the last three years; and

- can be diagnosed with one or more of the following conditions—substance abuse disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

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 who met all of the criteria for chronic homelessness before entering that facility also qualifies. In addition, a family whose composition has fluctuated while the head of household has been homeless also qualifies as long as the head of household meets the definition of chronic homelessness.

In order to provide the maximum extent of flexibility to communities, HUD has not required that a single occasion of homelessness must total a certain number of days. HUD considers an occasion to be any period of homelessness where the household resided in a place not meant for human habitation, an emergency shelter, or a safe haven, where that period was demarcated by a break of at least 7 or more consecutive nights not residing in a place not meant for human habitation, in shelter, or in a safe haven.

Chronic Homeless Status for Veterans

Please note that people who served in the US military are considered to be chronically homeless if they were chronically homeless during their current period of VA care, even if they have now entered a transitional housing or residential treatment program.

HUD recognizes the chronic status of veterans who were identified as chronically homeless by the VA at initial intake and are still in that episode of care with the VA for all PSH programs, not limited to HUD-Veterans Affairs Supportive Housing (HUD-VASH). HUD recognizes that the way the VA serves its homeless veterans is to conduct an initial verification of status but that the subsequent services are all considered part of a single service package, even when services are provided by different providers and in different programs, referred to as an episode of care. Thus, HUD allows a veteran to maintain his/her chronic status for the purpose of those in VA's homeless response system. If a veteran was identified as chronically homeless through the VA's initial intake and continues to be served

under a single episode of care, HUD would recognize that veteran's chronically homeless status for eligibility into its HUD permanent housing programs.[14]

This definition of chronic homelessness is not final. In 2015 or thereafter, HUD is expected to issue a final definition that further defines what constitutes an "occasion" of homelessness for the purpose of documenting four occasions in the last three years.

When does homeless status end?

In general, when individuals and families gain permanent housing they are no longer considered homeless. Persons in HUD-funded transitional housing continue to meet the definition of literal homelessness but do not quality as chronically homeless under the current definition and are therefore not eligible to enter any PSH project or program that is restricted to serving chronically homeless people.

Veterans residing in VA-funded transitional housing, including the VA Grant and Per Diem program (GPD), do maintain their homeless and/or chronic homeless status for the purpose of determining eligibility for RRH or PSH.[15] Note that this differs from non-veterans living in transitional housing, who are not considered chronically homeless, regardless of their status upon entry into transitional housing.

Program participants who receive rapid re-housing assistance, including CoC- and ESG-funded rapid re-housing participants as well as those in the Supportive Services for Veterans Families (SSVF) program or Veterans Homelessness Prevention Demonstration Project (VHPD), maintain their homeless status, including chronic homelessness if applicable at entry, for the purpose of eligibility for PSH programs funded through the CoC program or HUD-VASH, provided that they meet other eligibility requirements for those programs. Program participants maintain their homeless status during the time period in which they are receiving the rapid re-housing assistance.

In addition, program participants receiving rapid re-housing assistance from HUD or VA who met the definition of chronically homeless upon entry into the project may also maintain their status as chronically homeless during the period in which they are receiving rapid re-housing assistance. Therefore, these individuals and families remain eligible for PSH units that have been dedicated to serve chronically homeless people.

Overview of homeless categories

The chart below describes which categories of homeless status qualify for each program type funded in San Francisco. Note that additional eligibility requirements are often imposed by HUD with the release of the annual NOFA and so providers should confirm whether any further eligibility restrictions apply to their project.

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[14] HUD FAQ #1837, February, 2015.
[15] HUD Memo, "Guidance for Determining Eligibility for Permanent Supportive Housing for Persons Participating in Certain Department of Veteran's Affairs Programs." June 25, 2013.

Supportive Services Only (SSO)	Individuals and families defined as Homeless under the following categories are eligible for assistance in SSO projects: • Literally Homeless • Imminent Risk of Homeless • Fleeing/Attempting to Flee Domestic Violence
Transitional Housing (TH)	Individuals and families defined as Homeless under the following categories are eligible for assistance in TH projects: • Literally Homeless • Imminent Risk of Homeless • Fleeing/Attempting to Flee Domestic Violence
Permanent Supportive Housing (PSH)	Individuals and families defined as Homeless under the following categories are eligible for assistance in PSH projects: • Literally Homeless • Fleeing/Attempting to Flee Domestic Violence PSH projects have the following additional limitations on eligibility for those classified as Literally Homeless: • Individuals and families coming from TH must have originally come from the streets or emergency shelter • Individuals and families must also have an individual family member with a disability Note that participants who receive rapid re-housing assistance maintain their homeless status for the purpose of eligibility for PSH programs. Those who were Chronically Homeless upon entry into RRH maintain their chronic homelessness status.[16] Projects that are dedicated to chronically homeless must continue to serve chronically homeless persons **exclusively.**
Rapid Re-housing (RRH)	Individuals defined as Homeless under the following categories are eligible for assistance in RRH projects: • Literally Homeless • Fleeing/Attempting to Flee Domestic Violence (where the individual or family also meets the criteria for literally homeless)

3.   Disability Status[17]

All permanent supportive housing (PSH) projects that receive CoC funding are limited to serving individuals or families in which the heads of household meet the HUD definition of disability. A person meets the definition if he or she has a disability that:

- is expected to be long-continuing or of indefinite duration;

- substantially impedes the individual's ability to live independently;

- could be improved by the provision of more suitable housing conditions; and

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[16] ESG FAQ #529 and 530 (11/19/13)
[17] 24 CFR §582.5, §582.301(c) (developmental disability is defined at 24 CFR §578.3)

- is a physical, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury.

A person is also considered to have a disability if he or she has a severe and chronic developmental disability that manifests before the age of 22 and results in substantial limitations in areas of major life activity, or has HIV/AIDS. The term *person with disabilities* includes two or more persons with disabilities living together, as well as one or more such persons living with another person who is determined to be important to their care or well-being.

> *A complete description of the definition of a qualifying disability as well as verification requirements is included in Appendix B.*

4. Other Eligibility Criteria

a) Immigration status

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 ("Welfare Reform") provides that undocumented immigrants may not receive public benefits. However, CoC-funded transitional housing (TH) projects are exempted from this requirement because they provide short-term shelter or housing assistance, non-cash services at the community level, and are not means-tested.

For permanent housing (PH) projects, grantees that are governments are required to comply with the law restricting access to undocumented immigrants. Direct Grantees that are nonprofit charitable organizations are not required to, but may verify an applicant's citizenship or immigration status before providing assistance. If it is its policy to ask about citizenship or immigration status, this policy must be applied uniformly (i.e., if the CoC subrecipient asks one potential program participant, it must ask all – and may not knowingly provide CoC assistance to an undocumented person, unless it is necessary for protection of life and safety). S+C project sponsors who are subrecipients of HSA should consult with the Shelter + Care Program Manager at HSA for additional clarification if they have questions about this issue.

HUD has not provided specific guidance regarding how these rules apply to projects funded under the Support Services Only category. It is recommended however that providers follow the guidance described above for permanent housing projects.

b) Veteran status

There are no HUD CoC program components that require a recipient or subrecipient to specifically serve veterans and therefore the CoC program has no specific regulations governing verification of veteran status. Many programs for homeless veterans receive funding from the Veterans Administration (VA). These include VASH, SSVF and the Grant and Per Diem (GPD) program. Requirements for documentation of veteran status are set forth in the regulations governing these programs. Any program operator receiving funding

to serve homeless veterans should ensure they are complying with the documentation requirements imposed by their specific funding sources.

c) Restricting projects to special sub-populations[18]

CoC projects may exclusively serve a particular homeless subpopulation if the housing addresses a need identified by the Continuum of Care for the geographic area. The following general conditions apply to any project that limits admission to a specific subpopulation.

- The housing may be limited to a specific subpopulation, so long as admission does not discriminate against any protected class under federal nondiscrimination laws (e.g., the housing may be limited to homeless veterans, victims of domestic violence and their children, or chronically homeless persons and families).

- If the housing is assisted with funds under a federal program that is limited by federal statute or Executive Order to a specific subpopulation, the housing may be limited to that subpopulation (e.g., housing also assisted with funding from the Housing Opportunities for Persons with AIDS program may be limited to persons with AIDS or related diseases).

- Recipients may limit admission to, or provide a preference for, the housing to subpopulations of homeless persons and families who need the specialized supportive services that are provided in the housing (e.g., substance abuse addiction treatment, domestic violence services, or a high-intensity package designed to meet the needs of hard-to-reach homeless persons). While the housing may offer services for a particular type of disability, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

HUD has also set forth the following conditions relating to projects wishing to specifically target or exclude certain groups of people:

- *Serving people of only one gender* – The housing may be limited to one sex where such housing consists of a single structure with shared bedrooms or bathing facilities such that the considerations of personal privacy and the physical limitations of the configuration of the housing make it appropriate for the housing to be limited to one sex;

- *Serving households with children* –The housing may be limited to families with children;

- *Excluding registered sex offenders and people with violence criminal histories* –If the housing has in residence at least one family with a child under the age of 18, the housing may exclude registered sex offenders and persons with a criminal record that includes a violent crime from the project so long as the child resides in the housing.

- *Excluding people who are not clean and sober* –Sober housing may exclude persons who refuse to sign an occupancy agreement or lease that prohibits program

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[18] 24 CFR §578.93(b)

participants from possessing, using, or being under the influence of illegal substances and/or alcohol on the premises.

5. Income Verification

Although income is not a factor in determining eligibility for CoC programs, income at program entry must be calculated by all CoC programs because this is a required HMIS data element and must be entered into HMIS (or a comparable system for exempted DV providers). Programs that charge rent also collect income information in order to calculate the tenant's rental portion. The gross annual income is the amount that should be entered into HMIS. Additional information about how to calculate and verify income is included in the Rent Determination section below.

6. HMIS Intake

All projects funded with CoC or ESG funds, except those that are specifically for survivors of domestic violence, must participate in the Homeless Management Information System (HMIS.) Domestic violence providers are exempted and prohibited from entering data into HMIS, and must maintain a comparable database that collects similar information in order to provide aggregate data to HSA for reporting purposes.

All new project entries must be recorded in HMIS, ensuring that the date of entry corresponds correctly to the date that the participant was found to be eligible and admitted to the program in question.

Steps:

(1) Ensure there is a completed a Release of Information (ROI) for all adult members of the household before proceeding.

(2) Search for the client in HMIS.

(3) If the client has an HMIS record already, update the information that has changed based on the HMIS intake form and enter the client into the program.

(4) If the client does not have an HMIS record, create a new record for the client, including all information on the HMIS intake form, and enter the client into the appropriate program.

(5) If the client household consists of more than one person, be sure to join the members together through the creation of a household. For each member of the household, make sure to check first to see if there is already an HMIS record for that person before creating a new one.

For more information on how to do program entries in HMIS, see the training materials provided by HSA.

H. HOUSING AND UNIT REQUIREMENTS

In order to house persons who are homeless in CoC-funded housing, certain requirements apply. Some of these requirements are about the relationship between the program operator, the building owner, and the program participant, including lease requirements and rent amounts. Others apply to the conditions of the physical building. This section provides information about housing-related requirements.

1. All Programs

a) Geographic restrictions[19]

When necessary to facilitate the coordination of supportive services for scattered site rental assistance programs, the recipient or program operator administering tenant-based rental assistance may require program participants to live in a specific area for their entire period of participation, or in a specific structure for the first year and in a specific area for the remainder of their period of participation. Program participants who are receiving rental assistance in transitional housing may be required to live in a specific structure for their entire period of participation in transitional housing.

b) Dwelling size[20]

Each dwelling unit must have at least one bedroom or living/sleeping room for each two persons. Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room.

HUD regulations require that a program operator must include any approved live-in aide when determining the family unit size. A live-in aide is someone who is needed to provide assistance to a qualified individual with a disability.

> **TIP!** *For additional information regarding live-in aides see the Live-In Aide section included in the description of reasonable accommodations.*

c) Inspection requirements – Housing Quality Standards[21]

All housing leased with CoC program funds, or where rental assistance payments are made with CoC program funds, must meet applicable *Housing Quality Standards (HQS)*. HQS provides specific standards that must be met in 13 categories:

- Sanitary facilities
- Food preparation and refuse disposal

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[19] 24 CFR §578.51(c), CoC FAQ 1528 (7/18/14)
[20] 24 CFR §578.75(c)(1)
[21] 24 CFR §578.75(b)

- Space and security

- Thermal environment

- Illumination and electricity

- Structure and materials

- Interior air quality

- Water supply

- Lead-based paint

- Access

- Site and neighborhood

- Sanitary condition

- Smoke detectors

Program operators must ensure that all units are inspected before initial occupancy and at least annually during the grant period to ensure that the units continue to meet HQS.

> *For more information about HQS, see the Housing Choice Voucher Program*
> *Guidebook, Chapter 10.*

Assistance may not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the program operator verifies that all deficiencies have been corrected.

Lead-based paint standards

HQS sets standards to address potential lead-based paint hazards in HUD-assisted housing. The standards apply to any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless any child who is less than six years of age resides or is expected to reside in such housing) or any 0-bedroom dwelling or SRO unit. Properties that have been inspected according to HUD regulations and certified as having no lead paint and properties in which all lead-based paint was identified and removed according to HUD standards are also exempt.[22]

All housing projects are required to provide an EPA-approved lead hazard information pamphlet entitled *Protect Your Family From Lead in Your Home* or its equivalent to prospective residents.[23]

If the project is classified as tenant-based rental assistance and the dwelling unit will be occupied by a child less than six years of age, the HQS inspector must conduct a visual inspection in order to identify any deteriorated paint, the property owner must stabilize any

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[22] 24 CFR §35.115
[23] 24 CFR Part 35 Subpart A

deteriorated paint, and the unit must be cleared for occupancy by a trained or certified inspector. Ongoing lead-based paint maintenance activities must be incorporated into regular building operations. Further actions are required if a child less than six is identified as having an environmental intervention blood lead level.[24]

For project-based or sponsor-based rental assistance, if a project receives an average of $5,000 or less per unit per year, as with TRA, recipients or subrecipients must take steps to identify and stabilize deteriorated paint, obtain clearance, and incorporate ongoing lead-based paint maintenance activities. If the rental assistance is greater than $5,000 per unit per year, the recipient or subrecipient must do a more comprehensive risk assessment and conduct internal controls.[25] As with TRA, clearance must be obtained and ongoing lead-based paint maintenance activities must be incorporated into regular building operations. These rules apply to all units in target housing, not just units which a child less than six is about to occupy.[26]

For properties using CoC funds for leasing, services, or operating costs, program operators must take steps to identify and stabilize deteriorated paint, obtain clearance and incorporate ongoing lead-based paint maintenance activities. The program should work with HSA to determine whether the cost of evaluation and hazard reduction is to be borne by the owner, the program or a combination of the owner and the program, based on program requirements and local program design.[27]

In all cases, if inspection, testing, stabilization, or remediation is required, it must be done in accordance with detailed standards beyond the scope of this manual which can be found in 24 CFR Part 35, Subparts B and R.

TIP! *In order to be qualified to conduct a visual inspection, staff can complete an online training available at www.hud.gov/offices/lead/training/visualassessment/h00101.htm*

d) **Rent reasonableness**[28]

Rent reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged for similar units in the private market. These rents also must not be more than rents being charged by the same owner during the same time period for comparable units not assisted with federal funds.

To make this determination, the recipient or subrecipients should consider:

- the location, quality, size, type, and age of the unit; and

- any amenities, housing services, maintenance and utilities to be provided by the owner.

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[24] 24 CFR Part 35 subpart M referenced in 24 CFR 982.401(j) referenced in 24 CFR §578.75(b)
[25] 24 CFR §35.86
[26] 24 CFR 35 subpart H referenced in 24 CFR §578.75(b)
[27] 24 CFR 35 subpart K referenced in 24 CFR §578.75(b)
[28] 24 CFR §578.51(g)

Comparable rents can be checked by using a market study, by reviewing comparable units advertised for rent, or with a note from the property owner verifying the rents paid in other similar units. The most common approach is researching and documenting comparable rents. In this example, a program participant's case file might include the unit's rent and description, a printout of three comparable units' rents, and evidence that these comparison units shared the same features (location, size, amenities, quality, etc.).

To calculate the gross rent for purposes of determining whether it meets the rent reasonableness standard, programs should consider the entire housing cost: rent plus the cost of any utilities that are the responsibility of the tenant. For additional details on calculating gross rent see the Calculating Participant Rent below.

Recipients or subrecipients must establish written policies and procedures for documenting comparable rents and ensure that these procedures are followed. At a minimum, a rent-reasonableness policy should include a methodology for documenting comparable rents, case file checklists and forms, standards for certifying comparable rents as reasonable, staffing assignments, and strategies for addressing special circumstances.

> **TIP!** *A sample "Rent Reasonableness Checklist and Certification" form is available at www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc*

e) Fair Market Rent (FMR)

Other HUD programs sometimes use a standard known as Fair Market Rents (FMR). This is a rent amount based on unit size and geographic location determined by HUD annually.

> **TIP!** *FMRs for each fiscal year can be found by visiting HUD's website at www.huduser.org/portal/datasets/fmr.html and clicking on the current "Individual Area Final FY20XX FMR Documentation" link.*

In the event that a program determines that reasonable rent for a unit it hopes to include within its program is higher than Fair Market Rent, data supporting this determination should be retained and kept on file. Note that, unlike in many other HUD programs, a CoC-funded program may use **rental assistance** funds for a unit above the FMR as long as it meets the rent-reasonableness standard described above.[29] The total grant amount may, however, be based on the applicable FMR and should be kept in mind to ensure that the available funds are adequate to serve the number of participants outlined in the grant agreement.

The amount of CoC program funds used for **leasing** an individual unit may not exceed the current FMR for that unit's size and location. If the gross rent for the unit is reasonable but exceeds the FMR, CoC program recipients and subrecipients may use CoC program leasing funds for a portion of the rent, not to exceed the FMR, if another resource is available to pay the difference.[30] Note, however, that if the gross rent for the unit exceeds the rent

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[29] HUD CoC FAQ #1538 (7/18/14)
[30] 24 CFR §578.49(b)(2)

reasonableness standard, CoC program recipients or subrecipients are prohibited from using CoC program funds for any portion of the rent.

Example 1

A case manager is looking to house a mother and son in a rapid re-housing program, and has identified a 2-bedroom unit at a rent of $1,600 per month, not including utilities (the tenant's responsibility). The utility allowance established by the SFHA is $150. Therefore, the gross rent is $1,750. A check of three similar units in the neighborhood through Craigslist reveals that the average rent for the three comparable units (without utilities) is $1,800 for a gross comparable rent of $1,950. The program may use rental assistance funds to subsidize the unit for the family.

Example 2

A case manager is looking to house a mother with two small children in a rapid re-housing program, and has identified a 2-bedroom unit at a rent of $2,000 per month, not including utilities (the tenant's responsibility). The utility allowance established by the SFHA is $150. Therefore, the gross rent is $2,150. A check of three similar units in the neighborhood through Craigslist reveals that the average rent for the three comparable units in this neighborhood (without utilities) is $1,800, for a gross comparable rent of $1,950. The program may not use rental assistance funds to subsidize the unit for the family as the gross rent for the unit exceeds the rent-reasonableness standard.

Example 3

A permanent supportive housing program is looking to lease a 3-bedroom unit for a family. The program finds a housing unit for $2,400, including all utilities. A check of three similar units in the neighborhood through Craigslist reveals that the average rent for the three comparable units is $2,500. The FMR for 3-bedroom units, however, is only $2,200. Since CoC program leasing funds may only provide assistance up to the FMR, the recipient would either need to identify additional resources to make up the difference between the gross rent and the FMR (i.e., $2,400 - $2,200 = $200) or the another unit would need to be identified.

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2. Permanent Supportive Housing and Transitional Housing

a) Rent and occupancy charges

Program operators other than those utilizing funds for rental assistance (see below) are not required to charge rent as a condition of residing in the housing. However, if rent is charged, rent amounts must be calculated using the parameters described below.[31] Note that if rental assistance funds are used in permanent or transitional housing, program participants receiving rental assistance are required to pay rent.[32]

b) Calculating participant rent[33]

The amount of rent charged to participants is based on the household's annual income. If rent is charged, the amount may not exceed the highest of:

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[31] 24 CFR §578.77(b)
[32] 24 CFR §578.77(c), 42 US Code §1437a(a)(1)
[33] 24 CFR §578.77(b)

- 30 percent of the family's monthly adjusted income

- 10 percent of the family's monthly income

If the participant pays some or all utility costs, an allowance for these costs must be deducted from the rent. Utilities include gas, electricity, water, sewage, and trash disposal. Utilities do not include the cost of a telephone line, Internet or cable television. The monthly allowance for utilities depends on the types of utilities used and the size of the apartment. The allowances are established by the San Francisco Housing Authority and are updated annually.

> **TIP!** *A sample form that can be used to calculate rent and income is available on the HUD website at <u>www.hudexchange.info/resources/documents/incomeresidentrentcalc.pdf</u>.*

i) Determining income[34]

Annual income should include the total of all income received by any household member except children under the age of 18.

Typically, annual income will be estimated based on recent past income. The rental calculation, however, should be based on the expectation of income to be received over the coming year so if a household's income has recently changed or is anticipated to change this should be taken into consideration. Income should be calculated using the instructions below.

(1) Step 1: Determine gross annual income

Gross income includes wages, disability benefits, unemployment benefits, social security or other retirement benefits, CalWORKs benefits, and County Adult Assistance Programs (CAAP) benefits as well as various other less common income sources. Employment income to be included is the gross income prior to any payroll deductions and including any bonuses, tips, overtime pay or other compensation. Note that if an SSI/SSDI recipient is having money withheld due to an overpayment or other penalty, the amount of the grant before the deduction is the amount that should be used when calculating income.

The following forms of income are specifically **excluded**:

Lump sum retroactive SSI payments
Employment income that is disregarded for SSI recipients under the PASS program
Food stamps and WIC[35]
Income of a live-in aide

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[34] 24 CFR §5.609
[35] HUD handbook 4350.3, Chapter 5

Temporary non-recurring payments—this includes gifts and employment income that is not expected to be available in the future, such as income from being a census worker (seasonal employment such as summer employment or holiday employment is, however, included)
Income from job training programs or resident services stipends (up to $200 per month)
Income from employment of children under the age of 18
Financial aid (grants, school loans, work-study program) as long as a participant is school

If the tenant has a source of income other than common government benefits or employment, or if there are unique circumstances regarding a tenant's income, consult Homebase's "Calculating Resident Rent."

(2) Step 2: Determine deductions[36]

In order to determine the adjusted income, certain deductions must be taken.

- If the program participant has any dependents, the annual income amount should be reduced by $480.

- All households with a member who is 62 years or older or disabled are entitled to a deduction of $400 from their annual income.

- Child-care costs that are necessary to maintain employment are deductible.

- The sum of the following should be deducted, to the extent the sum exceeds three percent of annual income:

  o Unreimbursed medical expenses of any elderly family or disabled family member

  o Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each disabled family member, to the extent necessary to enable any member of the family (including the person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus.

The amount of the deductions for medical and attendant care should be based on expected expenses during the following year, not the expenses of the previous year. Anticipated medical expenses may be guided, however, by the medical expenses the participant paid in the 12 months preceding the certification less any one-time non-recurring expenses. Written documentation such as a medical bill that shows the patient co-pay amount or a receipt of payment must be provided verifying the anticipated amount of these expenses.

TIP! *For additional information regarding calculating deductions, consult Homebase's* *"Calculating Resident Rent."*

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[36] 24 CFR §5.611(a)

ii) Documentation[37]

For each program participant who pays rent, the program operator must maintain an income evaluation form and source documents (e.g., most recent wage statement, unemployment compensation statement, public benefits statement, bank statement) for all assets and income.

If source documents are unobtainable: Obtain a written statement by the relevant third party (e.g., employer, government benefits administrator) or written certification by the intake staff of oral verification by a third party of the income received.

If source documents and third-party verification are unobtainable: Obtain a written certification by the program participant of the amount of income that the program participant is reasonably expected to receive over the coming three-month period.

The following are examples of acceptable proof of income. This is not a complete list of all acceptable documentation types but describes many of the most common sources of income:

- *Bank statements* – Two months of most current bank statements from all adult members of the household.

- *Public benefits* (i.e. CalWORKs, SSI, CAAP, SSDI, Child Support, Veterans benefits, etc.) – Verification letter/statement from a caseworker of the agency indicating the amount of benefits received, and the start date of the benefit. Note that for S+C units, the S+C team will use CalWIN and other systems to pull recent income verification. If out-of-date benefits income is a barrier to obtaining available housing, applications can be processed with SSI/SSDI income verification that is up to 12 months old.

- *Employment wages* – Two months of most current consecutive paystubs.

- *New employment wages* (if a participant recently started a new job and has not received at least one month of paystubs) – Employment verification letter from employer, stating gross wages and hours, overtime pay for this year, or annual salary.

- *Seasonal/irregular employment* (if a participant is seasonally/irregularly employed) – Most current Federal Income Tax Return Form 1040; AND most current two months of paystubs for the employment; AND employment verification from employer, which indicates the period of the year that the participant will work as a seasonal employee, or discontinued employment.

- *Self-reporting income* – For self-declaration income such as recycling, day labor, etc., most current Federal Income Tax Return Form 1040 with 1040 Schedule C and/or Form 8829 and self-declaration verification letter from customer/client or certified self-affidavit letter. For self-employment (i.e. housekeeping, child care, contract labor), a verification letter from customer/client to prove continuing, discontinued, or temporarily discontinued self-employment services.

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[37] 24 CFR §578.103(6)

- *Unemployment benefits* – Unemployment benefits verification letter from EDD.
- *No income* – All adults in the household who currently have no income must complete and sign a <u>Declaration of No Income Form</u>.

Note that if a student age 18 and older is receiving financial aid, it is recommended that the provider obtain a current school schedule and school year financial aid letter. Although financial aid (grants, school loans, work-study programs) is not considered income as long as a participant is school, the program operator should obtain financial aid statements for their records.

iii) Program income[38]

Rent collected by the program from program participants is defined as program income and must be used for program-eligible activities. Rent collected from residents of transitional housing may be reserved to assist these residents to move to permanent housing. Program income <u>may not</u> be used as a source of <u>match</u> for CoC programs.

iv) Prohibition on charging program fees[39]

Although rent or occupancy charges are allowed, programs are not permitted to impose program fees on program participants. Any amount charged above the allowable rent or occupancy charge is considered a fee and is not allowed. Examples of such prohibited fees include fees for laundry or cleaning services, child care, transportation, or case management.

v) Interim changes to income[40]

Program operators must examine a program participant's income initially, annually, and any time there is a change in family composition (e.g., birth of a child). If there is a decrease in the resident's income during the year, the resident may request an interim reexamination, and the rental amount should be adjusted accordingly.

c) Lease or occupancy agreement requirements

Program operators must sign occupancy agreements or leases (or subleases) with all program participants residing in housing, including Transitional Housing.[41] The types of agreements will be different depending on whether the program operator is providing rental assistance or leasing units.

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[38] 24 CFR §578.49(b)(7) and 24 CFR §578.51(k)
[39] 24 CFR §578.87(d)
[40] 24 CFR §577(c)(2)
[41] 24 CFR §578.77(a)

i) Rental assistance

In a rental assistance program, the participant pays a portion of the rent directly to a landlord and the program operator provides a rental subsidy to the landlord on the participant's behalf. Typically there will be two agreements governing this arrangement: a lease and a housing assistance payments contract. The lease is between the participant and landlord and must require the program participant to pay rent directly to the landowner or sublessor. The housing assistance payments contract is between the program operator and owner or landlord and governs the payment of rental assistance. The program operator must make rental assistance payments to the owner or landlord based on the difference between the total rent and the amount paid by the program participant. The program operator is not responsible for the portion of the rent paid by the program participant if the program participant misses a rent payment in any given month. The program operator is also not responsible for compliance with any other requirements of the lease, though it may provide supportive services to the participant focused on meeting lease requirements.

When rental assistance funds are used in a permanent housing project, participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The agreement must be automatically renewable upon expiration for a minimum term of one month. When rental assistance funds are used in transitional housing, program participants must enter into an agreement for a term of at least one month. The agreement must be automatically renewable upon expiration, except on prior notice by either party, for up to 24 months.[42]

ii) Leasing

When CoC funds are used for leasing, the program operator must have a lease agreement for a property, or portion of a property, not owned by the program. The program in turn has an occupancy agreement or sublease with the program participant. The program operator is responsible for the 100 percent of the rent to the owner or landlord, even if the program participant does not pay their rent in a given month or the unit is vacant. Program operators that do not charge rent from program participants should maintain an occupancy agreement rather than a lease with the program participant.[43]

> **TIP!** *Sample lease and occupancy agreements can be found at*
> *https://www.hudexchange.info/resource/2894/coc-program-leasing-rental-assistance-examples-of-lease-agreements/*

d) Meal provision

Each program operator that provides permanent supportive housing for homeless persons with disabilities must ensure that meal preparation facilities are available to residents. This

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[42] 24 CFR §5 78.51(l)
[43] Lease and Sublease Agreement for Continuum of Care (CoC) Program Leasing Projects, February 2015

requirement is satisfied either by each unit having its own kitchen or by having communal kitchens that are shared among several residents (as is sometimes the case in SRO projects). If the site does not have meal preparation facilities, the program must provide meals.[44]

3. Permanent Housing

In all types of permanent housing, including both PSH and RRH, if a unit assisted with rental assistance, including a rapid re-housing unit, is vacated before the expiration of the lease, the assistance for the unit may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless occupied by another eligible person. No additional assistance will be paid until the unit is occupied by another eligible person.

Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies.[45]

4. Rapid Re-housing[46]

Continuum of Care funds may provide eligible <u>supportive services</u>, and/or tenant-based <u>rental assistance</u>, as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing.

Short-term rental assistance may be provided for up to three months and medium-term rental assistance may be provided for three to 24 months.

Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, state, or local sources.[47]

5. All Programs Using Rental Assistance

Certain program requirements apply to any program receiving rental assistance funds. Unless otherwise noted, these requirements are applicable regardless of whether the rental assistance is short, medium or long term and apply to all program components.

a) Use of rental assistance funds upon move-in[48]

Grant funds may be used for security deposits in an amount not to exceed two months of rent. An advance payment of the last month's rent may be provided to the landlord, in addition to the security deposit and payment of first month's rent.

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[44] 24 CFR §578.75(d)
[45] 24 CFR §578.51(i)
[46] 24 CFR §578.37(1)(ii)
[47] 24 CFR §578.51(a)
[48] 24 CFR §578.51(a)

For additional information about how rental assistance funds may be used see the complete description of eligible uses of funds.

b) Lease requirements[49]

Participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month. Program participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum of 24 months.

c) Rent charged to tenant

Each program participant on whose behalf rental assistance payments are made must pay a contribution toward rent. The minimum rent payment charged to participants must be the greater of:

- 30 percent of the family's monthly adjusted income
- 10 percent of the family's monthly income[50]

Rapid re-housing programs may require program participants to share in the costs of rent over and above the minimum rent amount. The CoC governing body, or in the absence of restrictions from the CoC, the recipient or program operator, may set limits on what program participants receive: a maximum amount or percentage of rental assistance; a maximum number of months of rental assistance; and/or a maximum number of times that a program participant may receive rental assistance. For additional information regarding calculating household income and rent, see Calculating Participant Rent.

For the purpose of calculating rent for rapid re-housing, the rent shall equal the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone and cable).[51] See a description of how to determine the utility allowance under Calculating Participant Rent for more information.

6.   Programs Serving Families with Children

a) Educational needs of children[52]

Recipients must take the educational needs of children into account when families are placed in transitional housing. Recipients should, to the extent practicable, place families with

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[49] 24 CFR §578.51(l)
[50] 24 CFR §578.77(c)(1)(i), 42 US Code §1437a(a)(1)
[51] 24 CFR §578.37(a)(1)(ii)(B)
[52] 24 CFR §578.23(c)(7)

children close to their school of origin so as not to disrupt the children's education. Any barriers should be documented in both the program participant and project files.

b) Prohibition against involuntary family separation[53]

The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project. For example, families with teenage children of either gender may not be denied a place in a transitional housing program that serves families with children under the age of 18.

I. ONGOING PROGRAM OPERATIONS

Once a program participant has entered a program, there are certain requirements that the program operator must follow as long as the participant is housed or served in the program. These requirements relate to ongoing responsibilities for ensuring continued eligibility and for delivering appropriate supportive services during the participant's time in the program.

1. All Programs

a) Changes to household composition[54]

If household composition changes during the term of assistance, recipients and subrecipients may relocate the household to a more appropriately sized unit.

b) Prohibition on charging program fees[55]

Although rent or occupancy charges are allowed for housing programs, all programs are prohibited from imposing program fees on program participants.

c) Interim changes to income[56]

Programs must examine a program participant's income initially, annually, and if there is a change in family composition (e.g., birth of a child). If there is a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge should be adjusted accordingly.

d) Services requirements[57]

To the extent practicable, each project must provide supportive services for participants, which may be designed by the recipient or participants. Each program must conduct an

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[53] 24 CFR §578.93(e)
[54] 24 CFR §578.75(c)(2)
[55] 24 CFR §578.87(d)
[56] 24 CFR §577(c)(2)
[57] 24 CFR §578.75(e) & (h)

ongoing assessment of the supportive services needed by the residents of the project, the availability of such services, and the coordination of services needed to ensure long-term housing stability and must make adjustments as appropriate.

In the 2014 NOFA, HUD gave points to CoCs in which projects are operated on Housing First principles, including minimal service participation requirements. HUD defines "Housing First" as a "model of housing assistance that is offered without preconditions (such as sobriety or a minimum income threshold) or service participation requirements, and rapid placement and stabilization in permanent housing are primary goals."

In housing programs, participants may be required to take part in supportive services provided through the project as a condition of continued program participation, as long as the services are not disability-related (e.g., mental health services, outpatient health services, provision of medication). Only projects whose primary purpose is to provide substance abuse treatment services may require program participants to take part in substance abuse treatment services as a condition of continued program participation.

Suggested Practices Regarding Case Notes

To support participants' efforts to gain housing stability and reach other goals, case managers or other staff must meet periodically with the participant. The frequency and content of these meetings will vary from participant to participant and program to program. To be able to track the agreements made with the participant, and to be able to demonstrate that services have been provided as required, service providers must keep records of each of their interactions with participants and other organizations or persons connected to supporting the participant. These records are usually referred to as "case notes" and may be kept on paper in a confidential participant file, or may be recorded in a program database, including HMIS or another software, as long as client confidentiality is protected.

HUD does not have specific case note requirements but, in order to ensure that the notes demonstrate that the requirements for the particular program have been met, the notes should minimally include:
- The name of the participant
- The name of the person making the note
- The date and time of the interaction or activity
- The names and organizations of any other persons involved in the interaction, such as an eligibility worker from another program with whom the case manager has spoken about the participant
- A brief summary of the interaction or activity undertaken
- A summary of any next steps agreed to or anticipated response or information from another party

Agencies should be very careful about sharing information about a client's disability, domestic violence status or other confidential information. For example, in a permanent supportive housing program, service provision notes should be kept separately from tenancy files and should not be shared with property management staff.

An agency that works with disabled clients may wish to produce summary forms for client interactions and record detailed case notes separately to further protect client confidentiality. A monitoring agency may not need to see the detailed notes if the information above is included in a summary format. Program operators are encouraged to have their own policies and procedures for case noting and to periodically self-monitor their records.

> **Model Case Note – Rapid Re-housing Program**
>
> **Participant: Jose Vargas**
>
> 3/31/2015, 2:30 pm.
> Met with Jose to discuss his housing search activities. Jose reports seeing two listings for units he can afford but is not sure about the neighborhood. We discussed how he could find out more using the internet and talking to other participants who are familiar with the neighborhood. Jose also mentioned that he has a lead on a job with a roofing company. He asked how he could get new work boots. I made a referral to Salvation Army Clothing for Work program. We will meet again on 4/2/2015 to complete applications that are being sent here.
>
> *Signed by Lilly Singh, Case Manager.*

e) Supportive services supervision[58]

Each program must provide residential supervision "as necessary to facilitate the adequate provision of supportive services to the residents of the housing." This means that for any CoC-funded program or project that provides any type of housing assistance (transitional, rapid re-housing, or permanent supportive housing), there must be a staff or staff person who is responsible for supervising the direct delivery of services to ensure they are adequate and appropriate. These staff must have sufficient knowledge to provide or to supervise the provision of supportive services to the residents.

2. Permanent Supportive Housing

a) Supportive services[59]

Supportive services designed to meet the needs of the program participants must be made available to the program participants.

b) Death, institutionalization or incarceration of participant[60]

Non-disabled household members of a qualifying (i.e., disabled) PSH resident may retain assistance until the end of the lease term in the event of the qualifying resident's death, long-term incarceration, or long-term institutionalization.

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[58] 24 CFR §578.75(f)
[59] 24 CFR §578.37(a)(1)(i)
[60] 24 CFR §578.75(i)

3. Rapid Re-housing

a) Assistance timelines[61]

Short-term rental assistance may be provided for up to three months and medium-term may be provided for three to 24 months.

b) Case management requirements[62]

Programs must require participants to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. The project is exempt from this requirement if the Violence Against Women Act of 1994 or the Family Violence Prevention and Services Act prohibits the recipient carrying out the project from making its housing conditional on the participant's acceptance of services.

Recipients and subrecipients may provide supportive services for up to six months after rental assistance stops.

c) Re-evaluation[63]

Rapid re-housing programs must reevaluate, not less than once annually, that the program participant lacks sufficient resources and support networks necessary to retain housing without CoC assistance, and the types and amounts of assistance that s/he needs to retain housing. The program may require program participants to notify the recipient or subrecipient of changes in their income or other circumstances (e.g., changes in household composition) that affect their need for assistance. When notified of a relevant change, the program must reevaluate the program participant's eligibility and the amount and types of assistance that s/he needs.

4. All Programs Using Rental Assistance

Certain requirements apply to any program receiving rental assistance funds. Unless otherwise noted, these requirements are applicable regardless of whether the rental assistance is short, medium or long term and apply to all program components.

a) Institutionalization or incarceration

Program participants who are occupying units subsidized with CoC rental assistance funds may enter an institution (jail, hospital, treatment program) for up to 90 days and continue to receive assistance on their unit. After 90 days, the unit must be considered vacant and the program may no longer expend rental assistance funds to hold the unit for the participant.

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[61] 24 CFR §578.37(1)(ii)
[62] 24 CFR §578.37(1)(ii)(D) & (F)
[63] 24 CFR §578.37(1)(ii)(E)

b) Changing site location[64]

Program participants receiving tenant-based rental assistance (TRA) who have complied with all program requirements during their residence retain the rental assistance if they move within the Continuum of Care geographic area. Programs administering TRA may, however, limit where participants may reside if it is necessary to facilitate the coordination of supportive services.

Program participants who have complied with all program requirements during their residence and who have been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believe they are imminently threatened by similar harm (also including include threats from a third party, such as a friend or family member of the perpetrator of the violence) if they remain in the assisted unit, and are able to document the violence and basis for their belief, may retain the rental assistance and move to a **different** Continuum of Care geographic area if they are moving to protect their health and safety.

For each program participant receiving tenant-based rental assistance who has moved to a different CoC in response to imminent threat of further domestic violence, dating violence, sexual assault, or stalking, each program operator must retain the following:

- Documentation of the original incident of domestic violence, dating violence, sexual assault, or stalking, only if the original violence is not already documented in the program participant's case file

- Documentation of the reasonable belief of imminent threat of further domestic violence, dating violence, sexual assault or stalking

This may be written observation by the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; medical or dental records; current restraining order; recent court order or other court records; law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts; or a written certification by the program participant to whom the violence occurred or the head of household.

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[64] 24 CFR §578.51(c) and §578.103(5), CoC FAQ 1528 (7/18/14)

Summary of Annual Recertification Requirements	
Income/rent	Participants must have annual reevaluations of income, and the participant's rent should be adjusted accordingly.[65] In addition, to continue to receive CoC RRH assistance, a program participant's reevaluation must demonstrate continued eligibility based on: • **Lack of resources and support networks** – The program participant's household must continue to lack sufficient resources and support networks to retain housing without CoC program assistance. • **Need** – The program must determine the amount and type of assistance that the individual or family will need to (re)gain stability in permanent housing.[66]
HQS	Program operator must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.[67]
Services plan	Each program must conduct an annual assessment of services for program participants who remain in the project for more than a year and adjust the service package accordingly.[68]
Annual update into HMIS	At least annually, while a participant is enrolled in a program, certain information must be updated in HMIS. Information that must be confirmed at the time of the update and revised if there has been a change includes income, benefits receipt, and employment status. Other changes such as the development of a disabling condition or a change in household composition should be recorded at this time if not previously recorded. See guidance from HSA for further information.

J.   EXIT REQUIREMENTS

Participants leave programs for many reasons, including completing the program successfully, leaving before completion for a variety of reasons, and becoming ineligible due to changes in their circumstances. When a participant leaves a program, the program must be sure to follow specific exit requirements.

1.   Transitional Housing Time Limits[69]

A homeless individual or family may remain in transitional housing for a period longer than 24 months if permanent housing for the individual or family has not been located or if the individual or family requires additional time to prepare for independent living. However, HUD may discontinue assistance for a transitional housing project if more than half of the homeless individuals or families remain in that project longer than 24 months.

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[65] 24 CFR §578.77(c)(2)
[66] 24 CFR §578.37(a)(1)(ii)(E)
[67] 24 CFR §578.75(b)(2)
[68] 24 CFR §578.53(a)(2)
[69] 24 CFR §578.79

2. Use of Rental Assistance Funds for Property Damage at Exit[70]

Rental assistance funds may be used in an amount not to exceed one month's rent to pay for any damage to housing due to the action of a program participant. This may be provided only once per program participant and only at exit from a housing unit (i.e., not during tenancy).

3. Termination of Participants[71]

a) Termination of assistance

The program may terminate assistance to a program participant who violates program requirements or conditions of occupancy. Termination does not bar the program from providing further assistance at a later date to the same individual or family.

b) Due process

In terminating assistance to a program participant, the program must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:

- providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;

- written notice to the program participant containing a clear statement of the reasons for termination;

- a review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and

- prompt written notice of the final decision to the program participant.

c) Hard-to-house populations

Programs providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.

d) Termination from S+C

For those participating in San Francisco's S+C program, additional procedures apply when terminating assistance. See the Appeals and Hearing Procedures in the S+C Section below for additional details.

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[70] 24 CFR §578.51(j)
[71] 24 CFR §578.91

4. HMIS Exit

When a participant leaves a program, for any reason, the HMIS record must be updated to reflect their exit, including the date that the participant was no longer enrolled, their destination and reason for leaving the program. As with the program entry, the required exit information must be entered for all members of a household. For adults, the record must also reflect their income, employment, and benefit receipt status at the time of the exit. The HMIS Exit form can be used to collect this information.

K.   RECORDKEEPING REQUIREMENTS[72]

Recipients (and in the absence of specific policies from the recipient, subrecipients) must establish and maintain standard operating procedures for ensuring that the CoC program funds are used in accordance with the requirements of the CoC program. All records (or copies of records) containing information related to CoC program funds and activities must be retained and kept accessible for five years. Records must include evidence of eligibility for each participant, income documentation, service records, evidence of HQS inspections and rent reasonableness for each assisted unit, documentation of required matching funds, documentation of expenditures and evidence that required policies are in place.

TIP!   *A complete description of recordkeeping requirements is included in Appendix C.*

L.   ALLOWABLE COSTS

The CoC Interim Rule sets forth the requirements relating to allowable uses of CoC funds. These are summarized below, by type of cost.

a) Leasing[73]

Leasing refers to funds expended to rent buildings for either the purpose of providing housing or services to eligible participants. Leasing is an eligible cost category under the PH, TH, and SSO program components. Funds may be used to lease individual units or all or part of structures. Grant funds may be used to pay for 100 percent of the costs of leasing a structure or structures, or portions thereof. Rents paid to landlords and owners must meet the rent reasonableness standard. The amount of CoC funds paid towards leasing costs cannot exceed the FMR. For more information about determining rent reasonableness and FMR standards, see the Rent Reasonableness section above.

Staff and overhead costs directly related to carrying out eligible activities are eligible costs as part of those activities. The costs associated with carrying out leasing activities would be

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[72] 24 CFR §578.103; HUD Grants Administration User Guide: Understanding Grants Administration and Requirements of the CoC Program Interim Rule, 2013
[73] 24 CFR §578.49

charged to the leasing budget line item, including staff time spent processing lease payments, calculating program participant income and occupancy charges, making rent reasonableness determinations, inspecting units, and collecting and processing occupancy fee payments.

These costs must be prorated based on the eligible activities conducted and the eligible units served. Costs for activities which are not directly related to eligible activities or which are not for eligible units cannot be paid for using CoC funds.

i) Prohibition on ownership

Unless a program has obtained an explicit exception from HUD, leasing funds may not be used for units or structures owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership where the partnership owns the structure.

ii) Utilities

If electricity, gas, and water are included in the rent paid to the owner/landlord, these utilities may be paid from leasing funds. If utilities are not provided by the landlord, these utility costs are an operating cost, except for supportive service facilities. If the structure is being used as a supportive service facility, then these utility costs are a supportive service cost.

iii) Security deposits

Recipients and subrecipients may use grant funds to pay security deposits for leased units, in an amount not to exceed two months of actual rent. An advance payment of the last month's rent may be provided to the landlord in addition to the security deposit and payment of the first month's rent.

b) Rental assistance[74]

Rental assistance is an eligible cost category under the PH and TH program components. Rental assistance differs from leasing in that the program pays a rental subsidy to a property owner (landlord) on behalf of a tenant in a unit in which the tenant has his or her own lease.

Rental assistance may be *tenant-based (TRA), sponsor-based (SRA),* or *project-based (PRA),* depending upon the component type.

- TRA – Tenants select any appropriately sized unit within the CoC's geographic area, although programs may restrict the location under certain circumstances to ensure the availability of the appropriate supportive services. Except for victims of domestic

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[74] 24 CFR §578.51

violence, program participants may not retain their rental assistance if they relocate to a unit outside the CoC's geographic area.

- SRA – Tenants must reside in housing owned or leased by a sponsor organization and arranged through a contract between the recipient and the sponsor organization.

- PRA – Tenants must reside in housing provided through a contract with the owner of an existing structure whereby the owner agrees to lease subsidized units to program participants. Tenants may not retain their rental assistance if they relocate to a unit outside the project.

i) Duration

Rental assistance may be short-term for up to three months; medium-term for three to 24 months; or long-term for more than 24 months. The length of assistance depends upon the component type under which the cost is funded. Short- and medium-term assistance can be used in PSH, TH or RRH. Long-term assistance may only be used in PSH.

ii) Use of excess funds

Recipients must serve as many program participants as shown in their funding application to HUD, but if the amount reserved for the term of the grant exceeds the amount needed to pay actual costs, the excess funds may be used to cover rent increases, or for serving a greater number of program participants.

iii) Security deposits

Grant funds may be used for security deposits in an amount not to exceed two months of rent. An advance payment of the last month's rent may be provided to the landlord, in addition to the security deposit and payment of first month's rent.

iv) Payment of damages

Property damage costs may not exceed one month's rent, may be provided only once per program participant, and may be provided only at exit from a housing unit (i.e., not during tenancy).

v) Rent reasonableness

HUD will only provide rental assistance for a unit if the rent is reasonable. The program must determine whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for similar private market units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. Reasonable rent must not exceed rents currently being charged by the same owner for comparable units not receiving a rental subsidy. If a participant

leases a unit where the rent charged exceeds the Fair Market Rent (FMR), the program may use rental assistance funds for that unit for an amount above FMR. However, the contract rent charged must be determined to be reasonable in relation to rents being charged for comparable unassisted units in the area. Note that this differs from the requirements related to the use of leasing funds. For more information about determining rent reasonableness, see the Rent Reasonableness section above.

vi) Vacancies

Rental assistance for a unit vacated by a program participant before the end of the lease may continue for a maximum of 30 days from the end of the month in which the unit was vacated. No additional rental assistance may be paid until the unit is occupied by another eligible person. Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies. Rental assistance may be paid during a brief stay in an institution.

vii) Staff costs related to providing rental assistance[75]

Staff and overhead costs directly related to carrying out eligible activities are eligible costs as part of those activities. The costs of processing rental payments to landlords; examining participant income and family composition; providing housing information and assistance; inspecting units for compliance with housing quality standards; and receiving new participants into the program are considered service delivery costs and are therefore eligible under rental assistance in the CoC Program.[76]

c) Supportive services[77]

Supportive services are eligible costs under the PH, TH, and SSO program components. Supportive services must be necessary to assist program participants to obtain and maintain housing. The CoC program Interim Rule specifies all eligible types of services (listed in the box below). The Rule is clear that any cost not listed is ineligible.

If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of said facility, including maintenance, repair, building security, furniture, utilities, and equipment are eligible as a supportive service.

Services may be provided for up to six months following exit from transitional housing or from homelessness, to assist participants to adjust to independent living.

A summary of eligible supportive services costs is provided in the table below. For a complete list of all eligible supportive services costs, see Appendix D.

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[75] 24 CFR §578.59(a)
[76] 24 CFR §582.105(e)(2)
[77] 24 CFR §578.53

Supportive Services – Eligible Types of Services
Annual assessment of service needs
One-time assistance with moving costs including truck rental/moving company
Case management including counseling, benefits advocacy, and using the coordinated assessment system
Child-care operations or vouchers (children must be less than 13 unless disabled)
Education services including consumer education, health education, substance abuse prevention, literacy, ESL and GED (can include the costs of tutoring, books, supplies, and instructional materials)
Employment assistance and job training, including the cost of providing reasonable stipends to participants in employment assistance and job training programs.
Food such as meals or groceries for program participants
Housing search and counseling, which can include landlord mediation, credit counseling and payment of rental application fees
Legal services for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing. Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants. Legal services for immigration and citizenship matters are ineligible.
Life skills training such as budgeting, money management, household management, nutrition, and other skills that may never have been learned or have been lost
Outpatient mental health services
Outpatient health services
Outreach services including the outreach worker's transportation costs and cell phone
Outpatient substance abuse treatment services
Transportation including program participant cost to travel to services or employment, service worker mileage, purchase or lease of program vehicle, the cost of gas, insurance, taxes, and maintenance for the vehicle
Utility deposits

Any costs not listed above are ineligible. Ineligible costs include costs for:

- Recreational activities
- Criminal background checks for participants
- Direct payments to participants or gift cards – including client stipends
- Staff training
- Obtaining professional licenses or certifications

- A services program with an inherently religious component (e.g., that involves worship, religious instruction, or proselytization)

d) Operating[78]

Operating costs are eligible under the PH and TH program components. Funds may be used to pay the day-to-day operating costs in a single structure or individual housing units.

Eligible operating costs are detailed below. Any costs not listed are not eligible. Allowable operations costs are:

- the maintenance and repair of housing (however, operating funds may not be used for maintenance and repair of housing where the costs of maintaining and repairing the housing are included in the lease);

- property taxes and insurance;

- scheduled payments to a reserve for replacement of major systems of the housing, provided that the payments must be based on the useful life of the system and expected replacement cost;

- building security for a structure where more than 50 percent of the units or area is paid for with grant funds. If 50 percent or less of the units or building area is paid for with grant funds, even if the building is used 100 percent for housing for homeless people, then no costs for building security may be charged to the CoC program grant. This also means that any funds used on building security may not count as match for the grant since the cost would not have been eligible to be paid with grant funds;[79]

- electricity, gas, and water;

- furniture; and

- equipment.

Staff and overhead costs directly related to carrying out eligible activities are eligible costs as part of those activities. For example, the staff time involved with paying taxes and utilities, overseeing maintenance staff or purchasing furniture and equipment can be charged to those line items.

Operating costs may not be combined with rental assistance costs within the same structure, and operating costs are not eligible under the SSO program component.

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[78] 24 CFR §578.55
[79] HUD CoC FAQ#1382 (1/4/14)

Examples of Eligible and Ineligible Operating Costs for a Supportive Housing Facility

Eligible operating costs

Costs associated with staff involved in operations (not delivering services), such as a maintenance person or security guard

Utilities costs: gas, heat, electric, etc. not provided by landlord

Desks, computers, telephones used by staff involved in operating the housing

Furnishings (beds, chairs, dressers, etc.) for use by participants. Furniture is intended for the operation of the housing; therefore, the furniture in projects must be retained for use in the project and cannot be kept by the program participant upon exiting the project.

Equipment such as refrigerators, ranges, etc.

Playground – a playground structure is a piece of equipment

Landscaping – CoC operating funds can be used for maintenance and repair costs, including landscaping, walkways, and grading. Landscaping for beautification is not eligible.

Workers compensation and employers liability insurance

Replacement reserve payments

Purchase of a vehicle to move furniture, appliances, and maintenance equipment. The vehicle must be used to support the function and operation of the housing project. Purchase of a vehicle for supportive services (e.g. for outreach, and to transport participants) remains an eligible supportive services cost.

Ineligible operating costs

Mortgage payments

Recruitment or ongoing training of staff

Rent (may be eligible as a leasing cost)

Depreciation

Costs associated with the organization rather than the project such as fundraising efforts, pamphlets about organizations, etc.

Cable TV costs for participants

e) HMIS[80]

Costs related to contributing client data to or maintaining data in the CoC's HMIS or a comparable database for victim service providers or legal services providers are eligible costs under the PH, TH and SSO program components. Eligible HMIS costs include:

- purchasing or leasing computer hardware;

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[80] 24 CFR §578.57

- purchasing software or software licenses;
- purchasing or leasing equipment, including telephones, fax machines, and furniture;
- obtaining technical support;
- leasing office space;
- paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;
- paying salaries for operating HMIS, including:
  - completing data entry
  - monitoring and reviewing data quality
  - completing data analysis
  - reporting to the HMIS Lead
  - training staff on using the HMIS, and
  - implementing and complying with HMIS requirements
- paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS;
- paying staff travel costs to conduct intake; and
- paying participation fees charged by the HMIS Lead, as authorized by HUD, if the recipient or subrecipient is not the HMIS Lead.

The staff time dedicated to eligible HMIS-funded costs can be calculated as a proportion of that staff's overall time, and billed accordingly.[81]

f) Administrative[82]

Per HUD regulations, recipients and subrecipients may use up to 10 percent of any grant for project administrative costs. In order to maximize local scoring under recent NOFAs, the San Francisco Local Homeless Coordinating Board has chosen to limit the total administrative percentage to seven percent.

Direct HUD grantees retain 100 percent of the administrative allowance. For subrecipients of HSA the administrative allowance is evenly split between HSA and the subrecipient. HSA has requested that subrecipients who operate rental assistance programs under San Francisco's Shelter Plus Care program allow HSA to maintain 100 percent of the administrative allowance.

Costs for staff and other overhead expenses directly associated with carrying out activities under any of the CoC program components are not considered administrative costs. Instead, they are considered eligible costs under the applicable CoC program component.

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[81] HUD CoC FAQ #495 (11/19/13)
[82] 24 CFR §578.59

Administrative costs include expenses related to the overall administration of the grant such as management, coordination, monitoring, and evaluation activities and environmental review. Specific eligible activities include:

General management, oversight, coordination, monitoring and evaluation	1. Salaries and related costs of staff engaged in program administration, which may include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. Program administration assignments include the following: a. Preparing program budgets and schedules, and amendments to those budgets and schedules; b. Developing systems for assuring compliance with program requirements; c. Developing agreements with subrecipients and contractors to carry out program activities; d. Monitoring program activities for progress and compliance with program requirements; e. Preparing reports and other documents directly related to the program for submission to HUD; f. Coordinating the resolution of audit and monitoring findings; g. Evaluating program results against stated objectives; and h. Managing or supervising persons whose primary responsibilities include such assignments the activities above. 2. Travel costs incurred for monitoring of subrecipients 3. Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and 4. Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.
Training on Continuum of Care requirements	Costs of providing training on Continuum of Care requirements and attending HUD-sponsored Continuum of Care trainings.
Costs of carrying out environmental review responsibilities	The costs incurred related to conducting environmental reviews.

The chart below provides additional information about the eligibility and ineligibility of certain costs under the administrative cost type.

Eligible Administrative Costs
General bookkeeping & recordkeeping
Program budgets and schedules preparation and amendment
Establishing procedures and conducting monitoring and evaluation
Audit expense
Training on CoC requirements
Conducting environmental reviews
Staff time to document service match requirements
Staff time to prepare HUD APRs and HUD LOCCS draws
Portion of Program Director time spent overseeing program – but not involved directly in participant services
Ineligible Administrative Costs
Staff time to conduct annual tenant income and rent certifications (may be eligible as a rental assistance or operating cost)
Staff time to help participants identify housing units (may be eligible as a supportive services cost)
Staff time to conduct housing inspections (may be eligible as a rental assistance cost)
Staff time to process landlord rent payments (may be eligible as a rental assistance cost)
Portion of Program Director time spent directly serving clients (may be eligible as a supportive services cost)

g) **Miscellaneous guidelines relating to allowable expenditures**

i) **Restrictions on combining funds**[83]

In a single structure or housing unit, the following types of assistance may not be combined:

- rental assistance and leasing, or
- rental assistance and operating

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[83] 24 CFR §578.87(c)

ii) Use of program income[84]

Program income is the income received by the program directly generated by a grant-supported activity. Any rent payments made by participants to the program are considered program income.

Program income earned during the grant term must be added to funds committed to the project by HUD to be used for eligible activities. Programs may use program income on any eligible costs, even if the cost was not documented in the approved grant agreement. However, programs must document that the program income was expended in accordance with the requirements of the CoC program. Programs are prohibited from using program income on any costs that would not be eligible to be charged to the CoC program grant.

Under the CoC Interim Rule, program income may not be used as match for CoC activities. This includes the value of tenant rents.

In addition, rents and occupancy charges collected from residents of transitional housing may be reserved, in whole or in part, to assist the residents from whom they are collected in moving to permanent housing.

iii) Pro-rating costs use for multiple purposes[85]

Structures used to provide housing, supportive housing, supportive services, or as a facility for HMIS activities may also be used for other purposes. However, CoC assistance will be available only in proportion to the use of the structure for supportive housing or supportive services.

TIP! *If eligible and ineligible activities are carried out in the same structure, the costs should be prorated based on the amount of time that the space is used for eligible versus ineligible activities.*

M. MATCH REQUIREMENTS[86]

All eligible funding costs, except leasing, must be matched with no less than a **25 percent cash or in-kind contribution**. No match is required for leasing. The match requirements apply to project administration funds and CoC planning costs, along with the traditional expenses—operations, rental assistance, supportive services, and HMIS.

Match must be for the total grant amount (minus leasing) and does not need to be matched on a line-item by line-item basis. For example, if a program gets a $100,000 CoC grant that includes

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[84] 24 CFR §578.97
[85] 24 CFR §578.37(c)
[86] 24 CFR §578.73, 578.103(10), Admin Guide Section 3.3, CoC FAQ 1552, 1553, 1557, 1559, 1560, 1561 (7/18/14), 24 CFR §84.23

$50,000 for operating costs and $50,000 for supportive services, a cash grant of $25,000 from local funds used 100 percent for supportive services satisfies the match requirement.

Match requirements must be met on an annual basis. All costs paid for with matching funds must be for activities that are eligible under the CoC program, even if the recipient is not receiving CoC program grant funds for that activity.

> *It is not recommended that program operators commit to more than the minimum required match amount. Any additional funds declared as match beyond the minimum required become subject to HUD restrictions.*

Required match is calculated by taking the total amount of the HUD award, minus leasing, and multiplying by 0.25. The box below provides examples.

Example A
Total HUD funding (without leasing):

    Rental Assistance funding = $95,000
    Project Administration funding = $5,000
    Total amount requested = $100,000

Total HUD funding x .25 = Minimum Match Requirement
    $100,000 x .25 = $25,000

Example B
Total HUD funding (with leasing)

    Leasing funding = $40,000
    Supportive Services funding = $55,000
    Project Administration funding = $5,000
    Total HUD funding = $100,000

Total HUD funding minus leasing: $100,000 (Total Amount) - $40,000 (Leasing Funds) = $60,000

Total HUD funding minus leasing x .25 = Minimum Match Requirement
    $60,000 x .25 = $15,000

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a) **Cash match requirements**

Cash match refers to funds that are received by the program from another source and used to provide eligible activities in the project. A program may use funds from any source, including any other federal sources (excluding Continuum of Care program funds), as well as state, local, and private sources, provided that funds from the source are not prohibited by law to be used as a match. Match may not be double counted, i.e. used as a match for any other federally assisted project or program. **Any program income generated from grant supported activities (e.g., rent or occupancy charges collected by the program) is prohibited from being considered as match.**

In general, participant mainstream benefits to program participants, such as Medi-Cal or CalWORKs, are not considered match in the CoC program because the benefits are not committed to the program for the activities funded through the project. Instead, benefits are provided directly to the program participant and are based on participant eligibility for the benefit program.

b) **In-kind match**

In-kind match refers to real goods, services, activities, or other non-cash resources that are provided to the program by another entity and constitute eligible activities:

- Programs may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been eligible.

- Before grant execution, services to be provided by a third party must be documented by a memorandum of understanding (MOU) between the recipient or subrecipient and the third party that will provide the services.
    - Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the program operator's organization.
    - The cost of donated supplies or equipment may not exceed the fair market value of the property at the time of the donation.
    - The MOU must establish the unconditional commitment, except for selection to receive a grant, by the third party to provide the services, the specific services to be provided, the profession of the persons providing the services, and the hourly cost of the services to be provided. Program income cannot be used as match.

- During the term of the grant, the program must keep, and make available for inspection, records documenting the service hours provided. The records must show how the value placed on third party in-kind contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

c) **Recordkeeping**

The program must maintain records indicating the grant and fiscal year for which each matching contribution is counted.

If the agency is an HSA subrecipient, when the anticipated source of match is cash, written documentation must be submitted to HSA with the grant application on the source agency's letterhead, signed and dated by an authorized representative, and, at a minimum, should include the following:

- amount of cash to be provided to the recipient for the project;
- specific date the cash will be made available;

- the actual grant and fiscal year to which the cash match will be contributed;
- time period during which funding will be available; and
- allowable activities to be funded by the cash match.

Programs must keep records of the source and use of contributions made to satisfy the match requirement (e.g., in a general ledger).

If the agency is an HSA subrecipient, when the anticipated source of match is the donation of in-kind goods and/or equipment, documentation must be provided to HSA with the grant application on the source agency's letterhead, signed and dated by an authorized representative of the source agency, and must, at a minimum, include the following:

- value of donated goods to be provided to the recipient for the project;
- specific date the goods will be made available;
- the actual grant and fiscal year to which the match will be contributed;
- time period during which the donation will be available;
- allowable activities to be provided by the donation; and
- value of commitments of land, buildings, and equipment—the value of these items are one-time only and cannot be claimed by more than one project or by the same project in another year.

If in-kind services are used to fulfill part of the match, the recipient must keep a copy of the Memorandum of Understanding (MOU) executed between the recipient or subrecipient and the third party that will provide the services. The program must maintain documentation of the actual in-kind services provided to program participants and in-kind contributions to the project throughout the grant period. The records must evidence how the value placed on third-party in-kind contributions was derived.

To the extent feasible, in-kind match represented by volunteer services must be documented using the same methods used by the program operator to support the allocation of regular personnel costs. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the program's organization. If employees of the organization do not perform similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

d) Leverage versus match

In addition to requiring a cash or in-kind match, at the time of project renewal, HUD typically requires that projects provide evidence of how projects are leveraging additional resources to support the program. The amount of leverage reported in recent years has impacted the score that the overall Continuum of Care receives in the national competition and as such the LHCB has opted to make leverage a factor in local scoring as well. It is important to note that match and leverage are separate and distinct. The cash and in-kind

amounts listed as a source of leverage are above and beyond the cash and in-kind amounts listed as match for the proposed project.

They types of resources that are eligible to be included as leverage are broader than those for match. Leverage includes all funds, resources, and/or services that the applicant can secure on behalf of the client being served by the proposed project. Leverage can be cash or in-kind and leverage can be used for any activity needed to support the project (not only on eligible CoC program activities). While programs must obtain a written commitment of available leverage from the applicable service provider at the time of grant renewal, unlike with match, a formal MOU is not required. Items provided directly to and for individuals/program participants such SSI, CAAP or CalWORKs benefits are not eligible as either match or leverage. A list of sample sources of leverage, prepared by Homebase, is included as Appendix I.

N.   PERFORMANCE GOALS

HUD has established system-level outcome measures based on the required selection criteria in the HEARTH Act. CoCs are encouraged to establish performance goals for each program or program type to track performance and to use the evaluation of performance as a factor in the rating and ranking of projects in the annual CoC application for funding.

San Francisco's LHCB has established specific performance measures and benchmarks for each program type. The benchmarks represent the outcomes that the City wants achieve, based on HUD goals and local priorities. These benchmarks are used to assess the performance of each project and impact how projects are ranked in the annual CoC competition.

Not every measure is applicable to every program type. The following chart presents the measures and the performance benchmarks sought for each program type included.

Performance Goals			Applicable Benchmark				
#	Measure	Defined	PSH	RRH	TH	SSO Employment	SSO Legal
1	Obtain/ retain permanent housing	% of participants remaining in PH or exited to PH	90%				
		% of participants exited to PH		80%	80%	40%	30%
2	Reduce evictions	% of households evicted in program year	< 10%				
3	Recidivism	% of participants who left a program and did not exit to PH, death, or institution	< 5%				
4	Recidivism	% of participants that exited to PH returning to homelessness within 12 months of exit, using HMIS data showing reentry in the system		Collect data in 2014 but will not operate under a set baseline			
5	Reduce time to access permanent housing	% of participants obtaining permanent housing within 90 days of being accepted into the program		60%			
6	Increase employment income	% of adults who increased employment income between entry and follow-up/exit	15%	30%	30%	75%	
7	Increase total income	% of participants with increased income between entry and follow-up/exit	20%	54%	54%	75%	30%
8	Maintain or increase total income	% of participants that either increased or maintained income between entry and follow up/exit	80%	70%	70%	85%	85%
9	Reduce households with no income	% of households exiting with income (of any amount)	95%	95%	95%	95%	95%
10	Increase enrollment in SSI/SSDI, SDI, CAPI and veterans benefits	% of disabled participants with SSI/SSDI, SDI, CAPI, or veterans benefits	40%	40%	40%	40%	40%
11	Obtain non- cash mainstream benefits	% of participants with non- cash mainstream benefits by follow up/exit (includes health insurance)	95%	95%	95%	95%	95%
12	Occupancy	% reflecting average # of households residing in a program per night relative to capacity	95%		95%		

O. GRANT ADMINISTRATION[87]

In San Francisco, most projects are operated by an agency that is a subrecipient to HSA, which is the HUD-designated recipient of CoC funds. In some cases, the agency operating the program is a direct grantee of HUD, or recipient, rather than a subrecipient to HSA. Both direct grantees and HSA subrecipients are responsible for ensuring that HUD requirements are met and that grants are administered according to applicable regulations. There are several administrative requirements mandated by HUD as part of the grant management processes.

CoC grants generally must be renewed annually through San Francisco's local application process, as governed by the annual HUD CoC NOFA. The Renewal Process is described in the next section. Applicants are notified by HUD whether their grant was renewed and at what amount, typically several months following the submission of the application.

1.   Technical Submission and Executing Contracts[88]

a) Technical Submission process

After the initial announcement of the grant award, recipients must complete the *Technical Submission process* before HUD will execute a grant agreement. The Technical Submission must be completed each time the grant is renewed, which for most grantees is annually. HSA subrecipients should work with HSA to provide the necessary information for submission. Direct recipients must submit the Technical Submission directly to HUD.

The Technical Submission is an opportunity for the applicant to correct any errors HUD has identified in the original application or to make minor changes to the proposed project. The components of the Technical Submission include the following steps:

(1) HUD uploads the Technical Submission form in the online grants management portal, *e-snaps*. The Technical Submission form includes an "Issues and Conditions" section that defines any problems HUD has identified in the application and requests additional information or clarification.

(2) HUD notifies recipients when the Technical Submission form is ready in e-snaps.

(3) Recipients acknowledge Issues and Conditions in e-snaps and provide any requested information or documents. This can include either budget or programmatic information or changes.

(4) Recipients provide detail concerning administrative costs and project milestones.

(5) Recipients may be required to attach supporting documentation (examples listed below) as required for the resolution of Issues and Conditions and the satisfaction of program requirements.

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[87] HUD Grants Administration User Guide: Understanding Grants Administration and Requirements of the CoC Program Interim Rule, 2013, FY2013 Recipients Technical Submission Instructional Guide
[88] 24 CFR §578.23, HUD Admin Guide Section 2.4

(6) The local HUD CPD field office reviews the Technical Submission form in e-snaps for approval.

Recipients must satisfy all conditions before the execution of a grant agreement. Specifically, in order to receive CoC program funding, each applicant must meet and provide proof of satisfying all requirements including:

- *Site control* – Acceptable evidence of site control is a deed or lease. Site control requirements do not apply if the housing will be leased directly by program participants (for example, in a rapid re-housing program) or if the project is for supportive services only at sites not operated by the recipient or subrecipient. Special rules also apply to those projects that use Low-Income Housing Tax Credit funds.[89]

- *Matching funds* – See detailed description regarding matching fund requirements above.

- *Environmental review requirements*[90] – It is the responsibility of HSA to determine the applicable environmental review requirements for all projects, even those for which it is not the recipient. All CoC projects are required to have an environmental review; however, not all projects require the same level of review. Most CoC-funded projects will be at the Categorically Excluded level, which does not require the reviewer to be physically onsite at the project. Additional information about standards for environmental review can be found on the HUD Resource Exchange.

- *Documentation of financial feasibility* – Applicants must satisfy all the requirements described above within 12 months of the announcement of award. HUD may extend the 12-month deadline if the applicant can provide compelling reasons for delay due to factors beyond its control.

b) Contract execution

Once the Technical Submission process is complete and all conditions are satisfied, the grant agreement will be executed. Each recipient must execute a grant agreement with HUD. The grant agreement establishes the rights and responsibilities of HUD and the recipient. The recipient is responsible for ensuring that the grant agreement is executed with HUD and that the terms of the agreement are carried out. The recipient and HUD must execute the grant agreement no later than 45 days from the date on which all conditions are satisfied.

2. Line of Credit Control System (LOCCS)

a) Protocols for HSA subrecipients

Line of Credit Control System (LOCCS) is HUD's primary grant subsidy disbursement system that handles disbursement and cash management for the majority of HUD grant programs. The HSA Fiscal Department is responsible for setting up LOCCS accounts and

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[89] 24 CFR §578.25
[90] 24 CFR §578.31

processing drawdown requests for all of its subrecipients. For subrecipients of HSA, each agency's specific process and requirements for invoicing are outlined in their agreement with HSA, specifically in Appendix C of each grant agreement. HSA subrecipients do not enter information into LOCCS directly, but rather submit invoices to HSA who then processes the drawdown requests.

b) LOCCS procedures for direct HUD recipients

Direct recipients must submit requests directly through the LOCCS system. Funds can be drawn down through eLOCCS or over the phone via the LOCCS Voice Response System (VRS) User system. Users wishing to opt in to the VRS method must complete the HUD-27054 - LOCCS VRS Access Form.

The awarded organization must register as the 'Business Partner,' designate one to five 'Coordinators' who can assign eLOCCS roles to 'Users,' and submit a LOCCS Access Authorization Form to complete registration. HUD's eLOCCS Getting Started Guide and eLOCCS Registration Guide provide additional information about this process.

i) Invoicing/drawdown protocols[91]

Since CoC funds are intended for immediate use to assist people experiencing homelessness, it is necessary for projects to stay on schedule. In addition to the development milestones, grantees are expected to make timely draws from their LOCCS project accounts—draws that are neither too early nor too late.

Recipients make draws too early when they draw down funds in advance of needing to pay for project-related expenses. US Treasury rules require recipients to repay any interest gained on holding grant funds in an interest-bearing account. The rule is that recipients should draw funds no more than three days before needing to pay project-related expenses.

Recipients make draws too late when they do not submit for reimbursement within a reasonable period of time, so that LOCCS can reflect a relatively up-to-date accounting of program expenditures and remaining grant funds. Recipients are encouraged to make LOCCS draws on a minimum of a monthly basis or as funds are expended. Request Voucher for Grant Payment can be made by completing the HUD-27053-A - LOCCS SNAPS Voucher Form. Payments from LOCCS can be direct deposited by completing the Direct Deposit Form-SF1199.

Note that for RRH projects, the amount an applicant requests for rental assistance is based on an estimate of the number of people who will be served during the grant period and the amount of assistance each one will receive. The amount drawn down from

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[91] SHP Desk Guide, Section F. Note that since the SHP regulations have been replaced by the CoC Interim Rule, the SHP Desk Guide is technically no longer applicable to most CoC grants. However, much of the information contained in it is consistent with the CoC Interim Rule. For the purpose of this Grants Management Section, references are provided to relevant sections of the SHP Desk Guide. Program operators should however be aware that the Guide is based on an old regulatory framework.

LOCCS each month should be equal to the actual amount the recipient spent on rental assistance for program participants, not an estimate.

3.   Reporting Requirements[92]

CoC funding recipients must collect data through HMIS (or a comparable system for victim assistance programs) and report data on their use of CoC program funds in an *Annual Performance Report (APR)*.[93] APRs are to be generated from the data collected in HMIS. For monitoring purposes, the information reported in APRs must match the data saved within HMIS. For programs that are subrecipients of HSA, HSA will submit the APR based on information provided in HMIS by the subrecipient.

The Annual Performance Report (APR) is used by HUD to track the progress and accomplishments of projects funded by HUD. The APR collects information on the people served by each project during the project's operating year. All CoC program recipients must complete a CoC APR in e-snaps. Recipients have 90 days from the end of their operating year to submit their APR to HUD through e-snaps. In order for HSA to submit the APR on time, programs that are subrecipients must submit the required information to HSA 45 days before the deadline. Programs should coordinate with their contract manager and HSA HMIS staff to ensure that all necessary information is received on time.

To submit the APR, new users will need to create a profile in e-snaps. Once a new user has created a profile, another authorized e-snaps user associated with the applicant of the grant can associate the new user with the applicant in order to access the APR and other documents associated with the applicant. If all previously authorized persons have left, or if no one has access to e-snaps, new users will need to create a profile and send a letter to HUD specifying the applicant with which they would like to be associated. For detailed support on adding a user, refer to the support information found on the HUD Exchange e-snaps page.

> **TIP!** *Important note: Setting up a new user cannot be completed quickly. Do not wait until the last minute.*

All projects must enter contact and project information into e-snaps in order for the appropriate APR to be generated. Information to be entered into the APR includes site information, bed and unit inventory, HMIS participation rate, data quality, persons and households served, utilization rates, client characteristics, client income, length of participation, destination at exit, program expenditures, and performance measures. Detailed information regarding how to complete the APR in e-snaps is available at http://www.hudhre.info/apr.

The APR is due within 90 days after the end of each operating year. Failure to submit an APR can delay receiving grant funds and may result in a determination of lack of capacity for future funding. An APR must be submitted for each operating year in which HUD funding is provided. HUD may terminate the renewal of any grant and require the recipient to repay the renewal grant

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[92] HUD Admin Guide section 3.8, CoC APR Guidebook
[93] 24 CFR §578.104(e)

if the recipient fails to submit an APR in a timely manner for the grant year immediately prior to renewal; or the recipient submits an APR that HUD deems unacceptable or that shows non-compliance with the requirements of the grant and the CoC program Interim Rule.[94]

4. Changes to Project/Amending Grants[95]

Whenever it is necessary to make changes to a grant agreement, both the San Francisco Local Homeless Coordinating Board and the HUD field office must be involved—either to be informed of the change or to approve the change through a grant amendment, depending on the scope. All HSA subrecipients must obtain HSA approval of the grant amendment request prior to LHCB and HUD approval. Neither recipients nor subrecipients may make any significant changes to projects without prior HUD approval. Significant changes substantially affect project implementation and represent a departure from the initial application. A written request for a significant grant amendment must be made directly to the local HUD CPD field office, which will review the request, and approve or reject the amendment. Project operators may not proceed with grant changes until approval has been received.

In recent years, certain types of changes have been prohibited through the grant amendment process, and must be done only as part of the CoC application process through grant re-allocation. This mainly involves changes to program components such as a change from Transitional Housing (TH) to Permanent Housing (PH). Grant re-allocation actually means the original project is terminated and a new project created. Re-allocation can also be partial, and can involve a permanent reduction in a project budget. Specific guidelines for grant re-allocation are published each year in the HUD CoC NOFA. Any decisions about re-allocation are made by the LHCB.

If project operators wish to make changes to their grants, they should be aware of timing restrictions relating to the CoC application process. The HUD field office may not process any grant amendments during the time window when the CoC competition is taking place. Operators should contact either HSA (if they are a subrecipient) or HUD directly (if they are a recipient) well in advance of the expected opening of the competition to request any significant grant changes.

Significant changes that require a grant amendment include:

- change of recipient(s);
- change of project site;
- addition or elimination of eligible costs approved for a project;
- shift of more than 10 percent from one approved eligible cost category to another;
- permanent change in subpopulation served by any one project under the grant; and/or
- permanent reduction in the total number of units funded under the grant.

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[94] 24 CFR §578.33(f), Homelessness 101: Managing HUD Continuum of Care Homeless Assistance Grants
[95] 24 CFR §578.105(b), HUD Admin Guide Section 4

Minor changes from the approved grant do not substantially affect grant implementation. An example of a minor change is a shift of less than 10 percent of CoC program funds from one approved activity to another over the term of the grant. Minor changes do not require HUD approval. However, the subrecipient must notify HSA and the HUD field office of these changes in order to update the budget in LOCCS and to be sure that the annual Grant Inventory Worksheet (GIW) is accurate when the CoC competition opens. The GIW is a document used by HUD and the CoC to document the exact amount of eligible renewal funds that are available in the competition. Programs and the recipient must fully document minor changes to an approved grant or project in their records.

Note that grantees cannot request an amendment to their grant before the grant agreement has been signed. Also, HUD will not agree to sign a grant agreement with an entity that did not apply for a grant, so grantees should not request a change of grantee during the competition's technical submission phase.[96]

5. Communication with HUD[97]

For direct grant recipients, the local HUD San Francisco Regional Office is the contact for correspondence. HSA subrecipients should only communicate with HUD through HSA.

The key to expediting correspondence with HUD is the inclusion of the project grant number and Project Identifier Number (PIN) as a means of reference. This is especially critical for recipients with multiple subrecipients or projects involving more than one HUD program. Correspondence requests can be sent to the Director of Community Planning and Development (CPD) at the San Francisco Regional Office. An "Attention" line can be added indicating the primary CPD contact. Contact information is:

> San Francisco Regional Office
> Dept. of Housing and Urban Development
> 1 Sansome Street, Suite 1200
> San Francisco, CA 94104
> Phone: (415) 489-6400
> Fax: (415) 489-6419

TIP! *Electronic messages are handled somewhat differently from regular mail in that they are not normally tracked or assigned a response date. For this reason, when requesting a written response to an email, it is recommended that correspondents indicate the need for a written response and follow-up the email with a letter.*

The following activities require communication in writing with the local field office:

- grantee or project sponsor address change;

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[96] SHP Desk Guide, Section R
[97] SHP Desk Guide, Section I

- key personnel changes;

- grantee or project sponsor name change;

- change to the grant (requiring an amendment); and

- change of LOCCS users.

6. Grant Close-Out

HUD formally closes out a grant when the annual grant term for the project is completed. HUD uses the same process when projects are terminated or no longer funded by HUD, or when recipients discontinue a project. The close-out process includes notification from HUD communicated to the recipient through various methods, such as via written notice (postal mail or email) or telephone.

HUD's grant close-out requirements are described at 24 CFR parts 84 and 85 and in other procedures established by HUD. Recipients must submit all reports required by HUD no later than 90 days from the date of the end of the project's grant term. Obligations remaining at close-out must be covered by the terms of the close-out agreement.

The close-out agreement, which will be prepared by HUD in conjunction with the recipient, must include the following information:

- identification of close-out costs or contingent liabilities subject to payment with CoC program funds after the close-out agreement is signed;

- identification of unused grant funds to be deobligated by HUD;

- identification of any program income on deposit in financial institutions;

- description of the recipient's responsibility after close-out for compliance with

  o all program requirements related to the use of program income and remaining CoC program funds;

  o use of real property;

  o use of personal property purchased with CoC program funds; and

  o requirements governing project income received subsequent to grant close-out; and

- other provisions appropriate to any special circumstances of the grant close-out.

7. Performance Review and Sanctions[98]

a) Performance review

HUD may review performance of each recipient in carrying out its responsibilities under the CoC program Interim Rule, with or without prior notice to the recipient. In addition, recipients are required to monitor their subrecipients. Recipients must provide HUD with open access to all grant-related information, including program participant and financial records.

Performance reviews will rely primarily on information obtained from:

- records and reports from recipients and subrecipients;
- information from on-site monitoring;
- audit reports;
- information from HUD's financial and reporting system (e.g., LOCCS and e-snaps);
- HMIS; and
- other relevant sources (e.g., citizen comments, complaint determinations, and litigation).

Areas that are subject to review include program participant eligibility, program components, eligible costs, project progress, meeting match requirements and maintaining appropriate documentation of match, subrecipient management, recipient management, financial management, cost allowability, procurement standards, equipment and equipment disposition, and other federal requirements. Below are some common areas where findings can occur:[99]

- *Program participants' eligibility* – Files must contain acceptable documentation of homeless status and disability (if relevant). Examples of compliance issues include: initial consultation files not dated or signed by the case worker, no clear documentation of chronology of homeless episodes, disability not documented, or disability documentation signed by a person not credentialed to make a diagnosis.

- *Supportive services* – Client files must contain a supportive services plan and an annual assessment of service needs, with corresponding adjustments to the services plan. Examples of compliance issues include: missing services plans and/or annual assessments.

- *Financial documentation* – Adequate documentation of expenditures and acceptable financial systems must be in place (see Financial Management section for more information.) Examples of compliance issues include: missing or insufficient documentation for incurred expenses and/or ineligible expenses; drawing a percentage of the grant each month with no support documentation of why funds

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[98] 24 CFR §578.107, Admin guide section 5.1
[99] HUD CoC Program Start-Up Training For Fiscal Year 2013 Recipients, CoC Program Basics.

were drawn from LOCCS; reimbursement of expenses incurred outside the grant term; lack of financial oversight for subrecipients; salary costs that cannot be tied to an eligible grant expense; or paying rent to someone who is not the property owner.

- *Resident rents* – Files must include income documentation and rent calculations, and expenditures must be within allowable limits. Examples of compliance issues include: overcharging rent; inadequate or no income verification; not reviewing program participant income annually or when a household's income changes; inadequate documentation of rent reasonableness; or charging fees other than rent or occupancy charge.

- *Match* – Sufficient match must be provided and documented. Examples of compliance issues include: insufficient match; in-kind services provided by a third party without an MOU that are counted as match; ineligible sources used as match; or match not adequately tracked or documented.

- *Staff time distribution* – Recipients and subrecipients should monitor to ensure that staff time and associated costs charged to the project are explicitly tracked by eligible activity. For staff who perform operations and other functions, such as supportive services, and/or who work in multiple projects, costs must be split between functions and documented (e.g., through time and activity reports) to substantiate how costs were assigned (see Financial Management section for more information). Examples of compliance issues include: grant files do not include records documenting the specific hours staff worked; timesheets are not signed or dated by supervisor; staff time records do not indicate how the time relates to eligible activities; salary costs not directly linked to serving program participants or other eligible costs in the CoC program; records do not demonstrate that case managers worked with program participants during the time charged to the project; records do not show cost documentation associated with staff time that was charged to the project. Specific cost documentation, such as payroll costs, must be used to substantiate the amount drawn for staff costs. For example, grant draws must be based on actual rather than estimated costs.

- *HMIS* – Program must be entering client-level data at entry, exit and annual updates. Examples of compliance issues include: privacy practices notice not posted at site, releases of information not included in file, significant missing data in HMIS.

If HUD determines that a recipient or subrecipient is not complying with a program requirement, it will issue a written notice within 45 days after completion of monitoring clearly describing the areas that were covered and the basis for its conclusions. The notification will offer an opportunity for the project to demonstrate, within a timeframe prescribed by HUD, that the project has complied with the requirements. The project may ask HUD for technical assistance support in resolving findings. Monitoring concerns or findings should be addressed completely and expeditiously.

b) Remedial actions and sanctions

To ensure ongoing and future compliance, HUD may require the recipient to submit payment requests and supporting documentation manually when seeking HUD approval to draw down funds. Failure to demonstrate satisfactory compliance may result in remedial actions and, potentially, sanctions. The following remedial actions and sanctions may be taken or imposed by both HUD and/or recipients.

i) Remedial actions[100]

- Developing and following a schedule of actions for carrying out project activities and projects affected by non-compliance, including schedules, timetables, and milestones

- Establishing and following a grants management plan that assigns responsibilities for carrying out remedial actions

- Canceling or revising project activities or projects likely to be affected by non-compliance before expending associated grant funds

- Re-programming grant funds not yet expended for given activities or projects to eligible costs or projects

- Suspending funds disbursement

- Reducing or terminating a subrecipient's remaining grant funds and re-allocating funds to other subrecipients or returning funds to HUD, and

- Requiring matching contributions to be made before or in conjunction with draws being made from the recipient's grant

ii) Sanctions[101]

- Changing method of payment to reimbursement

- Suspending payments to preclude the further expenditure of funds for affected projects or activities

- Continuing the grant with a substitute recipient of HUD's choosing

- Denying matching credit for all or part of the cost of the affected activities and requiring further matching contributions

- Requiring the recipient to reimburse its line of credit in an amount equal to the funds used for the affected activities

- Reducing or terminating the remaining grant

- Imposing conditions on a future grant, and

- Imposing other legally available remedies

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[100] 24 CFR §578.107(b)(1)
[101] 24 CFR §§578.107(b)(2) through (9)

HUD may deobligate funds for the following reasons:[102]

- Failure to meet timeliness standards

- Delays in completing construction activities that affect the expenditure of other funds for other activities during the remaining term of the grant

- Costs for acquisition, new construction, or rehabilitation that are less than the total cost agreed to in the grant agreement

- Actual annual leasing, operating, supportive services, rental assistance, or HMIS costs that are less than the total cost agreed to in the grant agreement for a one-year period

- Failure to move program participants into units within three months of units' availability for occupancy, and

- Other circumstances set forth in the grant agreement

Upon expiration of grants, unspent funds remaining in the project account of the expired grants are deobligated. Before proceeding with the recapture of any funds, HUD ensures that the grantee has not received a term extension and has made its final drawdown for costs incurred during the grant period.[103]

iii) HSA monitoring

Projects for which HSA is the recipient are also subject to monitoring by HSA. If HSA determines that a program is not complying with a program requirement, HSA is required by HUD to issue written notice of the determination and provide an opportunity for the subrecipient to demonstrate compliance. If the program is not able to demonstrate compliance, HSA must take appropriate actions to ensure compliance in order to avoid receiving a HUD preliminary determination notice.

TIP! *All programs receiving CoC funds should self-monitor for compliance.*

HSA monitors all subrecipients annually. Monitoring includes both fiscal and program components. Program monitoring generally includes a site visit, which is followed up by a letter delineating any findings and needed corrective action. Monitoring includes a review of: policies and procedures, methods for evaluating client satisfaction, accessibility, cultural competence, outreach procedures, staffing patterns, program administration, HMIS data entry, and completeness of client files. A sample program monitoring checklist provides additional details about each of these monitoring categories.

Although HSA conducts the direct monitoring of financial compliance, the fiscal and compliance monitoring of agencies that contract with the City is organized by the City's Controller's Office. They utilize a Risk Assessment Tool, which determines whether an

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[102] 24 CFR §578.107(d)
[103] SHP Desk Guide, Section U

agency is subject to a site visit, a self-assessment, or on rare occasions, a waiver. The Controller's office also coordinates monitoring for agencies that contract with more than one department. Within HSA, the Contract Managers conduct the fiscal and compliance monitoring. In addition to a general monitoring checklist used by all City Departments, HSA utilizes a HUD CoC Supplemental monitoring tool that covers time and activity reporting and match tracking. This tool is updated regularly.

8. Participation of Homeless People[104]

All CoC recipients **and** subrecipients must document compliance with the homeless participation requirements of the CoC Interim Rule. Specifically, recipients and subrecipients must provide for the participation of not less than one homeless individual or formerly homeless individual on their board of directors or other equivalent policymaking entity, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or the provision of CoC program assistance.

This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.

In addition, projects should involve homeless individuals and families in as many aspects of project implementation as practical, including employment, provision of volunteer services, or otherwise, in constructing, rehabilitating, maintaining, and operating facilities for the project and providing supportive services for the project.

P. GRANT RENEWAL[105]

New CoC grants are awarded for an initial grant period that can be anywhere from one to 15 years (depending on program component and the specific NOFA requirements under which the project was funded). Once the initial grant term expires, grants must be renewed on an annual basis to continue receiving funding.

Initial applications for any new funds available and renewal decisions are made by the LHCB based on local priorities and processes. CoCs have the option to re-allocate funding from lower performing projects to create new projects, so no project is guaranteed to be renewed.

Availability of HUD funds may also impact renewals. In some recent years, HUD has not had sufficient funding to renew all eligible grants across the country and therefore communities have had to place some renewals into a "Tier 2," which have a lower chance of being renewed.

Once a grant enters the annual renewal process, generally the grant amount will become fixed and will be renewed at the same funding level each year. Exceptions include:

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[104] 24 CFR §§578.75(g)
[105] 24 CFR §578.33(c)

- HUD may award increases to operations and leasing budgets based on increases in Fair Market Rents (FMRs)

- Rental assistance grants are calculated based on FMR so these grants will increase or decrease in size from year to year depending on whether FMRs go up or down

The process for renewing a grant is determined both at the local level and by HUD. Each year when HUD releases the annual CoC NOFA, it also opens the e-snaps online application system and issues instructions for how to complete the online application. The LHCB is required to rate and rank all applications received in the local process and submit the consolidated application with all projects included in a priority order. The LHCB establishes a local timeline and process to gather the information about project performance and other data that is used for ranking purposes. This process may begin even before the HUD NOFA is released. Once the local process is completed, applicants are notified whether their grant is being included in San Francisco's application to HUD, in what relative position, and at what funding level. After the CoC competition is over, HUD will notify applicants whether their grants have been funded and the funding amount.

III. SHELTER PLUS CARE - CoC RENTAL ASSISTANCE PROGRAM

A. GENERAL INFORMATION

Long-term rental assistance programs funded by the HUD through the CoC are administered through HSA as the Shelter Plus Care (S+C) program. Other CoC programs typically are either funded directly to a program operator (recipient) or HSA receives the funding and contracts with a nonprofit for all the program activities (subrecipient).

S+C operates differently. It provides a source of funding for housing assistance only, and services to the residents of the housing are paid for through other sources. An MOU is entered into between HSA and the project sponsor that governs leasing requirements, rental assistance amounts and terms, facility maintenance and operations, inspections, payments to sponsors, termination of tenancy, and compliance with HUD and local requirements. HSA manages the S+C program including determining who is eligible, managing the rental assistance payments, conducting Housing Quality Standards inspections and calculating tenant rent amounts.

A set of common rules applies to all S+C sponsors. While HSA has agreements with providers for the units dedicated to the program, payment is made only when units are occupied by eligible tenants enrolled in the S+C program (or during specified periods of vacancies as allowed by HUD regulations).

The procedures described in this section apply to those S+C units that are sponsor or project-based, meaning that participants live in specific units covered by the program. HSA also operates a tenant-based, scattered site S+C program directly and while many of the rules described here apply, this manual is not intended to describe the procedures that govern the tenant-based program.

B. OVERVIEW

1. Background and need

The San Francisco Shelter Plus Care (S+C) program assists homeless people with disabilities to gain entry to housing and achieve residential, economic, and emotional stability. S+C does so by providing safe, secure permanent housing and a broad range of support services. Program participants pay 30 percent of their adjusted household income for rent. The S+C program subsidizes the balance up to a permitted maximum.

2. Eligibility criteria

Consistent with CoC requirements, eligibility for S+C requires an applicant to be a homeless resident of San Francisco, living on the streets or in a shelter, and having one or more special

needs related to substance abuse, mental illness, or symptomatic HIV/AIDS. S+C rental assistance is available to single adults and households with children. Additional information regarding eligibility can be found in the Participant Eligibility Guidelines section of this manual.

3.   Support services

Support services include on-site and off-site case management, basic living skills, representative payee and money management, benefits advocacy, hot meals, substance abuse intake/assessment, special focus support groups, access to residential treatment, specialized mental health services, crisis intervention, recreational activities, and vocational training. Each program participant engages in services on a voluntary basis. Regulations related to service provision for permanent supportive housing as described elsewhere in this manual apply to the S+C program.

4.   How to apply – single adults

Referrals into all single adult S+C units are made through San Francisco's Coordinated Assessment team. The team screens for basic eligibility and then refers applicants to available units. See the Coordinated Assessment section of this manual for additional information.

5.   How to apply – families with children

Currently, families with children are not screened through the coordinated assessment team, although it is the intention of HSA to transition the family referral process for S+C along with all other family permanent supportive housing units to a centralized intake and coordinated assessment process in the future. Applying to S+C for a family unit consists of completing an application form, securing verifications of homelessness and special need(s), providing a photo ID and social security card, and consenting to exchange of information between HSA and certain service providers for eligibility verification and service coordination purposes. All applications are reviewed by the HSA S+C program staff to ensure eligibility. Additional detail about the application process is provided below.

6.   For more information

The San Francisco Human Services Agency administers S+C. For more information, call (415) 557-6480 or write to Shelter Plus Care ZB-31, Human Services Agency, PO Box 7988, San Francisco, CA 94120.

C.   REGULAR MEETINGS

1.   S+C Oversight Committee Meeting

The S+C Oversight Committee was established in September 1994, and consists of various community and governmental stakeholders tasked with establishing policy and procedures for the S+C program. In addition, the oversight committee is responsible for assistance with securing services for the S+C program, in particular the development of supportive services for S+C program participants. The oversight committee monitors the S+C program process, ensuring that it is responsive to the community being served. Since 2005, the oversight committee has been responsible for the evaluation and review of all S+C grant renewals applying for CoC funding along with the LHCB. As the S+C program continues to progress, the S+C oversight committee will continue to discuss and, if needed, develop new policies and procedures to ensure the overall effectiveness of the S+C program.

Meeting Schedule: Quarterly (4th Wednesday of the Month)
Meeting Time: 10:30 AM – 12:00 PM
Meeting Location: 1650 Mission St., Suite 302 (HSA Office)
Meeting Chair: Shelter Plus Care Program Manager
Chair Phone: (415) 557-6480

2.   S+C Sponsors Meeting

The S+C Sponsors Meeting was established in August 1994 to provide an open forum for all S+C housing site sponsors to share ideas and suggestions to improve the S+C program. Most revisions to S+C program policies and procedures are initiated at the sponsors meeting, with final approval by the oversight committee. In addition, the sponsors meeting hosts various community-based and governmental agencies to present on topics directly related to services rendered by S+C sponsors. The S+C program strongly encourages all S+C housing site sponsors to attend as regularly as possible.

Meeting Schedule: Bi-monthly (1st Wednesday of every other month)
Meeting Time: 10:30 AM – 12:00 PM
Meeting Location: 77 Otis St. (HSA Office)
Meeting Chair: Shelter Plus Care Compliance Officer
Chair Phone: (415) 557-6479

D.   APPLICATION PROCESS

As of the publication of this manual, San Francisco is in the process of transitioning the responsibilities for assessment, eligibility verification, and referral to a Coordinated Assessment system. All referrals into single adult S+C units are managed through the coordinated assessment team; however, referrals into family units continue to use the agency-based referral process described below.

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1. Application protocol

- Certain agencies in San Francisco serving the S+C target population have been designated as referral agencies.

- Referral agencies are required to enter into a Memorandum of Understanding (MOU) with the Human Services Agency.

- All referral agencies are required to exercise due diligence to follow and stay in contact with any applicant on whose behalf they are applying.

- As a vacancy becomes available, HSA S+C staff contact the next referral agency to submit an appropriate referral.

- At a minimum, two HSA S+C staff will review applications to ensure eligibility.

- S+C staff follow up with appropriate referral agencies, if additional documentation is required.

2. Responsibilities of referral agencies

- Attend orientation or make other arrangements with S+C for training if attendance at orientation is not possible

- Assist applicants through the entire intake process. If staff is unable to fulfill obligations, HSA reserves the right to terminate the MOU with a referring agency

- Identify agency staff responsible for assisting applicants

- Assist eligible applicants in completing application forms

- Obtain a copy of current/valid photo identification and social security card, referring applicant to appropriate resources if they do not have photo ID or evidence of social security number

- Copy current verification of income and/or assist applicant to secure such documentation

- Complete homelessness verification or assist to secure such documentation

- Obtain necessary verification of mental health issues, substance abuse and/or symptomatic HIV/AIDS, or assist applicant to secure such documentation

- Secure authorization for exchange of information between HSA and applicant's service provider(s) for purposes of verifying S+C eligibility and facilitating processing of application

- Advise applicant of their options for obtaining services including information and referral for shelter, treatment, and/or transitional housing, depending on applicant's needs and interest

- Receive and respond to inquiries regarding application process

- Provide HSA with data on services provided to S+C applicants by agency

- Refer to other affordable housing waiting lists, as appropriate

E.   DOCUMENTATION OF HOMELESSNESS

The Shelter Plus Care (S+C) program specifically targets individuals and families who are literally homeless, i.e. those who are sleeping in emergency shelters or in places not meant for human habitation. The latter includes cars, parks, abandoned buildings, and sidewalks. **In order to be eligible to receive services from S+C, persons must be homeless, living on the streets or in emergency shelters at time of application for services.** Persons must be in these or other homeless situations (detailed below) at time of housing occupancy. **Applicants must complete a Certification of Homelessness form per the instructions below certifying homelessness at time of application.**

1.   Documentation of persons living on the streets

If an applicant has been living on the streets, the certification of homelessness should be checked "Street, park, abandoned building," and be copied onto the referring agency's letterhead. In addition, the referring agency and/or applicant must describe the homeless situation in a short written statement, and both the application agency and applicant must sign the statement and date it. For example, the statement might read "client has been living in Golden Gate Park from June 14th until the time of application."

2.   Documentation of persons living in an emergency shelter

If an applicant has been staying in an emergency shelter, including emergency voucher beds, the certification of homelessness should be checked "Emergency shelter/Emergency voucher" and the appropriate category must be circled. If emergency shelter is circled, the referring agency must obtain verification from the shelter and the form must be on shelter letterhead. If emergency voucher is circled, the application agency must obtain verification from the agency that provided the voucher and the form must be on this agency's letterhead. If the application agency is the shelter where the client is staying or the agency that provided the voucher, copy the certification form on the application agency letterhead.

3.   Documentation of persons in transitional housing

If an applicant has been residing in a transitional housing facility, the certification of homelessness should be checked in the appropriate category "Transitional housing" and the form must be on the facility's letterhead. If the referring agency is the facility where the client is staying, copy the certification form on the facility's letterhead, and check the appropriate category. **Also, eligibility for S+C requires an applicant living in this situation at the time of application to have lived either on the streets or in an emergency shelter prior to their current situation. Documentation of their previous living situation is required, in addition to documentation of their current living situation.**

F. PROCEDURE FOR VERIFICATION OF MENTAL HEALTH

1. Who may verify serious mental health issues for S+C eligibility?

Person(s) must be licensed/credentialed to perform mental health assessments (or example: LCSW, MFCC, LPHA, etc.). If an agency employs licensed/credentialed personnel to perform mental health and/or substance abuse assessments, these staff may complete the <u>Verification of Mental Health</u> and/or <u>Verification of Substance Abuse</u> forms.

Agencies **without** licensed/credentialed staff to perform mental health and/or substance abuse assessments should utilize the <u>S+C Evaluation Form</u>. Agencies should submit the S+C Evaluation Form, along with the S+C application to HSA for review. HSA will contact a licensed/credentialed staff member to coordinate a time and place to perform an evaluation of the applicant.

2. What qualifies as serious mental health issues for S+C eligibility?

In order to meet S+C eligibility guidelines for serious mental health issues, the applicant must have a mental illness that: is expected to be of long-continued and indefinite duration; substantially impedes the person's ability to live independently; and is such that the person's ability to live independently could be improved by more suitable housing conditions.

Use the following guidelines to determine whether a person meets mental health eligibility criteria:

- applicant must either have a DSM Diagnosis that is not substance abuse OR

- applicant needs to meet criteria from ALL the following categories:
  - *Current presentation* – Symptoms of psychosis, major depression, mania, post-traumatic stress disorder, severe anxiety disorder or other mood disturbance, severe dissociative disorder, control disorder, and/or currently taking prescribed medications indicated for the above symptoms.

  - *History* – History of psychiatric hospitalization at any time, use of emergency service for psychiatric reasons within the past year, currently or recently in stable psychiatric treatment elsewhere (including in jail), having been on major psychiatric medications or psychiatric medications having been recommended. For recent immigrants, history of use of corresponding alternative indigenous treatments may also qualify.

  - *Functional impairment* – Impaired ability: to manage physical illness or displaying behavior likely to result in physical deterioration or poor nutrition; to maintain personal hygiene; to manage social relationships due to mental illness; to provide for basic needs without support or assistance from others; and/or to participate in structured daily activities.

G. PROCEDURE FOR VERIFICATION OF SUBSTANCE ABUSE

1. Who may verify substance abuse issues for S+C eligibility?

Person(s) must be licensed/credentialed to perform substance abuse assessments (for example: LCSW, LPHA, CAADAC, etc.).

2. What qualifies as serious substance abuse issues for S+C eligibility?

In order to meet S+C eligibility guidelines for serious substance abuse issues, the applicant must have a substance abuse illness that is expected to be of long-continued and indefinite duration; substantially impedes the person's ability to live independently; and is such that the person's ability to live independently could be improved by more suitable housing conditions.

Use the following guidelines to determine whether a person meets substance abuse eligibility criteria. Applicant needs to meet criteria from all of the following categories:

- *Current presentation* – Summary of current sobriety status that demonstrates severity of substance abuse.

- *History* – Summary of drugs of choice, type, and frequency of drug use that demonstrates severity of substance abuse.

- *Functional impairment* – Impaired ability: to manage physical illness or displaying behavior likely to result in physical deterioration or poor nutrition; to maintain personal hygiene; to manage social relationships due to mental illness; to provide for basic needs without support or assistance from others; and/or to participate in structured daily activities.

H. INCOME CERTIFICATION

In order to determine the appropriate amount of rent for a household to pay, participant income must be verified and rent must be calculated based on standards required by HUD. For additional information, see above description regarding calculation of rent.

I.   INITIAL INTAKE (POLICY 3.01)

The following forms should be used by S+C sponsors for referral and intake:

Form 3.01A	**Referral Follow-Up Form: Client Copy** Sent by HSA to applicant
Form 3.01B	**Referral Follow-Up Form: Sponsor Copy** Sent by HSA, sponsor fills out bottom portion
Form 3.01C	**S+C Contact Management Sheet** This form is used to document contact with the applicant pre-program enrollment. Upon receipt of referrals, sponsor will contact the applicant by phone, and document the calls on this form. This form is returned with the Referral Follow-Up Form.
Form 3.01D/ Form 3.01DS	**S+C Program Rules** **(REQUIRED FOR CERTIFICATION OF ELIGIBILITY)** This form is used to explain program rules to participants, and used to document acknowledgement of the rules by the participant. This form needs to be completed by all incoming applicants accepted by the sponsor. The original should be sent to HSA and a copy given to the program participant.
Form 3.01E/ Form 3.01ES	**Conflict of Interest Disclosure Statement** **(REQUIRED FOR CERTIFICATION OF ELIGIBILITY)**
Form 3.01F/ Form 3.01FS	**Authorization for Exchange of Information Form** **(REQUIRED FOR CERTIFICATION OF ELIGIBILITY)**
Form 3.01G	**Program Requirements** S+C resource specialists complete with client
Form 3.01H	**S+C Certification of Eligibility** This form is completed by the S+C program manager and certifies that the applicant is eligible for S+C housing. The S+C program manager signs the form certifying that all S+C mandated documents are approved. No S+C applicant may move into an S+C unit until a signed S+C Certification of Eligibility is executed.

J.   S+C EXIT (POLICY 3.02)

S+C sponsors should use the <u>S+C Exit Form</u> to document when a program participant exits an S+C unit. The original should be **submitted to HSA** *via fax or by email* **within three (3) days of exit date**.

Salvador Lopez, S+C Mental Health & Substance Abuse Specialist
Email: <u>salvador.lopez@sfgov.org</u>
Fax: (415) 557-6033

The Exit Form Supplement is to be submitted within 90 days of exit date in cases where the exited S+C tenant owes financial debt to the sponsor agency. This form must be signed by a supervisor and must be received within 90 days of exit date in order for reported debt to be considered in a reconsideration assessment.

K.   INCOME CHANGES FOR PROGRAM PARTICIPANTS (POLICY 3.03)

All S+C participants are required to report all changes in household income to the S+C intake specialist, respective housing case manager, and property manager when any change in household income occurs. Contact the S+C intake specialist for specific information regarding the policies and procedures for reporting all changes in income.

> **Shelter Plus Care Intake Specialist**
> Phone: (415) 557-5474 or (415) 557-6481
> Fax: (415) 557-6033

L.   REPORTING SIGNIFICANT VIOLATIONS (POLICY 3.04)

All project sponsors must provide information regarding significant incidents involving program participants using the Program Rule Violation Report (Form 3.04A). If there are problems at a housing site, it is best to report these problems as soon as possible to HSA before it is communicated or reported to HSA from another source.

1.   Justification for the reporting of significant violations

- Reports should be submitted if there is an incident that is intolerable to the point that continuation of rental assistance is at stake

- It is important to communicate major incidents to HSA to ensure that appropriate steps are taken and so that HSA can monitor potential problems

2.   Types of violations

The following types of violations must be reported:

- Incidents involving violence or harm against or threat to well-being of one or more program participants or building staff

- Incidents involving other violations of S+C program rules

- Incidents involving significant landlord/tenant disputes that are not reaching speedy resolution through the sponsor's own internal grievance/complaint processes (not including nonpayment of rent)

- Other incidents that may receive public attention

3. Process for reporting violations

a) Any incident involving a violation of Shelter Plus Care Program Rules must be documented on the <u>Program Rule Violation Report Form</u> (Form 3.04A). Any warning letters and/or other supporting documentation referencing the violation of program rule(s) should be attached to the S+C Program Rule Violation Report. All S+C Program Rule Violation Reports must be reviewed and signed by a supervisor prior to sending them to HSA.

b) Forms should be faxed to the S+C program manager at (415) 557-6033. All incidents must be reported to S+C administration (HSA) within five (5) business days of their occurrence.

c) For other types of incidents, sponsors may send copies of relevant documentation on the forms currently used by their agency, such as building incident reports or case notes. Documentation can be submitted to the S+C program manager by faxing documents to (415) 557-6033.

M. <u>DATA GATHERING (POLICY 3.05)</u>

Sponsors are responsible for completing Annual Progress Reports (APRs) for their projects. Sponsors are expected to submit completed APRs to HSA for review and final submittal to HUD. Each sponsor can develop their own reporting tools to obtain information related to specific S+C performance measures to be submitted as part of the APR. For additional information regarding how to submit the APR, see the <u>Grant Management</u> section above.

N. <u>TRANSFERRING FROM ONE UNIT/SITE TO ANOTHER (POLICY 3.06)</u>

The three categories of transfers include:

- Emergency
- Changes in household size
- Preference for different site

Transfer requests for reasons of emergency have top priority, change-in-household-size transfer requests have second priority, and transfer requests for reason of preference have third priority. **All transfer types require the submission of the Transfer Request Form (Form 3.08A) and approval by the S+C resource specialist.**

1. Emergency

In order to be considered, transfers for reason of emergency must meet the following guidelines:

- Immediate health and/or social service need of program participant as verified in writing by medical provider (health or social service need) or social service provider (social service need)

- Immediate safety need of program participant as verified in writing by medical or social service provider, or as documented by building incident reports or police reports

A program participant whose transfer request meets the above guidelines will be considered for the next place on the emergency transfer list. Once on that list, a program participant will have the first opportunity to interview at the next available S+C unit of appropriate size, as long as no prior emergency requests would require a unit of the same size.

All requests for emergency transfer must be reviewed by the housing sponsor that manages the unit to which the participant would move.

2. Change in household size

A family requiring a larger unit to reunite with additional children or due to the birth or adoption of a child will get the next place on the "change in household size" waiting list. That family will have the first opportunity to interview at the next S+C unit of appropriate size, as long as no emergency requests or prior change in household size requests would require a unit of the same size.

Verification by a social service provider of imminent reunification, and the need for a larger unit, is required for placement on the change in household size waiting list.

3. Preference for different site

Program participants wishing to transfer to a different building for reasons other than emergency or change in household size must reside in the first placement for at least two years (24 months). Once they meet the two-year requirement, they may submit a request to transfer to HSA. When their name reaches the top of the list for their identified transfer site, HSA will refer them accordingly. They must give 30 days notice at the first building, if they are accepted at the second one. **A transfer for reason of preference may happen only once per program participant. The following must be submitted with a preference request:**

- S+C Transfer Request Form (3.06A)

- Supplemental documentation providing the reason for the transfer request

- Letter of reference from the current housing site provider (e.g. case manager) that supports the transfer request

If the participant is referred to the housing site they requested and declines the referral, the client will be placed on the bottom of the preference transfer list.

HSA can authorize the closure of the preference transfer list, if needed. When HSA exhausts the list, it will administer an open enrollment period soliciting applications for those requesting preference transfers. HSA will conduct a lottery and assign wait list numbers accordingly.

4. Transfer policy

a) The transfer policy only applies when transferring from one site to another, not when moving to a different unit within the same building.

b) Tenants must provide additional documentation when transfer is requested as a result of gaining custody of a child or when transfers are requested as an emergency.

c) Tenants can request a transfer by submitting Form 3.08A, the Transfer Request Form.

d) The S+C resource specialist conducts assessment of transfer requests and provides information to tenants regarding the transfer process.

e) The S+C resource specialist verifies that the tenant is in "good standing" from prior placement and conducts an assessment as to whether: a) transfer is an emergency, b) tenant will be reunifying with children, or c) tenant will have a change in household size

f) In defining "good standing" the items that will be considered by the resource specialist are:

- Status of S+C rental assistance

- Status of rent payment

- Lease violations

- Condition of unit based on Housing Quality Standards

g) When filling vacant units, the S+C compliance officer will alternate between the transfer list and waiting list when transfer is a preference.

5. Transfer procedure

The following steps must take place in order to initiate a transfer:

a) Tenant requests form 3.06A, the Transfer Request Form

b) Tenant completes Transfer Request Form and submits it to the S+C compliance officer

c) S+C resource specialist meets with tenant and conducts assessment

d) S+C resource specialist may meet with property management and/or support services as part of the assessment (a release must be secured before information is shared between support services and property management)

e) S+C resource specialist approves or denies transfer request based on all available information

f) If the transfer is denied, the S+C resource specialist informs the tenant about the denial; at this time, the tenant may request a case conference

g) If transfer is approved, S+C resource specialist informs the tenant and S+C compliance officer; tenant then serves property management with a 30-day notice (property management will allow tenant to stay in unit until transfer takes place if transfer is approved)

h) S+C compliance officer adds approved transfer request to the Transfer Waiting List

O. PROCEDURES FOR COMMUNICATION OF TEMPORARY VACANCIES AND RESULTING CHANGES IN TENANT INCOME (POLICY 3.07)

1. Temporary vacancy

When an S+C program participant vacates their unit on a temporary basis, this should be communicated to HSA using the Temporary Vacancy Report (Form 3.07A).

a) If the program participant is paying a program fee to an outside institution such as a drug and alcohol treatment center or other inpatient facility during the temporary vacancy, and s/he is a SSI recipient, they may be eligible to have at least part of the program fee temporarily deducted from their tenant rent. In this case, the S+C subsidy would increase temporarily in an amount equal to the deduction, until the program participant is no longer paying the program fee:

- the participant must be on SSI

- the program outlay must exceed three percent of annual income

b) For a program participant to benefit from this opportunity, the following must apply: the program participant must furnish third-party documentation of their responsibility for the program fee, along with the beginning and projected ending dates of the program payments. The documentation must be on official letterhead of the facility or institution where they are staying, and must be signed by an authorized representative of that program. The program participant will be responsible for supplying receipts showing program fee payments while they are vacant from the unit. All documentation should be submitted to the S+C intake specialist.

c) The term "vacate" does not include brief periods of inpatient care, not to exceed 90 days for each occurrence.

2. Changes in tenant income

If a program participant's income changes due to temporary vacancy, they must communicate this to the S+C intake specialist, in order to have an adjustment made to the tenant share of their

rent amount. The S+C intake specialist needs the following information in order to adjust a tenant's rent contribution:

- Letter from the assistance agency (i.e. Social Security Administration) stating that the client has been terminated from their benefits

- Verification from the case manager/property manager outlining the time period during which the client is experiencing the temporary vacancy

- Forwarding address for the client so that the S+C intake specialist can obtain the client's signature on income certification documents

P. APPEALS PROCESS AND HEARING PROCEDURES (POLICY 3.08)

This policy pertains to both the appeals process and the hearing procedure. Three appeals processes exist:

- For applicants who are initially found ineligible for S+C but have a change in their situation which would affect their eligibility

- For applicants who meet S+C program eligibility guidelines but are denied available housing by a sponsor

- For residents of S+C units whose rental assistance is terminated

1. Process for applicants ineligible for S+C Program

The following process is in place for applicants who are determined to be ineligible for S+C rental assistance. Applicants are advised of rejection by letter, with a general reason given. The letter is sent to the address supplied by the applicant on their application. Reasons may include:

- Not homeless

- No special needs

- Applicant misses two or more S+C interviews (if applicant reschedules in advance, not counted as a miss)

The letter advises the applicant that if their situation changes, they can contact the S+C program manager. The applicant has 30 days to appeal.

2. Process for applicants who are not accepted into available housing by sponsor

The following process is for applicants who meet S+C eligibility, but are denied admittance into an available unit following an occupancy interview by the housing sponsor.

a) Applicants are advised of rejection by letter sent from the sponsor agency, with a general reason given. The letter is sent to the address supplied by the applicant on their application. Reasons may include:

- Applicant misses two or more S+C interviews (if applicant reschedules in advance, not counted as a miss)

- Inconsistent responses given during interview

- History of violence, including history of perpetration of child abuse (for sites where children will be present)

- Negative housing history (evictions don't necessarily make an applicant ineligible, but may be weighed if there are other significant negative factors)

- Inability to uphold conditions of the lease for housing

The letter advises the applicant that they have the right to appeal the decision by making a written or verbal request that the decision be reviewed by the S+C program manager. The letter includes information on how to contact S+C for an appeal (see sample denial letter for mandatory information). The written or verbal request must be received within ten business days from the date of the rejection letter, and the applicant must supply a current address and phone number where they can be contacted.

b) The S+C program manager will not have participated in the occupancy interview, and will not be a subordinate of any of the individuals who conducted that interview. The S+C program manager will contact the applicant and the sponsor by mail to schedule an appeal hearing, and also confirm by phone.

c) At the appeal hearing, the S+C program manager will review written and oral objections from the applicant and information provided by the sponsor. Failure to attend the hearing, or late arrival beyond 15 minutes by either party, will result in a default decision in the other party's favor, unless good cause is shown by the party failing to appear or appearing late. Good cause consists of verified hospitalization, illness or injury, death in the immediate family, arrest, or incarceration.

d) Once the appeal hearing takes place, the S+C program manager will communicate his/her decision in writing to the applicant and to the housing sponsor. This decision will be communicated within five business days from the date of the appeal hearing.

e) If the decision to deny housing is upheld, the applicant may be placed at the top of the S+C wait list and be referred to the next appropriate unit with a sponsor agency other than the sponsor that denied housing.

3. Process for residents of S+C units whose rental assistance is terminated

a) The HUD mandate for an appeals process refers strictly to situations where program participants are terminated, and not to instances where applicants are not admitted into the program. HUD regulations specify that when terminating assistance to a participant, the City must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law.[106] This process, at a minimum, must consist of:

- written notice to the participant containing a clear statement of the reasons for termination;

- a review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and

- prompt written notice of the final decision to the participant.

b) Rental assistance is terminated according to the following process:

(1) Termination from the program is initiated by the S+C program manager due to a violation of program rules (see Policy on Significant Incidents). Written notice of rental assistance termination is sent by the S+C program manager to the program participant, with a copy to the sponsor agency. The written notice must include documentation of the violation of program rules.

(2) On an ongoing basis, the S+C program manager will review and evaluate S+C Rule Violation Reports in addition to incident reports, warning letters, and other supporting documents. The S+C resource specialist will conduct a fact-finding investigation by meeting with the client, sponsor, and property management regarding the events in the S+C Rule Violation Reports and the supporting documents. Once the investigation is completed, the S+C program manager will meet with the S+C resource specialist regarding the facts of each case before making a decision to terminate rental assistance. Per HUD guidelines, the S+C program manager must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination, so that assistance is terminated only in the most severe cases.

(3) Once the S+C program manager decides whether or not to terminate rental assistance, written notice of the decision is sent to the program participant. If rental assistance is terminated, the participant is advised that they have the right to appeal the decision by making a written or verbal request that the S+C Oversight Appeal Subcommittee review the decision. The written or verbal request must be received within 10 business days from the date of the termination letter, and the applicant must supply a current address and phone number where they can be contacted.

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[106] 24 CFR §578.91

(4) The participant and sponsor agency may submit additional documentation to be used at the appeal hearing. All additional documentation must be submitted to S+C administration at least seven (7) business days before the hearing. All additional documentation to be used at the hearing must be relevant to the violation of the S+C program rule(s). The S+C program manager will determine if documentation meets the test of relevance to rule violation. If documentation meets the test of relevance, documentation to be used at the hearing will be provided to the appeal panel, opposing side and/or advocate at least five (5) business days before the hearing. The S+C program manager is to review submitted documents for relevance to rule violation(s), preside at the appeal hearing, and notify the program participant of the decision reached by the appeal panel.

(5) HSA contacts the three-person appeals subcommittee of the S+C oversight committee to schedule an appeal hearing. The subcommittee consists of rotating seats, which include one sponsor agency representative, one City agency representative, one nonprofit agency representative, and one program participant. The members of the subcommittee serve for three months, and reserve two regular times each month to hear appeals in the event that one is to take place. The subcommittee reviews written and oral objections from the applicant and from the S+C sponsor agency. The sole role of the appeals subcommittee is to decide if the decision of the S+C program manager should be upheld or overturned. Failure to attend the hearing, or late arrival beyond 15 minutes by either party, will result in a default decision in the other party's favor, unless good cause is shown by the party failing to appear or appearing late. Good cause consists of verified hospitalization, illness or injury, death in the immediate family, arrest, or incarceration.

(6) Once the appeal hearing takes place, the subcommittee will communicate its decision in writing to the S+C program manager. The decision of the subcommittee must be reached by consensus. The S+C program manager will then communicate this decision in writing to the participant, advocate, sponsor, and property management within five business days. The decision made by the S+C appeals subcommittee is final.

(7) If the decision to terminate rental assistance is overturned, and the participant is still in the unit, the participant will stay in the unit and their rental assistance will be re-established.

(8) If the decision to terminate rental assistance is overturned, and unlawful detainer proceedings have transpired and resulted in an eviction, the participant will be placed at the top of the waiting list for the next appropriate unit. Most likely, they would not be placed with the same sponsor due to the eviction history between the two parties.

(9) If the decision to terminate rental assistance is upheld, the participant may re-apply to Shelter Plus Care via the S+C Direct Referral process.

Shelter Plus Care (S+C) Participant Appeal Hearing Procedures

1. You (or a person authorized in writing by you) have the right to any documents and written record, which will be relied on by the Human Services Agency (HSA) at the informal hearing.

2. You have the right to submit additional documentation to be used at the appeal hearing. All additional documentation must be submitted to S+C administration at least seven (7) working days before the hearing. Such documents can be faxed to (415) 557-6033. All additional documentation to be used at the appeal hearing must be relevant to the violation of the S+C Program Rule(s). The S+C program manager will determine if documentation meets the test of relevance to rule violation. If documentation meets the test of relevance, documentation to be used at the hearing will be provided to the appeals panel, opposing side and/or advocate at least five (5) working days before the hearing.

3. The appeals panel has the right to question you, your witnesses, and any person appearing on behalf of the housing sponsor during the informal hearing.

4. Prior to and at the informal hearing, the appeals panel shall review your case file. The appeals panel shall describe the issues to be decided. Then you may present your position. HSA staff person(s) who made the contested decision shall be available.

5. You have the right to be represented or assisted by an attorney or any other person. Please inform the S+C program manager, (415) 557-6480, if someone will be representing and/or accompanying you during the appeal process. Consent for release of information will be required prior to discussion of the case with a third party.

6. At the hearing, you must clearly state the facts, and then be prepared to present evidence and arguments in support of your position, raise arguments against evidence relied upon by the housing sponsor, and ask questions of all witnesses on whose testimony or information we rely.

7. Hearings conducted by the appeals panel shall be informal. Any oral or documentary evidence relating the facts may be received by the appeals panel without regard to whether that evidence would be admissible in court. Factual determinations relating to the individual circumstance of the participant shall be based on a preponderance of the evidence presented at the hearing. This means that the appeals panel must be persuaded by the evidence that the facts presented by the tenant are more likely true than not true.

8. The decision made the S+C oversight committee is final. The final decision shall be in writing and shall be based on the record (which includes the case file and the evidence presented at the hearing).

IF YOU DO NOT ATTEND THE HEARING OR ARRIVE MORE THAN 15 MINUTES LATE, YOU WILL LOSE THE APPEAL BY DEFAULT.

Q. PROCEDURES FOR COMMUNICATING PROGRAM RULES (POLICY 3.09)

The following behaviors are violations of S+C program rules:

- Selling drugs in or near the building, by the tenant, guest or family member as witnessed by police, or building staff, or as documented by five confidential complaints by a tenant or other person on the lease

- Committing, or threatening to commit, physical violence including domestic violence in the building (violence or threats of violence by guests or family members will also be considered a violation of this rule)

- Willfully and /or repeatedly causing disturbance of quiet enjoyment of community by tenant, guest or family member as witnessed by police, or building staff, or as documented by five confidential complaints by a tenant or other person on lease

- Willfully and/or repeatedly causing damage to the physical building, or surroundings, or causing health, sanitation, fire or safety hazards (damage or health/safety hazards caused by guests or family members will also be considered a violation of this rule)

- Decrease in the number of people in a household will require the tenant(s) to move to a smaller suitable unit offered by S+C; failure to accept an offer of alternative housing will result in termination of the subsidy (all S+C housing meets housing quality standards, as described by HUD)

Each housing sponsor will follow these procedures in communicating S+C program rules to participants:

1. Upon entry to the S+C program

a) Review rules verbally and in writing as part of the S+C intake process.
b) Explain consequences if program participant violates rules, and process leading up to termination of rental assistance.
c) Participants are responsible for contacting the appropriate S+C resource specialist (family or single), and participating in the S+C "Program Requirements Orientation."

2. After entry to the S+C program

a) Post rules in English and Spanish in front lobby or other visible community space(s).
b) If a program participant requires rules in a language other than Spanish or English, appropriate written and verbal translation must be obtained.

3. Review rules verbally

Review rules verbally at least every ninety (90) days at a community meeting or other group setting which provides the opportunity for discussion. Notice of upcoming discussions is to be distributed to each program participant in advance.

R. PROCESS OF REUNIFICATION (POLICY 3.10)

The procedures below apply to cases where a household is engaged in a reunification process with a child or children who have been removed from the home by the child welfare system.

1. When a change occurs to the household size

The head of the household is responsible for notifying HSA, property management, and supportive services when a change occurs to the household size for any reason.

2. Property management notifies HSA

Property management will notify HSA and provide a description of the household's current unit occupants.

3. S+C resource specialist contacts the participant's case manager

a) S+C resource specialist gathers information, connects with Child Protective Services (CPS), and drafts a brief description of the case.

b) HSA sends the client a letter indicating that they will have six months to reunify with their children.

c) S+C resource specialist drafts monthly reports—including, but not limited to, gathering general information from property management and support services to assess whether the child is likely to return to the custody of their parent(s).

d) At the end of six (6) months—HSA will require documentation from CPS as to whether the children have been successfully reunited. Any information requested from CPS should be limited to information relevant to the determination of household size.

- In cases of unsuccessful reunifications, HSA will draft a letter to the client requiring them to transfer to a unit more appropriately sized for their family size. Failure to accept this transfer will result in subsidy termination 30 days from the date of the referral. The client will have 10 working days to appeal the decision.

- Extensions will be granted in cases in which reunification seems likely. The S+C family resource specialist will conduct an assessment and provide documentation to the S+C program manager to assist in determining as to whether an extension shall be granted. The S+C program manager will notify the client, property management, and support services, as to whether an extension has been granted or not.

e) If the decision is appealed, HSA will coordinate an appeal hearing within two weeks of the request.

- Issues to be covered include, but are not limited to, when the children will be returned and if they are going to be returned.

- If the decision is upheld, the subsidy will be terminated.

- If the decision is overturned, a reexamination of the reunification process will take place including whether a court date has been set.

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S.   SURVIVOR RIGHTS (POLICY 3.11)

This policy applies to family units only.

When a head of household who met eligibility for the S+C program becomes deceased while in a Shelter Plus Care unit, family members of the head of household occupying the unit and the sponsor agency should follow these guidelines:

- Per San Francisco S+C rules, family members (excluding 24-hour live-in caregivers) are allowed to stay in the unit up to six months with a possible six-month extension. Family members may stay in the unit with a new head of household, who will need to be verified as head of household by sending documentation to the S+C office. Verification should come from a court document or other legal document stating that the new head of household is the legal guardian of all minor survivors in the housing unit. The new head of household must immediately contact the S+C compliance officer to have his/her name amended on the lease. Rental assistance cannot continue on the unit until the new lease is amended.

Both the new head of household and other family members should work with the sponsoring agency and the S+C resource specialist to secure other housing. The new head of household needs to document the housing search.

T.   PROCEDURES FOR INTERNAL TRANSFERS (POLICY 3.12)

The protocol below should be utilized when a tenant transfers from one unit to another within the same building:

- Sponsor faxes or emails memo to S+C program manager requesting approval to transfer tenant from one unit to another within the same building. Memo should include tenant's name, housing site, current unit number, and prospective unit number.

- S+C program manager evaluates unit change. If approved, S+C program manager will note approval of unit change on tenant's Certification of Eligibility. S+C program manager emails or faxes approval notice back to sponsor agency.

- Sponsor agency submits the Request for Lease Approval to the S+C compliance officer.

- S+C conducts Housing Quality Standards inspection and issues new lease for new unit. This is required for all S+C unit changes.

U. PROCEDURES FOR ADDING ADULTS TO THE LEASE (POLICY 3.13)

1. If adult is Shelter Plus Care participant's care provider

a) Participant makes request to add a care provider to their lease to S+C program manager.

b) Participant submits third-party documentation of a disability, which requires a live-in care provider to S+C program manager, who then evaluates documentation.

c) S+C program manager makes referral to S+C resource specialist.

d) S+C resource specialist meets with participant and potential care provider to conduct assessment. The assessment includes:

- Approval of care provider

- Determination of unit size (per HUD requirements, care providers must be taken into consideration when determining unit size)

e) S+C resource specialist submits assessment to S+C program manager.

f) S+C program manager informs participant of assessment results.

If approved:

a) Participant obtains written approval of addition to lease from property management of housing site and submits to S+C program manager.

b) S+C intake specialist modifies and executes new lease. Housing site and participant are notified.

c) Participant and care provider must schedule intake with the S+C intake specialist in order to add care provider to lease. Note that name of the approved live-in aide may be listed as an occupant of the unit on the lease but should not be a signatory on the lease to avoid the caregiver obtaining tenant's rights.

2. If adult is partner

a) Participant makes request to add partner to their lease to S+C program manager. Partners can only be added to family units.

b) S+C program manager makes referral to S+C resource specialist.

c) S+C resource specialist meets with participant and partner to conduct assessment to:

- Determine partner's eligibility (this will include documenting partner's homeless status)

- Determine unit size (couples are eligible for 1-bedroom units unless circumstances require separate rooms—see HUD's occupancy standards)

d) S+C resource specialist submits assessment to S+C program manager.

e) S+C program manager informs participant of assessment results.

If approved:

a) Participant obtains written approval of addition to lease from property management of housing site and submits to S+C program manager.

b) S+C Intake Specialist modifies and executes new lease. Housing site and participant are notified.

c) Participant and partner must schedule intake with the S+C Intake Specialist in order to add partner to lease. Approval of partner by S+C (Human Services Agency) does not guarantee housing for partner.

V. POLICY ON DOMESTIC VIOLENCE (POLICY 3.14)

An S+C subsidy may be terminated for perpetrators of domestic violence following an investigation by the S+C family resource specialist in cooperation with on-site support and property management staff. In such cases, the subsidy may be transferred to the survivor, provided the survivor is eligible for the S+C program. The survivor may also be granted an emergency transfer when/if an appropriate unit is available. See Emergency Transfer Policy (3.08) for more information.

1. Procedures for terminating rental assistance based on domestic violence (3.14A)

- The following procedures are to be followed when incidences of domestic violence occur in S+C sites. Because of the potential threat to the health and safety of the domestic violence survivor and other S+C participants, time is of the essence. All incident reporting and follow-up actions should occur as soon as possible following the alleged incident.

- The sponsor agency should submit a S+C Program Rule Violation Report (Form 3.04A) describing the domestic violence incident and attach any relevant documentation, including but not limited to in-house incident reports, police reports, and written accounts/complaints from other residents. All documentation should be submitted in a timely manner.

- The S+C family resource specialist will convene a meeting with sponsor agency supportive services and property management staff to discuss the report.

- The S+C family resource specialist will convene a meeting with the alleged domestic violence survivor and their case manager to discuss the incident, assess the survivor's intentions and focus on a plan of action that would benefit the family.

- The S+C family resource specialist will work with the survivor and the household members on the lease to assess eligibility for S+C. If the survivor is not the subsidy holder and s/he is eligible for S+C, s/he will be asked to complete an S+C application.

- The S+C family resource specialist will present findings to the S+C program manager to assist in making the determination as to whether the perpetrator's S+C subsidy will be terminated. The S+C program manager will then make the decision whether to terminate the subsidy. If the subsidy is terminated, the S+C program manager will notify the participant by certified mail.

- If the perpetrator returns to the household after subsidy has been terminated, the sponsor agency's property management policies will determine whether s/he is permitted on-site.

IV. EMERGENCY SOLUTIONS GRANT PROGRAM

The Emergency Solutions Grants (ESG) program is a federally funded block grant administered by the US Department of Housing and Urban Development (HUD) and awarded through a formula to cities, urban counties, and states to support specific activities to address homelessness. These activities are focused on meeting emergency needs of people experiencing homelessness and those at high risk for losing housing, and helping them quickly back into stable housing. The Mayor's Office of Housing and Community Development (MOHCD) develops local ESG standards in conjunction with the CoC related to certain requirements and submits these to HUD with the annual Action Plan. Where relevant, these standards are referenced within this document.

A. DESCRIPTION OF PROGRAM COMPONENTS[107]

ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities. Street outreach is currently not a funded component in San Francisco.

The following summary presents the essential aspects of each component funded in San Francisco. Individual sections below provide greater detail for each component type.

1. Emergency Shelter[108]

Emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for homeless people in general or for specific populations of homeless people and which does not require occupants to sign leases or occupancy agreements. ESG may be used to operate the shelter or to provide a range of essential services to the residents. Temporary hotel and motel stays are also permitted under this component if no appropriate emergency shelter is available for a homeless individual or family.

While the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 eliminated transitional housing as an ESG-eligible activity, those projects that received ESG funding in Fiscal Year 2010 (July 1, 2010 – June 30, 2011) as an emergency shelter may continue to be funded under the ESG program, regardless of whether the project meets the revised definition. The table below shows the emergency shelter activities funded in San Francisco in FY 2010.

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[107] 24 CFR §576.100
[108] 24 CFR §§576.102, §576.2

Emergency Shelter Activities Funded in FY 2010	
Asian Women's Shelter	Gum Moon Residence Hall
Central City Hospitality House	Hamilton Family Center
Community Awareness and Treatment Services	La Casa de las Madres
Compass Family Services	Larkin Street Youth Services
Dolores Street Community Services	Providence Foundation
Episcopal Community Services of San Francisco	The Mary Elizabeth Inn
Friendship House Association of American Indians	YMCA of San Francisco (Bayview)/ United Council of Human Services

2. Homelessness Prevention[109]

Homelessness prevention refers to activities designed to keep households that are at-risk of losing their housing from becoming homeless. Homelessness prevention services include housing relocation and stabilization services and/or short- and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in "category one" (literally homeless) of the homeless definition. The definition of at-risk of homelessness is based on a combination of income, lack of supports, and recent conditions. The full definition appears in Appendix B and should be consulted when conducting eligibility assessments.

3. Rapid Re-housing[110]

Rapid re-housing refers to activities designed to assist households that are literally homeless to return to housing in the community as quickly as possible. Rapid re-housing services include housing relocation and stabilization services and/or short- and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

Rapid re-housing is also an eligible project-type under the Continuum of Care program. Many features of rapid re-housing are the same under the two programs, but there are some differences as well. A summary of the ways in which ESG-funded rapid re-housing differs from CoC-funded rapid re-housing is included as Appendix E.

Note that the primary difference between the rapid re-housing and homelessness prevention components is the type of households served. When relocation and stabilization services are provided to individuals and families that are sleeping in emergency shelter, on the streets, or another place not meant for human habitation, the component is rapid re-housing. When the same services are provided to households that are homeless in other conditions and to households

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[109] 24 CFR §576.103
[110] 24 CFR §576.104 – §576.106

that meet the definitions of "at-risk of homelessness," the component is homelessness prevention. For more information see the section regarding Eligibility below.

4.   Data Collection (HMIS)[111]

ESG funds may be used to pay for the costs of participating in and contributing to the Homeless Management Information System (HMIS) designated by the Continuum of Care for the area.

B.   PARTICIPANT ELIGIBILITY GUIDELINES[112]

Before providing services to any individual or household, programs must ensure that the potential participants are eligible for services.

1.   Referrals from a Centralized or Coordinated Assessment System[113]

ESG regulations require ESG recipients to work with the local Continuum of Care entity to establish and implement a system of centralized or coordinated assessment for all ESG- and CoC-funded programs. A centralized or coordinated assessment system must utilize a common assessment tool and connect potential participants to the most appropriate interventions, based on a set of local standards.

Once the Continuum of Care has developed a centralized or coordinated assessment system in accordance with the requirements to be established by HUD, each ESG-funded program or project within the Continuum of Care's area must use that assessment system. ESG subrecipients that are victim service providers may elect to not participate in the Continuum of Care's centralized or coordinated assessment system.

Not all ESG-funded activities in San Francisco are covered by a coordinated assessment system. Currently, San Francisco has a coordinated entry system for single adults in City-funded shelters and one for families for full-service shelters. (See the CoC portion of this manual for the coordinated entry process for permanent supportive housing.)

All City-funded shelters for single adults are accessed through Human Services Agency (HSA) resource centers where reservations are made for vacant beds anywhere in the adult shelter system. Shelters participating in the single adult system must confirm the identity of the person for whom the bed is reserved. The referral and reservation may serve as third-party evidence that the participant meets the homeless definition.

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[111] 24 CFR §576.107
[112] 24 CFR §576.2, §576.500 (a–d), §576.401(a), §91.5
[113] 24 CFR §576.400(d)

Families seeking shelter may contact Connecting Point, which does an initial assessment over the phone and a more in-depth assessment in person with families seeking shelter and other kinds of supportive services. Priority for shelter referrals is based on the day of first contact and whether a family has any critical health conditions such as pregnancy or an active mental health issue. Shelters participating in Connecting Point receive information confirming the family's eligibility at the time of contact with Connecting Point but may need to confirm continued eligibility as described below.

Homelessness prevention and rapid re-housing programs may receive referrals from a variety of organizations but are not currently accessed through a coordinated entry system. Such programs must establish eligibility of potential participants before serving them.

2. Initial Evaluation of Eligibility and Need[114]

The ESG-funded program must conduct an initial evaluation to determine each individual's or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements.

For programs that accept referrals from coordinated entry, the program should review any documentation provided to establish eligibility and needs. MOHCD or the Continuum of Care may prescribe an assessment form or tool to be used for this purpose in the future.

3. Determination of Homeless Status[115]

Eligibility for assistance under the ESG program depends on the housing or homeless status of the participant. All participants in ESG-funded programs must meet the applicable definition of homelessness or at-risk. The specific status needed to be eligible for assistance varies depending on the program component under which a program is operated.

Homeless status can be classified as one of three categories under the applicable HUD definition: "literally homeless," "imminent risk of homeless," or "fleeing/attempting to flee domestic violence." A fourth category of homeless status, "Unaccompanied youth and families with children who are defined as homeless under other federal statutes and experience housing instability" does not apply in San Francisco as San Francisco has chosen not to utilize this category given the complexities of the HUD document requirements and the limited nature of this category.

a) Literally homeless (Category 1)

Literally homeless is defined as an individual or family who lacks a fixed, regular, and adequate nighttime residence. This includes households with a primary nighttime residence

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[114] 24 CFR §576.401(a)
[115] 24 CFR §576.2

that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation (such as a car, park, abandoned building, bus or train station) or who are living in a supervised, publicly or privately operated shelter designed to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs). An individual who is exiting an institution where s/he resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution also qualifies.

b) Imminent risk of homeless (Category 2)

Imminent risk of homeless is defined as an individual or family who will imminently lose their primary nighttime residence. Qualifying under this criteria requires that the household's primary nighttime residence will be lost within 14 days of the date of application for homeless assistance, no subsequent residence has been identified, <u>and</u> the individual or family lacks the resources or support networks (e.g. family, friends, faith-based or other social networks) needed to obtain other permanent housing.

c) Fleeing/attempting to flee domestic violence (Category 4)

Fleeing/attempting to flee domestic violence is defined as fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; has no other residence; and lacks the resources or support networks (e.g. family, friends, faith-based or other social networks) to obtain other permanent housing.

d) At-risk of homelessness

Homelessness prevention programs may serve those under Categories 2 or 4 above (with incomes below 30% of the area median income (AMI)) and are also allowed to serve households that meet the definition of "at-risk of homelessness."

The definition of *at-risk of homelessness* is based on a combination of income, lack of supports, and recent conditions. The full definition appears in <u>Appendix B</u> and should be consulted when conducting eligibility assessments. In summary, at-risk of homelessness includes:

- having an annual income below 30 percent of median family income for the area; and
- lacking sufficient resources or support networks (e.g., family, friends, faith-based or other social networks) immediately available to prevent them from moving to an emergency shelter or a place not meant for human habitation; and
- meeting at least one of a set of possible conditions including a history of frequent moves, living doubled up, facing a loss of housing within 21 days, living in a hotel or

motel (not paid for by a non-profit or government agency), living in overcrowded conditions or residing in a publicly funded institution.

ESG-funded programs must document that the household would experience homelessness but for the ESG assistance, i.e. a household would require emergency shelter or would otherwise become literally homeless in the absence of ESG assistance.

In addition, a child or youth who does not qualify as "at-risk of homelessness" under this definition, but qualifies as "homeless" under the Runaway and Homeless Youth Act, the Head Start Act, the Violence Against Women Act of 1994, or the Food and Nutrition Act of 2008, is considered to meet the "at-risk" definition. A child or youth who does not qualify as "at-risk of homelessness" under this definition, but qualifies as "homeless" under the Educational section of the McKinney-Vento Homeless Assistance Act (which includes children and youth required to share housing to due loss of housing or economic hardship)[116] also qualifies as "at-risk," as does the parent(s) or guardian(s) of that child or youth if living with the child or youth.

The chart below shows which categories of homeless and at-risk status qualify for each component type in San Francisco. Additional detail regarding each definition and the requirements for documentation of eligibility are included in Appendix B.

Emergency Shelter[117]	Individuals and families defined as homeless under the following categories are eligible for assistance in emergency shelter projects: • Category 1 – Literally Homeless • Category 2 – Imminent Risk of Homeless • Category 4 – Fleeing/Attempting to Flee Domestic Violence
Rapid Re-housing[118]	Individuals and families defined as homeless under the following categories are eligible for rapid re-housing assistance: • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee Domestic Violence (where the individual or family also meets the criteria for Category 1)
Prevention[119]	Individuals defined as homeless under the following categories are eligible for prevention assistance: • Category 2 – Imminent Risk of Homeless (must be below 30% AMI) • Category 4 – Fleeing/Attempting to Flee Domestic Violence (must be below 30% AMI) • At-risk of Homelessness

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[116] McKinney Vento Homeless Assistance Act Section 725(2)
[117] 24 CFR §576.102
[118] 24 CFR §576.104
[119] 24 CFR §576.103

4. Guidance on Serving Persons Who May Be Undocumented Immigrants

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA; "Welfare Reform") imposes restrictions on providing federal public benefits to undocumented immigrants. ESG recipients or subrecipients that are government entities must comply with this law and its procedures specifying how the inquiry into a person's citizenship or immigration status is to be conducted (i.e., Interim Guidance on Verification of Citizenship, Qualified Alien Status and Eligibility Under Title IV of PRWORA).

However, for the purposes of ESG, subrecipients that are nonprofit charitable organizations are not required to have these procedures in place. ESG subrecipients that are nonprofit charitable organizations need not ask with regard to citizenship or immigration status; however, if it is its policy to ask, this policy must be consistent with the above-cited procedures and applied uniformly (i.e., if the ESG subrecipient asks one potential program participant, it must ask all – and may not knowingly provide ESG assistance to an undocumented person, unless it is necessary for protection of life and safety).

With regard to ESG rental and/or financial assistance, even if a household has a member that is an undocumented immigrant, such assistance may be pro-rated based on the eligible persons in the household, as not all members of the household need be eligible for assistance (including the head of household).

Under no circumstances are ESG subrecipients to knowingly provide federal public benefits to undocumented immigrants. ESG emergency shelter activities, including "grandfathered" transitional housing activities, however, are exempt from the requirements of this law, as these activities are short-term shelter, non-cash services, and are not means-tested and thus do not constitute "benefits."

Note that the City and County of San Francisco and its subrecipients' federally funded activities are required to affirmatively further the purposes of the Fair Housing Act (Title VIII of the Civil Rights Act of 1968). Furthermore, undocumented immigrants have the same fair housing protections as citizens and legal immigrants and are members of one of the protected classes of the Fair Housing Act (i.e., national origin). As such, and in the spirit of San Francisco's 1989 City and County of Refuge Ordinance ("Sanctuary Ordinance"), ESG subrecipients that are nonprofit charitable organizations are strongly encouraged to not inquire regarding citizenship or immigration status.

5. Documentation of Homeless/At-risk Status

Homeless or at-risk status must be documented to determine that an individual or family is eligible for assistance. The preferred method of documentation is "third-party"—that is, another individual or organization provides written documentation certifying their knowledge of the potential participants' housing or homeless status. A documented referral from Connecting Point or from the City's singles shelter reservation system would count as third-party documentation

for ESG-funded programs, provided it is still timely. Other forms of third-party documentation may come from an outreach worker or another program or shelter.

If third-party documentation is unavailable, the intake worker's observation may be used and should be documented. Finally, a program may accept self-certification from the person seeking assistance if no other documentation can be obtained.

While third-party documentation is preferred and should be sought whenever possible, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations.[120] A complete description of eligibility documentation requirements is included in Appendix B.

Forms that can be used to document homeless status, including a certification form and self-declaration form are included in Appendix H.

6. Income Eligibility for Homelessness Prevention and Rapid Re-housing

In addition to documenting homeless or at-risk status, households served in a homelessness prevention component must have an income below 30 percent of the area median income. This level of income is part of the definition of "at-risk" which qualifies most households for prevention services. If a participant qualifies under the "Imminent Risk of Homelessness" or "Fleeing/Attempting to Flee Domestic Violence" components the income eligibility requirement must also be verified. While this restriction does not apply to the rapid re-housing component, San Francisco ESG standards allow individual programs (subrecipients) providing rapid rehousing to choose to impose an income requirement at entry at their discretion.

TIP! *The section on Income Determination in the Continuum of Care portion of this manual describes how to determine gross household income.*

7. Prohibition Against Involuntary Family Separation – Emergency Shelter[121]

Shelters that serve families with minor children under the age of 18 may not refuse to serve a family based on the age of children in the household.

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[120] 24 CFR §576.500(b)
[121] 24 CFR §576.102(b)

8. HMIS Intake

All projects funded with ESG funds, except victim services providers and exempted legal services providers, must participate in the Homeless Management Information System (HMIS.) Victim service providers are exempted and prohibited from entering data into HMIS, and must maintain a comparable database that collects similar information in order to provide aggregate data to MOHCD for reporting purposes. Legal service providers may elect to keep a comparable database.

All new project entries must be recorded in HMIS, ensuring that the date of entry corresponds correctly to the date that the participant was found to be eligible and admitted to the program in question.

Steps:

(1) Ensure that a completed a Release of Information (ROI) has been obtained for all adult members of the household before proceeding.

(2) Search for the client in HMIS.

(3) If the client has a record already, update the information that has changed based on the HMIS intake form and enter the client into the program.

(4) If the client does not have an HMIS record, create a new record for the client, including all information on the HMIS intake form, and enter the client into the appropriate program.

(5) If the client household consists of more than one person, be sure to join the members together through the creation of a household. For each member of the household, make sure to check first to see if there is already an HMIS record for that person before creating a new one.

For more information on how to do program entries, see the training materials provided by HSA.

9. Documentation of Ineligibility[122]

ESG programs must keep records that not only demonstrate the eligibility of the participants that are served, but also the determination of ineligibility for any individual or family refused services. For each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.

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[122] 24 CFR §576.500(d)

C. ELIGIBLE ACTIVITIES AND PROGRAM REQUIREMENTS FOR HOMELESSNESS PREVENTION AND RAPID RE-HOUSING

1. Difference between Homelessness Prevention and Rapid Re-housing[123]

The primary difference between the rapid re-housing and homelessness prevention components is the initial housing status of households served. When relocation and stabilization services are provided to individuals and families that are sleeping in emergency shelter, on the streets, or another place not meant for human habitation, the component is rapid re-housing. When the same services are provided to households that are at imminent risk of homelessness, fleeing domestic violence and not living in a shelter, on the streets or another place not meant for human habitation, or to households that meet the definition of "at-risk of homelessness," the component is homelessness prevention. For more information see Eligibility above.

The housing or homeless status determined at eligibility governs whether the assistance provided is homelessness prevention or rapid re-housing. For the duration of time the participant is in the program, the assistance type will correspond to their housing/homeless status at entry.

Some programs may serve both homeless and at-risk households and therefore may provide homelessness prevention or rapid re-housing, depending on the participant household.

> **TIP!** *Programs that provide both homelessness prevention and rapid re-housing assistance should be sure that they are set up in HMIS as two different projects. Participants should be enrolled in the project that matches the ESG component for their housing/homeless status at entry.*

Rapid Re-housing	Individuals defined as homeless under the following categories are eligible for rapid re-housing assistance: • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee Domestic Violence (where the individual or family also meets the criteria for Category 1)
Prevention	Individuals defined as homeless under the following categories are eligible for prevention assistance: • Category 2 – Imminent Risk of Homeless (must be below 30% AMI) • Category 4 – Fleeing/Attempting to Flee Domestic Violence (must be below 30% AMI) • At-risk of Homelessness

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current

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[123] 24 CFR §§576.103 and 576.104

permanent housing or move into other permanent housing and achieve stability in that housing. Eligibility documentation, described above, includes ensuring the household is below 30 percent of the area median income and does not have the resources or support networks necessary to remain housed without assistance.

2. Overview of Eligible Activities

ESG-funded homelessness prevention and rapid re-housing assistance consists of two primary categories of support: Rental Assistance, and Housing Relocation and Stabilization Services. Housing Relocation and Stabilization Services funding can be used for certain specified types of direct costs to support participants (Financial Assistance) and for the costs associated with staffing or contracting with other providers to provide services to program participants. The following chart summarizes these categories.

Rental Assistance	Housing Relocation and Stabilization Services	
Eligible costs: • Short-term rental assistance • Medium-term rental assistance • Rental arrears	**Financial Assistance** Eligible costs: • Rental application fees • Security deposits (not to exceed two months' rent) • Last month's rent • Utility deposits • Utility payments • Moving costs	**Services Cost** Eligible costs: • Housing search and placement • Housing stability case management • Mediation • Legal services • Credit repair

3. Financial Assistance and Rental Assistance[124]

ESG funds may be used to pay for a variety of housing–related expenses, both one-time costs and certain repeating costs, as necessary to secure and/or stabilize housing. As noted in the section on Requirements for Housing below, none of these costs should be incurred before it is determined that the program participant's housing meets habitability requirements as well as rent reasonableness and fair market rent (FMR) requirements where applicable.

a) One-time financial assistance

ESG funds may be used to pay housing owners, utility companies, and other third parties for one-time costs that help the participant secure housing. All payments must be made to a third party, such as a landlord, moving company or utility company:

- ***Rental application fees*** – ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants; programs must verify that this is a requirement of all applicants prior to making payment

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[124] 24 CFR §§576.105 and 576.106

- *Moving and storage costs* – ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to three months, provided that the fees are accrued after the date the program participant begins receiving case management or other supportive services, as outlined below. **Payment of temporary storage fees in arrears is not eligible.**

Under no circumstances may a program provide financial assistance directly to a participant, even as reimbursement for expenses undertaken by the participant to secure housing.

b) Deposits and last month's rent

- *Security deposits* – ESG funds may pay for a security deposit that is equal to no more than two months' rent (note that landlords may not charge additional fees for service animals, beyond a standard fee or security deposit that applies to all tenants who do not have pets; therefore, ESG funds may not be used for this type of expense)[125]

- *Utility deposits* – ESG funds may pay for a standard utility deposit for gas, electric, water, or sewage (the deposit must be standard and required of all customers)

If a program participant leaves the program but remains in the unit for which the deposits were paid, the landlord will continue to hold the security deposit as provided in the lease, and the utility company will continue to hold any utility deposit as provided in the utility contract. State or local law and the terms of the lease and utility contract will dictate what the landlord and utility company may do with their respective deposits when the tenant leaves the unit and the utility contract terminates.

Programs need not require that security or utility deposits be returned to the program when the participant leaves the program, or when the lease or utility contract terminate. Any repayment of a security or utility deposit is considered program income and must be used as match in accordance with match regulations, and must be tracked in accordance with the recordkeeping requirements for match and program income.[126] See section below regarding Match and Administration for additional information.

- *Last month's rent* – If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any three-year period.

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[125] ESG FAQ 1372
[126] ESG FAQ 1373

c) Arrears

If participants owe back rent or utility payments ("arrears") and failure to pay will either cause them to lose their current housing and become homeless, or will make it impossible for them to move into new housing, payment of arrears is eligible. Arrears payment is capped at a maximum of six months, and partial payments for each month count as a full month.

- *Rental arrears* – Payment of rental arrears must be a one-time payment, including any late fees on those arrears. Programs must have written evidence of the amount due.

- *Utility arrears* – Arrears for unpaid gas, electric, water, and sewage may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Programs must have written evidence of the amount due and be able to demonstrate that the amount paid covers six months or less of arrears.

TIP! *In lieu of covering arrears, programs are encouraged to help participants establish payment plans and negotiate reduced arrears where possible.*

d) Recurring financial or rental assistance

- *Monthly utility payments* – If needed to support housing stability, programs may use ESG funds to cover all or a portion of a participant's utility payments, provided these are not covered by another source. In San Francisco, the maximum period permitted for utility assistance is 24 months.

- *Monthly rental assistance* – Rental assistance refers to rent payments made on behalf of an eligible participant for the rent on an eligible unit. Rental assistance is considered "short-term" if it lasts for three months or less, and "medium-term" if it lasts for four to 24 months.

In San Francisco, monthly financial or rental assistance is capped at a total of 24 months in three years. This includes any payments made for arrears, and any advance payment of last month's rent. See the table below for an example of this.

	Arrears Paid	Last Month's Rent Paid at Time of Deposit	Maximum Remaining Months of Assistance Permitted
Rental assistance	6 months	Yes	17 months
Utility payments	3 months	N/A	21 months

TIP! *Programs must be sure to track and document payments to ensure that rental and financial assistance do not exceed the 24-month maximum.*

e) Share of costs

ESG regulations allow the City to require program participants to share in the costs of rent or utilities. The City has established that ESG subrecipients may provide deep or shallow subsidies (under which participants pay a portion of the rental costs), pay100 percent of the rental costs, a set dollar amount, or graduated or declining subsidies.

f) Maximum assistance

Each ESG subrecipient may set a maximum number of months that a program participant may receive rental/financial assistance, or a maximum number of times that a program participant may receive rental/financial assistance. The total period for which any program participant may receive ESG assistance shall not exceed 24 months in three years. This 24-month total is inclusive of any payments for arrears and advance payment of last month's rent upon move in.[127]

i) Changes in household composition[128]

The limits on rental/financial assistance apply to the total assistance an individual may receive, either as an individual or as part of a family. For example, a person who is a member of an assisted household and then leaves to form a new household is not eligible for additional assistance that would exceed the maximum time frame.

ii) Prohibition on use with other subsidies[129]

Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA) during the period of time covered by the URA payments.

The program should be sure to ask participants and to document that the participant receives no other assistance for rental costs or costs otherwise eligible under financial assistance.

g) Conflict of interest[130]

Subrecipients may not require that an individual or family occupy housing owned by the City and County of San Francisco or the ESG subrecipient offering the assistance as a

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[127] 24 CFR §576.105(a)(3)
[128] 24 CFR §576.106 (j)
[129] 24 CFR §576.106(c)
[130] 24 CFR §576.404(a)

condition of receiving the assistance. In addition, ESG subrecipients cannot provide homelessness prevention assistance for units owned by the subrecipient.

4. Requirements for Housing

a) Habitability standards[131]

Programs may not use ESG funds to help a program participant remain or move into housing that does not meet minimum habitability requirements. In practice, this means that for all participants assisted, the unit they currently reside in if remaining there with homelessness prevention assistance, or the unit they will reside in, must be inspected for minimum habitability, and in most cases, lead-based paint.

ESG habitability standards cover 10 areas of review to ensure that the housing is minimally habitable. These are:

- *Structure and materials* – The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.

- *Space and security* – Each resident must be provided adequate space and security for themselves and their belongings, and an acceptable place to sleep.

- *Interior air quality* – Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.

- *Water supply* – The water supply must be free from contamination.

- *Sanitary facilities* – Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

- *Thermal environment* – The housing must have any necessary heating/cooling facilities in proper operating condition.

- *Illumination and electricity* – The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.

- *Food preparation* – All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

- *Sanitary conditions* – The housing must be maintained in a sanitary condition.

- *Fire safety* –
  - There must be a second means of exiting the building in the event of fire or other emergency.

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[131] 24 CFR §576.403

o Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.

o The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

A sample form for conducting habitability inspections is provided in Appendix F. The program should use this form or a similar form to document the inspection. Habitability inspections must be conducted by a qualified ESG recipient or subrecipient staff or contractor. Potential program participants may not conduct inspections.

Programs may wish to give the form in advance to the participant to review and conduct a self-inspection in advance of the program sending staff to inspect.

i) Lead-based paint remediation and disclosure[132]

ESG regulations require programs to address potential lead-based paint hazards in HUD-assisted housing. The standards apply to any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing) or any 0-bedroom dwelling or SRO unit. Properties that have been inspected according to HUD regulations and certified as having no lead-based paint and properties in which all lead-based paint was identified and removed according to HUD standards are also exempt.[133]

If the program is providing rental assistance and the dwelling unit will be occupied by a child less than six years of age, the ESG recipient, subrecipient, or contractor must conduct a visual inspection in order to identify any deteriorated paint. If any hazards are identified the property owner must stabilize any deteriorated paint, and the unit must be cleared for occupancy by a trained or certified inspector. Ongoing lead-based paint maintenance activities must be incorporated into regular building operations. Further actions are required if a child less than six is identified as having an environmental intervention blood lead level.[134]

In order to be qualified to conduct a visual inspection, staff must complete a 20-minute online training at www.hud.gov/offices/lead/training/visualassessment/h00101.htm.

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[132] 24 CFR part 35, subparts A, B, H, J, K, M, and R
[133] 24 CFR §35.115
[134] 24 CFR Part 35 subpart M referenced in 24 CFR 982.401(j) referenced in 24 CFR §578.75(b)

If an inspection reveals a hazard, MOHCD should be contacted for further guidance.

ii) Habitability versus HQS

Housing Quality Standards (HQS) is a standard used in many HUD programs, including the CoC program, which covers all of the above concerns as well as additional domains. If the ESG-subrecipient conducts HQS, this inspection will be accepted. If another agency that is certified to conduct HQS inspects the unit and provides a copy of the inspection report to the ESG subrecipients, this is also acceptable as long as the inspection is conducted before assistance is offered. For example, if an ESG-funded program is providing deposit assistance for a VASH or Shelter Plus Care client, the program may accept the inspection from the City. The relationship should be noted in the file.

b) Additional requirements when providing rental assistance[135]

All units must meet the habitability requirements described above. For participants to receive rental assistance, additional requirements regarding the rent and the terms of occupancy apply.

i) Unit location

A program participant who receives rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the participant continues to meet the program requirements, and the unit meets all of the requirements listed below.

MOHCD permits programs to use ESG funds outside of San Francisco, as long as the use is considered to benefit San Francisco residents. If a San Francisco resident is eligible for rapid re-housing assistance but wants to live in an area outside San Francisco, funds may be used outside the jurisdiction. (Note that this does not apply to rapid re-housing funded with Continuum of Care funds.)

ii) Fair Market Rents and rent reasonableness[136]

ESG programs must ensure rents do not exceed the lesser of current Fair Market Rent (San Francisco, CA HUD Metro FMR Area) or the rent reasonableness standard. If the gross rent for the unit exceeds either, ESG subrecipients are prohibited from using ESG funds for any portion of the rent, even if the household is willing and/or able to pay the

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[135] 24 CFR §576.106
[136] 24 CFR §576.106(d)

difference. ESG programs must perform both a rent reasonableness determination and document that the rent falls at or below the applicable Fair Market Rent **on every unit assisted with rental assistance**, whether for homelessness prevention or rapid re-housing. If a participant is provided with first month's rent as part of move-in assistance, this payment is considered rental assistance and is subject to the rent reasonableness and FMR standards.

The FMR and rent reasonableness standard requirement does not apply when a program participant receives only financial assistance or services under housing stabilization and relocation services. This includes rental application fees, security deposits, an advance payment of last month's rent, utility payments/deposits, and/or moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

As a matter of practicality, however, if the household were also receiving ongoing rental assistance, the amount of the deposit and/or last month's would be limited based on these standards. Caution should be used when providing assistance that exceeds the standard for rental assistance even if used for one-time move-in assistance only, as the provider would be prohibited from providing additional assistance in the future if the household subsequently requires additional assistance.

Rent reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private market and must not be in excess of rents being charged by the owner during the same time period for comparable units not being subsidized through rental assistance.

To make this determination, the recipient or subrecipients should consider

- the location, quality, size, type, and age of the unit; and

- any amenities, housing services, maintenance and utilities to be provided by the owner.

Comparable rents can be checked by using a market study, by reviewing comparable units advertised for rent, or with a note from the property owner verifying the rents paid in other comparable units. Note that not every element in the suggested list of things to check for must be known to establish a comparable unit.

The *Fair Market Rent (FMR)* is a benchmark established by HUD for specific geographic regions. For ESG, the FMR is the maximum rent permitted even if other similar units rent for more.

Final FY 2015 FMRs by Unit Bedrooms[137]					
SRO	Studio/ Efficiency	1- bedroom	2- bedroom	3- bedroom	4- bedroom
$942	$1,256	$1,635	$2,062	$2,801	$3,386

The above chart displays the Fair Market Rents applicable during FY2015. Fair Market Rents are updated and published by HUD every year. **Programs must ensure that they are using the FMRs in effect at the time of their determination.**

FMRs for each fiscal year can be found by visiting HUD's website at www.huduser.org/portal/datasets/fmr.html and clicking on the current "Individual Area Final FY20XX FMR Documentation" link.

The FMR used for a household in shared housing is the lower of the FMR for the family unit size or the pro-rata share of the FMR for the shared housing unit size. The pro-rata share is calculated by dividing the number of bedrooms available for occupancy by the assisted family by the total number of bedrooms in the unit. For example, in the case of a single person household renting one room in a 4-bedroom house, the FMR used would be the lower of the 1-bedroom FMR or the pro-rata share of the 4-bedroom FMR (1/4 of the 4-bedroom FMR).[138]

For purposes of calculating whether a rent is within the FMR, the rent is equal to the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities established by the Public Housing Authority for the area in which the housing is located. Utilities include gas, electric, water, sewage and trash disposal but do not include the cost of a telephone line, Internet or cable television. In San Francisco the allowances are established by the San Francisco Housing Authority and are updated annually.

A sample "Rent Reasonableness Checklist and Certification" form can be found at: www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc. The "Payment Standard" referred to on this form is the applicable Fair Market Rent.

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[137] http://www.huduser.org/portal/datasets/fmr.html
[138] HUD response to ESG question 49751 provided 3/9/15

iii) Lease[139]

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. If a program participant will be renting a bedroom in a single-family home, apartment, or rooming house, the participant must have a lease with the owner. Program participants are not permitted to receive ESG rental assistance if they are subleasing from another renter.

In cases where a program participant is renting a room from a friend or family member, note that although ESG regulations do not prohibit renting a room in the house of a family member or friend with ESG funds, it may be difficult to demonstrate that the potential program participant has no other resources and support networks if they have a family member or friend with an extra room in their home. One key factor to consider is whether the family member or friend has been renting out the bedroom in the recent past.[140]

> *Since this type of arrangement has a high potential for fraud, it is critical that the provider thoroughly document in the participant's case file that all eligibility requirements have been met.*

Where the program is only providing assistance for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

iv) Rental assistance agreement[141]

ESG subrecipients must enter into a rental assistance agreement with owners before making any rental assistance payments. The rental assistance agreement should ensure that the owner is apprised of the nature of the program, the anticipated support to be provided to the participant, and the manner in which the landlord may contact the program if there are concerns.

The rental assistance agreement must also notify the owner that, while the agreement is in effect, the owner must give the program a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

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[139] 24 CFR §576.106(g)
[140] HUD response to ESG question 49751 provided 3/9/15
[141] 24 CFR §576.106(e)

v) Prohibition on using ESG for late payments[142]

The program must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The program is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

5. Housing Relocation and Stabilization Services – Services Costs[143]

ESG funds may be used to provide specific supportive services to eligible households. These services may be provided with or without the provision of financial or rental assistance, for a maximum of 24 months.

a) Housing stability case management[144]

ESG funds may be used to pay costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing, or to assist a program participant in overcoming immediate barriers to obtaining housing.

For rapid re-housing programs, case management assistance cannot exceed 30 days during the period the program participant is seeking permanent housing.

Whether paid for with ESG funds or not, housing stability case management should be provided as needed to support households to regain housing stability and link them to other services in the community.

The program must, at minimum, develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

Case management services are intended to be flexible and respond to the participant's needs, while taking advantage of other services in the community as much as possible (see below for more about mainstream program coordination and linkages.) During their enrollment in the program, participants must meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability.

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[142] 24 CFR §576.106(f)
[143] 24 CFR §576.105
[144] 24 CFR §576.401 (e)

Programs are exempt from this requirement if the Violence Against Women Act of 1994 or the Family Violence Prevention and Services Act prohibit the program from making housing conditional on the participant's acceptance of services.

b) Housing search and placement

For participants who need assistance finding or securing housing, ESG funds may support the services or activities necessary to assist them in locating, obtaining, and retaining suitable permanent housing. These activities include:

- assessment of housing barriers, needs, and preferences;
- development of an action plan for locating housing;
- housing search;
- outreach to and negotiation with owners;
- assistance with submitting rental applications and understanding leases;
- assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness/FMR as described above;
- assistance with obtaining utilities and making moving arrangements; and
- tenant counseling.

c) Mediation

ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the s/he currently resides.

d) Credit repair

ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

e) Legal services[145]

ESG funds may pay for legal services as set forth below, as long as the services are necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the s/he currently resides. ESG funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

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[145] 24 CFR §576.105(b)(4)

- *Eligible subject matters* are landlord/tenant matters; child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; and the resolution of outstanding criminal warrants.

- *Eligible costs* are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the state in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing.

Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal service provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

6. Reevaluation[146]

The purpose of the homelessness prevention and rapid re-housing components is to provide support to participants to achieve housing stability—but not to provide more support than is needed. Reevaluation of need and eligibility, also referred to locally as recertification, is a key aspect of both components:

- Homelessness prevention programs must reevaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every three months

- For rapid re-housing, the program must reevaluate at least annually but may do so more frequently

- At a minimum, each reevaluation of eligibility must establish that:

  o The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and

  o The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance

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[146] 24 CFR §576.401(b)

The program may require each program participant to notify it regarding changes in income or other circumstances (e.g., changes in household composition) that affect the participant's need for assistance under ESG. When notified of a relevant change, the program must reevaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

Each reevaluation of eligibility must establish that the program participant has an annual income that does not exceed 30 percent of median family income for the area. If the reevaluation shows that the program participant is no longer eligible for ESG, assistance must be stopped at that time.

Annual Update in HMIS: At least annually, while a participant is enrolled in a program, information must be updated in HMIS. Information that must be included at the time of the update includes income, benefits receipt, and employment status. Other changes such as the development of a disabling condition or a change in household composition should be recorded at this time if not previously recorded.

D. ELIGIBLE ACTIVITIES AND PROGRAM REQUIREMENTS FOR EMERGENCY SHELTER

ESG funds may be used to provide essential services to families and individuals in emergency shelter and to operate emergency shelters. The table below provides an overview of eligible activities and costs.

Emergency Shelter Component – Eligible Activities and Costs	
Essential Services	**Shelter Operations**
Eligible costs: • Case management • Child care • Education services • Employment assistance and job training • Transportation Eligible if otherwise not available: • Legal services • Outpatient health services • Life skills training • Mental health services • Substance abuse treatment services Eligible if covered above: • Services for special populations	Eligible costs: • Maintenance • Rent • Security • Fuel • Equipment • Insurance • Utilities • Food • Furnishings • Supplies necessary for shelter operation • Hotel/motel vouchers (Where no appropriate emergency shelter is available for a homeless family or individual)

1. Essential Services[147]

a) Essential services

The following service costs are eligible and considered to be essential services for persons who are living in emergency shelter.

i) Case management

Eligible costs include the cost of assessing housing and service needs as well as arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. This includes the following activities:

- Using the required centralized or coordinated assessment system

- Conducting the initial evaluation including verifying and documenting eligibility

- Counseling

- Developing, securing and coordinating services and obtaining federal, state, and local benefits

- Monitoring and evaluating program participant progress

- Providing information and referrals to other providers

- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault and stalking

- Developing an individualized housing and service plan, including planning a path to permanent housing stability

ii) Child care

The costs of child care for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

iii) Education services

When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and

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[147] 24 CFR §576.102(a)1

testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

iv) Employment assistance and job training

The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost.

Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

v) Transportation

Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities. These costs include the following:

- The cost of a program participant's travel on public transportation

- If service workers use their own vehicles, mileage allowance for said workers to visit program participants

- The cost of purchasing or leasing a vehicle for the program in which staff transport program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle

- The travel costs of program staff to accompany or assist program participants in using public transportation

b) Additional services that are eligible if not otherwise available

The following additional services are also eligible to be covered with ESG funds for residents of an emergency shelter, but only to the extent that the services are not otherwise available or accessible within the community.

i) Legal services

Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

- *Eligible subject matters* are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; and the resolution of outstanding criminal warrants.

- *Eligible costs* are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the state in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the programs employees' salaries and other costs necessary to perform the services.

Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

ii) Outpatient health services

Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and non-cosmetic dental care.

Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals.

iii) Life skills training

The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community.

Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

iv) Mental health services

Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management. Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions.

v) Substance abuse treatment services

Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days.

Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

c) Services for special populations

ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are otherwise eligible under one of the categories above. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

2.   Shelter Operations

a) Activities associated with the running of a shelter housing homeless people are eligible

Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter.

b) Hotel or motel vouchers

Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

c) Serving Young Children

The Early Childhood Self-Assessment Tool for Family Shelters, developed by the Administration for Children and Families at the U.S. Department of Health and Human Services (HHS), is intended to help shelter staff ensure their facilities are safe and appropriate for the development of young children. This tool includes recommendations and information on how the shelter environment, programming, policies, and staff can support early childhood safety and development.

d) Maximum length of stay

Per local San Francisco standards, the maximum length of stay will be no longer than six months, unless the ESG subrecipient determines, on a case-by-case basis, that a longer stay is appropriate. The basis for the exception to the six-month maximum should be documented in the case file. No persons who are facing or suspect they may face a threat of violence should be discharged into an unsafe condition.

3.   Habitability Standards for Emergency Shelters

a) Minimum standards

Any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation, and privacy standards. The recipient may also establish standards that exceed or add to these minimum standards.

- *Structure and materials* – The shelter building must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use ENERGY STAR and WaterSense products and appliances.

- *Access* – The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 USC. 794) and implementing regulations at 24 CFR part 8 the Fair Housing Act (42 USC. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 USC. 12131 et seq.) and 28 CFR part 35; where applicable. See sections in this manual regarding fair housing and Section 504 for additional information.

- *Space and security* – Except where the shelter is intended for day use only, the shelter must provide each program participant with an acceptable place to sleep and adequate space and security for themselves and their belongings.

- *Interior air quality* – Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.

- *Water supply* – The shelter's water supply must be free of contamination.

- *Sanitary facilities* – Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

- *Thermal environment* – The shelter must have any necessary heating/ cooling facilities in proper operating condition.

- *Illumination and electricity* – The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.

- *Food preparation* – Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

- *Sanitary conditions* – The shelter must be maintained in a sanitary condition.

- *Fire safety* –
  - There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas.
  - The fire alarm system must be designed for hearing-impaired residents.
  - All public areas of the shelter must have at least one working smoke detector.
  - There must also be a second means of exiting the building in the event of fire or other emergency.

b) **Lead-based paint remediation and disclosure**[148]

Certain federal requirements related to lead-based paint apply to all shelters assisted under ESG programs. These facilities must be inspected to determine the possible presence of lead-based paint hazards to children and if hazards are present, remedial action must be taken.

Emergency shelters that fall under the definition of zero-bedroom dwellings are exempt under the statute. If the shelter does not qualify for the zero-bedroom exemption, it is covered by the regulation. A zero-bedroom dwelling is defined as "any residential dwelling in which the living areas are not separated from the sleeping area. The term includes efficiencies, studio apartments, dormitory or single-room occupancy housing, military barracks, and rentals of individual rooms in residential dwellings."

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[148] 24 CFR part 35, subparts A, B, H, J, K, M, and R

If a program receives funds for a shelter with units having one or more bedrooms, for more than 100 days, it is required that it adopt and implement a policy that assures that the child-occupied spaces are lead safe.

E. COORDINATION AND LINKAGE REQUIREMENTS FOR ALL ESG-FUNDED PROGRAMS

ESG-funded programs are expected to maximize the use of their resources and assist participants to meet a range of needs by integrating services and supports with other homeless-targeted and mainstream programs as much as possible.

1. Coordination with Other Targeted Homeless Services[149]

ESG subrecipients must coordinate and integrate, as much as possible, ESG-funded activities with other programs targeted to homeless people in the area covered by the Continuum of Care or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area. Federal programs of this type include:

- CoC-funded programs including those formerly known as Shelter Plus Care and Supportive Housing Program
- HUD—Veterans Affairs Supportive Housing (HUD-VASH)
- Education for Homeless Children and Youth Grants for State and Local Activities
- Healthcare for the Homeless
- Programs for Runaway and Homeless Youth (RHY)
- Projects for Assistance in Transition from Homelessness (PATH)
- Services in Supportive Housing Grants
- Emergency Food and Shelter Program (EFSP)
- Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program
- Homeless Veterans Reintegration Program (HVRP)
- Domiciliary Care for Homeless Veterans Program
- VA Homeless Providers Grant and Per Diem Program (GPD)
- Homeless Veterans Dental Program
- Supportive Services for Veteran Families Program (SSVF)
- Veteran Justice Outreach Initiative

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[149] 24 CFR §576.400(b)

Additional state and local programs that should also be considered include:

- State Emergency Housing Assistance Program (EHAP)

- Direct Assistance to Housing (DAH)

- Housing funded through the San Francisco Local Operating Subsidy Program

2. Coordination with Mainstream Resources[150]

Subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at-risk of homelessness and homeless individuals and families may be eligible. Examples of these programs include:

- Public housing programs

- Housing programs receiving tenant-based or project-based assistance under Section 8

- Supportive Housing for Persons with Disabilities (Section 811)

- HOME Investment Partnerships Program

- Temporary Assistance for Needy Families (TANF) – known as CalWORKs

- Health Center Program

- State Children's Health Insurance Program (S-CHIP)

- Head Start

- Mental Health and Substance Abuse Block Grants

- Services funded under the Workforce Investment Act

Local programs to be considered include:

- Healthy San Francisco

3. Participant Linkages[151]

Programs funded with ESG must assist each program participant, as needed, to obtain the following.

a) Appropriate supportive services, including assistance in obtaining:

- permanent housing

- medical health treatment

- mental health treatment

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[150] 24 CFR §§576.400(c), §576.401(d)
[151] 24 CFR §§576.400(c), §576.401(d)

- counseling

- supervision, and

- other services essential for achieving independent living

b) **Other federal, state, local, and private assistance available to assist the program participant in obtaining housing stability, including:**

- Medi-Cal and/or Healthy San Francisco

- Supplemental Nutrition Assistance Program (CalFRESH)

- Women, Infants and Children (WIC)

- Federal-State Unemployment Insurance Program

- Social Security Disability Insurance (SSDI)

- Supplemental Security Income (SSI)

- Child and Adult Care Food Program

4. Documentation of Coordination

For the coordination and linkages described in 1, 2, and 3 above, programs are encouraged to document formal relationships with other programs in the form of MOUs or other agreements, and to record in participant files and case notes the referrals made and services received from the above mainstream programs as well as local mainstream programs including Healthy San Francisco.

F. EXIT REQUIREMENTS

1. HMIS Exit

When a participant leaves an ESG program, for any reason, the HMIS record must be updated to reflect their exit from the project, including the date that the participant was no longer enrolled in the project, and their destination. As with the entry, the required information must be entered for all members of a household. For adults, the record must also reflect their income, employment, and benefit receipt status at the time of the exit.

2. Termination[152]

If a program participant violates program requirements, the program may terminate the assistance in accordance with a formal process established by the recipient or subrecipient that recognizes the rights of individuals affected. The program must exercise judgment and examine

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[152] 24 CFR §576.402

all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

a) Ability to provide further assistance

Termination under this section does not bar the program from providing further assistance at a later date to the same family or individual.

b) Additional requirements for rapid re-housing or homelessness prevention

To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:

- written notice to the program participant containing a clear statement of the reason(s) for termination;

- a review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and

- prompt written notice of the final decision to the program participant.

c) Termination of rental assistance

The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:

- the program participant moves out of the housing unit for which the program participant has a lease;

- the lease terminates and is not renewed; or

- the program participant becomes ineligible to receive ESG rental assistance.

G. ALLOWABLE COSTS[153]

In San Francisco, Emergency Solutions Grants (ESG) funds can be used to provide a wide range of services and supports under four program components: (1) Homelessness Prevention, (2) Rapid Re-housing, (3) Emergency Shelter and (4) HMIS.

Certain administrative activities are also eligible.

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[153] 24 CFR §§576.101 - §576.108

1. General Information Regarding Eligible Costs[154]

Employee compensation (including fringe benefits such as holiday, vacation, sick leave) and other overhead costs directly related to carrying out activities eligible under an ESG component are eligible costs. Determining how these staff costs should be allocated will depend on the type of assistance being provided to the program participant.

To allocate these costs, first determine the program component under which these costs fall, then allocate the costs to an activity within the component. For example, staff time expended on processing checks for utility payments for program participants could be eligible under the rapid re-housing component or the homelessness prevention component; the activity would be housing relocation and stabilization services.

For the salaries and related costs of staff that are not fully dedicated to a particular component, costs should be reimbursed in proportion to the actual hours worked on each ESG component. A staff position that is not fully dedicated to ESG cannot be paid solely through ESG funds. For example, if an accountant spends 100 percent of his/her time tracking rental assistance or security deposits for homelessness prevention activities, then paying for this time is allowable under the homelessness prevention component because the accountant's time is only spent working on a single component. Alternatively, the cost for an accountant to process checks for both the homelessness prevention and rapid re-housing components must be prorated by each component. Also, the accountant's time preparing an invoice to obtain ESG funds from the recipient (or, for a recipient, a staff member's time drawing funds in IDIS) would be an administrative cost. Therefore, recipients or subrecipients must break out the accountant's time based on the activities performed.

Other overhead costs, such office costs for rental space, a photocopier, lighting and utilities for an office, could be eligible either as a direct cost charged to one or more components, depending on the activities delivered by that office, or could be charged as an indirect cost if part of an indirect cost allocation plan.

Additionally, please be aware of the following:

- if any of these cost items is part of an indirect cost allocation plan, they must not be billed directly to any activity

- when more than one ESG component or other programs are operated from the same office, the costs and the rationale used to determine the portion of the costs assigned to each component and/or program must be carefully documented

The exact methodology for tracking the time that staff worked on federal grants, and on components and activities within a federal grant, is at the discretion of the recipient. However, recipients and subrecipients must be able to sufficiently document the actual time charged to federal grants and the methodology used, which must be reasonable and justifiable. The Office of Management and Budget (OMB) guidance does not require that recipients track actual time by

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[154] Text from HUD FAQ 1838 published February 2015

ESG component and activity, but there must be a methodology in place to estimate time allocated to components because of the statutory caps in place on street outreach and emergency shelter, and administration.

Additionally, because of the Consolidated Annual Performance and Evaluation Report (CAPER) reporting requirements, there must be a methodology in place to estimate time allocated to activities within a component. While actual time is preferred, any estimates must be a realistic reflection of actual time spent across ESG components and activities.

> *Timesheets that capture actual time spent on specific programs are the most straightforward way to meet time reporting requirements. However, other approaches may be acceptable as long as they meet the guidelines established in the Omni-Circular at 2 CFR Part 200, as applicable.*

2. Eligible Costs by Component

The tables below outline the eligible activities and costs associated with them. More detail on the specific types of activities covered is presented above under the applicable program components.

a) Eligible costs for homelessness prevention and rapid re-housing

Homelessness prevention and rapid re-housing programs have two areas of eligible costs: (1) Housing Relocation and Stabilization Services, and (2) Rental Assistance. The following tables lay out the included activities or items and the associated costs that are permitted in each category:

i) Housing relocation and stabilization services[155]

Housing relocation and stabilization services include two sub-categories of expense: (1) financial assistance and (2) services costs.

Financial assistance consists of those expenses that are paid to a third party such as a housing owner or utility company on behalf of a program participant. See eligible financial assistance costs in the chart below.

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[155] 24 CFR §576.105

Financial Assistance - Housing Relocation/Stabilization Services	
Item	**Eligible Cost**
Rental application fees	The charge to apply for rental housing that is made by an owner to all applicants
Security deposits	A deposit to cover any damages to a unit rented by a program participant, that is equal to not more than 2 months' rent
Last month's rent	One month's rent, in addition to first and deposit which may be paid if necessary to obtain housing for the program participant
Utility deposits	The deposit required of all customers initiating service with a gas, electric, water, or sewage utility provider
Utility payments	A partial or complete payment of a utility bill from a provider of gas, electric, water, or sewage. The program participant or a member of the participant household's name must be on the account or the program has proof of responsibility to make the payment. Payments are limited to not more than 24 months during any three-year period.
Moving costs	Reasonable costs to rent a truck or hire a moving company for a program participant to move into an eligible unit. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance and before the program participant moves into permanent housing. **Payment of temporary storage fees in arrears is not eligible.**

These housing relocation and stabilization services sub-categories are not subject to the requirements above restricting allowable rental assistance to <u>Rent Reasonableness and Fair Market Rent</u> standards. As a matter of practicality, however, if the household were also receiving ongoing rental assistance, the amount of the deposit and/or last month's would be limited based on these standards. Caution should be used when providing assistance that exceeds the standard for rental assistance even if used for one-time move-in assistance only, as the provider would be prohibited from providing additional assistance in the future if the household subsequently requires additional assistance.

Note also that the payment of last month's rent counts towards the maximum number of months of rental assistance for which a household is eligible.

Services - Housing Relocation/Stabilization Services

Item	Eligible Cost
Housing search and placement **Housing stability case management** **Mediation** **Credit repair**	Program costs to provide eligible services using program staff or through subcontracts that cover costs or fees for the services provided, in accordance with applicable financial and cost standards. Housing stability case management may not be provided for more than 30 days during the period the program participant is seeking housing. Credit repair costs may not include the payment or modification of a debt.
Legal services	Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the state in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the programs employees' salaries and other costs necessary to perform the services.

Only the above supportive services are under these components. All other services, including those permitted under the emergency shelter component, are ineligible for homelessness prevention and rapid re-housing. Programs that see a need for these services for their participants are encouraged to make relationships with other providers of services.

ii) **Rental assistance**[156]

Homelessness prevention and rapid re-housing programs may provide a program participant with up to 24 months of rental assistance during any three-year period. This assistance may be short-term, medium-term, payment of rental arrears, or a combination of this assistance.

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[156] 24 CFR §576.106

Item	Eligible Cost – Rental Assistance
Short-term rental assistance	Short-term rental assistance is assistance for up to 3 months of rent.
Medium-term rental assistance	Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent.

Rental assistance payments may only be made to an owner with whom the program has entered into a rental assistance agreement and with whom the program participant holds a lease.

ESG funds may **not** be used to cover late fees for rental assistance. |
| Rental arrears | Rental arrears consist of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears. An oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. |

All rental assistance, including the payment of arrears, is subject to the requirements above restricting allowable rental assistance to <u>Rent Reasonableness and Fair Market Rent</u> standards.

b) Emergency shelter component[157]

Emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Eligible costs for the emergency shelter component include (1) essential services and (2) shelter operations.[158]

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[157] 24 CFR §576.102
[158] Renovation and Assistance under the Uniform Relocation Act are also eligible costs under this component but are not used for this purpose in San Francisco.

i) Essential services

Item	Eligible Cost – Essential Services
Case management	The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible.
Child care	The costs of child care for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.
Education	The costs of improving knowledge and basic educational skills are eligible. Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.
Employment and job training	The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost.
Outpatient health services*	Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and noncosmetic dental care.
Legal services*	Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the state in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services. Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

Item	Eligible Cost – Essential Services
Life skills	The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.
Mental health services*	Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions. Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
Substance abuse treatment services*	Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.
Transportation	Eligible costs consist of a program participant's travel costs to and from medical care, employment, child care, or other eligible essential services facilities. These include: • Travel on public transportation • Mileage allowance for service workers using their own vehicles to visit program participants • Purchasing or leasing a vehicle in which staff transport program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and • The travel costs of staff to accompany or assist program participants in using public transportation

*All service categories indicated with an asterisk are only eligible to the extent that they are unavailable or inaccessible in the community.

ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under the above categories.

ii) Shelter operations

The following costs associated with operating an emergency shelter are eligible:

Item	Eligible Cost – Shelter Operations
Maintenance	Shelter maintenance costs including minor or routine repairs
Rent	
Security	
Fuel	
Equipment	
Insurance	The costs of each of these items, subject to applicable cost principles, are allowed
Utilities	
Food	
Furnishings	
Supplies	
Hotel or motel voucher	Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual

c) HMIS component[159]

Homeless Management Information System (HMIS) means the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

Eligible HMIS costs include the cost for a program that does not run the HMIS to cover the costs of contributing data to the HMIS, and for the HMIS lead agency to operate the HMIS. Victim services and legal providers may also receive funds under this component to operate a comparable database to the HMIS.

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[159] 24 CFR §576.107

Entity	Eligible Costs - HMIS

A program receiving ESG funding that is not the HMIS Lead	• Purchasing or leasing computer hardware
	• Purchasing software or software licenses
	• Purchasing or leasing equipment, including telephones, fax machines, and furniture
	• Obtaining technical support
	• Leasing office space
	• Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS
	• Paying salaries for operating HMIS, including:
	    o Completing data entry
	    o Monitoring and reviewing data quality
	    o Completing data analysis
	    o Reporting to the HMIS Lead
	    o Training staff on using the HMIS or comparable database, and
	    o Implementing and complying with HMIS requirements
	• Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act
	• Paying staff travel costs to conduct intake, and
	• Paying participation fees charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead

HMIS Lead	In addition to the above, if the recipient is the HMIS Lead it may use ESG funds for other costs needed to maintain and administer the HMIS system
Victim services provider or legal services provider	ESG funds may be used to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

d) Indirect costs

MOHCD negotiates an indirect rate with each subrecipient to cover administrative costs. Details regarding allowable indirect costs are included in each individual subrecipient agreement with MOHCD.

H.   MATCH REQUIREMENTS[160]

The recipient must make matching contributions to supplement the recipient's ESG program in an amount that equals the amount of ESG funds provided by HUD. In other words, for every dollar provided through the ESG program, the recipient must contribute a dollar from another source to eligible ESG activities within the same funded programs. The recipient may require its subrecipients to make matching contributions to help meet the recipient's matching requirement.

Matching contributions may be obtained from any source, including any federal source other than the ESG program, as well as state, local, and private sources. However, the following requirements apply to matching contributions from a federal source of funds:

- the recipient must ensure the laws governing any funds to be used as matching contributions do not prohibit those funds from being used to match Emergency Solutions Grant (ESG) funds

- if ESG funds are used to satisfy the matching requirements of another federal program, then funding from that program may not be used to satisfy the matching requirements under this section

1.   Recognition of Matching Contributions

In order to meet the matching requirement, the matching contributions must meet all requirements that apply to the ESG funds provided by HUD.

- The matching contributions must be provided after the date that HUD signs the grant agreement

- For cash match, "provided" means when the funds are expended (or when the allowable cost is incurred)

- For in-kind match, it is the date the service (or other in-kind match source) is actually provided to the program or project

- To count toward the required match for the recipient's fiscal year grant, cash contributions must be expended for eligible activity costs within 24 months after the date HUD signs the grant agreement with the recipient

- Contributions used to match a previous ESG grant may not be used to match a subsequent ESG grant

- Contributions that have been or will be counted as satisfying a matching requirement of another federal grant or award may not count as satisfying the matching requirement of this section

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[160] 24 CFR §576.201

2.   Eligible Types of Matching Contributions

The matching requirement may be met by one or both of the following:

- *Cash contributions* – Cash expended for allowable costs of the recipient or subrecipient, as defined in the Omni-Circular (2 CFR §200).

- *Noncash contributions* – The value of any real property, equipment, goods, or services contributed to the recipient's or subrecipient's ESG program, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the purchase value of any donated building.

3.   Calculating the Amount of Noncash Contributions

To determine the value of any donated material or building, or of any lease, the recipient must use a method reasonably calculated to establish the fair market value.

Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If the recipient or subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

Some noncash contributions are real property, equipment, goods, or services that, if the recipient or subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

4.   Costs Paid by Program Income

Costs paid by program income shall count toward meeting the recipient's matching requirements, provided the costs are eligible ESG costs that supplement the recipient's ESG program.

I.   GRANT ADMINISTRATION

The policies described below reflect HUD requirements related to grant administration for subrecipients of ESG funding. MOHCD also publishes an Operating Procedures Manual for each program year that provides detailed information about preparing program budgets, requesting budget revisions, required internal controls for accounting and recordkeeping, rules related to procurement and contractual services, local monitoring protocols, and general administrative procedures.

1. Confidentiality and Access to Records[161]

a) Confidentiality

Programs must have written procedures to ensure:

- all records containing personally identifying information (as defined by HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applied for and/or received ESG assistance will be kept secure and confidential;

- the address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and

- the address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the City or the program, and consistent with state and local laws regarding privacy and obligations of confidentiality.

b) Federal government rights

Notwithstanding the confidentiality requirements above, HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, must have the right of access to all books, documents, papers, or other records of the recipient and its subrecipients that are pertinent to the ESG grant in order to make audits, examinations, excerpts, and transcripts. These rights of access are not limited to the required retention period (i.e., five years from the grant closeout date) but last as long as the records are retained.

c) Public rights

The recipient must provide citizens, public agencies, and other interested parties with reasonable access (consistent with state and local laws regarding privacy and obligations of confidentiality and the confidentiality requirements in this part) to records regarding any uses of ESG funds the recipient received during the preceding five years.

2. Recordkeeping Requirements[162]

Sufficient records must be established and maintained to enable MOHCD and HUD to determine whether ESG requirements are being met. All records pertaining to each fiscal year of ESG funds must be retained for five years after the expenditure of all funds from the grant under which the program participant was served (i.e., five years from the date of grant closeout). Copies made by microfilming, photocopying, or similar methods may be substituted for the original records. If

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[161] 24 CFR §576.500(x)
[162] 24 CFR §576.500

ESG funds are used for emergency shelter renovation or conversion, different recordkeeping requirements apply.

Specific required records for the ESG program can be found in <u>Appendix F</u>.

3.　Reporting Requirements

Programs receiving ESG funding must report to MOHCD on activities and expenditures as specified in the RFP under which the funding was awarded, and in the contract between MOHCD and the subrecipients. Additional reporting to the Continuum of Care Local Homeless Coordinating Board may be required.

4.　Enforcement[163]

a) Performance reviews

HUD requires MOHCD to monitor their grantees' performance to ensure adequacy and compliance with all applicable regulations. MOHCD accomplishes this through a review of periodic reports and site visits. Additional detail regarding monitoring and the corrective action process is including in the MOHCD Operating Procedures Manual, which is published annually.

If a program fails to demonstrate to MOHCD's satisfaction that the activities were carried out in compliance with ESG program requirements, HUD regulations allow MOHCD to take remedial actions or apply sanctions. Sanctions can include:

- Instructing the recipient to submit and comply with proposals for action to correct, mitigate, and prevent noncompliance with ESG requirements

- Suspending payments to the extent MOHCD deems it necessary to preclude the further expenditure of funds for affected activities

- Denying matching credit for all or part of the cost of the affected activities and requiring the recipient to make further matching contributions to make up for the contribution determined to be ineligible

- Requiring the subrecipient to reimburse the City in an amount equal to the funds used for the affected activities

- Reducing or terminating the remaining grant of a recipient and reallocating those funds to other subrecipients

- Conditioning a future grant

- Taking other remedies that are legally available

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[163] 24 CFR §576.501

V. GENERAL PROVISIONS

A. FINANCIAL MANAGEMENT OF GRANTS

1. Guiding Statutes, Regulations and Circulars

Financial management of federal grant programs, including HUD's homeless programs, is governed by a set of requirements that are contained in the following:

- Provisions in law, as set out in statutes

- Regulations, which interpret and amplify the statute and are set out in the Code of Federal Regulations (CFR)

- Office of Management and Budget (OMB) Circulars, which in some cases have been reissued as part of the CFR

2. Accounting Controls

Having accurate and comprehensive documentation of revenue and expenses is a regulatory requirement, and it is also a necessary part of an agency's organizational responsibilities. Accounting controls consist of procedures that enable recipients and subrecipients of federal funds to maintain accounting records that sufficiently identify the source and application of funds that flow through the agency and, thereby, meet applicable standards. Most important of all, accounting records must be supported by source documentation.

a) Regulatory standards

HUD standards for *accounting records*[164] require that all recipients and subrecipients:

- maintain records that adequately identify the source and application of funds provided for financially assisted activities; and

- assure that these records contain complete and accurate information pertaining to grant or subgrant awards and authorizations, obligations, unobligated balances, assets, liabilities, outlays or expenditures, and income.

Per HUD standards for *source documentation*[165]

- accounting records must be supported by such source documentation as cancelled checks, paid bills, payrolls, time and attendance records, contract and subgrant award documents, etc.

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[164] 24 CFR 85.20(b)(2) and 24 CFR 84.21(b)(2)
[165] 24 CFR 85.20(b)(6) and 24 CFR 84.21(b)(2)

b) Basic elements of accounting records

To meet these regulatory requirements, an organization's accounting system should include at least the following elements:

- *Chart of accounts* – A list of account names and the numbers assigned to each

- *Cash receipts journal* – A chronological listing of when funds were received, in what amounts, and from what sources

- *Cash disbursements journal* – A chronological listing of how much was paid, when and to whom payment was made

- *Payroll journal* – A chronological listing of payroll amounts, benefits, and payroll taxes

- *General journal* – A record of all non-cash transactions

- *General ledger* – A comprehensive depiction, with details by account, of the activities recorded in each account of an organization. Entries transferred to the general ledger are cross-referenced to the applicable subsidiary journal or supporting documentation to permit the tracing of any financial transaction, thereby creating what is called an 'audit trail.'

c) Basic elements of source documentation

Accounting records must be supported by source documentation that shows that all costs charged against the relevant HUD program were:

- incurred during the effective period of the agreement between the recipient (or HSA/MOHCD for subrecipients) and HUD;

- incurred for eligible items;

- approved by the appropriate official(s) within the organization;

- expended (i.e., have proof of actual payment); and

- not reimbursed by another funding source.

Adequate documentation will vary depending on the specific activity. Basic documentation would include the following:

- *Client eligibility* – Proof of homeless status, as well as household income and composition (updated as required by statute and contract agreement)

- *Rental assistance* – Annual income determination, annual rent calculation, housing inspection, lease, rent standard, cancelled checks to landlord

- *Facility-based housing* – Documentation of adequate services, rent calculation, leases, records supporting operating costs (e.g., utility bills, lease, or mortgage payments)

- **Supportive services** – Documentation fitting with type of service (e.g., transportation, case management), that service was delivered, timesheets, client participation records

- **Agency operating costs** – Maintenance cost records, bills or invoices for utilities, insurance, and taxes, travel reimbursement records, office space leases, documentation for materials (paper, computers, phones) related to project, indirect cost documentation

- **Grant administration** – Administrative time and activity reports, indirect cost documentation

d) Fund and cost accounting

i) Fund accounting

Fund accounting is a method of recording financial information that groups resources into funds based on their source and the use of those resources. In fund accounting, each grant and source of cash match is unique, has its own fund, own chart of accounts, and own specific list of eligible activities. Incurred costs are only eligible for federal reimbursement when those costs are allocated to the specific fund source based on proper supporting documentation.

Some subrecipients concurrently receive funds through multiple federal, state, and local grants, as well as funds from private philanthropy and other sources of cash. The costs incurred by such an organization must be properly allocated to each fund/grant source. Any organization that operates programs that receive multiple grants or relies on a single federal grant along with other distinct funding sources will need to use fund accounting practices in order to meet the financial management requirements associated with the federal award.

> **TIP!** *More information on fund accounting can be found in the Fund Accounting Clinic Manual, which was written for use with HUD's homeless programs at the HUD Exchange website: .*
> *www.hudexchange.info/resources/documents/FundAccountingManual.pdf*

ii) Cost accounting

Cost accounting is the process of tracking, recording, and analyzing individual costs associated with an organization's activities. Cost accounting is a critical tool that allows an organization to determine the full cost of each of its activities by identifying each element of cost contributing to the activity.

Cost accounting allows organizations to turn financial data into knowledge that is useful for the following:

- Understanding what it actually costs to deliver an activity

- Tracking the adherence of the activity to its budgeted cost

- Setting clear fundraising goals needed to ensure continuation of the activity

- Evaluating the cost effectiveness of existing activities

- Evaluating the cost of expanding a program or savings that come with reducing an activity

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Case Management Activities and Cost Accounting
For example, the full cost of providing case management services to a client would include a number of cost categories in addition to the case manager's salary. Among the other costs are: additional elements of compensation (fringe benefits, retirement contributions, and other authorized personnel costs); related costs of space, support staff, and supervision; and organizational costs such as accounting and human resources.

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e) **Documenting CoC and ESG matching funds**

To be in compliance with HUD Match Documentation requirements, recipients and subrecipients are expected to implement operating policies and procedures sufficient to assure that:

- cash match funding is tracked through the agency's financial system;

- in-kind match funding is tracked, and the valuation of donated goods and services is documented;

- match funding is **from** eligible funding sources (for CoC programs, in-kind match funding is only used if the source was included in the CoC application);

- match funding is **used** for eligible activities only. For CoC programs match funding is used only in Budget Line Items allowable in the contract's CoC program component(s). Expenditures are supported by documentation (e.g. personnel activity reports, invoices, and receipts).

f) **Audit requirements**

Recipients and subrecipients must comply with the audit requirements described in the Code of Federal Regulations (2 CFR §200.500 – Subpart F).

B.   COST ALLOCATION

1.   Basics of Cost Allocation

Cost principles are those common principles that help organizations determine the costs for specific activities and the costs that are chargeable to grants, awards, and other agreements. Although the cost principles for the federal government, local governments, and nonprofit organizations are similar, they are not identical. Recipients and subrecipients should ensure they

are using the appropriate Office of Management and Budget (OMB) guidance and are in compliance with all applicable state and local requirements, detailed in in **2 CFR §200.400 (Subpart E–Cost Principles)**. The information that follows describes how costs are classified, what is required to receive reimbursement, and how both direct and indirect costs are allocated. OMB identifies three specific attributes related to costs:

- Allowability
- Reasonableness
- Allocability

a) Allowable costs[166]

To be allowable, a cost must meet **all** of the following requirements:

- Be included within the description of eligible activities in the applicable HUD regulations

- Be incurred directly or indirectly for the benefit of an eligible HUD client

- Comply with any limitations or exclusions set forth in these principles or as specified in the HUD grant award process (and codified in the grant agreement)

- Be treated consistently, determined in accordance with generally accepted accounting principles (GAAP) and documented adequately

- Be determined to be necessary, reasonable, allocable to the HUD grant, and otherwise in conformance with the general criteria for allowable costs set forth in 2 CFR Subpart E.

- Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in the current year or prior periods

b) Reasonable costs[167]

Costs are considered 'reasonable' if they do not exceed what a prudent person would incur under similar circumstances. All costs must pass the 'rational person' test by meeting **all** of the following criteria:

- The cost is recognized as ordinary and necessary for the operation of the organization and/or project

- The cost is in accordance with market prices for comparable goods or services as evidenced by cost estimates and documentation

- The individuals responsible for incurring the cost acted with prudence and for the benefit of the organization and its activities

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[166] 2 CFR §200.403
[167] 2 CFR §200.404

- The cost has been incurred after following the established practices of the organization, and in accordance with the terms and conditions of the award

c) Allocable costs[168]

Costs must meet federal guidelines for allocability in order to be reimbursed through a federal grant or contract. To be allocable, a cost must meet **one** of the following requirements:

- Benefits both the federal award and other activities and can be distributed in proportions that may be approximated using reasonable methods

- Is incurred specifically for the funded program (i.e., direct costs)

- Proves necessary to the overall operation of the organization, even though a direct relationship to any particular program activity cannot be readily shown (i.e., indirect costs)

The cost may benefit both the funded program activities and other activities, in which case it must be assigned to the respective activities in reasonable proportion to the benefits received.

A simple aid in determining what is eligible for reimbursement and why it is eligible, as well as how to document compliance with financial management standards so that costs charged are limited only to those that are allowable and reimbursable, is the so-called 'RADAR Test.' When costs are: Reasonable, Allowable, Documented and Allocable, then they are Reimbursable.

2. The Cost Allocation Process

The purpose of cost allocation is to divide shared costs in such a way that the appropriate amount, based on the relative proportion of total resources used, is charged to each applicable program and funding source. Of course, costs defined as ineligible by OMB—or explicitly excluded by HUD or a local funder—can never be reimbursed by a federal grant. One important outcome of the process is the assurance that the same cost is never charged to more than one funding source.

a) Defining direct and indirect costs[169]

All costs can be classified as either 'direct' or 'indirect,' and the cost type governs how they are allocated:

i) Direct costs

"There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or

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[168] 2 CFR §200.405
[169] 2 CFR §200.412

function, but indirect with respect to the federal award or other final cost objective. Therefore, it is essential that each item of cost incurred for the same purpose be treated consistently in like circumstances either as a direct or an indirect (F&A) cost in order to avoid possible double-charging of federal awards."

Direct costs are those that can be specifically identified with a particular award or activity relatively easily with a high degree of accuracy. Identification with the federal award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect costs of federal awards. Examples of direct costs are the salary and benefits paid to a case manager, a rental assistance check paid directly to a landlord, and mileage reimbursement for staff making home visits.

ii) Indirect costs

Indirect costs are those that have been incurred for 'shared' or 'joint' objectives and cannot be readily identified with any particular activity. Typical examples of these costs include:

- Rent, utility, insurance, maintenance, and other expenditures related to shared space

- Administrative and executive team functions that support multiple program areas

- Purchases, transportation, and staff expenses that benefit multiple program areas

Due to the diverse characteristics and accounting practices of non-profit organizations, it is not possible to specify the types of cost that may be classified as indirect cost in all situations. However, a cost may not be allocated as an indirect cost if any similar costs have been assigned as a direct cost.

b) Documenting direct personnel costs

One of the most important aspects of allocating direct costs that benefit more than one grant or program area is the documentation of the cost, regardless of whether it is a personnel or non-personnel cost. Correct allocation of personnel costs, however, often requires more extensive protocols than non-personnel costs. The amount charged for staff time supporting both HUD-funded activities and non-HUD-funded activities must be prorated according to the degree to which the activities benefit the HUD grant. In addition, personnel costs can be attributed to different activities such as program, fundraising, or management and general functions. If there is no record to support the staff time spent and its relationship to the approved grant activities, it is as though it did not happen and those staff costs cannot be paid with HUD funds.

i) Cost reasonableness

Cost reasonableness as it applies to personnel costs is typically established in an organization's Human Resources records that establish pay ranges and job descriptions.

- These documents need to demonstrate that the pay scales and benefits for each position are within the range of similar positions in the labor market area and therefore are reasonable.

- For nonprofit organizations, assistance in establishing and evaluating pay ranges can be obtained from other local nonprofits or from associations of nonprofit organizations that exist in many areas of the country.

ii) Personnel costs

Personnel costs (i.e., staff salaries and benefits) are reimbursable under a HUD grant when staff time is spent conducting HUD-funded and approved activities and providing services to grant-eligible clients (and only to that portion of total clients served).

- This requires an effective time-recording system that not only supports the personnel costs charged to HUD, but also divides the time among the separate program categories required for reporting.

- Note that just because a staff member works exclusively on a HUD grant, 100 percent of his or her time may not be reimbursable under the grant. This is because staff members typically also spend time in internal agency meetings, conducting staff reviews, and other non-HUD-related activities. The time and costs incurred for these functions are not part of an allowable HUD cost.

Example

A program director spends 20 percent of her time providing case management to HUD CoC clients, 40 percent supervising CoC program case managers, and 40 percent supervising case managers seeing non-HUD clients.

Her annual salary of $60,000 would be allocated as follows:

- CoC = ($60,000 x .20 = $12,000) + ($60,000 x .40 = $24,000) = $36,000

- Non-HUD = $60,000 x .40 = $24,000

iii) After-the-fact time and activity reporting

In order to comply with financial management requirements, recipients and subrecipients should be able to document all staff time that is paid from the HUD grant. To document the division of costs between funding sources, staff are expected to record actual time spent on each HUD or non-HUD activity to provide the basis for how much of his or her salary (and related fringe benefit costs) will be allocated to the various funding sources.

According to OMB, time and activity records must be prepared at least monthly, but keeping records on a daily or weekly basis is much more practical and efficient. The recording may take place after the fact. Because it is difficult to reconstruct the time spent on activities with any degree of accuracy many days after the fact, it should occur as soon as possible, preferably the same day or first thing the next. Optimally, the timekeeping

procedures an organization implements require effective supervision by managers to ensure on a regular basis that employees are keeping records accurately. Such systems help establish an unbroken thread from the work performed by an individual staff person to the eligible HUD activity in an approved grant, contract, or agreement.

iv) HSA personnel costs & personnel activity reports

The most important tool in adequately documenting time is an adequate time and activity reporting system. This system must allow employees to log the time spent on different clients, activities, and grants, and provide a mechanism for employees to report all the time they spent working throughout that day.

In order to properly account for and report CoC and associated matching funds, all staff of CoC subrecipient agencies are expected to use both timesheets and HSA's standard *Personnel Costs & Personnel Activity Reports (PARs)*. Direct HUD CoC recipients are highly encouraged to use these tools as well. Further, subrecipients are expected to implement operating policies and procedures sufficient to assure that:

- Personnel Activity Reports (PARs) are prepared and completed by individual employees and signed by a manager each pay period, or once each month, and that reports coincide with one or more pay periods;

- all of an employee's paid time is recorded in their PAR (this should include time spent on behalf of contracted HUD programs, time spent on other programs, and paid time off);

- all the time that employees record as HUD-funded are assigned to CoC budget line items that are allowable and authorized under the relevant HSA contract;

- employees assign their time to appropriate subcategories within the HUD CoC budget line items that were identified in the associated HUD/HSA application;

- PARs, payroll time sheets, and/or payroll registries capture and record information sufficient to determine the appropriate amount of expense to be:

  o billed to HSA/HUD under the correct HUD CoC budget line item category, or

  o recorded as a matching fund activity.

v) Supplemental documentation of staff activities

For costs to be 'allowable' expenditures, the time that staff spends delivering services to those clients — and only those clients — can be charged to the grant. This demonstrates that the costs are 'allocable' costs. Recording hours, however, is not sufficient by itself. An adequate time and activity system will have additional documentation that explains how the staff person spent the time on eligible clients and activities, such as the following:

- *Case notes* – Case managers should keep case notes about the issues and topics that were covered in their sessions with clients and have a justification for the frequency or infrequency of meetings.

  o For instance, one client may have a steady job, be successfully managing their symptoms, and have a stable coping strategy and family support. Such a client might only require monthly check-ins with a case manager.

  o Another client may have more significant obstacles to housing stability or be going through a crisis. This client might require daily counseling sessions.

- *General service plan* – At the point of intake, the case manager will work with each client to create a general service plan that will include the areas that the client will work on, the goals to achieve, and the service delivery schedule.

  o This service plan forms the backbone for scheduling and providing services and should be kept on file for that client.

  o Case notes will indicate progress towards the goals and changes in the client's circumstances.

- *Activities log* – Other staff, such as maintenance personnel, might keep a time log and file by housing unit. The log would document the time and activities spent on HUD-funded units and the file would contain forms like maintenance request forms.

Together these documents are used to verify recipients' and subrecipients' efforts to ensure that clients receive appropriate services as well as verify the work case managers conduct with their clients. This documentation is the foundation for the timesheet submitted and approved to charge time to HUD or other funding sources. This type of supporting documentation should also be available to respond to monitoring reviews or the test of transactions in an audit.

c) Direct charge of non-personnel costs

Non-personnel direct costs are allocated through associating each cash outlay with a particular activity and fund source. For example, rent payments are charged to the appropriate funding source. Supplies and resources purchased for a specific program are recorded as direct expenses at the time of payment, based on purchase order requests or other such authorizing documentation.

d) Allocating shared non-personnel costs

Non-personnel "shared" direct costs can include the purchase of supplies, food, and other materials used or consumed directly by clients. In this case, recipients and subrecipients would employ standardized procedures for documenting the proportion of each purchase to be associated with appropriate grant sources and program activities, such as purchase order requests or supply requisition forms.

Other non-personnel "shared" direct costs can include a portion of office space, utilities or transportation costs, for which the costs of rent (or vehicle maintenance) may be prorated

according to the percentage of HUD clients served, building square footage used by associated program staff, or miles driven.

For organizations without an approved federal indirect rate, the ***Direct Allocation method*** is the most common method used for handling shared non-personnel costs. It treats almost all indirect costs as direct costs. The basis for prorating indirect costs as direct costs is supported by documentation that demonstrates the relative benefit of the particular cost to the grant's activities.

Using this method, all costs are limited to three basic categories:

- Program activities, including those performed under federal grants

- Management functions and general expenses (M&G)

- Fundraising, which, under the OMB regulations, is never eligible for HUD-reimbursement

Shared (or indirect) costs, such as insurance, depreciation, facilities, copier, other equipment and phone/Internet expenses are prorated as though they are direct costs and are assigned to one of the three categories above using a base appropriate to each particular cost type.

- To accurately reflect each program area's share of the organization's total operational expenses, management and general expenses may be further allocated to each program area.

- Detailed instructions for implementing an item-by-item allocation methodology should be contained in each recipient or subrecipient's Cost Allocation Plan. Please note, however, that HSA and HUD regulations do not allow for any reimbursement of 'administrative' expenses as a direct expense. Examples of cost allocation methodologies are described below.

Example A

Agency A has 1,000 square feet of space for its program activities (plus an additional 400 for administration and fundraising). Within the program space, it operates a HUD CoC program and several non-HUD programs staffed by five full-time workers.

- Each month all staff members complete time sheets and PARs that document how they spent their time during that month.
- The portion of total rent and utility costs associated with the 1,000 square feet for program staff—and to be charged each applicable funding source—is calculated by:

    o First, applying the proportion of 'program' to total space (1,000/1,400 sq. ft.) = 5/7 of the total cost of $3,500 per month = $2,500.

    o Then applying the ratio of program-related personnel costs calculated for each funding source and activity. There are 5.0 FTE staff: 2 CoC case managers, 2 non-HUD case managers, and 1 supervisor who spends 60% of her time on CoC-related activities and 40% on non-HUD activities.

    o This ratio is determined based on the proportion of hours charged by staff to each fund source and activity in the monthly staff time and activity reports, e.g.:
    2.6 FTE staff for COC activities = 2.6/5 x $2,500 = $1,300 in CoC rent cost
    2.4 FTE staff for non-HUD activities = 2.4/5 x $2,500 = $1,200 in non-HUD rent

Example B

Agency B utilizes a 9-passenger van to assist clients to get to medical appointments. Only the ESG-funded Rapid Re-housing contract recognizes this as a reimbursable activity. Thus, for every trip, the van operator keeps track of each client, which program s/he is associated with, and the miles driven on behalf of that client. The amount eligible for ESG reimbursement is determined by calculating the ESG-eligible portion of total person-miles driven and applying that ratio to the total costs for that trip.

e) **Defining administrative costs for HUD purposes**

Because HUD programs have specific limits on the amount of funds spent on grant administration, separating program costs from administrative costs is essential for financial management compliance. For both the CoC and ESG programs, administrative costs include the costs of overall program management, budgeting, coordination, monitoring, reporting, and evaluation. This includes salaries and benefits for personnel engaged in these activities, as well as the costs of administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services. It can also include the costs of goods and services required for program administration, including the rental or purchase of equipment, insurance, utilities, office supplies, and the rental and maintenance (but not purchase) of office space. A more detailed description of allowable CoC administrative costs is included in the Expense Guidelines section above.[170]

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[170] 24 CFR 578.59 and 576.108

C.   SAN FRANCISCO FAIR CHANCE POLICY

All City contractors, housing providers, and employers with 20 or more employees must comply with San Francisco's Fair Chance Ordinance (in effect August 13, 2014). The ordinance requires employers to review an individual's qualifications before inquiring about their arrest and conviction record(s) and related information when making employment decisions. It also regulates affordable housing providers' use of arrest and conviction records of applicants for, or residents in, affordable housing. The ordinance:

- prohibits employers from issuing job ads or solicitations stating that persons with arrests or convictions may not apply or will not be considered for employment;

- prohibits questions about or consideration of the following six categories of information at any time in the interview or hiring process:

  o an arrest not leading to a conviction, except for unresolved arrests,

  o participation in a diversion or deferral of judgment program,

  o a conviction that has been dismissed, expunged, or otherwise invalidated or inoperative,

  o a conviction, determination or adjudication in the juvenile justice system,

  o a conviction that is more than seven years old, and

  o an offense other than a felony or misdemeanor, such as an infraction

- prohibits questions about conviction history or unresolved arrests until after an employer has either conducted a live interview with the applicant, or made a conditional offer of employment to the applicant;

- requires the employer to provide the applicant with a copy of Office of Labor Standards Enforcement Fair Chance Ordinance Notice before inquiring about conviction history or unresolved arrests;

- requires the employer to conduct an individualized assessment if s/he intends to make an employment decision based on an unresolved arrest or conviction history;

- requires that the employer give the applicant an opportunity to explain or correct an unresolved arrest or conviction history, as well as to provide any evidence of rehabilitation or mitigating factors;

- requires the employer to delay any adverse action and reconsider the action if the applicant provides evidence of rehabilitation, mitigating circumstances factors, or inaccuracies in the report; and

- requires the employer to inform the applicant if s/he decides to take an adverse action based on the applicant's unresolved arrest or conviction history.[171]

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[171] Article 49 of the San Francisco Police Code and Chapter 12T of the San Francisco Administrative Code

D. SUBSIDY LAYERING[172]

Applicants that receive or can reasonably be expected to receive an aggregate amount of assistance in excess of $200,000 must submit information in their application on other sources of governmental assistance that they have received, or reasonably expect to receive, for a proposed project or activities. HUD's review of this information is intended to prevent excessive public assistance for proposed project or activities by combining (layering) assistance under this program with other governmental housing assistance from federal, state, or local agencies, including assistance such as any loan, grant, guarantee, insurance, payment, rebate, subsidy, credit, tax benefit, or any other form of direct or indirect assistance. This disclosure is submitted via HUD form 2880.

E. FAITH-BASED ACTIVITIES[173]

1. Equal Treatment

Organizations that are religious or faith-based are eligible to participate in the CoC and ESG programs. Recipients and subrecipients must not discriminate against a program participant or prospective program participant on the basis of religion or religious belief.

2. Separation of Activities

Recipients and subrecipients of CoC or ESG funds that engage in explicitly religious activities such as worship, religious instruction, or proselytization, must offer these services separately, in time or location, from the programs or services funded through CoC or ESG. Participation in any such explicitly religious activities must be voluntary for CoC and ESG program participants.

3. Religious Identity

A faith-based organization that is a recipient or subrecipient of CoC or ESG program funds may continue to carry out its mission, including the definition, development, practice, and expression of its religious beliefs, provided that it does not use direct program funds to support or engage in any explicitly religious activities. Faith-based organizations may use space in their facilities to provide program-funded services, without removing or altering religious art, icons, scriptures, or other religious symbols.

In addition, ESG regulations explicitly specify that religious organizations retain authority over internal governance. The organization may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.

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[172] 24 CFR §578.29, 42 US Code §3545(b), 24 CFR 4.9
[173] 24 CFR §§58.87(b), 578.103(13), 578.406

4.   Alternative Provider

If a program participant or prospective program participant of the CoC objects to the religious character of an organization that provides services under the program, that organization shall, within a reasonably prompt time after the objection, undertake reasonable efforts to identify and refer the program participant to an alternative provider to which the prospective program participant has no objections. Recipients and subrecipients shall document any objections from program participants and prospective program participants and any efforts to refer such participants to alternative providers.

F.   FAIR HOUSING[174]

CoC and ESG recipients must implement programs in a manner that affirmatively furthers fair housing, which means that the recipient must:

- affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap. Marketing should target those least likely to apply without special outreach, and records should be maintained of all marketing activities;

- where a recipient encounters a condition or action that impedes fair housing choice for current or prospective program participants, provide such information to the Mayor's Office of Housing and Community Development; and

- provide program participants with information on rights and remedies available under applicable federal, state and local fair housing and civil rights laws.

The recipient and its subrecipients must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to, adopting procedures that will make information available regarding the services and facilities that are accessible to persons with disabilities. Recipients and subrecipients are also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.[175]

HUD recipients and subrecipients must comply with the accessibility requirements of the Fair Housing Act (24 CFR part 100), Section 504 of the Rehabilitation Act of 1973 (24 CFR part 8), and Titles II and III of the Americans with Disabilities Act, as applicable (28 CFR parts 35 and 36) as summarized below.[176]

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[174] Fair housing and reasonable accommodation information excerpted from HUD SHP desk guide
[175] 24 CFR §576.407(b), Title VI and Executive Order 13166
[176] 24 CFR §578.93, 578.103(14)

1. Minimum Accessibility Requirements[177]

In addition to its general non-discrimination requirements, the Fair Housing Act requires that new multifamily housing with four or more dwelling units built for first occupancy after March 13, 1991, be designed and built to contain minimum accessibility features for persons with disabilities. This includes accessible public and common use areas, doors that are wide enough for wheelchairs, kitchens and bathrooms that allow a person using a wheelchair to maneuver, and other adaptable features within the units. These accessibility requirements are in addition to those required under Section 504 (see below). Sleeping rooms that share kitchen facilities and dormitory style housing are subject to these requirements. For more information about these the accessibility requirements see www.fairhousingfirst.com.

2. Inquiries Related to Disability

Although the Fair Housing Act places limitations on the ability of housing providers to inquire about the nature and severity of an applicant's disability, it is permissible for a housing provider that offers housing serving persons with disabilities to inquire whether an applicant meets the program's eligibility requirements.[178] Thus, a provider whose housing is limited to serving residents with disabilities may inquire whether an applicant has a qualifying disability. In addition, service providers connected with the housing program may make inquiries necessary to determine the service needs of residents. Housing providers may also ask applicants and residents whether they need units with special features or if they have special needs related to communication, but they should make these inquiries of all program participants.

3. Equal Access[179]

Housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status. No recipient or subrecipient of HUD funds may inquire about the sexual orientation or gender identity of an applicant for, or occupant of, HUD-assisted housing for the purpose of determining eligibility for the housing or otherwise making such housing available. This prohibition on inquiries regarding sexual orientation or gender identity does not prohibit any individual from voluntarily self-identifying sexual orientation or gender identity. This prohibition on inquiries does not prohibit lawful inquiries of an applicant or occupant's sex where the housing provided or to be provided to the individual is temporary emergency shelter that involves the sharing of sleeping areas or bathrooms, or inquiries made for the purpose of determining the number of bedrooms to which a household may be entitled.

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[177] 24 CFR 100.205
[178] 24 CFR 100.202(c)
[179] 24 CFR § 5.105(a)

4. Fair Housing Act Prohibitions on Discrimination Based On Sex

In general, the Fair Housing Act prohibits housing providers from limiting access to their housing program based upon sex. However, housing may be limited to one sex where, because of the physical limitations or configuration of the housing facility, considerations of personal privacy or personal safety would make it inappropriate for the facility to be made available to members of both sexes. For example, it would not be a violation of the Fair Housing Act for units with shared bathing or sleeping facilities to be limited to one sex.

5. Discrimination Based Upon Religion

The Fair Housing Act prohibits discrimination based upon religion. Recipients and subrecipients may not restrict housing or services to persons of a particular religion or religious denomination, nor may they require a particular religious belief or activity as a condition of receiving benefits or participating in program activities. If providers allow tenants to use the public and common spaces for religious services, it must make those public and common spaces available for all types of religious services requested by the tenants.

In addition to the Fair Housing Act prohibitions on discrimination based upon religion, there are other HUD requirements relating to use of federal funds by faith-based organizations.

6. Title VI of the Civil Rights Act of 1964

Title VI prohibits all recipients of federal financial assistance from discriminating based on race, color, or national origin. Title VI applies to any program or activity receiving federal financial assistance, not just housing.[180] In housing, Title VI and the Fair Housing Act apply to many of the same types of activities. However, HUD has broader investigative authority in complaints related to violations of Title VI and the authority to impose different types of remedies than it does in cases involving violations of the Fair Housing Act.

Title VI regulations require that recipients have an affirmative obligation to take reasonable steps to remove or overcome any discriminatory practice or usage that subjects individuals to discrimination based on race, color, or national origin. The regulations also require that, even in the absence of prior discrimination, recipients should take affirmative steps to overcome the effects of conditions that result in limiting participation by persons of a particular race, color, or national origin. Title VI regulations also require that owners maintain racial and ethnic data showing the extent to which members of minority groups are beneficiaries of federal financial assistance.

Under Title VI, recipients may be required to provide language assistance to persons who, as a result of their national origin, are limited in their English proficiency, in order to improve access to their programs and activities.

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[180] See 24 CFR Part 1

7. American with Disabilities Act (ADA)

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination against persons with disabilities in all programs, activities, and services of a public entity (i.e., state or local government; or department, agency, special purpose district, or other instrumentality of a state, or states, or local government). The prohibitions against discrimination under Title II of the ADA are essentially the same as those in Section 504, except they apply to all programs, activities, and services of the public entity, not just those funded with federal financial assistance.

Title III of the ADA prohibits discrimination on the basis of disability in public accommodations and commercial facilities. These do not include housing, but do include emergency overnight shelters or social service facilities. For more information about the ADA and its requirements, see the Department of Justice website at: www.ada.gov.

Recipients must ensure that their program's housing and supportive services are provided in the most integrated setting appropriate to the needs of persons with disabilities.[181]

8. Age Discrimination Act of 1975[182]

The Age Discrimination Act prohibits discrimination based upon age in federally assisted and funded programs or activities, except in limited circumstances. It is not a violation of the Age Discrimination Act to use age as a screening criterion in a particular program if age distinctions are permitted by statute for that program or if age distinctions are a factor necessary for the normal operation of the program or the achievement of a statutory objective of the program or activity.

G. <u>DEFINITION OF FAMILY AND EQUAL ACCESS</u>[183]

The Fair Housing Act prohibits discrimination based upon familial status, defined as families and individuals with children under 18, as well as pregnancy, and families and individuals in the process of securing legal custody of individuals under 18. Discrimination against families with children is prohibited, regardless of the ages of the children, or the number of children in a household. Notwithstanding the prohibition against discrimination on the basis of familial status, state and local governments do have the right to apply reasonable restrictions regarding the maximum number of occupants permitted to occupy a dwelling.

In general, absent special circumstances, HUD's position is that a maximum of two persons in a bedroom is a reasonable occupancy standard. Bedroom size, unit size, age of children, and other circumstances might affect the reasonableness of a two person per bedroom occupancy rule.[184]

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[181] 24 CFR 8.4(d)

[182] 24 CFR Part 146

[183] 24 CFR §5.105

[184] For a detailed discussion on establishing lawful occupancy standards, see "Fair Housing Enforcement—Occupancy Standards Notice of Statement of Policy," published in the Federal Register on December 18, 1998, Volume 63, Number 243.

A family can include any group of persons presenting for assistance together with or without children regardless of marital status, actual or perceived sexual orientation, or gender identity. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

What this means is that any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, is considered to be a family and must be served together as such. Further, a recipient or subrecipient receiving funds under the ESG or CoC programs cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member's family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity.

1. Equal Access

Housing that is assisted by HUD shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.

2. Prohibition of Inquiries on Sexual Orientation or Gender Identity

No owner or administrator of HUD-assisted housing, nor any recipient or subrecipient of HUD funds, may inquire about the sexual orientation or gender identity of an applicant for, or occupant of, HUD-assisted housing for the purpose of determining eligibility for the housing. This prohibition on inquiries regarding sexual orientation or gender identity does not prohibit any individual from voluntarily self-identifying sexual orientation or gender identity. This prohibition on inquiries does not prohibit lawful inquiries of an applicant or occupant's sex where the housing provided or to be provided to the individual is temporary emergency shelter that involves the sharing of sleeping areas or bathrooms, or inquiries made for the purpose of determining the number of bedrooms to which a household may be entitled.

Below are two examples of how this might apply:[185]

> **Example A**
>
> **A permanent supportive housing project under the CoC program rule that serves chronically homeless families.** A permanent supportive housing program that serves families must serve all types of families and cannot discriminate against any family based on marital status, actual or perceived sexual orientation of the family members, or gender identities of the family members. Therefore, if two adults present together as a family, the recipient or subrecipient must serve the two adults as a family and may not require proof of marriage and may not limit assistance to couples in a heterosexual relationship.

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[185] HUD CoC FAQ 1529

> **Example B**
>
> **An emergency shelter, transitional housing project, or permanent housing project that serves households with children.** While it is acceptable for a shelter or housing program to limit assistance to households with children, it may not limit assistance to only women with children. Such a shelter must also serve the following family types, should they present, in order to be in compliance with the Equal Access rule:
>
> - Single male head of household with minor child(ren); and
> - Any household made up of two or more adults, regardless of sexual orientation, marital status, or gender identity, presenting with minor child(ren).
>
> In this example, the emergency shelter or housing program would not be required to serve families composed of only adult members and could deny access to these types of families provided that all adult-only families are treated equally, regardless of sexual orientation, marital status, or gender identity.

H.   SECTION 504 REQUIREMENTS[186]

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based upon disability in all programs or activities operated by recipients of federal financial assistance, regardless of whether the programs involve provision of housing or non-housing services or benefits. While Section 504 overlaps with the disability discrimination prohibitions of the Fair Housing Act, it also imposes broad affirmative obligations on recipients to make their programs, as a whole, accessible to persons with disabilities. These obligations include the following: ·

1.   Affirmative Accessibility Requirements

Section 504 regulations establish affirmative physical accessibility requirements when federal financial assistance is used for new construction or rehabilitation of housing. The regulations require five percent of units to be made accessible to persons with mobility disabilities and an additional two percent to be made accessible to persons with communication disabilities. In addition, the regulations require accessible public and common use areas.[187] Units and public and common use areas that meet the requirements of the Uniform Federal Accessibility Standards (UFAS) are deemed to be fully accessible under Section 504.[188] The Section 504 accessibility requirements are in addition to the requirements imposed by the Fair Housing Act for newly constructed multifamily housing. Units that only meet the Fair Housing Act design and construction standards do not comply with UFAS. A copy of UFAS can be obtained at http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/ufas. Services provided to participants in SHP programs must also be provided in accessible settings.

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[186] 24 CFR Part 8
[187] 24 CFR §§ 8.20, 8.22, 8.23
[188] 24 CFR § 8.32

2. Site Selection

The Section 504 regulations require that recipients consider physical accessibility in determining the site or location of a federally assisted facility. The regulations state that it is discriminatory for recipients to select sites which have the purpose or effect of excluding qualified persons with disabilities from participating in, or denying the benefits of, any program or activity, that receives federal financial assistance.[189] For example, a CoC recipient should not lease a building that has steps at the entrance and cannot be ramped to allow persons with mobility impairments to access the building.

3. Effective Communication

The Section 504 regulations require recipients to take appropriate steps to ensure effective communication with applicants, residents, and the public with communication disabilities. Providers should ensure that their application and admissions process and the services offered are accessible and understandable by persons with disabilities. This may include providing necessary auxiliary aids and services such as sign language interpreters and written materials in alternative formats.[190]

I. REASONABLE ACCOMMODATION

The Fair Housing Act requires owners of housing facilities to provide reasonable accommodations to persons with disabilities. Under the Fair Housing Act, reasonable accommodations are changes, exceptions, or adjustments to a program, service, or procedure that will allow a person with a disability to have equal enjoyment of the housing program. There must be an identifiable relationship between the requested accommodation and the person's disability. Reasonable accommodations need not be provided if they would constitute an undue financial and administrative burden, or if they would be a fundamental alteration of the provider's program.[191]

The Fair Housing Act does not require owners and homeowner associations to make and pay for structural modifications to dwellings. Instead, it requires owners and homeowners to allow tenants with disabilities to make reasonable access-related modifications to their private living space and common use spaces.[192] However, recipients of federal financial assistance such as CoC grantees should be mindful that they are subject to Section 504's more stringent requirements that they make and pay for structural modifications to dwellings and public and common use areas that are needed as a reasonable accommodation for persons with disabilities

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[189] 24 CFR §8.4(b)(5)

[190] 24 CFR §8.6

[191] For information about reasonable accommodations under the Fair Housing Act, see the Joint Statement of the U.S Department of Housing and Urban Development and the US Department of Justice entitled Reasonable Accommodations Under the Fair Housing Act, issued on May 14, 2004 found at http://www.hud.gov/offices/fheo/library/huddojstatement.pdf.

[192] 24 CFR §100.203

unless providing that accommodation would constitute a fundamental alteration of the program or an undue financial and administrative burden.

Like the Fair Housing Act, Section 504 requires that recipients provide reasonable accommodations to persons with disabilities by making changes to policies, practices, procedures, and structures if needed to allow applicants or tenants with disabilities to have access to or participate in the program. A particular reasonable accommodation need not be provided if doing so would constitute an undue financial and administrative burden or a fundamental alteration of the program.[193] The requirements for reasonable accommodations related to policies, practices, and procedures are the same under Section 504 and the Fair Housing Act. However, the Section 504 reasonable accommodation obligation is broader than the obligation under the Fair Housing Act with respect to requests for structural changes to facilities because Section 504 requires that recipients of federal financial assistance make and pay for physical changes to dwelling units and public and common use spaces if needed as a reasonable accommodation unless it is an undue financial and administrative burden or a fundamental alteration of the program.

Recipients are allowed to verify the existence of the disability and the need for the requested accommodation.

Examples of reasonable accommodations under Section 504 include:

- Making an exception to a rule that prohibits animals in a dwelling to accommodate a person with a disability who uses an assistance animal

- Providing and paying for a ramp to the entrance of a unit which would allow a tenant in a wheelchair to access the unit

- Providing accessible transportation for a trip for program participants where transportation is being provided for nondisabled residents

- Providing a first floor unit to an applicant or a transfer to a first floor unit for a resident who cannot climb stairs to a second floor unit

- Allowing a resident to have a personal refrigerator to store medications in a development that does not normally provide refrigerators in sleeping units

HUD strongly recommends that providers have written, reasonable accommodation policies and that applicants and residents be advised of the existence of their right to reasonable accommodation at admission and during tenancy.

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[193] 24 CFR §§ 8.20, 8.24, 8.33

J. LIVE-IN AIDES[194]

One type of reasonable accommodation request is a request to have a live-in aide in HUD-funded housing. HUD regulations define a live-in aide as, "A person who resides with one or more elderly persons or near-elderly persons or persons with disabilities and who:

- is determined to be essential to the care and well-being of the persons;

- is not obligated for the support of the persons; and

- would not be living in the unit except to provide the necessary supportive services."[195]

When requesting information to verify the necessity of a live-in aide, HUD limits the type of information that can be requested. A provider may not seek the individual's specific diagnosis, nor may the provider seek information regarding the nature, severity, or effects of the individual's disability.[196]

1. Determining the Residence of the Live-in Aide

HUD regulations seek to distinguish between a household member who would normally be expected to live in the unit and provide supports to a person with a disability—such as a spouse or parent—and an individual who has joined the household solely for purposes of caretaking. A provider is permitted to ask a participant and aide to demonstrate that the provision of care is an 'arm's length transaction' or that an aide was not a household member prior to becoming the helper.

2. Relatives as Live-In Aides

Although relatives are not automatically excluded as eligible live-in aides, they must meet the definition stated above. Generally, pre-existing household members will not be able to qualify as a live-in aide. It is more complicated when a child moves into a unit to assist an ailing parent or vice versa, or when a live-in aide becomes a boyfriend or girlfriend after moving into the unit.

Some examples include:

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[194] Technical Assistance Collaborative "Live-In Aides in Federally-funded Housing Programs: Information for MFP Participants and Program Staff", May 2013.
[195] 24 CFR part 5.403
[196] PIH Notice 2010-26: Non-Discrimination and Accessibility for Persons with Disabilities

> **Example A**
> A husband and wife are current tenants and are receiving rental assistance through a prevention program. The husband has a stroke and as a result of the stroke, can no longer walk independently without assistance. Although the wife would continue to live in the unit as a member of the household, she would not qualify as a live-in aide because she was a member of the household prior to the stroke. Her income would not be excluded from the income calculation.

> **Example B**
> An elderly gentleman is residing in permanent supportive housing. He has a stroke and as a result, can no longer walk independently without assistance. He hires and pays a woman to live with him to help him with household chores and personal care. She qualifies as a live-in aide.

> **Example C**
> A 30-year old woman is residing in permanent supportive housing. She is in a car accident and as a result, can no longer walk independently without assistance. Her nephew comes to live with her to assist her with household chores and personal care. The nephew may or may not be a live-in aide depending on the situation. For example, if the nephew rents his own apartment in the community and gives up his apartment in order to live with his aunt to assist her with household chores and personal care, he may qualify as a live-in aide.

3. Eligibility and Screening

Once the housing provider has determined that the participant is eligible for a live-in-aide and that the aide would not otherwise be living with the participant, the housing provider should determine whether the specific individual is eligible to live in the unit. It is important to note that aides who do not live on the premises are not subject to any type of review by any housing agency. Live-in aides are not subject to income or credit checks. However, since the aide will be living on the premises, the housing agency is permitted to conduct background checks to determine suitability. This may include a review of past tenancy and criminal behavior. Housing agencies can refuse to accept individuals as live-in aides based on the results of this screening.

4. Income Exclusions

In all HUD-funded housing programs, the income of an approved live-in aide is **excluded** when calculating a household's income and the amount the household must pay toward rent. Since the live-in aide is an occupant and not a tenant in the unit (see Occupancy section below), it is not appropriate to include their income in these calculations. In addition, if the participant is paying the live-in aide directly and receives funds specifically to cover the cost of these services (e.g., from health or long-term care insurance coverage including Medicaid or Medicare funds), this income must be excluded as well when calculating the household's share of the rent.

5. Bedroom Size

HUD regulations require that a housing agency must include any approved live-in aide when determining the family unit size. For example, a single person who has a disability is generally

eligible for a studio or a one-bedroom unit. If that same individual is determined eligible for a live-in aide, they are eligible for a two-bedroom unit. Note in this second scenario, the individual is eligible for either a two-bedroom unit or a one-bedroom unit. If the individual is homeless, for example, or in a precarious housing situation and the wait for a two-bedroom unit is longer than a one-bedroom unit, the individual may choose to live in a one-bedroom unit with the live-in aide using a pull-out sofa in the living area in order to secure housing more quickly. The request cannot violate HUD's Housing Quality Standards (HQS), which states that the dwelling unit must have at least one bedroom or living/sleeping room for each two persons.

6. Occupancy

A live-in aide is considered an occupant of the unit but is not a tenant and does not have the rights of tenancy. The name of the approved live-in aide may be listed as an occupant of the unit on the lease but should not be a signatory on the lease. **If the participant determines they want to change aides, and if the aide is a tenant of the unit, the participant might be required to evict the aide, a lengthy and problematic process, potentially placing the participant's housing at-risk while the aide stays in place.**

Providers are encouraged to use a lease addendum providing the right to evict a live-in aide who violates any of the house rules. This same lease addendum also clarifies that the aide does not qualify for continued occupancy when the participant is no longer a tenant—regardless of the reason why.

K. CONFLICT OF INTEREST[197]

HUD requires that recipients and subrecipients implement and document procedures in order to ensure that no conflicts of interest emerge.

1. Procurement[198]

a) Procurement of property (goods, supplies or equipment) and services

For the procurement of property (goods, supplies or equipment) and services, the recipients and subrecipients must use their own written and competitive procurement procedures. All procurement transactions shall be conducted in a manner to provide, to the maximum extent practical, open and free competition.

Procurement requirements fall essentially into two categories—'small purchases' and 'substantial goods, services and property':

- Most recipients and subrecipients use grant funds to procure *small purchases* such as office equipment or janitorial services, which do not exceed the small purchase

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[197] 24 CFR §578.95(a), §578.103(11), §576.404
[198] 40 CFR §247, 24 CFR §§84.40- 84.48

acquisition threshold of $150,000.[199] These purchases require fairly simple procurement procedures and documentation. The organization needs to obtain and compare price or rate quotations from more than one qualified source, such as a service provider or supply catalog. It is important to refer to 24 CFR 85.36 to discern when a sealed bid competition is required and when a non-competitive procurement is acceptable.

- For more *substantial contracts for services or goods*, procurement procedures must follow more rigorous standards. For example, grantees (and sponsors) need to adhere to requirements for procurement methods such as competitive and non-competitive bids. They need to include various contract provisions such as compliance with equal employment opportunity requirements, termination for cause, reporting requirements, etc. They also need to determine whether bidders are on the federal list of parties that are barred from receiving federal funds, and they are not allowed to enter into contract agreements that are considered 'cost plus' contracts.

Recipients and subrecipients must use the applicable procurement process to secure a contract with an entity that will provide goods or perform specific tasks. However, the entity itself is not further subject to the federal procurement rules as it carries out its work to provide the contracted goods or services. Appropriate contract management, nevertheless, is necessary to ensure that the work is performed as contracted at a reasonable cost and that the contractor follows any and all stipulations that are part of the contract.

For both small purchases and more substantial procurements, recipients and subrecipients must have written policies and procedures that describe how their organizations will procure goods and services, what information they will require when receiving a price or rate quote, and who will have approval authority.

Additionally, recipients and subrecipients of HUD funds must have regular in-house trainings and a written code of standards for employees who award and administer contracts. An employee, officer or agent of a HUD recipient or subrecipient organization should not participate in awarding a contract if any of the following people have an interest—financial or otherwise—in a firm that might be selected:

- The employee, officer, or agent

- Any member of their immediate family or a partner

- An organization that employs, or is about to employ, any of the above

The board of directors and program staff should identify potential conflicts of interest. The board should review these situations, using the organization's own procedure for addressing conflicts of interest. Independent auditors of a recipient or subrecipient organization's finances will typically also review the organization's policies and activities for potential conflicts of interest.

Procurements are also subject to the following standards:

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[199] 41 USC. 403(11)

- Recipients should avoid purchasing unnecessary items

- Where appropriate, an analysis should be made of lease and purchase alternatives to determine the most economical and practical procurement

- Solicitations for goods and services should provide a clear and accurate description of the technical requirements for the material, product or service; requirements to be fulfilled by the bidder; and description of features, dimensions and functions to be performed including the minimum acceptable standards

- Positive efforts shall be made to utilize small businesses, minority-owned firms, and women's business enterprises, whenever possible

- Records must be kept that describe the basis for contractor selection and the basis for the award cost or price

- In competitive procurements, descriptions shall not contain features that unduly restrict competition

- Preference shall be given, to the extent practicable and economically feasible, for products and services that conserve natural resources and protect the environment and are energy efficient. Procurement for item(s) expected to exceed $10,000 over the fiscal year must also, to the extent practicable, contain the highest percentage of recovered material. Recipients and subrecipients must establish an affirmative procurement program for the procurement of recovered materials as identified in EPA guidelines.[200]

b) Codes of conduct

The recipient must maintain written standards of conduct governing the performance of its employees engaged in the award and administration of contracts. No employee, officer, or agent should participate in funding decisions nor solicit or accept gratuities, favors, or anything of monetary value from contractors, or parties to subrecipients. However, recipients may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must include disciplinary actions to be applied for violations.[201]

c) Contract provisions

All contracts awarded by a recipient, including small purchases, shall contain provisions requiring compliance with Equal Employment Opportunity requirements, the Copeland "Anti-Kickback" Act, the Contract Work Hours and Safety Standards Act, the Clean Air Act, the Byrd Anti-Lobbying Amendment, Debarment and Suspension rules, and Drug-Free Workplace Requirements.[202]

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[200] 24 CFR §578.99(b), Section 6002 of the Solid Waste Disposal Act
[201] 24 CFR §84.42
[202] 24 CFR Part 84, Appendix A

2. Organizational Conflict[203]

An organizational conflict of interest arises when, because of their relationship with a recipient or subrecipient, an individual is unable or potentially unable to remain impartial and objective. For example, a board member cannot participate in the decision of the award of a grant to the organization that such member represents. It would also arise when an employee of a recipient or subrecipient participates in making rent reasonableness determinations and housing quality inspections of property owned by the recipient, subrecipient, or a related entity.

a) **Persons covered by these requirements include:**

- employees
- agents
- consultants
- officers, and
- elected/appointed officials of the recipient or subrecipient

All contractors of the recipient or subrecipient must comply with the same requirements that apply to subrecipients.

b) **No person or organization who is currently or previously involved in the activities funded by the CoC or ESG grant or participating in a decision-making process may:**

- have a financial interest or benefit in any contract, subcontract, or agreement with respect to a funded CoC or ESG activity; or
- have a financial interest in the proceeds derived, either for themselves, their family, or those with whom they have business ties during their tenure or the one-year period following.

3. Exceptions

Upon the written request of the recipient, HUD may grant an exception to the provisions of this section on a case-by-case basis. HUD will consider an exception only after the recipient has provided the following documentation:

- Disclosure of the nature of the conflict and if the recipient is a private nonprofit organization, assurance that the conflict has been disclosed in accordance with the agency's written code of conduct or other conflict-of-interest policy, and
- An opinion of the recipient's attorney that the interest for which the exception is sought would not violate state or local law and that the exception would not violate the organization's internal policies

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[203] 24 CFR §§576.404, 578.95(c) & (d)

a) Factors to be considered for exceptions

HUD must conclude that the exception will serve to further the purposes of the Continuum of Care or ESG program and the effective and efficient administration of the recipient's or subrecipient's project. Factors considered include:

- A significant cost benefit or an essential degree of expertise

- An opportunity for open competitive bidding

- Withdrawal from the decision-making process regarding activity in question

- Presence of the interest or benefit prior to the affected person's role in the relevant position

- Hardship to the recipient, the subrecipient, or the person affected, outweighs the public interest served by avoiding the conflict

- If the person affected is a potential beneficiary of the funded activity, the exception will permit him/her to receive generally the same amount or type of benefit as others eligible for funded activity

4. Continuum of Care Board Members[204]

No CoC board member may participate in or influence discussions concerning the award of a grant or other financial benefits to the organization that the member represents.

5. ESG Organizational Conflict[205]

The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the recipient, the subrecipient, or a parent or subsidiary of the subrecipient. No subrecipient may, with respect to individuals or families occupying housing owned by the subrecipient, or any parent or subsidiary of the subrecipient, carry out the initial evaluation required to determine eligibility for ESG programs or administer homelessness prevention assistance.

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[204] 24 CFR §578.95 (b)
[205] 24 CFR §576.404(a)

L. GENERAL RECORDKEEPING AND CONFIDENTIALITY

1. Confidentiality[206]

In addition to meeting the specific confidentiality and security requirements for HMIS data, the recipient and its subrecipients must develop and implement written procedures to ensure:

- all records containing protected identifying information of any individual or family who applies for and/or receives assistance will be kept secure and confidential;

- the address or location of any family violence project assisted will not be made public, except with written authorization of the person responsible for the operation of the project; and

- the address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

2. Period of Record Retention[207]

All records pertaining to Continuum of Care funds must be retained for the greater of five (5) years or the period specified below. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

Documentation of each program participant's qualification as a family or individual at-risk of homelessness, or as a homeless family or individual, and other program participant records must be retained for five (5) years after the expenditure of all funds from the grant under which the program participant was served.

All records pertaining to each fiscal year of ESG funds must be retained for five (5) years after the expenditure of all funds from the grant under which the program participant was served. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records. If ESG funds are used for emergency shelter renovation or conversion, different recordkeeping requirements apply.

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[206] 24 CFR §§578.103 (b), 576.500(x)
[207] 24 CFR §§578.103 (c), 576.500(y)

M. OTHER FEDERAL REQUIREMENTS[208]

Use of assistance must comply with the following federal requirements.

1. Subawards

All federal requirements apply to subrecipients performing work under a CoC or ESG award.[209]

2. Davis-Bacon Act

The provisions of the Davis-Bacon Act do not apply to either CoC or ESG.[210]

3. Section 3 of the Housing and Urban Development Act[211]

Employment and other economic opportunities generated by federal assistance should, to the greatest extent feasible, be directed toward low- and very low-income persons, particularly those who are recipients of government assistance housing. Notice of this requirement, including the name and location of the person(s) taking applications for each of the positions and the anticipated start date, must be sent to the labor organization or representative of workers with which the contractor has a collective bargaining agreement, and made visible at the work site. Every subcontract must include this employment targeting language. Positions may be filled by persons over the low-income limit only after attempts to meet this requirement have been made.[212] Homeless individuals have priority over other Section 3 residents.[213]

4. Transparency Act Reporting

Recipients awarded a new federal grant greater than or equal to $25,000 as of October 1, 2010 must report a subrecipient award greater than or equal to $25,000 in the Federal Government website www.fsrs.gov by the end of the month following the month the subrecipient contract is awarded. Information on federal awards is made available to the public via the single, searchable website www.USASpending.gov which empowers every American to hold the government accountable for each spending decision.[214]

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[208] 24 CFR §§578.99, 578.103(15-17), 576.407

[209] 24 CFR §84.5

[210] 24 CFR §578.99(h), 576.407(e)

[211] 12 USC. 1701u, 24 CFR §135.38

[212] 25 USC. 450e

[213] 24 CFR §§578.75(g), 576.405

[214] Section 872 of the Duncan Hunter Defense Appropriations Act of 2009, Federal Financial Assistance Accountability and Transparency Act of 2006, as amended by section 6202 of Public Law 110-252 and 75 FR 55669

5. Uniform Administrative Requirements[215]

The requirements of 24 CFR part 84—Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations—apply to all recipients and subrecipients. These regulations provide additional detail regarding financial management requirements, property and equipment standards, procurement standards, reporting requirements, termination, enforcement, and close-out.

6. Debarment and Suspension

Rule that restricts subawards and contracts with certain parties that are debarred, suspended or otherwise excluded from or ineligible for participation in federal assistance programs or activities apply.[216]

7. Drug- Free Workplace

Recipients must provide drug-free workplaces in accordance with the Drug-Free Workplace Act of 1988.[217] This includes publishing a statement that illegal drug use, possession, sales, or manufacture is prohibited and the actions that will be taken for violations. This statement must be given to all employees and must inform employees that they must notify the employer within five days of any conviction for a violation of a criminal drug statute occurring in the workplace. Employers are required to provide this information to HUD within ten calendar days along with the intended action, which can include requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program. The Act also requires the establishment of a drug-free awareness program.

8. Anti-Lobbying

Grant recipients cannot use federal funds to pay a person to influence or attempt to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.

9. Equipment Records[218]

Equipment "means tangible nonexpendable personal property including exempt property charged directly to the award having a useful life of more than one year and an acquisition cost of $5000

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[215] 24 CFR part 84 referenced in 24 CFR §§578.99(e) and 576.407(c)
[216] 24 CFR §84.13
[217] 41 USC. 701
[218] 24 CFR §84.34

or more per unit."[219] Equipment records shall be maintained that include a description of all equipment purchased with federal funds, serial numbers, acquisition dates and costs, and disposition information. A physical inventory of equipment shall be taken and the results reconciled with the equipment records at least once every two years. A control system must be in place to insure adequate safeguards to prevent loss, damage, or theft of the equipment and any loss, theft or damage should be investigated and documented.

10. Disposition of Equipment and Supplies

If supplies or equipment valued at more than $5,000 remain in the possession of the recipient or subrecipient upon termination or completion of the project, the recipient or subrecipient may be required to compensate the Federal Government for its share.[220]

11. Relocation

In the event that ESG or CoC funds are used for acquisition and rehabilitation, certain requirements apply related to the displacement and relocation of individuals and households.[221]

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[219] 24 CFR §84.2
[220] 24 CFR §§84.34-35
[221] 24 CFR §§576.408, 578.83

VI. APPENDICES

Appendix A - Glossary of Terms

Consolidated plan – A long-term housing and community development plan developed by state and local governments and approved by HUD. The Consolidated Plan contains information on homeless populations and should be coordinated with the Continuum of Care plan.

Continuum of Care body – The group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; homeless and formerly homeless persons; and organizations that serve homeless and formerly homeless veterans, and that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at-risk of homelessness for a specific geographic area. In San Francisco this group is known as the Local Homeless Coordinating Board (LHCB).

Continuum of Care (CoC) program – The program funded by HUD under the Federal HEARTH Act to end homelessness. The CoC program consolidates three separate programs—the Supportive Housing, Shelter Plus Care, and Single Room Occupancy grant programs—into one grant program.

Disabled family – A family whose head (including co-head), spouse, or sole member is a person with a disability. It may include two or more persons with disabilities living together, or one or more persons with disabilities living with one or more live-in aides.

Elderly family – A family whose head (including co-head), spouse, or sole member is a person who is at least 62 years of age. It may include two or more persons who are at least 62 years of age living together, or one or more persons who are at least 62 years of age living with one or more live-in aides.

Emergency Solutions Grants (ESG) program – The program funded by HUD to provide emergency shelter for the homeless, essential services related to emergency shelters and street outreach for the homeless, and homelessness prevention and rapid re-housing assistance.

Fair Market Rent (FMR) – The rent, including the cost of utilities (except telephone), that would be required to be paid in the housing market area to obtain privately owned, existing, decent, safe and sanitary rental housing of modest (nonluxury) nature with suitable amenities. HUD establishes Fair Market Rents on an annual basis for existing housing units of varying sizes (number of bedrooms).

Family - A group of persons residing together, regardless of actual or perceived sexual orientation, gender identity, or marital status. A child who is temporarily away from the home because of placement in foster care is considered a member of the family. Any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such.[222]

Family includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- A group of persons residing together, which includes, but is not limited to:
  - A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family)
  - An elderly family
  - A near-elderly family
  - A disabled family
  - A displaced family, and
  - The remaining member of a tenant family

Family With Children – A household that includes at least one parent or guardian and one child under the age of 18, a pregnant woman, an individual in the process of securing legal custody of any person who has not attained the age of 18 years, an individual with a dependent child over the age of 18 who is mentally or physically disabled, and an individual who has actual custody of, and is responsible for, the care of a child.

Gender identity – Actual or perceived gender-related characteristics.

HEARTH Act – A 2009 amendment to the McKinney-Vento Act that makes a number of significant changes to the Homeless Assistance Grants and the Emergency Solutions Grants programs.

Homeless Management Information System (HMIS) – The information system designated by the Continuum of Care to comply with HUD's data collection, management, and reporting standards, and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

Household – An individual, couple or family receiving assistance as a single unit.

Housing Quality Standards (HQS) – Housing Quality Standards include all state and local housing codes, licensing requirements, and any other standards regarding the condition of a structure and the operation of the housing and/or services. HQS sets acceptable conditions for

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[222] 24 CFR §5.105

interior living space, building exterior, heating and plumbing systems, and general health and safety.

Human Services Agency (HSA) – The unit of local government that manages the local Continuum of Care program.

Leasing – The recipient or project sponsor has an agreement with a third-party property owner and makes payments to the property owner using leasing funds provided by their Continuum of Care grant.

Line of Credit Control System (LOCCS) – The LOCCS system is the accounting and grantee reimbursement system used by HUD.

Mayor's Office of Housing and Community Development (MOHCD) – The unit of local government that manages the local ESG program.

McKinney-Vento Act – Signed into law on July 22, 1987, the McKinney-Vento Homeless Assistance Act is the authorizing legislation for a number of programs providing a range of services to homeless people, including the Continuum of Care programs. These programs were originally categorized into three programs (the Supportive Housing Program, the Shelter Plus Care Program, and the Single Room Occupancy Program) which were combined into a single program under the 2009 HEARTH Act. The Act also established the Emergency Shelter Grant Program, subsequently renamed the Emergency Solutions Grants Program (ESG). These programs are all contained within Title IV. The Act also authorizes a number of other programs within other federal agencies.

Near-elderly family – A family whose head (including co-head), spouse, or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62, living with one or more live-in aides.

Nonprofit status (private) – Private nonprofit status is documented by submitting either: (1) A copy of the Internal Revenue Service (IRS) ruling providing tax-exempt status under Section 501(c)(3) of the IRS Code; or (2) documentation showing that the applicant is a certified United Way agency; or (3) a certification from a designated official of the organization that no part of the net earnings of the organization inures to the benefit of any member, founder, contributor, or individual; that the organization has a voluntary board; that the organization practices nondiscrimination in the provision of assistance; and that the organization has a functioning accounting system.

Occupancy agreement – An agreement between the project sponsor and a program participant in either transitional housing or permanent housing that may or may not include an occupancy charge. A *sublease* means a particular form of occupancy agreement for program participants residing in a property that is leased by the project sponsor from the property owner. A *rental agreement* means a particular form of occupancy agreement for program participants receiving rental assistance through Continuum of Care.

Occupancy charge – A charge imposed by the project sponsor on a program participant in either transitional housing or permanent housing. In the case of a program participant receiving rental assistance, the occupancy charge is the same thing as the participant's portion of the rent.

Private nonprofit organization – A private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

Program component – Means the particular component as defined by HUD in the grant agreement under which a project is funded. In San Francisco projects can be permanent supportive housing, rapid re-housing, transitional housing or support services only.

Program income – Gross income received by the participating jurisdiction, state recipient, or a subrecipient directly generated from the grant funds or matching contributions. Program income includes any amount of a security or utility deposit returned to the recipient or subrecipient.

Program operator – This manual uses the term program operator to refer to the agency operating a specific program or project funded by CoC or ESG funds and covered by this manual. The program operator is likely to have the responsibilities generally associated with a subrecipient under ESG and CoC programs contracts with HSA, or those of a direct recipient in the case of CoC programs awarded from HUD to an agency.

Program participant – Means an individual (including an unaccompanied youth) or family who is assisted with Continuum of Care program funds or an individual or family who is assisted under the ESG program.

Project – Refers to a set of connected eligible programmatic activities, identified as a project in an application to HUD for Continuum of Care funds, and also identified by a single designation within HMIS. A project can include structures that are leased, payments for operating costs, or funding for rental assistance. A project may also include supportive services connected to a site secured through one of the above means, or eligible supportive services that are not associated with a specific site. In common language, and within the ESG program, a "project" is usually referred to as a "program" and in this manual the use of the term "program" to refer to a set of programmatic activities, is the same as a HUD "project."

Recipient – An entity that enters into a direct grant agreement with HUD. Under the CoC program a recipient can be a private nonprofit organization or a unit of local government. Under the ESG program a recipient is a governmental entity. In the past, the term "grantee" was often used to describe a recipient.

Reevaluation - The periodic review of eligibility for ESG prevention or rapid re-housing services required by HUD regulations in order to continue to provide assistance. In San Francisco, this is also sometimes referred to as recertification.

Sexual orientation – Homosexuality, heterosexuality, or bisexuality.

Subrecipient – Means a private nonprofit organization, or unit of local government that receives a contract for CoC or ESG funds from a recipient to carry out a project. The term subrecipient replaces the terms "project sponsor" and "subgrantee." Although the term subrecipient is used throughout this manual, in other contexts, MOHCD may refer to ESG subrecipients as "nonprofit contractors."

Victim service provider – A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

Appendix B - Eligibility Documentation Requirements[223]

1. Criteria and Documentation for Homeless Categories

CATEGORY 1: AN INDIVIDUAL OR FAMILY WHO LACKS A FIXED, REGULAR, AND ADEQUATE NIGHTTIME RESIDENCE
In order to qualify as homeless under this category, ONLY ONE of the following criteria and documentation requirements must be met.

Criteria	Documentation Required to Demonstrate Criteria are Met
An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; OR	One of the following: • Written observation by an outreach worker of the conditions where the individual or family was living • Written referral by another housing or service provider, OR • Certification by the individual or head of household seeking assistance
An individual or family living in a supervised, publicly or privately operated shelter designed to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs); OR	One of the following: • Written observation by an outreach worker of the conditions where the individual or family was living • Written referral by another housing or service provider, OR • Certification by the individual or head of household seeking assistance
An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.	One of the following: • Written observation by an outreach worker of the conditions where the individual or family was living • Written referral by another housing or service provider, OR • Certification by the individual or head of household seeking assistance PLUS One of the following: • Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker; OR • If evidence described above isn't attainable, a written record of the intake worker's due diligence in attempting to obtain that evidence PLUS a certification by the individual seeking assistance that states he or she is exiting or has just exited an institution where he or she resided for 90 days or less.

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[223] 24 CFR §578.3, §576.2, §576.500 (a–d), §576.401(a), §91.5; HUD Notice: CPD-14-012, Sections V(B) & (C)

CATEGORY 2: AN INDIVIDUAL OR FAMILY WHO WILL IMMINENTLY LOSE THEIR PRIMARY NIGHTTIME RESIDENCE
In order to qualify as homeless under this category, ALL of the following criteria and documentation requirements must be met.

Criteria	Documentation Required to Demonstrate Criteria are Met

The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance.
 	
(Note that youth who are within 14 days of exiting the foster care system who have not identified other permanent housing and who have no other resources or support networks to obtain permanent housing are <u>not defined as homeless</u> under this category); AND
	One of the following:
	
	• A court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law;
	• For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance; OR
	• An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either:
	  o Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; OR
	  o If the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete; PLUS

No subsequent residence has been identified; AND	Certification by the individual or head of household that no subsequent residence has been identified; PLUS
The individual or family lacks the resources or support networks, e.g. family, friends, faith-based or other social networks, needed to obtain other permanent housing.	Certification or other written documentation that the individual or family lacks the resources and support networks needed to obtain other permanent housing.

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CATEGORY 4: PEOPLE FLEEING DOMESTIC VIOLENCE	
Criteria	**Documentation Required to Demonstrate Criteria are Met**
Is fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; has no other residence; and lacks the resources or support networks (e.g. family, friends, faith-based or other social networks) to obtain other permanent housing.	Oral statement by the individual or head of household seeking assistance that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other housing.

If the individual or family is receiving shelter or services provided by a victim service provider, the oral statement must be documented by either a certification by the individual or head of household; or a certification by the intake worker.

Otherwise, the oral statement must be documented by a certification by the individual or head of household that the statement is true and complete, and, where the safety of the individual or family would not be jeopardized, the domestic violence, dating violence, sexual assault, stalking, or other dangerous or life- threatening condition must be verified by a written observation by the intake worker or a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, dating violence, sexual assault, or stalking. The written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking. |

CHRONICALLY HOMELESS To qualify as chronically homeless, an individual must meet ONE of the following criteria:	
Criteria	**Documentation Required to Demonstrate Criteria are Met**
Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; <u>AND</u> Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 1 year or on at least 4 separate occasions in the last 3 years; <u>AND</u> Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; <u>OR</u>	Evidence of an individual or head of household's current living situation may be documented by a written observation by an outreach worker, a written referral by housing or service provider, or a certification by the household seeking assistance that demonstrates that the individual or head of household is currently homeless and living in a place not meant for human habitation, in an emergency shelter, or a safe haven. **i. Evidence that the homeless occasion was continuous, for at least 1 year.** Recipients must provide evidence that the homeless occasion was continuous, for a 1-year period, without a break in living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter. A break is considered at least 7 or more consecutive nights not residing in a place not meant for human habitation, in shelter, or in a safe haven. At least 9 months of the 1-year period must be documented by one of the following: (1) HMIS data, (2), a written referral, or (3) a written observation by an outreach worker. Note: A single encounter with a homeless service provider on a single day within 1 month that is documented through third-party documentation is sufficient to consider an individual or family as homeless for the entire month unless there is any evidence that the household has had a break in homeless status during that month (e.g., evidence in HMIS of a stay in transitional housing). **ii. Evidence that the household experienced at least 4 separate homeless occasions over 3 years.** Generally, at least 3 occasions must be documented by either: (1) HMIS data, (2) a written referral, or (3) a written observation. Any other occasion may be documented by a self-certification with no other supporting documentation. In only rare and the most extreme cases, HUD would allow a certification from the individual or head of household seeking assistance in place of third-party documentation for up to the entire period of homelessness or in place of third-party documentation for the 3 occasions. Where third-party evidence could not be obtained, the intake worker must obtain a certification from the individual or head of household seeking assistance, and evidence of the efforts made to obtain third-party evidence as well as documentation of the severity of the situation in which the individual or head of household has been living. An example of where this might occur is where an individual has been homeless and living in a place not meant for human habitation in a secluded area for more than 1 year and has not had any contact with anyone during that entire period.

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CHRONICALLY HOMELESS (CONT'D)
To qualify as chronically homeless, an individual must meet ONE of the following criteria:

Criteria	Documentation Required to Demonstrate Criteria are Met
An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; OR	Acceptable evidence includes: • Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution that demonstrate the person resided there for less than 90 days. All oral statements must be recorded by the intake worker; OR • Where the evidence above is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in the paragraph above and a certification by the individual seeking assistance that states that they are exiting or have just exited an institution where they resided for less than 90 days; AND • Evidence that the individual was homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter, and met the criteria of the definition for chronically homeless immediately prior to entry into the institutional care facility.
A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.	Documentation requirements are same as above. Evidence must be provided for head of household.

AT-RISK OF HOMELESSNESS
To qualify as at-risk of homelessness, an individual must meet ALL of the following criteria:

Criteria	Documentation Required to Demonstrate Criteria are Met
Has an annual income below 30 percent of median family income for the area[224] AND	When determining annual income use the standard for calculating income described in the income section above. Annual income. For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than 1 year, the following documentation of annual income must be maintained: • Income evaluation form containing the minimum requirements specified by HUD and completed by the recipient or subrecipient; and • Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement); • To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or • To the extent that source documents and third party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.
Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in category (1) of the "Homeless" definition AND	The program participant's certification on a form specified by HUD that the program participant has insufficient financial resources and support networks; e.g., family, friends, faith-based or other social networks, immediately available to attain housing stability and meets one or more of the conditions below: The most reliable evidence available to show that the program participant does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or a place not fit for human habitation. Acceptable evidence includes: source documents such as a notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, public administrator, relative) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or both of the above criteria OR To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; AND

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[224] 24 CFR §§576.500(e), §576.2, §91.5

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AT-RISK OF HOMELESSNESS (CONT'D)
To qualify as at-risk of homelessness, an individual must meet ALL of the following criteria:

Criteria	Documentation Required to Demonstrate Criteria are Met
Meets one of the following conditions: (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for homelessness prevention assistance; (B) Is living in the home of another because of economic hardship; (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, state, or local government programs for low-income individuals; (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the US Census Bureau; (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan; OR	Source documents that evidence one or more of the conditions is met (e.g., eviction notice, notice of termination from employment, bank statement) To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, owner, primary leaseholder, public administrator, hotel or motel manager) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the criteria **OR** To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria or, if a visit is not practicable or relevant to the determination, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence
A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under the Runaway and Homeless Youth Act, the Head Start Act, the Violence Against Women Act of 1994, or the Food and Nutrition Act of 2008 OR A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under the McKinney-Vento Homeless Assistance Act and the parent(s) or guardian(s) of that child or youth if living with her or him.	Certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the relevant program

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2. Disability Status

a) **A person meets the HUD definition of disability if s/he has a disability that:**

- is expected to be long-continuing or of indefinite duration;

- substantially impedes the individual's ability to live independently;

- could be improved by the provision of more suitable housing conditions; and

- is a physical, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury.

b) **A person is also considered to have a disability if s/he has a developmental disability, defined as a severe, chronic disability that:**

- is attributable to a mental or physical impairment or combination of mental and physical impairments;

- is manifested before the individual attains age 22;

- is likely to continue indefinitely;

- results in substantial functional limitations in three or more of the following areas of major life activity:

  o self-care

  o receptive and expressive language

  o learning

  o mobility

  o self-direction

  o capacity for independent living

  o economic self-sufficiency

- reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

An individual from birth to age nine, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described above if the individual, without services and supports, has a high probability of meeting these criteria later in life.

c) **A person will also be considered to have a disability if he or she has acquired:**

- immunodeficiency syndrome (AIDS); or

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- any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).

d) **The term "person with disabilities" includes:**

- two or more persons with disabilities living together;

- one or more such persons living with another person who is determined to be important to their care or well-being; and

- the surviving member(s) of any household described in the first sentence of this definition who were living, in a unit assisted under this part, with the deceased member of the household at the time of his/her death. (In any event, with respect to the surviving member(s) of a household, the right to rental assistance under this part will terminate at the end of the grant period under which the deceased member was a participant.)

Acceptable evidence of the disability includes ONE of the following:

(1) Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration, and substantially impedes the individual's ability to live independently;

(2) Written verification from the Social Security Administration;

(3) The receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation);

(4) Intake staff-recorded observation of disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence in paragraph (1), (2), (3), or (4) of this section.

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Appendix C - .CoC Recordkeeping Requirements[225]

1. Eligibility

Recipients or subrecipients must keep CoC Program records documenting acceptable evidence of homeless status of program participants.

2. Records of Reasonable Belief of Imminent Threat of Harm

For each program participant receiving tenant-based rental assistance who has moved to a different CoC in response to an imminent threat of further domestic violence, dating violence, sexual assault, or stalking documentation must be retained as described above.

3. Annual Income

For each program participant who receives CoC program housing assistance, when rent or an occupancy charge is paid by the program participant, recipients or subrecipients must keep the . following documentation of annual income:

- income evaluation form specified by HUD and completed by the recipients or subrecipients

- source documents (e.g., most recent wage statements, unemployment compensation statements, public benefits statements, bank statements) for the assets held by the program participants and income received before the date of the evaluation

- to the extent that source documents are unobtainable, written statements by relevant third parties (e.g., employer, government benefits administrator) or written certification by the recipients' or subrecipients' intake staff of the oral verification by the relevant third party of the program participant's income over the most recent period, or

- to the extent that source documents and third-party verification are unobtainable, written certification by the program participants of the amount of income that the program participants receive

4. Services Provided

Recipients and subrecipients must keep records for each program participant that document the following:

- the services and assistance provided to the program participant and the amounts spent on those services, including evidence that the recipient or subrecipient:
    - o conducted an annual assessment of services for program participants who remain in the project for more than a year
    - o adjusted the service package accordingly, and

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[225] 24 CFR §578.103

o   provided case management services not less than once per month to program participants receiving rapid re-housing

- in cases of termination of assistance, the recipient or subrecipient complied with all due process requirements. This includes providing the participant with a written copy of program rules and the termination process at intake, written notice regarding the reason for termination, and an opportunity for review of the decision to a person other than the person who made the termination decision (or their subordinate)

5. Housing Quality Standards

Recipients or subrecipients must retain documentation to demonstrate compliance with the housing quality standards.

6. Conflict of Interest Policy

Recipients and subrecipients must maintain copies of the following policies:

- organizational and personal conflict of interest

- CoC board conflict of interest

- other conflict of interest requirements

- records supporting any exceptions to the personal conflict of interest prohibitions

7. Homeless Participation Requirements

Recipients and subrecipients must document compliance with the requirement that not less than one homeless individual or formerly homeless individual participate on their board of directors or other equivalent policymaking entity. If a project qualifies for a waiver of this requirement, justification must be documented.

8. Fair Housing

Recipients and subrecipients must maintain copies of marketing, outreach, and other materials used to inform eligible program participants who are least likely to apply, in the absence of special outreach, for the project.

9. Confidentiality of Records

The recipients and subrecipients must develop and implement written procedures to ensure:

- All records containing protected identifying information of any individual or family that applies for and/or receives CoC program assistance will be kept secure and confidential;

- The address or location of any family violence project assisted with CoC program funds will not be made public, except with written authorization of the person responsible for the operation of the project; and

- The address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

10. Other Federal Requirements

Recipients and subrecipients must document compliance with the federal requirements as applicable, including environmental review requirements, Section 6002 of the Solid Waste Disposal Act, transparency in subcontracting, the Coastal Barrier Resources Act of 1982, applicable Office of Management and Budget (OMB) circulars, lead-based paint requirements, audit requirements, Davis-Bacon Act requirements, and requirements specified in Section 3 of the Housing and Urban Development Act.

11. Match

The recipient must keep records of the source and use of cash and in-kind contributions used to satisfy the 25 percent match requirement. Match records must indicate the grant and fiscal year for which each matching contribution is counted. If the subrecipient is responsible for some or all of the match commitment, the recipient should collect appropriate documentation from the subrecipient in order to comply with the match recordkeeping requirements.

If in-kind services are used to fulfill part of the match, the recipient must keep a copy of the Memorandum of Understanding (MOU) executed between the recipient or subrecipient and the third party that will provide the services. The recipient or subrecipient must maintain documentation of the actual in-kind services provided to program participants and in-kind contributions to the project throughout the grant period. The records must evidence how the value placed on third-party in-kind contributions was derived.

To the extent feasible, in-kind match represented by volunteer services must be documented using the same methods used by the recipient or subrecipient to support the allocation of regular personnel costs. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If employees of the recipients or subrecipients do not perform similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

12. Subrecipients and Contractors

The recipient must maintain well-documented and accurate project records related to any CoC program-funded activities conducted by subrecipients or other contractors. At a minimum, the records must include:

- copies of all solicitations of and agreements with subrecipients

- records of all payment requests by and dates of payments to subrecipients in compliance with 24 CFR parts 84 and 85

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- documentation of subrecipient monitoring, including any monitoring findings, corrective actions required, and sanctions imposed, as applicable, and

- copies of all procurement contracts issued by the recipient or subrecipients and documentation of compliance with the procurement requirements in 24 CFR part 85.36 and 24 CFR part 84

Appendix D - CoC Supportive Services Eligible Costs

1.   Annual Assessment of Service Needs

The costs of the assessment are eligible costs.

2.   Assistance with Moving Costs

Reasonable one-time moving costs are eligible and include truck rental and hiring a moving company.

3.   Case Management

The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Component services and activities consist of:

- counseling
- developing, securing, and coordinating services
- using the centralized or coordinated assessment system
- obtaining federal, state, and local benefits
- monitoring and evaluating program participant progress
- providing information and referrals to other providers
- providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking, and
- developing an individualized housing and service plan, including planning a path to permanent housing stability

4.   Child Care

The costs of establishing and operating child care, and providing child-care vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible:

- the children must be under the age of 13, unless they are disabled children
- disabled children must be under the age of 18
- the child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible

5.   Education Services

The costs of improving knowledge and basic educational skills are eligible:

- services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED)
- component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources

6. Employment Assistance and Job Training

The costs of establishing and operating employment-assistance and job-training programs are eligible, including classroom, online and/or computer instruction; on-the-job instruction; services that assist individuals in securing employment; acquiring learning skills; and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost:

- learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates
- services that assist individuals in securing employment consist of:
  o employment screening, assessment, or testing
  o structured job skills and job-seeking skills
  o special training and tutoring, including literacy training and pre-vocational training
  o books and instructional material
  o counseling or job coaching, and
  o referral to community resources

7. Food

The cost of providing meals or groceries to program participants is eligible.

8. Housing Search and Counseling Services

Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible:

- component services or activities are tenant counseling, assisting individuals and families to understand leases, securing utilities, and making moving arrangements
- other eligible costs are:
  o mediation with property owners and landlords on behalf of eligible program participants
  o credit counseling, accessing a free personal credit report, and resolving personal credit issues, and

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o the payment of rental application fees

9. Legal Services

Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing:

- eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants

- component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling

- fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

- legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible (retainer fee arrangements and contingency fee arrangements are ineligible)

10. Life Skills Training

The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.

11. Mental Health Services

Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

12. Outpatient Health Services

Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals, including:

- providing an analysis or assessment of an individual's health problems and the development of a treatment plan

- assisting individuals to understand their health needs

- providing directly or assisting individuals to obtain and utilize appropriate medical treatment

- preventive medical care and health maintenance services, including in-home health services and emergency medical services

- provision of appropriate medication

- providing follow-up services, and

- preventive and non-cosmetic dental care

13. Outreach Services

The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible:

- eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach

- component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care

14. Substance Abuse Treatment Services

The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.

15. Transportation

Eligible costs are:

- the costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other services eligible under this section

- mileage allowance for service workers to visit program participants and to carry out housing quality inspections

- the cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants

- the cost of gas, insurance, taxes, and maintenance for the vehicle

- the costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation, and

- if public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:

  o payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types)

  o payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car, and

  o the recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance

16.   Utility Deposits

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

17.   Direct Provision of Services

If a service described in paragraphs (1) through (16) of this section is being directly delivered by the recipient or subrecipient, eligible costs for those services also include:

- the costs of labor or supplies, and materials incurred by the recipient or subrecipient in directly providing supportive services to program participants, and

- the salary and benefit packages of the recipient and subrecipient staff who directly deliver the services

Appendix E - RRH Differences Between ESG and CoC

Rental Assistance Overview		
	ESG-RRH **24 CFR part 576.104**	**CoC-RRH** **24 CFR part 578.37(a)(1)(ii)**
Housing Standards	Units must pass HUD Habitability Standards	Units must meet HUD Housing Quality Standards
Fair Market Rent (FMR)	Rental assistance may cover up to the FMR for a unit	Rent reasonableness is the applicable rent standard
Rent Reasonableness	Units must comply with HUD's rent reasonableness standards	Units in a structure must comply with HUD's rent reasonableness standards
Lease Requirements	• A written lease between the owner and the program participant is required for TBRA and PBRA. • For program participants living in housing with PBRA, the lease must have an initial term of one year. There is no minimum lease period for TBRA. • The only exception to the written lease requirement is in the case of rental assistance provided solely for rental arrears.	Program participants receiving TBRA must sign a lease of at least one year that is renewable (for a minimum term of one month) and terminable only for cause.
Housing Location	Can be housed outside of CoC geography	Must be housed within CoC geography (unless meets domestic violence exception)
Rent payment	Subrecipients have flexibility regarding participant rent standards	Requires tenants pay at least 30% of income

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Summary of Eligible RRH Supportive Services		
	ESG-RRH **24 CFR part 576.10**	**CoC-RRH** **24 CFR part 578.53**
Housing services & related services	Assist participants in locating, obtaining, and retaining suitable permanent housing, including: • Housing search • Tenant counseling • Understanding leases • Arranging for utilities • Making moving arrangements • Assessment of housing barriers, needs, and preferences • Development of an action plan for locating housing • Outreach to and negotiation with owners • Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness • Assistance with submitting rental applications	Assist participants in locating, obtaining, and retaining suitable housing, including: • Housing search • Tenant counseling • Understanding leases • Arranging for utilities • Making moving arrangements • Mediation with property owners and landlords • Credit counseling, accessing a free personal credit report, and resolving personal credit issues • Payment of rental application fees
Case management	Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing by, for example: • Conducting the initial evaluation, including verifying and documenting eligibility • Using the centralized or coordinated assessment system • 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 • Developing an individualized housing and service plan, including planning a path to permanent housing stability • Conducting re-evaluations	Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of program participant(s), including: • Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking • Using the centralized or coordinated assessment system • 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 • Developing an individualized housing and service plan, including planning a path to permanent housing stability • Conducting required annual assessment of service needs (re- evaluation)

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Summary of Eligible RRH Supportive Services (cont')

	ESG-RRH 24 CFR part 576.10	CoC-RRH 24 CFR part 578.53
Legal services	Costs of resolving a legal problem that prohibits a program participant from obtaining or retaining permanent housing. Legal services or activities include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling. Filing fees and other necessary court costs are also eligible. Legal services are subject to the following provisions: (a) Eligible Billing Arrangements. ESG funds may be used only for legal advice from and representation by licensed attorneys and by person(s) under the supervision of licensed attorneys. Costs may be based on: • Hourly fees • Fees based on the actual service performed (i.e., fee for service) but only if the cost would be less than the cost of hourly fees (b) Ineligible Billing Arrangements. Funds must not be used for legal advice and representation purchased through retainer fee arrangements or contingency fee arrangements. (c) Eligible Subject Matters. Landlord/ tenant matters; child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; resolution of outstanding criminal warrants. (d) Ineligible Subject Matter. Legal services related to immigration and citizenship matters or related to mortgages.	Costs of legal advice and representation in matters that interfere with the homeless individual's or family's ability to obtain and retain housing. Legal services or activities include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling. Filing fees and other necessary court costs are also eligible. Legal services are subject to the following provisions: (a) Eligible Billing Arrangements. CoC funds may be used for legal advice from and representation by licensed attorneys and by person(s) under the supervision of licensed attorneys. Costs may be based on: • Hourly fees • Fees based on the actual service performed (i.e., fee for service) but only if the cost would be less than the cost of hourly fees (b) Ineligible Billing Arrangements. Funds must not be used for legal advice and representation purchased through retainer fee arrangements or contingency fee arrangements. (c) Eligible Subject Matters. Landlord tenant disputes; child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; resolution of outstanding criminal warrants. (d) Ineligible Subject Matter. Legal services related to immigration and citizenship matters or related to mortgages and homeownership.
Moving costs	Costs such as truck rental or hiring a moving company, including payment of temporary storage fees for up to 3 months	Reasonable one-time moving costs, including truck rental and hiring a moving company
Utility deposits	Standard utility deposit that the utility company requires of all customers	Payment of utility deposit, which constitutes a one-time fee paid to utility companies

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Summary of Eligible RRH Supportive Services (CONT'D)

	ESG-RRH 24 CFR part 576.10	CoC-RRH 24 CFR part 578.53
Mediation	Mediation between the program participant and the owner or person(s) with whom the participant is living	Mediation with property owners and landlords on behalf of eligible program participants
Credit repair	- Credit counseling - Accessing a free personal credit report - Resolving personal credit problems - Other services needed to assist with critical skills related to household budgeting and money management	- Credit counseling - Accessing a free personal credit report - Resolving personal credit issues

Additional Supportive Services Eligible under CoC-RRH ONLY

Child care	The costs of establishing and operating child care and providing child care vouchers for children from families experiencing homelessness
Education services	The costs of improving knowledge and basic educational skills
Employment assistance and job training	The costs of establishing and operating employment assistance and job training programs
Food	The cost of providing program participants with meals or groceries
Life skills training	The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness but that are necessary to function independently in the community
Mental health services	The direct outpatient treatment of mental health conditions by licensed professionals
Outpatient health services	The direct outpatient treatment of medical conditions by licensed medical professionals
Outreach services	Activities to engage persons for the purpose of providing immediate support and intervention and for identifying potential program participants
Substance abuse treatment services	The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing
Transportation	Costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other eligible services

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Appendix F - ESG Recordkeeping Requirements[226]

1. Eligibility Records

- *Homeless or at-risk status* – Evidence of the homeless status or "at-risk of homelessness" status described in <u>Appendix B</u>.

- *Annual income* – For each participant who receives homelessness prevention assistance or who received rapid re-housing assistance longer than one year.

  o income evaluation form specified by HUD and completed by the recipients or subrecipients

  o source documents (e.g., most recent wage statements, unemployment compensation statements, public benefits statements, bank statements) for the assets held by the program participants and income received before the date of the evaluation

  o to the extent that source documents are unobtainable, written statements by the relevant third-parties (e.g., employer, government benefits administrator) or written certification by the recipients' or subrecipients' intake staff of the oral verification by the relevant third-party of the program participant's income over the most recent period, or

  o to the extent that source documents and third-party verification are unobtainable, written certification by the program participants of the amount of income that the program participants receive

- *Determinations of ineligibility* – For each individual or family determined to be ineligible for ESG assistance, the records must include documentation of the reason for that determination

2. Program Participant Records

In addition to the eligibility documentation required above, program participant records must include:

- documentation of the services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant

- compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions

- where applicable, compliance with the termination of assistance requirement

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[226] 24 CFR §576.500

3. Centralized or Coordinated Assessment Systems & Procedures

The program must keep documentation evidencing the use of the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD.

4. Rental Assistance Agreements and Payments

The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

5. Utility Allowance

The records must document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.

6. Shelter and Housing Standards

The records must include documentation of compliance with the shelter and housing standards including inspection reports.

7. Coordination with Other Programs

Programs must document their compliance in coordinating and integrating ESG assistance with programs targeted toward homeless people and mainstream service and assistance programs.

8. Matching

The program must keep records of the source and use of contributions made to satisfy the matching requirement as described above in the section on Match. The records must indicate the particular fiscal year grant for which each matching contribution is counted. The records must show how the value placed on third-party, non-cash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

9. Conflicts of Interest

The program must keep records to show compliance with the organizational conflicts-of-interest requirements, a copy of the personal conflicts of interest policy or codes of conduct, and records supporting exceptions to the personal conflicts of interest prohibitions.

10. Faith-based Activities[227]

The program must document its compliance with the faith-based activities requirements described in the general management portion of this manual.

11. Other Federal Requirements[228]

Programs must document their compliance with the federal requirements, as applicable, including:

- records demonstrating compliance with nondiscrimination and equal opportunity requirements including data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds and affirmative outreach requirements

- records demonstrating compliance with the uniform administrative requirements for nonprofit organizations described under financial management of grants and cost allocation

- records demonstrating compliance with flood insurance requirements if applicable

- certifications and disclosure forms required under the lobbying and disclosure requirements

12. Financial Records

The program must keep documentation showing that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities. Any programs that receive program income must retain records of the receipt and use of program income.

13. Subrecipients and Contractors

The program must retain copies of all procurement contracts and documentation of compliance with federal procurement requirements.

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[227] 24 CFR §576.406
[228] 24 CFR §576.407

Appendix G - Other Resources

1. HUD Homelessness Assistance Resource Exchange

Contains links to laws, regulations and notices; program guides, tools and webinars; HUD news and announcements; reporting tools; FAQs; and other resources.

- *General information*: https://www.hudexchange.info/homelessness-assistance
- *Continuum of Care*: https://www.hudexchange.info/coc/
- *Emergency Solutions Grants*: https://www.hudexchange.info/esg/
- *Homeless Management Information Systems*: https://www.hudexchange.info/hmis/

2. San Francisco Local Homeless Coordinating Board

http://sfgov.org/lhcb/

Contains information about local CoC application process, point-in-time homeless count, local reports, and meeting information.

3. San Francisco Mayor's Office of Housing and Community Development, Community Development Division

http://sf-moh.org/index.aspx?page=626

Contains information about the local San Francisco Emergency Solutions Grants program.

4. Fair Market Rents (FMRs) - http://www.huduser.org/portal/datasets/fmr.html

5. e-snaps - https://esnaps.hud.gov/grantium/frontOffice.jsf

e-snaps is HUD's electronic Homeless Assistance Application and Grant Management System used to submit CoC Grant applications, technical submissions and Annual Performance Reports (APRs).

6. The Line of Credit Control System (LOCCS) -
http://portal.hud.gov/hudportal/HUD?src=/program_offices/cfo/loccs_guidelines

The Line of Credit Control System (LOCCS) is the US Department of Housing and Urban Development's (HUD) primary grant disbursement system.

7. HUD Research/Publications and Data Sets - http://www.huduser.org

8. **Office of Management and Budget (OMB) Circulars -**
http://www.whitehouse.gov/omb/circulars/index.html

   OMB Omni-Circular – Code of Federal Regulations Title 2, Part 200
   http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl

9. **Technical Assistance**

   Questions can be submitted through the HUD Virtual Help Desk at
   https://www.hudexchange.info/get-assistance/my-question/

   Additional technical assistance materials are available at
   http://www.homebaseccc.org/pages/Hot_Topics/HUD_TAmaterials.html

10. **US Interagency Council on Homelessness -** http://www.usich.gov/

    USICH is an independent agency within the federal executive branch whose mission is to coordinate the federal response to homelessness. The website includes a range of tools and resources related to best practices for ending homelessness.

OTHER FEDERAL AGENCIES THAT RESPOND TO HOMELESSNESS

11. **Department of Education**
    http://www.ed.gov/programs/homeless/resources.html

    This page shows resources related to Homeless Children and Youths Grants for State and Local Activities.

12. **Department of Health and Human Services (HHS)**
    http://www.hhs.gov/homeless/

    This page includes information on relevant HHS activities, grants, research and publications, federal links, and homelessness resources.

13. **Department of Labor**
    http://www.dol.gov/dol/audience/aud-homeless.htm

    This page includes a list of Department of Labor programs for people who are experiencing homelessness and targeted funding.

14. Department of Veterans Affairs
http://www.va.gov/HOMELESS/index.asp

This page lists resources related to the Department of Veterans Affairs services for veterans who are homeless.

15. Social Security Administration (SSA)
http://www.socialsecurity.gov/homelessness/

This page provides information on relevant SSA programs, program instructions, reports, and available funds for outreach projects, and other federal and resource links.

Appendix H - Forms

Continuum of Care Homeless Programs
Certification of Homelessness
(on agency letterhead)

Date (of enrollment into program): _____

Program Name and Agency: _____

This will certify that (name of applicant): _____

(Social security number) _____ - _____ - _____

Meets the Continuum of Care Homeless Programs guidelines defining homelessness. This applicant was living in the following situation at the time that she/he first contacted the application agency (please check **one** category that best describes the applicant's living situation and attach the appropriate documentation):

Street, parks, cars, or abandoned buildings (1)   _____
Emergency shelter/ Emergency voucher (2)   _____
Transitional housing facility (3)   _____
Psychiatric facility (4)   _____
Alcohol or drug treatment facility (4)   _____
Hospital (4)   _____
Jail (4)   _____
Eviction from private dwelling/hotel/motel (5)   _____
Domestic violence shelter/fleeing domestic violence situations (6)   _____

Is this client chronically homeless* (7)?   ____Yes   ____No   ____ Unknown

*A chronically homeless person is an unaccompanied homeless individual or a family with at least one adult member with a disabling condition who has either been continuously homeless for a year or more or has had at least four (4) episodes of homelessness in the past three (3) years. The person must have been living on the streets or in an emergency shelter during these stays.

Signed: _____
       (Signature of agency representative)

Continuum of Care Homeless Programs
Homelessness Documentation
(on agency letterhead)

Type of documentation obtained:

_____ Third Party Documentation

_____ Staff Observation

_____ **Client Self Certification (with certification form)

Description of the documentation Obtained:

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

If Self Certification is being used, explain the process or attempts made to get third party verification first:

_____

_____

_____

_____

_____

_____

☐ **Check here if all documentation is in case file**

Agency Staff Signature_____ Date _____

Continuum of Care Homeless Programs
Certification of Homelessness & Supporting Documentation

The Continuum of Care Homeless Program is designed to move homeless persons from streets and shelters to permanent housing and maximum self-sufficiency. A person must be homeless in order to receive assistance from CoC programs. A person is considered homeless only when he/she resides in one of the situations listed on the Certification of Homelessness form. Please read the following instructions carefully.

- The Certification of Homelessness and Documentation of Persons Living on the Streets forms need to be placed on your agency letterhead.
- Agency staff not program participants must fill out the Certification of Homelessness form.
- Check the one category that best describes the participant's situation at time of intake and refer to the list below to find out what additional supporting documentation is needed.
- The order of priority for obtaining evidence of homelessness is: (1) third party documentation, (2) staff observations, (3) certification from the participant.

(1)   If you checked the box marked "Street, park, car, or abandoned building" on the Certification of Homeless form and if an outreach worker or social service agency referred the participant, you must obtain written verification from the referring organization regarding where the person has been residing. This verification should be on agency letterhead, signed and dated. If the household was not referred, please describe the conditions where the individual or family was living on the Documentation of Persons Living on the Streets form, and sign and date it. In addition, you may have the participant make a statement, sign his/her statement and date it.

(2)   If you checked the box marked "Emergency shelter/Emergency voucher" please obtain written verification from the shelter staff, or staff from HSA, that the participant has been residing at the emergency shelter for homeless persons. This verification must be signed and dated.

(3)   If you checked the box marked "Transitional housing facility" please obtain a letter from facility staff that states the participant resides in the program. Participants should also have written verification that he/she was living on the streets or in an emergency shelter prior to living in the transitional housing facility (see above for required documentation) or was discharged from an institution or evicted prior to living in the transitional housing facility and would have been homeless if not for the transitional housing (see below for required documentation). (Note: Persons leaving transitional housing who were not originally living on the streets or in shelter are an ineligible category under permanent housing (PH) projects.)

(4)   If you checked the box marked "Psychiatric facility, Alcohol or drug treatment facility, Hospital, or Jail" and the participant has been in the facility for **90 days or less** please obtain written verification from staff at the discharging facility that states he/she was living on the street or in an emergency shelter prior to the short-term stay and the beginning and end dates of the time residing in the facility. If you are unable to obtain written verification, you make take an oral referral from staff at the discharging facility, but you must create the written verification. If you are unable to obtain evidence from the discharging facility, you may create written verification of your repeated efforts to obtain the information and get a signed/date statement from the participant including where discharged from and his/her entry and exit dates. If participant has been in the facility for **more than 90 days** (note: ineligible category under permanent housing (PH) projects), please have the referring institution's staff document

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Continuum of Care Homeless Programs
Certification of Homelessness & Supporting Documentation

The Continuum of Care Homeless Program is designed to move homeless persons from streets and shelters to permanent housing and maximum self-sufficiency. A person must be homeless in order to receive assistance from CoC programs. A person is considered homeless only when he/she resides in one of the situations listed on the Certification of Homelessness form. Please read the following instructions carefully.

- The Certification of Homelessness and Documentation of Persons Living on the Streets forms need to be placed on your agency letterhead.
- Agency staff not program participants must fill out the Certification of Homelessness form.
- Check the one category that best describes the participant's situation at time of intake and refer to the list below to find out what additional supporting documentation is needed.
- The order of priority for obtaining evidence of homelessness is: (1) third party documentation, (2) staff observations, (3) certification from the participant.

(1)   If you checked the box marked "Street, park, car, or abandoned building" on the Certification of Homeless form and if an outreach worker or social service agency referred the participant, you must obtain written verification from the referring organization regarding where the person has been residing. This verification should be on agency letterhead, signed and dated. If the household was not referred, please describe the conditions where the individual or family was living on the Documentation of Persons Living on the Streets form, and sign and date it. In addition, you may have the participant make a statement, sign his/her statement and date it.

(2)   If you checked the box marked "Emergency shelter/Emergency voucher" please obtain written verification from the shelter staff, or staff from HSA, that the participant has been residing at the emergency shelter for homeless persons. This verification must be signed and dated.

(3)   If you checked the box marked "Transitional housing facility" please obtain a letter from facility staff that states the participant resides in the program. Participants should also have written verification that he/she was living on the streets or in an emergency shelter prior to living in the transitional housing facility (see above for required documentation) or was discharged from an institution or evicted prior to living in the transitional housing facility and would have been homeless if not for the transitional housing (see below for required documentation). (Note: Persons leaving transitional housing who were not originally living on the streets or in shelter are an ineligible category under permanent housing (PH) projects.)

(4)   If you checked the box marked "Psychiatric facility, Alcohol or drug treatment facility, Hospital, or Jail" and the participant has been in the facility for **90 days or less** please obtain written verification from staff at the discharging facility that states he/she was living on the street or in an emergency shelter prior to the short-term stay and the beginning and end dates of the time residing in the facility. If you are unable to obtain written verification, you make take an oral referral from staff at the discharging facility, but you must create the written verification. If you are unable to obtain evidence from the discharging facility, you may create written verification of your repeated efforts to obtain the information and get a signed/date statement from the participant including where discharged from and his/her entry and exit dates. If participant has been in the facility for **more than 90 days** (note: ineligible category under permanent housing (PH) projects), please have the referring institution's staff document

that the participant is being discharged within 14 days and, without CoC assistance, has no place to go upon release. The agency must also have information on the income and other resources of the participant and what efforts were made to obtain housing and why, without the CoC assistance, the participant would be living on the street or in an emergency shelter.

(5)   If you checked the box marked "Eviction from private dwelling/hotel/motel" please obtain a copy of the formal eviction notice indicating that the participant has to leave his/her residence within 14 days before receiving CoC assistance. If the participant was living in a hotel/motel (not paid for with government or charitable resources), obtain evidence that the participant does not have the resources to remain there for more than 14 days after applying for CoC assistance. If the participant is being evicted by family or other owner/renter of housing where there is no formal eviction process, you must obtain a written statement from the participant that he/she will not be allowed to stay for more than 14 days after applying for homeless assistance. You must certify that statement by obtaining a written certification by the owner/renter evicting the participant, or barring that, recording the owner/renter's oral statement, or barring that, documenting and certifying your due diligence to obtain the owner/renter's verification and obtaining certification from the participant that his/her statement was true and complete. The agency must also have information on the income and other resources of the participant and what efforts were made to obtain housing and why, without the CoC assistance, the participant would be living on the street or in an emergency shelter. (Note: Ineligible category for permanent housing (PH) projects).

(6)   If you checked the box marked "Domestic violence shelter/fleeing domestic violence situations" please obtain written verification from the participant that he/she is fleeing a domestic violence situation, that he/she does not have anywhere else to go, and that he/she lacks the resources or support networks to obtain other housing. If the participant is unable to prepare the verification, prepare a written statement about the participant's previous living situation, lack of housing, and lack of resources and have the participant sign the statement and date it. If the participant's safety would not be jeopardized, you must obtain certification from a domestic violence or other housing, services, or legal provider that the person is fleeing domestic violence.

(7)   A chronically homeless person is an unaccompanied homeless individual or a family with at least one adult member with a disabling condition who has either been continuously homeless for a year or more or has had at least four (4) episodes of homelessness in the past three (3) years. To be considered chronically homeless, a person must have been living on the streets, in a HUD-defined safe haven (A Woman's Place is the only one in San Francisco) or in an emergency shelter during these stays. If a chronically homeless person comes directly from the streets, obtain documentation, such as a certification, from outreach workers who have assisted them in the recent past. If a chronically homeless person comes from an emergency shelter, documentation from the shelter should be obtained. For prior stays on the streets or in emergency shelters, the participant or caseworker should prepare a brief written statement. This certification should include information (i.e. dates and locations) about previous emergency shelter and/or street.

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SELF-DECLARATION OF HOUSING STATUS

Participant Name: _____

This is to certify that the above named individual is currently homeless or at-risk of homelessness, based on the following and other indicated information and the signed declaration by the applicant.

Check only <u>one</u>:

☐ I am currently homeless and living on the street (i.e. a car, park, abandoned building, bus station, airport, or camp ground); in a homeless shelter; or in a transitional housing program

☐ I am the victim of domestic violence and am/are fleeing from abuse.

☐ I am being evicted from the housing/institution/program I am presently staying in and must leave this housing/institution/program within the next _____ days.

I certify that the information above and any other information I have provided is true, accurate and complete.

Participant Signature: _____ Date: _____

Staff Certification
I understand that third-party verification is the preferred method of certifying homelessness or risk for homelessness for an individual who is applying for assistance. I understand self declaration is only permitted when I have attempted to but cannot obtain third party verification.

Documentation of attempt made for third-party verification:

_____

_____

_____

_____

Staff Signature: _____ Date: _____

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SELF-DECLARATION OF HOUSING STATUS - FAMILY

Participant Name: _____

        Household with dependent children (complete one form for household)
        Number of persons in the household: _____

This is to certify that the above named household is currently homeless or at-risk of homelessness, based on the following and other indicated information and the signed declaration by the applicant.

Check only one:

    ☐ I [and my children] am/are currently homeless and living on the street (i.e. a car, park, abandoned building, bus station, airport, or camp ground); in a homeless shelter; or a transitional housing program.

    ☐ I [and my children] am/are the victim(s) of domestic violence and am/are fleeing from abuse.

    ☐ I [and my children] am/are being evicted from the housing/institution/program we are presently staying in and must leave this housing/institution/program within the next _____ days.

I certify that the information above and any other information I have provided is true, accurate and complete.

Participant Signature: _____ Date: _____

Staff Certification
I understand that third-party verification is the preferred method of certifying homelessness or risk for homelessness for an individual who is applying for assistance. I understand self declaration is only permitted when I have attempted to but cannot obtain third party verification.

Documentation of attempt made for third-party verification:

_____

_____

_____

_____

Staff Signature: _____ Date: _____

APPLICATION CHECKLIST
SHELTER PLUS CARE

Name of Applicant:_____

Application Agency:_____
Application Agency Contact Person:_____
Telephone:_____

This applicant is (check one): ☐   Single Diagnosed
☐   Multiply Diagnosed

This applicant is (check one): ☐   A single adult
☐   Head of Household with child(ren)

Spoken Language(s) ☐   English
☐   Spanish
☐   Other _____

PLEASE ATTACH TO THIS FORM:

☐   Pages 1-5   Application Form

☐   Pages 6-7   Certification of Homelessness on Agency Letterhead

☐   **Pages 8-9**   Application Evaluation Form, if applicable *(TO BE COMPLETED BY AGENCIES WITHOUT LICENSED/CREDENTIALED STAFF ONLY)*

☐   **Page 10** Verification of Serious Mental Health Issues Form, if applicable *(TO BE COMPLETED BY LICENSED/CREDENTIALED STAFF ONLY)*

☐   **Page 11** Verification of Substance Abuse Issues Form, if applicable *(TO BE COMPLETED BY LICENSED/CREDENTIALED STAFF ONLY)*

☐   **Page 12-13**   Declaration of No Income, if applicable

☐   Verification of **Disabling HIV/AIDS** Diagnosis, if applicable (e.g. documentation from health care provider)

☐   Copy of **Current/Valid** Government Issued Photo ID

☐   Copy of Social Security Card

☐   Verification of **Current Income** (i.e. copy of paycheck, printout of CAAP eligibility)

☐   Declaration of No Income Form (only completed by clients with zero income)

☐   If family referral, copies of **Social Security Card(s) and Birth Certificate(s) of children**

☐   **Last two bank statements** (Referring Agency to verify if applicant does not have an account)

Please mail the entire application packet to this exact address:

Shelter Plus Care ZB-31
Department of Human Services
PO Box 7988
San Francisco, CA 94120

APPLICATION
SHELTER PLUS CARE

I. APPLICATION INFORMATION

1. Name of Head of Household:_____

2. Mailing Address, including zip code:_____
   Contact Telephone Number(s):_____

3. Names, addresses, and telephone numbers of two people who know how to contact you:

Name:_____   Name:_____
Address:_____   Address:_____
Telephone:_____   Telephone:_____

4. Are you a veteran? ☐Yes   ☐No

5. Members of Household: List all individuals who will reside in Shelter Plus Care housing. **If a second adult will be a Shelter Plus Care participant, please complete two separate applications.** Do not list children who are not **currently** staying with you.

Name	Sex	Social Security Number	Date of Birth
Self/Head of Household			
Second Adult, or Child, if any			
Child, if any			
Child, if any			

How many children do you have? (total: custody and not in custody)_____

Is any member of the household pregnant?   ☐Yes   ☐ No
        If yes, how many months?   _____Months   If yes, who?_____

Do you expect any changes in the size of your family over the next 12 months? ☐Yes   ☐No
        If yes, indicate the reason:
                        ☐   Reunification with children
                        ☐   Reunification with partner/spouse
                        ☐   Pregnancy
                        ☐   How many additional people anticipated? _____

If you may be reunified with children after receiving housing, please provide complete information below for all children who may be joining the household:

Name	Sex	Social Security Number	Date of Birth
Child			
Child, if additional			
Child, if additional			

6. Check the category that BEST describe your race.

Race:
- ☐ African American
- ☐ Asian/Pacific Islander
- ☐ American Indian/Alaskan Native
- ☐ White
- ☐ American Indian/Alaskan Native and White
- ☐ Asian and White
- ☐ African American and White
- ☐ American Indian/Alaskan Native & African American
- ☐ Other Multi-Racial
- ☐ Other (please describe): _____

7. Check the category that best describes your ethnicity.

Ethnicity:
- ☐ Hispanic
- ☐ Non-Hispanic

II. APPLICANT'S RESOURCES

4. List all income:

Income Source	Amount Per Month
SSI	$
SSDI	$
Social Security	$
CAAP *(circle one: PAES, SSIP, CALM, GA)*	$
TANF	$
Unemployment	$
Veterans benefits	$
Employment	$
No financial resource	$
Other *(please specify)*	$

5. Please indicate any of the following types of assistance you receive:

- ☐ Food stamps
- ☐ Medical
- ☐ Medicare
- ☐ Other (please specify):_____

III. APPLICANT ELIGIBILITY AND HOUSING NEEDS

1. Please check *ALL* categories that apply.   **YES**   **NO**

    a.   Person is homeless   ☐   ☐

2. Person has special needs related to:

    a.   Mental health issues   ☐   ☐

    b.   Symptomatic HIV/AIDS   ☐   ☐

    c.   Substance abuse (alcohol, drugs)   ☐   ☐

If you indicated more than one special need (a,b,c), circle the one that is greatest for you.

3. Please check the response below which BEST describes your experience receiving the following services:

    a.   Mental health treatment:

          ☐   No treatment

          ☐   Outpatient care only

          ☐   Three or fewer hospitalizations

          ☐   More than three hospitalizations

          ☐   Not applicable

    b.   Alcohol and other substance abuse treatment:

          ☐   No formal treatment

          ☐   Outpatient care only

          ☐   Three or fewer inpatient admissions (including detox)

          ☐   More than three inpatient admissions

          ☐   Not applicable

    c.   AIDS related treatment:

          ☐   No medical treatment

          ☐   Outpatient care only

          ☐   Three or fewer hospitalizations

          ☐   More than three hospitalizations

          ☐   Not applicable

Please write names, addresses, and telephone numbers of service providers who know you.

Name	Address	Phone #

    a.   **How did you find out about the Shelter Plus Care program?** Check all that apply.

☐	Street outreach	☐	Alcohol or other drug outpatient staff
☐	Shelter staff	☐	Police
☐	Psychiatric hospital staff	☐	Newspaper/publication
☐	Other hospital/medical clinic staff	☐	Other social service provider
☐	Outpatient mental health staff	☐	Other (please specify)_____

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5. Housing/homeless history:

      b.   Please indicate your living situation **at the time of application**:

                  ☐   Street, park, abandoned building
                  ☐   Emergency shelter
                  ☐   Domestic violence shelter
                  ☐   Transitional housing facility (previously resided on the street or in an emergency shelter)

      c.   How long have you been in there?

            _____ Years, _____ Months, _____ Days

      1.   Please list complete history of living situations over the **past two years**, listing most recent experience first:

Date/City/State: Type of situation (**circle one per living situation**):

____Street, park, abandoned building, emergency shelter, transitional housing, transient hotel, apartment or house, friends or family, couch/floor, jail, hospital, **other (describe):**_____

_____

_____Street, park, abandoned building, emergency shelter, transitional housing, transient hotel, apartment or house, friends or family, couch/floor, jail, hospital, **other (describe):**_____

_____

_____Street, park, abandoned building, emergency shelter, transitional housing, transient hotel, apartment or house, friends or family, couch/floor, jail, hospital, **other (describe):**_____

_____

      2.   How long have you lived in San Francisco?

            _____Years, _____Months, _Days

6. If there is any other information you feel is important and should be added to your application, please use this space. Indicate whether you have any special housing needs due to disability, or any limitations with mobility, vision, or hearing:_____

_____
_____
_____
_____
_____

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Certification: *To the best of my knowledge and belief, I certify that the above information is true, complete, and correct. I understand that if I have provided any false information, this may disqualify me from participation in Shelter Plus Care.*

Consent for Exchange of Information

I understand that the Shelter Plus Care Program (S+C) of the Human Services Agency needs to contact individuals and/or agencies to verify my eligibility for S+C. My signature below serves as a time-limited consent for exchange of information between S+C and all service providers listed in this application. In addition, I consent to exchange of information between S+C and the Department of Public Health (DPH), DPH/Community Behavioral Health Services, and DPH/AIDS Office and other divisions of HSA.

The disclosure of information and records is required for eligibility determination and service coordination. Such disclosure shall be limited to the fact that I have received or I am receiving services related to mental health, primary care, substance abuse, and/or HIV/AIDS disease.

Consent may be revoked by me at any time and, if not revoked earlier, it shall terminate upon my exit from S+C.

Certification and Consent for Exchange of Information:

Applicant Signature:_____

Print Name and Date:_____

Co-Applicant Signature:_____

Print Name and Date:_____

Witness Signature:_____

Print Name and Date:_____

Reference: Welfare and Institutions Code section 5328.7

This application does not guarantee housing assistance of any kind.

<u>EQUAL HOUSING OPPORTUNITY</u>

ALL APPLICATION AGENCIES REQUIRED TO COMPLETE THIS SECTION

APPLICATION/OUTREACH AGENCY:_____

Individual Making Referral:_____**Phone Number:**_____

Additional Housing Recommendations:_____

_____

_____

_____

Signature of Person Making Referral:_____

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VERIFICATION OF SERIOUS MENTAL HEALTH ISSUES
SHELTER PLUS CARE

TO BE COMPLETED BY LICENSED/CREDENTIALED STAFF ONLY

To: Shelter Plus Care Program

From: _____(Print Name of Service Provider)

           _____(Name of Agency)

Date: _____(Today's Date)

Re: _____(Name and Social Security # of Applicant)

This is to verify that the individual named above has a mental illness that is expected to be of long-continued and indefinite duration; substantially impedes the person's ability to live independently; and is such that the person's ability to live independently could be improved by more suitable housing conditions.

(Complete section 1, **(if applicable)** and section 2 below, and sign at the bottom of this sheet.)

1.   The person has a DSM Diagnosis that is not substance abuse. The DSM Diagnosis is:

_____

_____

2.   The person meets criteria from the following categories **(please use an additional sheet if necessary):**

a.   **Current Presentation (describe):**

_____
_____
_____
_____

b.   **History (describe):**

_____
_____
_____
_____

c.   **Functional impairment (describe):**

_____
_____
_____
_____

Signed:_____

Title:_____

EVALUATION FORM
SHELTER PLUS CARE

*** TO BE COMPLETED BY AGENCIES *WITHOUT* LICENSED/CREDENTIALED STAFF ONLY. ONCE
COMPLETED, PLEASE SUBMIT THIS FORM WITH THE APPLICATION TO SHELTER PLUS CARE***

1. Please describe the applicant's current living situation:_____
_____
_____
_____
_____

2. Medications

a Current psychotropic medications: _____
_____
_____
_____
_____

b. Current non-psychiatric medications:_____
_____
_____
_____
_____

3. Medical history including hospitalizations:

a. Psychiatric history:_____
_____
_____
_____
_____
_____
_____
_____

b. Suicidal history:_____
_____
_____
_____
_____
_____
_____
_____

EVALUATION FORM (CONTINUED)
SHELTER PLUS CARE

b.   Substance abuse history: (Current: ☐Yes ☐No)   (Past: ☐Yes ☐No)

a. Please describe the applicant's use and treatment received:_____
_____
_____
_____
_____
_____
_____
_____

5. Please describe the applicant's psychosocial history:_____
_____
_____
_____
_____
_____
_____

6. Please describe the applicant's current mental status (please include appearance, movement, speech, and your overall impression):_____
_____
_____
_____
_____
_____
_____

7. Recommendation/disposition:_____
_____
_____
_____
_____
_____

Print Name and Agency:_____

Staff Signature:_____   **Date:**_____

Title:_____

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VERIFICATION OF SERIOUS SUBSTANCE ABUSE ISSUES
SHELTER PLUS CARE

To: Shelter Plus Care Program

From: _____(Print Name of Service Provider)

            _____(Name of Agency)

Date: _____(Today's Date)

Re: _____(Name and Social Security # of Applicant)

This is to verify that the individual named above has a substance abuse illness that is expected to be of long-continued and indefinite duration; substantially impedes the person's ability to live independently; and is such that the person's ability to live independently could be improved by more suitable housing conditions.

1.   The person meets criteria from the following categories **(please use an additional sheet if necessary):**

      a.   **Current Presentation (describe):**

_____
_____
_____
_____
_____

      b.   **History (describe):**

_____
_____
_____
_____
_____

      c.   **Functional impairment (describe):**

_____
_____
_____
_____
_____

Signed:_____
Title:_____

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DECLARATION OF NO INCOME
SHELTER PLUS CARE

ALL AGENCIES REQUIRED TO COMPLETE ON AGENCY LETTERHEAD/STATIONERY

I (name),_____SSN_____

do hereby certify that I do not receive income from any source.

I understand sources of income include but are not limited to:

- Unemployment benefits
- Employment
- CalWORKs or TANF (Temporary Assistance to Needy Families)
- Social Security
- S.S.I (Supplemental Security Income) / S.S.D.I. (Social Security Disability Insurance)
- General Assistance (CAAP, PAES, CALM, SSIP, GA)
- V.A. Pension
- Retirement Benefits
- Disability Benefits
- Spousal Support
- Child Support
- Income From Assets
- School Grants
- Family Support (parent, children, etc.)
- Interest From Savings Account
- Self-employment (including child care, housekeeping, work from home, contracted, etc.)
- Any other interest received

I further understand that should I become gainfully employed or begin receiving income from any source, it must be reported to the Shelter Plus Care Program immediately.

I sign this declaration under penalty of perjury and with full knowledge of the repercussions of willful falsification.

WARNING:Section 1001 of Title 18 of the US Code makes it a criminal offense to make willful false statements or misrepresentations to any department or agency of the United States as to matters within its jurisdiction.

Signed:_____
       (signature of agency representative)

Applicant Signature:_____

Date:_____

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DECLARATION OF NO INCOME (CONTINUED)
SHELTER PLUS CARE

Please answer the following questions to determine that you are indeed, without income ($0.00). If you are without income, you must complete and submit both pages of this 'Declaration of No Income' document with any verification of income.

Have you obtained any income?	☐Yes	☐No
Is anyone assisting you by paying any bills at this time?	☐Yes	☐No

    If yes, who? _____

How do you pay for food?_____

Do you pay utilities?	☐Yes	☐No

    If yes, how?_____

Do you pay for transportation?	☐Yes	☐No
Do you ride the bus?	☐Yes	☐No

    How? _____

Do you own a motor vehicle?	☐Yes	☐No
Do you make monthly payments?	☐Yes	☐No
Do you have car insurance?	☐Yes	☐No

    How do you buy gas?_____

Do you have credit cards, credit lines or loans?	☐Yes	☐No
Monthly payments?	☐Yes	☐No

    How do you make payments? _____

Do you own a phone (home and/or cellular)?	☐Yes	☐No

    How do you pay the bill? _____

If you answered 'yes' to ANY of the above questions, please obtain **WRITTEN VERIFICATION** proving that the resource(s) used to pay the item(s) is/are not from your own income. All Referring Agencies submitting supplementary written verification of no income are required to complete written verification on agency letterhead/stationery and should be signed and dated by a Referring Agency staff person authorized to validate these items that support a declaration of '$0.00 Income'.

FORM 3.01A
APPLICANT REFERRAL AND FOLLOW-UP FORM
SHELTER PLUS CARE

Date: _____

Applicant SSN: _____

Name: _____

Mailing Address:_____   Applicant's Phone #:_____

Household Size: # of people in household

This referral is from: Wait list ☐   Transfer List ☐   Reconsideration List ☐
                                                     Current housing site: Previous housing site:

Please contact: name of intake coordinator at sponsor agency

At: phone number

A Shelter Plus Care housing unit is available at: address of housing site

You are eligible for an occupancy interview.

      a)   **If you do not contact the housing provider named above within five business days from the date of this notice, you may lose your priority status.**

      b)   **Please bring all checked items to the occupancy interview.**

Certification of current homelessness	☐	Copy of government-issued identification	☐
Mental health verification	☐	Copy of social security card	☐
Substance abuse verification	☐	DVAMC release	☐
HIV/AIDS verification	☐	Proof of income	☐

This is not a guarantee of housing.

_____
_____
_____
_____
_____
_____

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FORM 3.01B
APPLICANT REFERRAL AND FOLLOW-UP FORM
SHELTER PLUS CARE

Part I

Date:_____

Applicant SSN:_____

Name:_____

Mailing Address:_____Applicant's Phone #_____

Household Size: # of people in household:

This referral is from: Wait list ☐   Transfer List ☐   Reconsideration List ☐
     Wait List Number: Current Housing Site: Previous Housing Site:

Please contact: name of intake coordinator at sponsor agency At: phone number

A Shelter Plus Care housing unit is available at: address of housing site

You are eligible for an occupancy interview.

If you do not contact the housing provider named above within five business days from the date of this notice, you may lose your priority status.

Please bring all checked items to the occupancy interview.

Certification of current homelessness	☐	Copy of government-issued identification	☐
Mental health verification	☐	Copy of social security card	☐
Substance abuse verification	☐	DVAMC release	☐
HIV/AIDS verification	☐	Proof of income	☐

===

Part II: For Shelter Plus Care Sponsor/Program Use Only

Date: _____
To: Shelter Plus Care Program
From: _____

The applicant indicated above (check one of the following three options):
☐   Has been accepted for housing: Address, Unit Number _____
☐   Has NOT been accepted for housing (copy of denial letter attached).
☐   Did not establish contact or client did not complete intake process (copy of contact management notes attached).

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FORM 3.01C
CONTACT MANAGEMENT SHEET
SHELTER PLUS CARE

Name of Applicant/Program Participant: _____

Social Security Number: _____

Date	Staff Initials	Type of Contact*	Summary of Attempted/ Fulfilled Contact

*KEY:
P=Personal Meeting
T=Telephone

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FORM 3.01D
CLIENT RULES
SHELTER PLUS CARE

The following program rules govern my participation in the Shelter Plus Care Program.

I understand that if I perform the following activities, my rental assistance may be terminated. I also understand that, as a Shelter Plus Care participant, I am responsible for the behavior of my family members and guests in my home/building. Violations of the rules below by my family members or guests may result in the termination of my rental assistance.

1. Selling drugs in or near the building, by myself, guest or family member as witnessed by police, or building staff, or as documented by five confidential complaints by a tenant or other person on the lease.

2. Violence in or near the building or staff work environment. Violence can include, but is not limited to, physical violence, domestic violence, verbal assault, intimidation, harassment, menacing behavior and posturing in a threatening manner. Violence by guests or family members will also be considered a violation of this rule.

3. Willfully and/or repeatedly causing disturbance of staff work environment and/or quiet enjoyment of community by myself, guest or family member as witnessed by police, or building staff, or as documented by five confidential complaints by a tenant or other person on lease.

4. Willfully and/or repeatedly causing damage to the physical plant, or surroundings, or causing health, sanitation, fire or safety hazards. Damage or health/safety hazards caused by guests or family members will also be considered a violation of this rule.

5. If there is a decrease in the number of people in my household, I understand that I will be required to move to a smaller unit. S+C will offer a suitable unit; and failure to accept an offer of alternative housing will result in the termination of my subsidy. All S+C housing meet housing quality standards, as described by HUD.

The Shelter Plus Care Program prohibits all of the above activities.

These rules have been read by or to me prior to my signature below. I understand these rules, and I have received a copy of them. If, in the future, I have any questions about these rules, I can speak with a case manager.

Program Participant Signature

Signed:_____ Print Name:_____

Date: _____

Witness Signature

Witness:_____ Print Name:_____

Date: _____

FORM 3.01DS
CLIENT RULES
SHELTER PLUS CARE
REGLAS DE EL PROGRAMA DE ASISTENCIA SOCIAL Y VIVIENDA
EFECTIVO EL DIA 31 DE DECIEMBRE, DE 2004

Las siguientes reglas rigen mi participación en el programa de Asistencia Social y Vivienda.

Entiendo que mi asistencia de renta podría ser cancelada si cometo alguna de las siguientes actividades ilícitas:

- Si mis invitados o yo mísmo vendo drogas dentro o cerca de el edificio y fué presenciado por la policía, o personal de el edificio, o documentado por la oficina a travéz de cinco quejas confidenciales por inquilinos o alguna otra persona en el contrato.

- Por cometer o amenazar a cometer violencia física, incluyendo violencia doméstica, en el edificio.

- Si yo o alguno de mis invitados causa disturbio de la paz con obstinación y repetidamente Y presenciado por la policía, o personal de el edificio, o documentado por la oficina a travéz de cinco quejas confidenciales por inquilinos o alguna otra persona en el contrato.

- Si causo daño obstinado o repetido a esta propiedad o sus alrededores o pongo en peligro la seguridad de el edificio por fuego o daños a la salud.

- Si hay una disminución en el número de personas en mi casa, yo entiendo que seré requerido a mover a una unidad más pequeña. S + C ofrecerá una unidad conveniente; y el fracaso para aceptar que una oferta de envoltura de alternativa tendrá como resultado la terminación de mi subvención. Todo S + envoltura C encuentra los estándares de la calidad de envoltura, como descrito por HUD.

Todas esas actividades ilícitas serán prohibidas por el programa de Asistencia Social y Vivienda.

Todas estas reglas se me han leido y explicado antes de firmar. Yo entiendo estas reglas y he recibido una copia de ellas.
Si en el futuro llegase a tener preguntas acerca de estas reglas yo puedo preguntarle a un trabajador social.

Firma:_____ Nombre completo:_____

Fecha: _____/_____/_____

Firma de Testigo:_____ Nombre completo: _____

Fecha: _____/_____/_____

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FORM 3.01E
CONFLICT OF INTEREST DISCLOSURE STATEMENT
SHELTER PLUS CARE

Name: _____

Address of Shelter Plus Care site where you may be housed (if known):

_____

Organizations in which I have a family or business tie:

_____

_____
_____
_____
_____

I hereby certify that the information stated above is true and complete. I have no other ties or potential conflicts with the Shelter Plus Care Program. I will notify the Shelter Plus Care Program immediately of any potential conflict of interest or potential appearance of a conflict of interest if such arises in the future.

Name:_____

Signature (Head of Household):_____

Date: _____

CONFLICT OF INTEREST DISCLOSURE STATEMENT
SHELTER PLUS CARE

CONSTANCIA DE REVELACION SOBRE LOS CONFLICTOS DE INTERESES

NOMBRE: _____

Dirección de la localidad de el Programa Shelter Plus Care donde pueda que este viviendo (si se sabe):

_____

ORGANIZACIONES DONDE YO TENGA FAMILIA O NEGOCIOS:

_____
_____
_____
_____
_____

Yo declaro y certifico que la información aqui proveida es cierta y completa. No tengo ninguna otra afiliación o conflictos potenciales con el programa de Shelter Plus Care. Yo notificaré al Programa de Shelter Plus Care inmediatamente de cualquier conflicto de intereses potencial o la posibilidad de que exista algun conflicto de intereses potencial en el futuro inmediato.

_____
Nombre

_____   _____
Firma   Fecha

FORM 3.01F
AUTHORIZATION FOR EXCHANGE OF INFORMATION
SHELTER PLUS CARE

The San Francisco Shelter Plus Care Program (S+C) is a supportive housing program funded by the Department of Housing and Urban Development (HUD). As a condition of funding, the city must report of HUD on program outcomes, service utilization, and needs of program participants. We need to gather this information in order to monitor S+C and to coordinate services to better meet the needs of the program participants. In the long-run, it is hoped that having this information will enable us to continue to make S+C housing available, and to maintain and expand those services which you find helpful.

In order to do this, service providers need to share information with each other and with S+C about service utilization. Whenever possible, this information will be shared on an anonymous basis, and your name will not be used. Case management staff will ask to speak with you on a regular basis to learn about your experiences in the program, including which services you have found useful.

Please read and complete the section below. If you have any questions, please consult the housing sponsor or S+C representative who provided this form to you. Once you have read and understood the form, your signature will authorize information to be shared only as necessary.

Program Participant Complete This Section:

I have read this form and understand that I will be asked to speak with case management staff about the services I use and my experiences in the Program. I understand that the Shelter Plus Care Program needs to contact agencies to monitor the Program. My signature below serves as an indefinite release, subject to termination at any time from the undersigned, for:

IV.   The San Francisco Human Services Agency and the Department of Public Health to provide information to the Shelter Plus Care Program about any records relation to me; and for

V.   _____ (Name of housing sponsor staff person) to provide information to the Shelter Plus Care program about any records relating to me.

This authorization is granted on the condition that due care be exercised at all times with respect to my rights to privacy and confidentiality. This authorization is not a waiver of any right or privilege conferred on me by law or regulation. Disclosure of the information herein is required for program monitoring. This form has been read by or to me prior to this signature. The consent is subject to revocation by the undersigned at any time.

Signature: _____ Date: _____

Print Name: _____

Witness Signature: _____ Date: _____

Print Name: _____

FORM 3.01FS
AUTHORIZATION FOR EXCHANGE OF INFORMATION
SHELTER PLUS CARE

AUTORIZACION PARA INTERCAMBIO DE INFORMACION

El Programa de Shelter Plus Care (S+C) es un programa de vivienda patrocinado por el Departamento de Vivienda y Desarrollo Urbano (HUD). Como una condición de patrocinio, la ciudad debe reportar a HUD los resultados de el programa, la utilización de servicios, y las necesidades lo los participantes en el programa. Nosotros necesitamos reunir esta información para poder administrar el S+C y también para coordinar los servicios para así atender mejor las necesidades de los participantes. En el futuro, se espera que esta información nos ayudará a seguir haciendo más disponible la vivienda en el programa de S+C. Asi como tambien a mantener y expander esos servicios que usted mismo encuentra favorables.

A manera de que ésto funcione, los proveedores de servicios necesitan compartir la información de la utilización de servicios entre ellos y con el programa de S+C. Cuando es posible, los proveedores de servicios necesitam compartir la información de una manera anónima y sin usar su nombre. Los trabajadores sociales del programa le preguntarán cosas regularmente para aprender de sus experiencias con el programa, incluyendo los servicios que usted encuentra favorables para usted.

Por favor lea y complete la sección siguiente. Si tiene alguna pregunta por favor vea al patrocinador de su vivienda o al representante de S+C, o quién le haya dado esta forma. Una vez que haya leído y comprendido ésta forma, su firma autorizará que la información que usted dió se comparta según sea necesario.

Participante de el Programa, por favor complete esta sección:

He leído ésta forma y entiendo que se me pedirá que hable con los trabajadores sociales o personal acerca de los servicios que yo uso y mis experiencias en el programa. Entiendo que el S+C Program necesita contactar otras agencias para administrar el programa.:

    ✓   Los departamentos de Servicios Humanos y Salud Pública para proveer información a el programa de S+C sobre cualquier record sobre mi persona; y para

    ✓   _____ (Nombre de la persona que lo refirio o personal) para dar información sobre mi al programa de S+C.

Esta autorización es concedida con la condición de que se ejercite cuidado en todo momento respecto a mis derechos de privacidad y confidencialidad. Esta autorización no es una renuncia a mis derechos o privilegios otorgados a mi por ley o regulación. La revelación de información aqui proveida es requerida sólo para administración del programa. Esta forma ha sido leída por mi o se me ha leído, antes de haber firmado. El consentimiento esta sujeto a revocación por el/la que firma y en cualquier momento.

Firma:_____Fecha:_____

Nombre (letra de molde): _____

Testigo de Firma: _____Fecha:_____

Nombre (letra de molde): _____

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San Francisco Shelter Plus Care Program
Program Requirements

Program Description:

The San Francisco Shelter Plus Care Program (S+C) assists homeless people with disabilities to gain entry to housing and achieve residential, economic, and emotional stability. S+C does so by providing safe, secure permanent housing and a broad range of support services. Program participants pay 30 percent of household income for rent. The S+C subsidy covers the balance.

Support services include on-site and off-site case management, basic living skills, representative payee and money management, benefits advocacy, hot meals, substance abuse intake/assessment, special focus support groups, access to residential treatment, specialized mental health services, crisis intervention, recreational activities, and vocational training. Although services are not mandatory, each program participant will be actively encouraged to participate.

Conditions for Program Participants:

1. I understand that my case manager will encourage me to develop a service plan that addresses any services I may need to keep my housing. I may choose to update this plan as needed.

2. Once I move into an S+C unit, I am obligated to abide by the terms of my lease. Any violations of house rules can be grounds for eviction. House rules include, but are not limited to:
    ✓ Paying rent on time each month,
    ✓ Keeping my unit and surrounding areas in a clean, safe, and sanitary condition,
    ✓ Not disturbing my neighbors,
    ✓ The prohibition of any illegal activities, on or near the building by myself, guests, family members, and guests of family members,
    ✓ I am responsible for the actions of my guests; I cannot allow anyone to live in my unit without the prior written approval of the S+C Program, and Property Management.

3. I agree to report any changes in my household to S+C and on-site property management.
    ✓ If there is a decrease in the number of people in my household, I understand that I will be required to move to a smaller unit. S+C will offer a suitable unit; and failure to accept an offer of alternative housing will result in the termination of my subsidy. All S+C housing meet housing quality standards.
    ✓ I also agree to notify S+C in the event that a member of my household reaches the age of 18, and that his/her income may be considered in determining the amount of rent that I owe.
    ✓ Participants housed in SRO's who experience an increase in household size must meet with the S+C Resource Specialist to request a transfer into another unit which will accommodate their larger household.

4. I understand that I am required to report all sources of my household income and assets accurately to S+C. I understand that I am required to report any changes in the sources or amount of my household income to my assigned S+C intake specialist, immediately.

5. I understand that if I do not make timely rent or utility bill payments, I will be encouraged to enroll in money management services as a means to maintaining my housing.

6. I understand that I may not be eligible for S+C reconsideration unless I reconcile past debt from the S+C Housing Program. This includes any outstanding rent or property damage that the S+C Program determines that I am responsible for.

Termination of Rental Assistance:

I understand that my rental assistance may be terminated for any of the following S+C rule violations:

1. Selling drugs in or near the building, by myself, guest or family member as witnessed by police, or building staff, or as documented by five confidential complaints by a tenant or other person on the lease.

2. Violence in or near the building or staff work environment. Violence can include, but is not limited to, physical violence, domestic violence, verbal assault, intimidation, harassment, menacing behavior and posturing in a threatening manner. Violence by guests or family members will also be considered a violation of this rule.

3. Willfully and/or repeatedly causing disturbance of staff work environment and/or quiet enjoyment of community by myself, guest or family member as witnessed by police, or building staff, or as documented by five confidential complaints by a tenant or other person on lease.

4. Willfully and/or repeatedly causing damage to the physical plant, or surroundings, or causing health, sanitation, fire or safety hazards. Damage or health/safety hazards caused by guests or family members will also be considered a violation of this rule.

5. . If there is a decrease in the number of people in my household, I understand that I will be required to move to a smaller unit. S+C will offer a suitable unit; and failure to accept an offer of alternative housing will result in the termination of my subsidy. All S+C housing meet housing quality standards, as described by HUD.

Any participant whose rental assistance has been terminated from the S+C Programs is entitled to appeal this decision in accordance with the S+C policies.

By signing below, I state that I understand the terms and conditions of these Program Requirements. I also understand that if I lose my S+C subsidy, the S+C Program cannot guarantee other housing for me.

_____	_____
Program Participant Name (Print)	Date
_____	
Program Participant Signature	
_____	_____
Other Adult Household Member Signature (if applicable)	Date
_____	_____
Shelter Plus Care Resource Specialist Signature	Date

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Requisitos del Programa de Shelter Plus Care de San Francisco

Descripcion del programa:

El programa de Shelter Plus Care de San Francisco (S+C) ayuda a personas sin hogar con incapacidades al acceso a vivienda y a lograr estabilidad residential, economica y emotional. De esta manera, el programa de S+C provee vivienda permanente asegurada y segura y una variedad amplia de servicios de apoyo. Los participantes del programa pagan el 30 por ciento del total de los ingresos del hogar. El subsidio de S+C cubre el resto/balance.

Los servicios del apoyo incluye servicios dentro y fuera del edificio de vivienda, manejo de casos (case management) aptitudes basicas, representantes de pago y servicios de manejo de dinero, advocacia de beneficios, comidas calientes, ab(uso) de substancias evaluacion inicial, enfoque principal de grupos de apoyo, acceso a programas residenciales, especializados en servicios de salud mental, intervencion de crisis, actividades recreacionales y entrenamientos vocacional. Aunque los servicios no sean obligatorios, cada participante del programa será alentado activamente a participar.

Las condiciones para Participantes del Programa:

1. Entiendo que mi manejador de caso (case manager) me alentará a desarrollar un plan de servicio que tratara cualquier servicio que podria necesitar para poder asegurar mi vivienda. Yo puedo actualizar este plan cuanto sea necesario.

2. Una vez que yo me mude a una unidad de S+C estoy obligado a respetar los términos de mi arrendamiento. Cualquier infracción de reglas de casa podria ser motivo para el desalojo. Las reglas de la casa incluyen, pero no son limitadas a:
    ✓ Pagar la renta a tiempo cada mes,
    ✓ Mantiener mi unidad y sus alrededores en una condición limpia, segura y sanitaria,
    ✓ No molestar a mis vecinos,
    ✓ La prohibición de cualquier actividad ilegal, en y cerca del edificio por mi mismo, por los huéspedes, por miembros de familia, y por los huéspedes de miembros de familia,
    ✓ Yo soy responsable de las acciones de mis huéspedes; y no puedo permitir que nadie viva en mi unidad sin la previa aprobación escrita del programa de S+C, y la Administración de la Propiedad(Property Management).

3. Estoy de acuerdo de informar cualquier cambio de mi vivienda al programa de S+C y a la administracion de la propiedad de el edificio en la que vivo.
    1. Si hay una disminución en el número de personas en mi casa, entiendo que seré requerido a mudarme a una unidad más pequeña. S+C ofrecerá una unidad apropiada; y el incumplimiento al no aceptar una oferta alternativa de vivienda tendrá como resultado la terminación del subsidio. Toda vivienda de S+C satisface las regulaciones de calidad de vivienda.
    2. Tambien estoy de acuerdo en notificar a S+C en el caso que un miembro de mi casa cumpla la edad de 18, y que sus ingresos puedan ser considerados en determinar la cantidad del pago de renta que debo.
    3. Los Participantes que vivan en SRO's y que experimenten un aumento en el numero de familia debera hacer una cita con el especialista de recursos de S+C para solicitar una transferencia otra unidad mas apropiada.

4. Entiendo que estoy requerido a reportar toda fuente de ingresos de la casa y recursos exactamente al programa de S+C. Entiendo que estoy requerido a informar imediatamente cualquiera cambio de fuentes o la cantidad de mis ingresos de la casa al especialista asignado de S+C.

5. Entiendo que si no pago mi renta o pago de utiliades, se me alentara a enrrolar en los servicios de manejo de dinero (money management)como un medio preventivo para poder mantener mi vivienda.

6. Entiendo que no podria calificar para la reconsideración del programa de S+C al menos que reconcilie deudas pasadas del programa de S+C. Esto incluye cualquie renta pendiente o daños a la propiedad que el programa de S+C determine que soy responsible.

La Terminación de Ayuda de Renta:

Entiendo que mi asistencia de renta podria terminarse por cualquiera de las siguientes infracciones de reglas del programa de S+C.

1. Vender drogas en o cerca de el edificio , por mi mismo, miembro de huésped o de familia presenciado por la policía, o por el personal del edificio, o documentado por cinco quejas confidenciales por un inquilino u otra persona en el contrato de renta.

2. Violencia en o cerca de el edificio o en el espacio laboral del personal de el edificio. Violencia puede incluir, pero no esta limitada a, violencia fisica, violencia domestica, asalto verbal, intimidacion, acoso, comportamiento amenazante y posturas de manera amenazadoras. Violencia por huespedes o miembros de familia tambien seran considerados como una infraccion de esta regla.

3. Intencionalmente y/o causar repetidamente perturbacion de o en area laboral del personal y/o de la paz y tranquilidad de la comunidad por mi mismo, huesped o miembro de familia presenciado por la policia, personal del edificio, o documentado por cinco quejas confidenciales por un inquilino u otra persona en el contrato de renta.

4. Intencionalmente y/o causando danos al edificio, o sus alrededores, o causando peligros de suguridad de salud, saneamiento, e incendio. Daños a la salud/ seguridad causada por miembros de huéspedes o miembros de familia tambien sera considerada una infracción de esta regla. .

5. Si hay una disminución en el número de personas en mi casa, entiendo que estare requerido a mudarme a una unidad más pequeña.

S + C ofrecerá una unidad apropiada; y el incumplimiento al no aceptar la oferta alternative de vivienda tendra como resultado la terminacion del subsidio. Toda vivienda de S+C satisface los regulacions de calidad de vivienda,como han sido descritos por HUD.

Cualquier participante cuya ayuda de renta ha sido terminada del programa de S+C tienen derecho de apelar esta decisión de acuerdo con los reglamentos de S+C.

Firmando abajo, yo declaro que entiendo los términos y las condiciones de estos requisitos del programa.Tambien entiendo que si pierdo mi subsidio de S+C, el programa de S+C no puede garantizarme otro tipo de vivienda.

_____   _____
Nombre del participante del programa (Molde)   Fecha

_____
Firma del Participante del programa

_____   _____
Firma Adulta de otro Miembro de la Casa (si aplica)   Fecha

_____   _____
Especialista de Recurso de Cuidado de S+C   Fecha

City and County of San Francisco
Edwin Lee, Mayor

Human Services Agency
Department of Human Services
Department of Aging and Adult Services

Trent Rhorer, Executive Director

FORM 3.01H
CERTIFICATION OF ELIGIBILITY
SHELTER PLUS CARE

DATE:_____

TO: Property Manager at _____

FROM: Shelter Plus Care Program Manager

_____

This is to certify that, based on the information available to me,

NAME:_____

SOCIAL SECURITY NUMBER:_____

Meets the Shelter Plus Care eligibility criteria. I am hereby referring that individual to you to complete the occupancy process.

_____
Shelter Plus Care Program Manager

FORM 3.02A
EXIT FORM
SHELTER PLUS CARE

Tenant Name:			Social Security Number:		
Agency:		Service Provider:		Phone Number:	
Today's Date:		Date of Exit:		Housing Site:	
New Mailing Address, if known:					

I.   TYPE OF EXIT:
☐ Eviction
☐ Transfer
☐ Abandonment
☐ Move Out
☐ Death
☐ Stipulated agreement
☐ Exceeded 90 day vacancy
☐ Expiration of Survivorship
☐ Other _____

II.   REASON FOR DEPARTURE:
☐ Left independently
☐ Non-payment of rent; eviction
☐ Illegal/violent behavior
☐ Inability to live independently
☐ Arrest
☐ Death
☐ Medical needs
☐ Psychiatric/mental health needs
☐ Substance (ab)use needs
☐ No longer eligible
☐ Subsidy terminated
☐ Unknown
☐ Other (please specify) _____

III.   DESTINATION: Where does program participant plan to go after leaving this site/service?
☐ Alternate housing with support services
☐ Subsidized independent housing
☐ Unsubsidized housing
☐ Move in with family or friends
☐ Psychiatric hospital
☐ Hospice
☐ Unknown

☐ Other hospital
☐ Jail/prison
☐ Street, etc.
☐ Emergency shelter
☐ Inpatient alcohol/drug treatment facility
☐ Remains in unit
☐ Other (please specify) _____

1.   INCOME AT TIME OF EXIT:

i) INCOME SOURCE	*AMOUNT PER MONTH*
SSI	$
SSDI	$
Social Security	$
CAAP *(CIRCLE ONE: PAES, CALM, SSIP, or GA)*	$
TANF (AFDC)	$
Unemployment	$
Veterans Benefits	$
Employment	$
No Financial Resources	$
Other *(PLEASE SPECIFY):*	$

2.   Benefits: Did program participant receive any of the following benefits at the time of exit?

☐ Food Stamps   ☐ MediCal   ☐ Medicare

VI.   Will An Exit Form Supplement Be Submitted For This Former Tenant?   ☐ Yes   ☐ No

SEND THIS COMPLETED FORM AND ATTACHMENT(S) TO: ZB-31, DHS, PO Box 7988, SF, CA 94120 AND FAX A COPY OF FORM TO S+C: (415) 557-6033

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FORM 3.02C
EXIT FORM SUPPLEMENT
SHELTER PLUS CARE

Note: This form must be submitted within 30 days of exit date.

Former Tenant Name: _____ Social Security #: _____

Date of Exit: _____ Housing Site: _____

■■■

Sponsor Representative Completing Form:_____

Sponsor Agency: _____Phone #:_____

Signature of Sponsor Supervisor: _____

Today's Date: _____Supervisor Phone #: _____

■■■

Please complete all information below regarding outstanding debts of the above former tenant to the sponsor agency. The San Francisco Shelter Plus Care Program requires that former tenants pay back all debts to sponsor agencies in <u>full</u> before being eligible for future S+C housing placement. Payment of debt does not guarantee or placement in other S+C housing.

Past Due Rent Owed by Former Tenant: _____

Damages Owed by Former Tenant: _____

Legal Fees Owed by Former Tenant: _____

                                Sub Total: _____

**(Minus any Security Deposit Paid by
Former Tenant and Withheld):**   _____

                                Total:_____

Who should be contacted to make payment arrangements?

Name: _____Phone: _____

Agency: _____Position: _____

FORM 3.04A
PROGRAM RULE VIOLATION REPORT
SHELTER PLUS CARE

Name of S+C Tenant: _____ SSN: _____

S+C Housing Site: _____ Today's Date: _____

Person Completing Form: _____ Phone#: _____

Date of Incident: _____

Note: The information on this form is confidential. S+C will share this information with only the resource specialist and the appeal panel in the case that rental assistance is terminated.

Please indicate which S+C Program Rule(s) were violated by checking the appropriate boxes.

☐**Rule 1**
Selling drugs in or near the building, by myself, guest or family member as witnessed by police, or building staff, or as documented by five confidential complaints by a tenant or other person on the lease.

☐**Rule 2**
Violence in or near the building or staff work environment. Violence can include, but is not limited to, physical violence, domestic violence, verbal assault, intimidation, harassment, menacing behavior and posturing in a threatening manner. Violence by guests or family members will also be considered a violation of this rule.

☐**Rule 3**
Willfully and/or repeatedly causing disturbance of staff work environment and/or quiet enjoyment of community by myself, guest or family member as witnessed by police, or building staff, or as documented by five confidential complaints by a tenant or other person on lease.

☐**Rule 4**
Willfully and/or repeatedly causing damage to the physical plant, or surroundings, or causing health, sanitation, fire or safety hazards. Damage or health/safety hazards caused by guests or family members will also be considered a violation of this rule.

☐**Rule 5**
If there is a decrease in the number of people in my household, I understand that I will be required to move to a smaller unit. S+C will offer a suitable unit; and failure to accept an offer of alternative housing will result in the termination of my subsidy. All S+C housing meet housing quality standards, as described by the SFHA.

Is there an "in house" incident report attached?   ☐YES   ☐NO

Please describe in detail the incident that resulted in the S+C program rule violation. If more than one rule was violated, please describe each rule violation separately.

_____
_____
_____
_____

Name of Supervisor: _____ Supervisor Phone: _____

Signature of Supervisor: _____ Date: _____

3.06A
TRANSFER REQUEST FORM
SHELTER PLUS CARE

Dear Shelter Plus Care Resident,

You were given this form because you have expressed an interest in transferring to a different Shelter Plus Care housing site. You may request a transfer after living in your current housing site for two (2) years. However, there is no length of stay requirement for transfers granted due to an emergency or a change in household size. This form was designed to make it easier for you to remember the steps you need to take in order to request a transfer. We also want to let you know what you should expect. The next 5 steps will explain how to apply for a transfer.

A.   The first step is to fill out this form and mail it to the address below. Be sure to keep a copy for your own records. You may do this on your own or you may contact a case manager or service provider in your building to help you.
Mailing Address: **DHS ZB-31, PO Box 7988, San Francisco, CA 94120**

B.   Meet with the Shelter Plus Care Resource Specialist to discuss your options at other Shelter Plus Care housing sites. The S+C Resource Specialist will contact you after this form is received.

C.   If your transfer request is not approved, you will be contact by the S+C Resource Specialist. If your transfer request is approved, you will receive a referral letter in the mail when a unit is available. You should call the name and phone number provided on the referral letter to make an appointment for an interview with the potential new housing sponsor. This is a new application for housing.

D.   Every tenant has the responsibility to give a "30 day notice" to their landlord when they plan to move. You need to inform you property manager or administrator that you plan to transfer at least 30 days in advance. This does not require you to move in 30 days. Your rent must be paid in full up to the day you move. You should also ask your property manager about how and when a security deposit might be returned to you.

Your property manager/administrator is:_____ at phone#:_____

E.   Follow the instructions given to you by the housing sponsor you are applying to and keep you current housing provider informed of your progress.

You should expect the following:
1.   The housing sponsor you are applying to may contact your current housing provider. .
2.   You will be expected to pay move in cost at the new housing site based on your income.
3.   The transfer request is not a guarantee of housing at your desired housing site.

Please fill out the following:

Name (tenant):_____   Date:_____

Current Housing Sponsor:_____

Address (including unit :_____Phone#:_____

Transfer Request Explanation: **Briefly explain why you would like to transfer and any preferences you have in other Shelter Plus Care housing. You may use the other side of this form.**

_____
_____
_____
_____
_____
_____

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3.06A
(TO BE COMPLETED BY S+C RESOURCE SPECIALIST)
TRANSFER REQUEST FORM
SHELTER PLUS CARE

Transfer Approved: ☐Yes   ☐No

If yes, what type of transfer has been approved: ☐Emergency   ☐Size Change   ☐Preference

S+C Building(s) Requested by Client:_____

_____

_____

_____

If no, why is the transfer declined:_____

_____

_____

_____

S+C Resource Specialist Name:_____

S+C Resource Specialist Signature:_____

Date:_____

FORM 3.07A
TEMPORARY VACANCY REPORT
SHELTER PLUS CARE

Name of Program Participant:_____

Address and Unit #:_____

☐ FIRST REPORT (Date vacancy commenced, reason for vacancy/destination, date of expected return (if any))

_____

_____

_____

Date:_____   Initial:_____

☐ SECOND REPORT (30 DAYS AFTER VACANCY COMMENCED)

Date:_____   Initial:_____

☐ THIRD REPORT (60 DAYS AFTER VACANCY COMMENCED)

Date:_____   Initial:_____

☐ FOURTH/FINAL REPORT (90 DAYS AFTER VACANCY COMMENCED/EXIT FORM ATTACHED)

Date:_____   Initial:_____

Name and telephone number of sponsor/service representative reporting vacancy:

_____

SEND THIS COMPLETED FORM AND ATTACHMENT(S) TO: ZB-31, DHS, PO Box 7988, SF, CA 94120

DENIAL LETTER (EXAMPLE)
SHELTER PLUS CARE

A denial letter must include the following:

1)   Contact information for client to appeal decision:
   Shelter Plus Care Program, ZB-31
   Human Services Agency
   PO Box 7988
   San Francisco, CA 94120
   (415) 557-6480

2)   The letter must say that the applicant has 10 days to appeal the decision.

The following is a sample letter that can be used by sponsor agencies who deny housing to applicants. Programs can use their own letter format as long as the letters include the above requirements.

Sample Denial Letter

Dear _____;

I am sorry to inform you that your application for housing at _____has been rejected. Our rejection is based on our concerns regarding your _____.

If you disagree with the decision stated above regarding your current eligibility, you may request a review of your status by sending the enclosed form or writing to: Shelter Plus Care Program, ZB-31, Human Services Agency, PO Box 7988, San Francisco, CA 94120 – or you may call (415) 557-6480. Your request must be received within ten business days of the date of this letter, or you will lose your right to have this decision reviewed. With your request for an appeal you must indicate a current address and phone number where you can be contacted. The Shelter Plus Care Program will contact you by mail to schedule a time to meet, and will also confirm by phone, if possible. The issues considered at this meeting will be limited to reviewing the determination indicated above. In the event that your appeal is upheld you may request that you be considered for the next appropriate Shelter Plus Care unit with a different housing sponsor. Please note that, even if the decision to deny housing in overturned, you are not guaranteed housing.

Sincerely,

_____

cc: Shelter Plus Care Program Manager

Housing & Homeless Programs
Monitoring Checklist for Site Visits of CoC Program

The monitoring will focus on the scope of services and program objectives, program operations, policies and procedures, and a review of client case files, including:

I. Staff Development and Training Activities
A. ☐ Grantee ensures that staff receives varied training opportunities appropriate to job descriptions.
B. ☐ Specific examples of trainings offered to/attended by staff in the past year were documented.

II. Program Policies and Procedures
Written policies/procedures are in place for:
A. ☐ Eligibility- certification of homelessness
B. ☐ House Rules (if applicable)
C. ☐ Reasonable Accommodation
D. ☐ Discharge/Denial of Service
E. ☐ Grievance/Complaint Policy
F. ☐ Coordination between Property Management and Supportive Services (if applicable)

III. Customer Satisfaction
A. ☐ Does program have method for customers to evaluate services received (e.g. surveys)?
B. ☐ Clients understand who to contact for relevant types of assistance and indicate program is responsive to their needs.

IV. Programmatic and Physical Accessibility/Cultural Competence
A. ☐ Facility, program and materials are accessible to persons with disabilities.
B. ☐ Notice of Rights for People with Disabilities is publicly displayed.
C. ☐ Forms related to reasonable accommodations are available to clients.
D. ☐ Written materials are translated into applicable languages.
E. ☐ Service delivery and activities offered respect the backgrounds and interests of clients served.

V. Outreach Procedure/Materials
A. ☐ Grantee has a written policy regarding how clients will be outreach to for engagement in services.
B. ☐ Grantee provided examples of flyers, newsletters and other examples of outreach materials.

VI. Staffing Pattern and Job Descriptions
A. ☐ Staffing levels/types are adequate to deliver contracted services.

VII. Program Specific Administration
A. ☐ Are quarterly/annual reports received on time and accurate?
B. ☐ Is grantee responsive to agency requests?

VIII. Client Tracking System
A. ☐ Program is participating in Homeless Management Information System
B. ☐ Program has good data completion and data quality rates for HMIS

IX. Client Files
Does program maintain client files that include:
A. ☐ Client intake or program application
B. ☐ Client appraisal/assessment information
C. ☐ Client Release of Information
D. ☐ Homeless Certification and back up documentation that define homeless status (including chronic homeless documentation, if applicable)
E. ☐ Current and comprehensive case notes
F. ☐ Service Plan (if applicable)
G. ☐ Evidence of supervisor review
H. ☐ Rent calculation: Including policy, methodology, and back up documentation (if applicable)
I. ☐ Are client files easily accessible and clearly organized according to a sample file?

Program Compliance
A. ☐ Did the program meet their service and outcome objectives during the period reviewed?

Other
A. ☐ Is the agency participating in the Continuum of Care meetings?
B. ☐ Is the agency in compliance with HEARTH policies and procedures

EMERGENCY SOLUTIONS GRANT
HOMELESSNESS CERTIFICATION – EMERGENCY SHELTER

ESG Household Name: _____ Date: _____

This is to certify the above individual or household is currently homeless based on the category checked and required documentation.

CATEGORY 1: Literally Homeless

☐ Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; **or**
  (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs).
  To certify homeless status for the above, must provide documentation of one of the following:
  ☐ Written observation by the outreach worker; **or**
  ☐ Written referral by another housing or service provider; **or**
  ☐ Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter (use self-certification form)

☐ Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  (iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution **(documentation must include one of the above forms of evidence <u>AND</u> one of the following).**
  ☐ Discharge paperwork **or** written/oral referral; **or**
  ☐ Written record of intake worker's due diligence to obtain above evidence **and** certification by individual that they exited institution (use self-certification form)

CATEGORY 2: Imminent Risk of Homelessness

☐ Individual or family who will imminently lose their primary nighttime residence, provided that:
  (i) Residence will be lost within 14 days of the date of application for homeless assistance;
  (ii) No subsequent residence has been identified; and
  (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing.

  Documentation must include <u>one</u> of the following:
  ☐ A court order resulting from an eviction action notifying the individual or family that they must leave; **or**
  ☐ For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay (use self-certification form); **or**
  ☐ An oral statement that residence will be lost within 14 days of the date of application for homeless assistance that if verified by an intake worker **or**
  ☐ If the intake worker is unable to verify the oral statement, must document due diligence in attempting to obtain verification and obtain written certification by the individual or head of household seeking assistance (use self-certification form)

  In addition to one of the above, documentation must include <u>ALL</u> of the following:
  ☐ Certification that no subsequent residence has been identified (use self-certification form); **<u>AND</u>**
  ☐ Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing (use self-certification form).

CATEGORY 4: Fleeing/Attempting to Flee Domestic Violence

☐ Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence;

(ii) Has no other residence; **and**

(iii) Lacks the resources or support networks to obtain other permanent housing

Documentation required:

For victim service providers:

    ☐ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification (use self-certification form) **or** a certification by the intake worker.

*For non-victim service provider (must document **all** of the following):*

    ☐ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification (use self-certification form) **or** by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; **and**

    ☐ Certification by the individual or head of household that no subsequent residence has been identified (use self-certification form) **and**

    ☐ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing (use self-certification form)

Intake Staff Name: _____

Intake Staff Signature: _____

Date: _____

EMERGENCY SOLUTIONS GRANT
HOMELESSNESS CERTIFICATION – RAPID REHOUSING/PREVENTION

ESG Household Name: _____ Date: _____

This is to certify the above individual or household is currently homeless based on the category checked and required documentation.

CATEGORY 1: Literally Homeless *(Eligible for Rapid Re-housing Assistance Only)*

☐ Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
(iii) Has a primary nighttime residence that is a public or private place not meant for human habitation; **or**
(iv) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs).

To certify homeless status for the above, must provide documentation of one of the following:
☐ Written observation by the outreach worker; **or**
☐ Written referral by another housing or service provider; **or**
☐ Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter (use self-certification form)

☐ Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
(iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution **(documentation must include one of the above forms of evidence <u>AND</u> one of the following).**
☐ Discharge paperwork **or** written/oral referral; **or**
☐ Written record of intake worker's due diligence to obtain above evidence **and** certification by individual that they exited institution (use self-certification form).

CATEGORY 2: Imminent Risk of Homelessness *(Eligible for Homelessness Prevention Only)*

☐ Individual or family who will imminently lose their primary nighttime residence, provided that:
(i) Residence will be lost within 14 days of the date of application for homeless assistance;
(ii) No subsequent residence has been identified; and
(iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing.
(iv) Has an annual income below 30% of AMI

Documentation must include <u>one</u> of the following:
☐ A court order resulting from an eviction action notifying the individual or family that they must leave; **or**
☐ For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay (use self-certification form); **or**
☐ An oral statement that residence will be lost within 14 days of the date of application for homeless assistance that if verified by an intake worker **or**
☐ If the intake worker is unable to verify the oral statement, must document due diligence in attempting to obtain verification and obtain written certification by the individual or head of household seeking assistance (use self-certification form)

In addition to one of the above, documentation must include <u>ALL</u> of the following:
☐ Has an annual income below 30% of AMI (must have documentation of income eligibility); **<u>AND</u>**
☐ Certification that no subsequent residence has been identified (use self-certification form); **<u>AND</u>**
☐ Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing (use self-certification form).

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CATEGORY 4: Fleeing/Attempting to Flee Domestic Violence (*Eligible for rapid re-housing if household is also literally homeless. If not, they are eligible for Homelessness Prevention.)*

☐ Any individual or family who:
  (i) Is fleeing, or is attempting to flee, domestic violence;
  (ii) Has no other residence; **and**
  (iii) Lacks the resources or support networks to obtain other permanent housing

Documentation required:
For victim service providers:
  ☐ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification (use self-certification form) **or** a certification by the intake worker.
*For non-victim service provider (must document **all** of the following):*
  ☐ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification (use self-certification form) **or** by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; **and**
  ☐ Certification by the individual or head of household that no subsequent residence has been identified (use self-certification form); **and**
  ☐ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing (use self-certification form).
☐ PREVENTION ONLY: Must have an annual income below 30% of AMI (must have documentation of income)

AT RISK OF HOMELESSNESS *(Eligible for Homelessness Prevention Only)*
CHECK ONLY ONE CATEGORY AND COMPLETE ONLY THAT SECTION

CATEGORY 1: An individual or family:
☐ Has an annual income below 30% of AMI (must have documentation of income eligibility); **AND**
☐ Lacks sufficient resources or support networks immediately available to prevent homelessness. Must complete Self-Certification Form supported by other documentation when practical such as termination notice, unemployment compensation statement, bank statement, healthcare/utility bill showing arrears.

AND meets ONE of the following risk factors with acceptable documentation:

Acceptable documentation of risk factors includes source documents that evidence one or more of the conditions is met (e.g., eviction notice, notice of termination from employment, bank statement). **OR**

<u>To the extent that source documents are unobtainable</u>, *a written statement by the relevant third party (e.g., former employer, owner, primary leaseholder, public administrator, hotel or motel manager) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the criteria* **OR**

<u>To the extent that source documents and third-party verification are unobtainable</u>, a written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria or, if a visit is not practicable or relevant to the determination, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence

☐ **Risk 1:** Persistent housing instability - has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance
☐ **Risk 2:** Living in the home of another person/individual because of economic hardship
☐ **Risk 3:** Housing loss within 21 days – has been notified of their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance: notification to leave within 21 days

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☐ **Risk 4**: Living in a rented hotel or motel and cost is not paid for by charitable organization or by Federal, State, or local government programs for low-income individuals

☐ **Risk 5**: Living in a severely over-crowded unit as defined by US Census Bureau: lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than 1½ persons per room

☐ **Risk 6**: Exiting publicly funded institution or system of care

☐ **Risk 7**: Living in housing associated with instability and an increased risk of homelessness.

CATEGORY 2: Unaccompanied Children and Youth

☐ A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute **(must document the following)**:

    ☐ Written Verification of Homeless Status must be provided by agency administering applicable Federal program.

CATEGORY 3: Families with Children and Youth

☐ An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her **(must document the following).**

    ☐ Must have documentation of homeless status, which may be letter or referral provided by agency administering the Federal Program **AND** must confirm family/guardian is residing with children/youth.

ALL PROGRAMS MUST COMPLETE BELOW, REGARDLESS OF ELIGIBILITY CATEGORY

Describe the documentation obtained and attached to this form: _____

_____

If self certification was used, describe efforts to obtain third party certification:_____ .

_____

_____

_____

Intake Staff Name: _____

Intake Staff Signature: _____Date: _____

ESG Self-Certification Form

Instructions: This form is to be completed by applicants or program participants when they are unable to provide required verifications or other documents and self-certification is the only way the agency is able to verify information related to the ESG program eligibility.

This section to be completed by the applicant/participant

Date_____

Name of Head of Household_____

Unit Address_____
             Street Address   Apt. #   City   State   Zip Code

Telephone Number (____)_____ E-Mail Address_____

Self-Certification of: [ ] Lack of sufficient financial resources and/or support networks and no subsequent residence has been identified; [ ] Fleeing domestic violence; [ ] Living on street or in shelter; [ ] Exiting from institution [ ] Other (please describe) _____

[blank ruled writing area]

Certification: I hereby certify, under penalty of perjury, that the information I have provided on this form is true and correct, to the best of my knowledge, and that I do not have any documents or forms in my possession, nor am I able to obtain such documents to verify homelessness, at risk of homelessness, income or other information hereby provided.

Client Signature: _____Date_____

Intake Staff Signature: _____Date_____

WARNING: Section 1001 of Title 18 of the U.S. Code makes it a criminal offense to make willful false statements or misrepresentations to any department or Agency of the United States as to any matter within its jurisdiction.

DECLARATION OF NO INCOME
EMERGENCY SOLUTIONS GRANTS

Must complete both pages of this 'Declaration of No Income' document.

I (name),_____SSN_____
do hereby certify that I do not receive income from any source.

I understand sources of income include but are not limited to:

- Unemployment benefits
- Employment
- CalWORKs or TANF (Temporary Assistance to Needy Families)
- Social Security benefits
- S.S.I (Supplemental Security Income) / S.S.D.I. (Social Security Disability Insurance)
- General Assistance (CAAP, PAES, CALM, SSIP, GA)
- V.A. Pension
- Retirement Benefits
- Disability Benefits
- Spousal Support
- Child Support
- Income From Assets
- School Grants
- Family Support (parent, children, etc.)
- Interest From Savings Account
- Self-employment (including child care, housekeeping, work from home, contracted, etc.)
- Any other interest received

I further understand that should I become gainfully employed or begin receiving income from any source, it must be reported to the Program immediately.

I sign this declaration under penalty of perjury and with full knowledge of the repercussions of willful falsification.

Section 1001 of Title 18 of the US Code makes it a criminal offense to make willful false statements or misrepresentations to any department or agency of the United States as to matters within its jurisdiction.

Signed:_____
(signature of agency representative)

Applicant Signature:_____

Date:_____

DECLARATION OF NO INCOME (CONTINUED)
EMERGENCY SOLUTIONS GRANTS

Please answer the following questions to determine that you are indeed, without income ($0.00). If you are without income, you must complete and submit both pages of this 'Declaration of No Income' document.

Have you obtained any income?	☐Yes	☐No
Is anyone assisting you by paying any bills at this time?	☐Yes	☐No

      If yes, who? _____

How do you pay for food?_____

Do you pay utilities?	☐Yes	☐No

      If yes, how?_____

Do you pay for transportation?	☐Yes	☐No
Do you ride the bus?	☐Yes	☐No

      How? _____

Do you own a motor vehicle?	☐Yes	☐No
Do you make monthly payments?	☐Yes	☐No
Do you have car insurance?	☐Yes	☐No

      How do you buy gas?_____

Do you have credit cards, credit lines or loans?	☐Yes	☐No
Monthly payments?	☐Yes	☐No

      How do you make payments? _____

Do you own a phone (home and/or cellular)?	☐Yes	☐No

      How do you pay the bill? _____

If you answered 'yes' to ANY of the above questions, please obtain **WRITTEN VERIFICATION** proving that the resource(s) used to pay the item(s) is/are not from your own income.

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ESG Housing Habitability Standards Inspection Checklist

Inspections must be conducted upon initial occupancy and then on an annual basis for the term of ESG assistance. The habitability standards are different from the Housing Quality Standards (HQS) used for other HUD programs. Because the HQS criteria are more stringent than the habitability standards, a grantee could use either standard. In contrast to HQS inspections, the habitability standards do not require a certified inspector. As such, ESG program staff could conduct the inspections, using a form such as this one to document compliance.

Participant Name: _____

Address: _____

City/Zip Code: _____

Instructions: Mark each statement as 'A' for approved or 'D' for deficient. The property must meet all standards in order to be approved. A copy of this checklist should be placed in the client file.

Approved or Deficient	Element
	1. *Structure and materials*: The structures must be structurally sound so as not to pose any threat to the health and safety of the occupants and so as to protect the residents from hazards.
	2. *Access*: The housing must be accessible and capable of being utilized without unauthorized use of other private properties. Structures must provide alternate means of egress in case of fire.
	3. *Space and security*: Each resident must be afforded adequate space and security for themselves and their belongings. Each resident must be provided with an acceptable place to sleep.
	4. *Interior air quality*: Every room or space must be provided with natural or mechanical ventilation. Structures must be free of pollutants in the air at levels that threaten the health of residents.
	5. *Water Supply*: The water supply must be free from contamination.
	6. *Sanitary Facilities*: Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.
	7. *Thermal environment*: The housing must have adequate heating and/or cooling facilities in proper operating condition.
	8. *Illumination and electricity*: The housing must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of residents. Sufficient electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.
	9. *Food preparation and refuse disposal*: All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.

	10. *Sanitary condition*: The housing and any equipment must be maintained in sanitary condition.
	11. *Fire safety*: Both conditions below must be met to meet this standard. a. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing- impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. b. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, day care centers, hallways, stairwells, and other common areas.

CERTIFICATION STATEMENT

I certify that I have evaluated the property located at the address below to the best of my ability and find the following:

☐ Property meets all of the above standards.
☐ Property does not meet all of the above standards.

Therefore, I make the following determination:

☐ Property is approved.
☐ Property is not approved.

Name of Evaluator: _____

Date: _____

Signature: _____

Appendix I - Sample CoC Leverage Sources

Advocacy
Assistance to immigration
Benefits advocacy
Housing advocacy
Legal assistance, advocacy, representation, and referrals
Peer advocacy
Tenant rights workshops

Children
After-school children's program
Child development consultation
Child care services
Children's books, loaned television, videos, art supplies as available, training, tickets for special events
Children's art program
Children's books
Children's circus program
Children's holiday party and shopping spree
K-12 homeless education
Parenting classes
Summer camp
Therapeutic day Care
Weekly children's art program

Counseling
Bereavement counseling and pastoral services
Counseling services
Crisis intervention
Landlord/tenancy counseling
Pre-treatment counseling, support groups, counseling, and housing assistance
Recovery groups
Support groups
Therapy

Education, Employment and Training
After school and associated summer school activities
Aftercare services
Basic computer skills classes and individual tutoring for residents and graduates
Benefits and Work Incentive Workshops
Computer literacy training
Employment and training services
Education/courses
Education Counseling
ESL
Job development and employment services
Job research
Job placement
Job retention
Leadership training
Life skills training
Literacy
Nutrition education/cooking classes
School supplies for children
Sewing classes
Training tuition
Training videos and games
Transitional housing
Tutoring
Uniform vouchers
Vocational services

Financial Services
Asset/resource management services
Money management
Representative payee services

Health
Acupuncture services
Adult day health care
AIDS-related services
Dental screening services
Detoxification services
Dual diagnosis services
Emergency room services
Gynecological services
Health care resources and education
Healthcare services
Medical services
Medical, psychiatric and pharmacy services
Medication support
Mental health services
Peer support

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Pregnancy testing
Preventative Health Care Services
Psychiatric disability evaluations
Psychotherapy
Residential and outpatient treatment services
Respite care
Substance abuse services
Triage

Housing
Construction loans cash match
Emergency motel vouchers
Emergency shelter
Financial move in grants, housing search
support and monthly housing clinics
Housing
Housing placement
Housing search assistance
Leasehold value of building
Maintenance and repair
projects/beautification project
Move-In assistance
Property management
Rental assistance and financial assistance for
move-in costs
Rental subsidies

Human Resources
Americorps VISTA Volunteers
Advertising
Applicant interview
Consultation staff
Mental health advocacy staff
New employee orientation
Pre-Employment process
Volunteer hours

In-Kind
Cash/Grants
Clothing
Equipment
Food
Furnishings

Household items
Welfare benefits

Operations
Administrative support
Clerical services
Consulting and practical support
Facility Space
Indirect Expenses
Mail service
Office/workshop space
Programming
Voice mail

Supportive Services
Artistic services to residents
Assessment services
CalWORKS eligibility support
Case management
Community development
Family Support Services
Grooming
Independent living services
Mentoring services
Outreach
Recreational trips and activities
Referrals
Restraining order assistance, court
accompaniment and consultation
Shelter services
Story telling
Support services supervision
Team Leader
Technical assistance
Translation services
Veteran's services assistance
YMCA membership & joining fees

Transportation
Subsidized/free bus passes
Transportation
Vehicle

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✓ View as Digital

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kschulenberg

Applicant Name:
San Francisco
Collaborative Applicant
Applicant Number:
CA-501
Project Name:
San Francisco CoC
Registration FY 2015
Project Number:
COC_REG_2015_122092

CoC Registration and
Application FY2015

FY2015 CoC Priority
Listing Detailed
Instructions

Project Priority List
FY2015

Before Starting
1A. Identification
2. Reallocation
3. Grant(s) Eliminated
4. Grant(s) Reduced
5. New Project(s)
6. Balance Summary
7A. CoC New Project
Listing
7B. CoC Renewal Project
Listing
7D. CoC Planning Project
Listing
Funding Summary
Attachments
Submission Summary

View Applicant Profile

Export to PDF
Get PDF Viewer

Back to Submissions List

Submission Summary

**WARNING: The FY2015 CoC Consolidated Application requires 2 submissions. Both this
Project Priority Listing AND the CoC Consolidated Application MUST be submitted.**

Page	Last Updated
Before Starting	No Input Required
1A. Identification	09/18/2015
2. Reallocation	11/14/2015
3. Grant(s) Eliminated	11/17/2015
4. Grant(s) Reduced	11/17/2015
5. New Project(s)	11/18/2015
6. Balance Summary	No Input Required
7A. CoC New Project Listing	11/18/2015
7B. CoC Renewal Project Listing	11/18/2015
7D. CoC Planning Project Listing	11/17/2015
Attachments	11/17/2015
Submission Summary	No Input Required

Back	Next

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Submit

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