

# ANCHORAGE CONTINUUM OF CARE WRITTEN STANDARDS

Anchorage Coalition to End Homelessness

*FINAL*

Updated September 2017

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## Introduction

### Background on the Continuum of Care Program

*The following is an extract from the U.S. Department of Housing and Urban Development (HUD) Publication, Establishing and Operating a Continuum of Care. Published November 2012. Available here: <https://www.hudexchange.info/resource/2717/establishing-and-operating-a-coc/>*

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act. Among other changes, the HEARTH Act consolidated the three separate McKinney-Vento homeless assistance programs (Supportive Housing Program, Shelter Plus Care program, and Section 8 Moderate Rehabilitation SRO program) into a single grant program known as the Continuum of Care (CoC) Program.

HUD published the Continuum of Care Program interim rule in the Federal Register on July 31, 2012. The rule was posted on HUD's website and now governs the CoC Program.

The CoC Program is designed to assist individuals (including unaccompanied youth) and families experiencing homelessness and to provide the services needed to help such individuals move into transitional and permanent housing, with the goal of long-term stability. More broadly, the program is designed to promote community-wide planning and strategic use of resources to address homelessness; improve coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness; improve data collection and performance measurement; and allow each community to tailor its program to the particular strengths and challenges within that community.

Each year, HUD awards CoC Program funding competitively to nonprofit organizations, States, units of local governments, and/or instrumentalities of State or local government collectively known as recipients. In turn, recipients may contract or subgrant with other organizations or government entities, known as subrecipients, to carry out the grant's day-to-day program operations.

### Purpose of the Anchorage Continuum of Care (CoC)

The purpose of the Anchorage CoC is to plan, implement and promote strategies to prevent and end homelessness by providing housing and fostering self-sufficiency in recognition that housing is a basic human right.

### Elements of the Anchorage CoC

#### The Continuum of Care (CoC)

- CoC is represented by the Anchorage Coalition to End Homelessness (ACEH) General Membership.
- Non or underrepresented sectors will be recruited to participate in the CoC.

### The CoC Board of Directors

- The CoC Board of Directors is the same as the ACEH Board of Directors.
- The ACEH Board of Directors has the following standing Board Committees:
  - Executive Committee
  - Finance/Audit Committee
  - Data Committee
  - Membership Committee
  - Education and Advocacy Committee
  - Community Plan to Reduce Homelessness Committee, (jointly with the Municipality of Anchorage’s Housing and Neighborhood Development Commission Oversight Subcommittee on Homelessness).

### The CoC Review Committee

- A designated committee that will meet for one-year terms to approve the community application, review and rank applications received, and conduct reporting and evaluation on projects funded through the CoC.
- All members of the Coordinating Board shall abide by the Conflict of Interest guidelines provided in the HEARTH Interim Rules 24 CFR 578.95 Conflicts of Interest.
- Employees of current grantees are not eligible to participate in this committee, and must wait one year after their CoC grant concludes to join the committee.

### The CoC Workgroup

- A designated committee that will meet for one-year terms to write the consolidated application for CoC NOFAs, ensure compliance with all HUD requirements, and provide follow-up on community goals outlined in the application.
- Participation is open to all CoC members, and representation from both grantees and non-grantees is encouraged.

### Homeless Management Information System (HMIS)

- The Anchorage and Alaska Balance of State (AK-501) CoCs jointly manage a shared Homeless Management Information System (HMIS), known as AKHMIS.
- The AKHMIS utilizes Bowman ServicePoint software and is administered by the Institute for Community Alliances (ICA).
- There is an AKHMIS Advisory Board, composed of members from both CoCs that oversee the user experience and operations of the HMIS, and make recommendations to the two CoC boards for changes.

### Coordinated Entry System

- The design of a community wide Coordinated Entry System was designed by a Planning and Design Committee comprised of CoC members, service providers, representatives of units of local government and the broader community. The system structure and work flow will continue to be monitored and adapted to serve

client needs, with a Coordinated Entry Design Team providing guidance and support to the Coordinating Entry and system components.

- Once the CoC's Coordinated Entry System is established all referrals to CoC-funded projects, including Permanent Supportive Housing, Transitional Housing, and Rapid Re-housing, as well as "entry/exit" shelters, but not "open/low-barrier" emergency shelters, and assessment for type and level of services will come through the Coordinated Entry System.

## **Purpose of the Written Standards**

The Written Standards establish community-wide expectations on the operations of projects and programs within the community, and ensure the system is transparent to users and operators. The CoC must establish and consistently follow written standards for providing assistance. The Coordinated assessment system must incorporate these standards when evaluating and referring potential program participants, including prioritizing households for assistance from permanent supportive housing, transitional housing and rapid re-housing. These written standards will be reviewed and revised annually.

The Anchorage CoC is implementing a Continuum-wide Housing First approach. All CoC-funded projects will need to adhere to this approach. The adherence standard for Anchorage CoC's Housing First is "an approach to homeless assistance that prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions such as sobriety or a minimum income threshold. Supportive services are available; however, participation in these services is based on the needs and desires of program participants." The Anchorage CoC will use the following specific steps to support a Housing First approach:

- Ensure projects receive and accept referrals from the Coordinated Entry System. Receiving and accepting a referral does not guarantee that a client will be accepted into the project. Each project may continue to have programmatic intake and eligibility determination requirements.
- Use data to quickly and stably house homeless persons and measure the length of time it takes for programs to move households into permanent housing and help providers improve performance.
- Engage landlords and property owners and identify and recruit landlords of units in the geographic area so that when an individual or family needs housing, potential units that those individuals or families may choose from have already been identified, speeding up the housing process. Landlord engagement will both be undertaken by each homeless assistance provider and consolidated via a Landlord Liaison position engaging landlords on behalf of many providers.
- Remove barriers to entry. The Anchorage CoC will review project-level eligibility criteria for all programs and remove any barriers to accessing housing and services. Persons experiencing homelessness will not be screened out of or discouraged from participating in programs because they have poor credit history,

or lack income or employment. People with addictions to alcohol or substances will not be required to cease active use before accessing housing and services.

- Adopt client-centered service methods. All projects will ensure housing and service options are tailored to meet the unique needs of each individual or family presenting for services and that program participants have access to the services that they reasonably believe will help them achieve their goals. However, program participants will not be required to participate in services and will not be required to participate in disability-related services.

The Anchorage CoC agrees these standards must be applied consistently across the entire Anchorage CoC's geographic area. Additionally, Anchorage CoC members must agree to administer their assistance and programs in compliance with these written standards on awarding CoC funds. CoC recipients and sub-recipients may develop additional guidelines to administer programs, but the standards may not be in conflict with the Anchorage CoC Written Standards, including the Housing First approach.

Appendix 2 includes a list of desired additions to the written standards, as recommended by the CoC Workgroup. These additions should be added during the 2017 update of these written standards.

## Eligibility, Coordinated Entry and Program Requirement Standards

### Overview

In order to be eligible for assistance under the CoC program, participants must meet the HUD definition of homelessness in CFP 572.2 (available in Appendix 1 of this document), and meet the program sub-population criteria, i.e., youth, gender, domestic violence, etc. All project-level criteria must align with HUD's Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs" final rule, published on September 21, 2016. Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity in programs and shelter funded under programs administered by HUD's Office of Community Planning and Development (CPD). The final rule requires recipients and sub-recipients of Community Planning Department (CPD) funding, as well as owners, operators, and managers of shelters, and other buildings and facilities; and providers of services funded in whole or in part by any CPD program to grant equal access to such facilities, and other buildings and facilities, benefits, accommodations and services to individuals in accordance with the individual's gender identity, and in a manner, that affords equal access to the individual's family.

This rule builds upon HUD's February 2012 final rule entitled *Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity* which includes the definition of "family" and the prohibition on actual or perceived sexual orientation and gender identity when administering assistance.

Beginning in 2016, the Anchorage CoC will start using a Coordinated Entry system to better coordinate and connect people who experience homelessness with the resources they need when experiencing a housing crisis.

## **Coordinated Entry System**

Coordinated Entry is a centralized system for people in the Anchorage CoC experiencing housing crisis, designed to assist them in accessing local housing information and referrals to appropriate services, using a “no wrong door” approach. The primary goals for the Coordinated Entry processes are that assistance is allocated as effectively as possible and that it be easily accessible no matter where or how people present. Coordinated Entry processes will help the Anchorage CoC 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, and provide information about service needs and gaps to help plan assistance and identify needed resources.

The system will have multiple intake and access points to ensure equal access across the Anchorage CoC. This included physical locations such as emergency shelters, homeless assistance provider offices, public/institutional facilities, telephone or virtual referral systems such as 2-1-1, and street outreach. Standard intake screening methods will be used, and the Anchorage CoC has adopted the Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT) for Adults, the Vulnerability Index & Family Service Prioritization Decision Assistance Tool (VI-FSPDAT) for families, and the Vulnerability Index & Youth Service Prioritization Decision Assistance Tool ((VI-YSPDAT) as our standard assessment tools.

The Anchorage CoC will use AKHMIS as the database for the Coordinated Entry System. Assessments kept in HMIS include the intake and screening questionnaire, client profile, the VI-SPDAT/VI-F-SPDAT/VI-YSPDAT, length of homelessness, chronic homelessness and veteran’s status. Participants will be assessed for the community wide prioritization lists for Adults, Families and Unaccompanied Youth. HMIS will also hold the prioritization lists and make the referrals to/from the system to agencies. The lists are kept up to date in HMIS. Agencies that do not use HMIS can partner with Coordinated Entry staff to make alternate arrangements for referring participants to the prioritization list.

Coordinated Entry is the avenue for managing the referral process for the Anchorage CoC’s Permanent Supportive Housing Programs and Transitional Housing (Youth) Program. Currently there is no Rapid-Rehousing Program in the Anchorage CoC, however should a RRH program be added, a prioritization list for RRH will be established via the Coordinated Entry system.

The Coordinated Entry system tracks requirements for CoC housing services, including participant eligibility requirements. Agencies are required to provide accurate and up to date information on populations served and other requirements.

## Coordinated Entry Minimum Standards

1. **Prioritization:** The system will ensure that the most vulnerable participants are served first by using the VI-SPDAT, length of homelessness and chronic homeless status. The Anchorage CoC will use the HUD Orders of Priority for prioritizing referrals to dedicated PSH projects.
2. **Low Barrier:** The system will not screen out people because of perceived barriers to housing or services. Participants are served through Coordinated Entry regardless of income level, employment, drug or alcohol use, and criminal background. In addition, housing and homelessness assistance programs in the Anchorage CoC will lower their screening barriers in partnership with the Coordinated Entry system.
3. **Housing First Orientation:** The purpose of the system is to house participants as quickly as possible, without pre-conditions or service participation requirements.
4. **Person-Centered:** Participants can accept or deny services from any agency without losing their spot on the prioritization list. Participant choice is facilitated via the assessment tool and other methods.
5. **Fair and Equal Access:** All participants in the CoC geographic area can access services through the “no wrong door” approach. The Anchorage CoC, the Coordinated Entry system, and all system partners will adhere to policies and employ procedures that allow fair and equal access, including but not limited to Limited English Proficiency, Section 504 Reasonable Accommodations, and HUD’s Equal Access Rule.
6. **Standardized Assessment:** All system partners will use the same screening questions and the VI-SPDAT appropriate for the participant as the assessment tool. All assessors will receive training, and the System will ensure high adherence to the assessment methodology.
7. **Emergency Services:** The Coordinated Entry system does not delay access to emergency services or open emergency shelters. Access to emergency services are available independent of the Coordinated Entry system, although shelters are intake points. Non-emergency “entry/exit” shelters will accept referrals from the Coordinated Entry System, but will also be open to those who are eligible.
8. **Inclusive:** All subpopulations can access the Coordinated Entry the same way, but will be directed to different access points for effective services. Subpopulations include people experiencing chronic homelessness, veterans, families, unaccompanied youth, and those fleeing or survivors of domestic violence. The Anchorage CoC will continuously evaluate and improve processes to ensure all subpopulations are well served.
9. **Referral Protocols:** The Coordinated Entry system will refer participants to appropriate shelter and housing services including ESG and CoC funded projects. CoC and ESG funded projects are required to fill housing vacancies using the prioritization list in AKHMIS. All other projects are encouraged to use the community lists.
10. **Outreach:** Street outreach efforts will include conducting the VI-SPDAT and ensuring that names are placed on the appropriate prioritization lists.
11. **Ongoing Planning and Stakeholder Consultation:** The Anchorage CoC engages in ongoing planning with all stakeholders participating in the Coordinated Entry process.

This planning includes evaluating and updating the coordinated entry processes and system at least annually. Feedback from individuals and families experiencing homelessness or recently connected to housing through the Coordinated Entry process is regularly gathered through surveys, focus groups, and other means and is used to improve the process. Information gathered through the Coordinated Entry process is used to guide homeless assistance planning and system change efforts in the community, and leverage local attributes and capacity.

12. **Safety Planning:** The Coordinated Entry system has protocols in place to ensure the safety of the individuals seeking assistance. These protocols ensure that people fleeing domestic violence have safe and confidential access to the Coordinated Entry process and domestic violence services, and that any data collection adheres to the Violence Against Women Act (VAWA).
13. **Full Coverage:** Coordinated Entry will serve any participant experiencing homelessness or at risk of homelessness in the Municipality of Anchorage.
14. **Equal Access:** All participating Coordinated Entry access points and CoC grantees must have procedures that address Section 504 of the Rehabilitation Act and provide for a process for reasonable accommodation. All participants and grantees must also have Limited English Proficiency Procedures and all grantees that provide housing under the CoC must have procedures that meet the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Rule. All procedures must be submitted at time of application for CoC Grantees and/or on being a Coordinated Access point for continuity. The procedures will be reviewed by the CoC and must include:
  - Staff training requirements for these procedures.
  - Implementation in the coordinated entry system.
  - Implementation in homeless outreach.
15. **Prohibition Against Involuntary Family Separation:** Providers shall not deny admission or separate any family members from other members of their family when entering shelter or housing. The CoC will hold a training on preventing involuntary family separation at least once a year.
16. **Special Considerations for Youth Trafficking & Exploitation:** Youth providers in the CoC actively work to divert youth from institutions and the criminal justice systems as a result of those youths' actions that stem from being trafficked. These include working with the Anchorage Police Department, the FBI and Covenant House Alaska's Youth Reception Center to identify appropriate diversions. The CoC has increased housing and service options for youth fleeing or attempting to flee trafficking through the prioritization of housing those youth. The CoC enumerates and characterizes local youth trafficking through the standardized intake assessment in the Coordinated Entry process, which includes a tool (TAY-VI-SPDAT) to identify youth trafficking. In addition, youth providers have conducted surveys of their populations to identify youth trafficking victims. The CoC implements cross-systems strategies to quickly identify

and prevent occurrences of youth trafficking, including Safety Meetings led by the Municipality of Anchorage which is also attended by the FBI, local law enforcement and local youth providers. Youth providers in the CoC conduct community awareness training concerning youth trafficking around the state on a regular basis.

The assessment for severity of service needs will be standardized through the community's Coordinated Entry system using the combined Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) score and recommended intervention. The Anchorage CoC has adopted a list of additional questions, the "Community Questions" based on local priorities that will be administered as part of the assessment process. These questions will be scored; however, the Community Questions score will not be added to the VI-SPDAT score. The Community Question score will be used for tie-breaking, and to inform the referral process to ensure the most appropriate referral can be made.

- For individuals: those not qualifying for permanent supportive housing are eligible for transitional housing.
- For families: all families will be housed in transitional housing, if space permits; otherwise prioritization is by length of time of homelessness.
- For youth: this is defined under the Transitional Housing section of "Prioritization by Housing Type" in this document.

Prioritization criteria and target populations will be reviewed by the CoC Workgroup and Coordinated Entry oversight committee annually and updated as appropriate.

## **Program Requirement Standards**

Most of the CoC-funded projects in the Anchorage CoC are Permanent Supportive Housing Projects. Additionally there is one Transitional Housing project, one Supportive Service Only project (the Coordinated Entry project), and one dedicated HMIS project.

### **Permanent Supportive Housing**

Permanent supportive housing (PSH) is safe, affordable housing, the purpose of which is to provide housing without a designated length of stay.

#### **Eligibility Criteria**

- Participants must meet categories 1- Literally Homeless or 4 – Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability
- Referrals for dedicated PSH will be generated through the Anchorage CoC Coordinated Entry system and the CoC- wide priority lists for families and individuals (and youth if over the age of 18).

## Participant Prioritization Requirements

- Participants will be prioritized for eligibility based on their chronic homeless status, length of time homeless, and VI-SPDAT or VI-F-SPDAT score. See the section titled “Prioritization by Housing Type” for more information on the prioritization process.

## Minimum Standards

1. There can be no predetermined length of stay for a PSH project.
2. Supportive services designed to meet the needs of the project participants must be made available to the project participant throughout the duration of stay in the PSH project, however there is no requirement that a PSH participant receive services to remain in the PSH project, and the participant can choose their service provider, regardless of the agency providing the PSH.
3. Project participants in PSH must enter into a lease agreement that is terminable for cause for an initial term of at least one year. The lease must be automatically renewable upon expiration for a minimum term of one month, except on prior notice by either party. The lease must afford all of the applicable rights and obligations and enjoyments of tenancy per Alaska Landlord Tenant laws and regulations, including freedom of movement and visitation.
4. If not already dedicated, turnover beds in PSH projects will be prioritized for chronically homeless participants.
5. PSH projects will use the Anchorage CoC Housing First approach. Projects that do not, or cannot use the Housing First approach will be at risk of losing their CoC funding.

## Access to PSH Projects

- All referrals for PSH projects will come through the Coordinated Entry system and the CoC-wide PSH priority lists for families and individuals.

## Minimum Performance Benchmarks for PSH Projects

- 80% or more of participants remain stable in PSH for at least one year or exit to a different permanent housing situation
- 20% or more of adult participants will have income from sources other than employment
- 54% or more of adult participants will increase income for sources other than employment
- 75% or more of all participants will have mainstream benefits at exit from the project
- 20% or more of adult participants will have employment income

## Transitional Housing

Transitional Housing (TH) facilitates the movement of homeless individuals, families and unaccompanied youth to permanent housing within 24 months of entering TH. Programs

will provide safe, affordable housing that meets participants' needs. The Anchorage CoC has one TH project serving Transitioned Aged Youth.

#### Eligibility Criteria:

- Participants must meet categories 1 - Literally Homeless, 2 - At Imminent Risk, or 4 - Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- By 2017, all TH program participants must fall into at least one of the categories below:
  - a. Individuals or head of household struggling with a substance use disorder
  - b. Individuals in early recovery from a substance use disorder who may desire more intensive support to achieve their recovery goals
  - c. Survivors of domestic violence or other forms of severe trauma who may require and prefer the security and onsite services provided in a congregate setting to other available housing options
  - d. Unaccompanied and pregnant or parenting youth (age 16-24) who are unable to live independently (i.e. un-emancipated minors) or who prefer a congregate setting with access to a broad array of wraparound services to other available housing options
  - e. Individuals listed on a sex offender registry
  - f. People re-entering the community after a stay in jail or prison
  - g. Large families (6 or more people)

#### Minimum Standards:

1. Maximum length of stay cannot exceed 24 months.
2. Assistance in transitioning to permanent housing must be provided. A VI-SPDAT must be completed within 30 days of program entry, and the household name referred to the appropriate housing priority list, if not done already. A participant has the right to refuse completing the VI-SPDAT assessment.
3. Intensive support services must be provided through the duration of stay in transitional housing.
4. 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 term of 24 months.
5. Case management staff must have skills and experience to meet the unique needs of the population served.

#### Minimum Performance Benchmarks for TH Projects:

- 80% or more of all participants will exit to a permanent housing situation
- 63% or more of all participants will have mainstream (non-cash) benefits at exit from program
- 54% or more of adult participants will increase income from all sources

## Rapid Re-Housing\*:

\*The Anchorage CoC currently does not have a Rapid Re-housing (RRH) project. This section is included for reference only and is based on the Written Standards RRH from Dane County CoC (Wisconsin). Should a RRH project be funded in the future in the Anchorage CoC, these standards will be reviewed and revised as appropriate.\*

RRH is an intervention designed to help individuals, families and unaccompanied youth exit homelessness as quickly as possible, return to permanent housing, and achieve stability in that housing. Rapid re-housing assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety) and the resources and services provided are typically tailored to the unique needs of the household.

The core components of a rapid re-housing program are housing identification and relocation, short- and/or medium term rental assistance and move-in (financial) assistance, and case management and housing stabilization services.

Program staff are expected to remain engaged with the households from first contact to program exit (no more than 24 months of rental assistance, in addition to up to 6 months of continued case management), using a progressive engagement approach and tailoring services to the needs of the household in order to assist the household to maintain permanent housing. (24 CFR 578.37 and Core Components of Rapid Re-Housing, National Alliance to End Homelessness) According to the National Alliance to End Homelessness, progressive engagement is “a strategy of providing a small amount of assistance to everyone entering the homelessness system. For most households, a small amount of assistance is enough to stabilize, but for those who need more, more assistance is provided. This flexible, individualized approach maximizes resources by only providing the most assistance to the households who truly need it. This approach is supported by research that household characteristics such as income, employment, substance use, etc., cannot predict what level of assistance a household will need.”

## Eligibility Criteria:

- Participants must meet categories 1- Literally Homeless or 4 – Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
- If the household meets category 4, they must also reside in one of the places set forth in category 1 at the time eligibility is determined. Homeless Verification form must be retained in the household’s file.
- The participant’s household annual income must be at or below 30% CMI.
- The participant must be assessed using the VI-SPDAT or VI-F-SPDAT. A copy of the assessment shall be retained in the participant’s file.
- Participants must lack sufficient resources and support networks necessary to retain housing without rapid rehousing assistance (24 CFR 578.37(E)).
- Participants will be prioritized based on VI-SPDAT or VI-F-SPDAT score and length of time homeless. Youth ages 18-21 will be prioritized.

### Minimum Standards:

1. The maximum length of program participation is 24 months.
2. Supportive services designed to meet the needs of the project participants must be made available to the project participant throughout the duration of stay in the RRH project.
3. Project participants in RRH must enter into a written lease agreement that is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month, except on prior notice by either party. Programs may have additional requirements determined by program funding requirements. For example, programs may require a written lease agreement for an initial term of one year.
4. RRH programs may provide move-in costs.
5. RRH project will use Housing First approaches, following the Minimum Standards listed in the Housing First section of the Written Standards.
6. Financial assistance and case management should be based on a household's individual needs using progressive engagement. Assistance should be offered using a light touch; start with a small amount of assistance and increase it if needed.
7. RRH programs will connect households with community resources and mainstream benefits to allow for individual resources to be used for housing costs.

### Access to Rapid Re-housing:

All referrals for RRH projects will come through the Coordinated Entry system and the HSC community RRH priority lists for families and individuals.

### Minimum Performance Benchmarks for RRH Projects:

- Average length of shelter stay is less than 45 days.
- Average time from program entry to housing placement is 60 days.
- Referral to RRH Priority List within 7 days of emergency shelter entry or assessment for families and individuals living on the streets or in a place not meant for human habitation.
- 80% of participants will remain in permanent housing -at the end of the operating year or exiting to permanent housing during the operating year
- 80% of adult participants will maintain or increase their total income -at the end of the operating year or program exit.

## Prioritization by Housing Type

### How to Determine and Prioritize which Eligible Individuals, Families and Unaccompanied Youth will Receive Permanent Supportive Housing Assistance

The HUD Prioritization Policy was adopted to meet the documented prioritization requirement for the Anchorage CoC's Permanent Supportive Housing. The original policy was released in July 2014, in 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." With the publishing of Notice CDP-16-11, which supersedes Notice CPD 14-012, the Anchorage CoC will adhere to the Order of Priority outlined in Notice CPD-16-11, until that Notice is amended, superseded, or rescinded by HUD.

The Notice defines the following order of priority for CoC program-funded PSH that is either dedicated or prioritized for use by individuals experiencing chronic homelessness. Recipients and sub-recipients of CoC program-funded PSH are required to follow the order of priority when selecting participants for housing.

#### A. Order of Priority in CoC Program-funded Permanent Supportive Housing Beds Dedicated to Persons Experiencing Chronic Homelessness and Permanent Supportive Housing Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

Recipients of CoC funds are required to prioritize their CoC funded PSH units for chronically homeless individuals, families and unaccompanied youth who are identified through and referred to the PSH program by the coordinated entry system based on the length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the individual's or family's service needs.

The Anchorage CoC will prioritize dedicated PSH to those for chronically homeless individuals and families with the longest lengths of time residing in a place not meant for human habitation, safe havens, and emergency shelters, who also have the most severe service needs.

- Length of time will be determined by self-reported data collected via Coordinated Entry intake, using a system-standard data collection questionnaire that is entered in AKHMIS. Verification of chronic homelessness will be determined once the individual or family has been referred by the Coordinated Entry system to a program.
- Severity of Service Needs will be determined by score of the applicable VI-SPDAT, with higher scores indicating higher severity of service needs. The Anchorage CoC has adopted a list of additional questions, the "Community Questions" based on

local priorities that will be administered as part of the assessment process. These questions will be scored; however, the Community Questions score will not be added to the VI-SPDAT score. The Community Question score will be used for tie-breaking, and to inform the referral process to ensure the most appropriate referral can be made.

- In the event that an individual or family has the same length of time homeless and the same VI-SPDAT score, the Anchorage CoC will use the score from the Community Questions.
- In the event that the application of tie-breaking criteria does not result in a prioritization determination, the Coordinating Entity of the Coordinated Entry system will convene a review committee to determine the prioritization and referral for that particular case.

#### Other Notes on Prioritization

- Where a CoC or a recipient of CoC Program-funded PSH beds that are dedicated or prioritized is not able to identify chronically homeless individuals, families and unaccompanied youth as defined in 24 CFR 578.3 within the CoC, the order of priority in Section B. of Notice CDP-16-11, as adopted by the CoC, may be followed.
- Recipients of CoC Program-funded PSH should follow the order of priority above while also considering the goals and any identified target populations served by the project. For example, a CoC Program-funded PSH project that is permitted to target homeless persons with a serious mental illness that has been identified as a project that will prioritize a portion or all of its turnover beds to persons experiencing chronic homelessness should follow the order of priority listed above to the extent in which persons with serious mental illness meet the criteria.
- Recipients must exercise due diligence when conducting outreach and assessment to ensure that persons are served in the order of priority above. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant where there are persons who meet a higher priority within the CoC and who have not yet accepted the PSH opportunities offered to them. Street outreach providers should continue to make attempts to engage those persons and the CoC and CoC Program-funded PSH providers are encouraged to follow a Housing First approach to the maximum extent practicable. For eligibility in dedicated or prioritized PSH serving chronically homeless households, the individual or head of household must meet all of the applicable criteria to be considered chronically homeless per 24 CFR 578.3.

#### B. Order of Priority in Permanent Supportive Housing Beds Not Funded by the Continuum of Care or Dedicated to the Chronically Homelessness

PSH projects not dedicated to the chronically homeless and not funded by the CoC are encouraged to prioritize their PSH units for individuals, families and unaccompanied youth

who are identified through the coordinated entry system based on the below outlined priorities to the highest extent feasible.

Recipients of non-dedicated and non-prioritized PSH are encouraged to offer housing to chronically homeless individuals, families and unaccompanied youth first, and minimally are required to place otherwise eligible households in an order that prioritizes, in a nondiscriminatory manner, those who would benefit the most from this type of housing, beginning with those most at risk of becoming chronically homeless. For eligibility in non-dedicated and non-prioritized PSH serving non-chronically homeless households, any household member with a disability may qualify the family for PSH.

#### First Priority– Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs.

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

#### Second Priority– Homeless Individuals and Families with a Disability with Severe Service Needs.

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

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

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

#### Fourth Priority– Homeless Individuals and Families with a Disability Coming from Transitional Housing.

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

not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

#### Other Notes on Prioritization

- Recipients of CoC Program-funded PSH should follow the order of priority above, while also considering the goals and any identified target populations served by the project. For example, in CoC Program-funded PSH where the beds are not dedicated or prioritized and which is permitted to target homeless persons with a serious mental illness should follow the order of priority above, to the extent in which persons with serious mental illness meet the criteria.
- Due diligence should be exercised when conducting outreach and assessment to ensure that persons are served in the order of priority in this Notice CDP-16-11, and as adopted by the CoC. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant where there are persons who meet a higher priority within the CoC and who have not yet accepted the PSH opportunities offered to them. Street outreach providers should continue to make attempts with those persons using a Housing First approach to place as few conditions on a person’s housing as possible.

## How to Determine and Prioritize Which Eligible Individuals, Families and Unaccompanied Youth Will Receive Transitional Housing Assistance

### Program Summary

Transitional Housing (TH) facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering TH. Programs will provide safe, affordable housing that meets participants’ needs.

### Determining Homeless Status of Youth

The criteria for determining the homeless status of youth are from HUD’s “Determining Homeless Status of Youth<sup>1</sup>” guidelines, as outlined below. Youth may be verified to be homeless under Categories 1, 2 and 4 below

#### Category 1: Literal homelessness, living situation:

- Shelter including emergency shelter, transitional housing, or hotel or motel paid by government or charity
- Street or other place not meant for human habitation (ex. car, garage, park, abandoned building)

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<sup>1</sup> <https://www.hudexchange.info/resources/documents/Determining-Homeless-Status-of-Youth.pdf>

- An institution (ex. jail, hospital, juvenile detention) that the youth is exiting and\ where youth was resident for 90 days or less AND the youth resided in emergency shelter or place not meant for human habitation immediately prior to entering that institution

#### Category 2 Imminent Risk of Homelessness, living situation:

- In own housing, but being evicted within 14 days
- A hotel or motel paid for by the youth, family or friends where the youth cannot stay for more than 14 days (often due to lack of ability to continue paying)
- With family or friends and being asked to leave within 14 days

Additionally, the youth must have no safe alternative housing, resources or support networks to maintain or obtain permanent housing.

#### Category 4 Fleeing Domestic Violence, living situation

- Youth fleeing or attempting to flee their housing or the place they are staying because of domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence that has taken place in the house or has made them afraid to return to the house, including:
  - Trading sex for housing, Trafficking, Physical abuse, Violence (or perceived threat of violence) because of the youth's sexual orientation

Additionally, the youth must have no safe, alternative housing, resources or support networks to maintain or obtain permanent housing.

### Eligibility/Prioritization

To be eligible for transitional housing people must:

- Meet the federal criteria under category (1), (2) or (4) of the “homeless” definition for youth as described above.
- A score on the TAY-VI-SPDAT assessment tool that does not indicate a need for permanent supportive housing

Youth ages 18 – 24 will be prioritized for transitional housing. All chronically homeless individuals and families will be referred permanent supportive housing through a Housing First approach and/or rapid re-housing as appropriate. Also, eligible single veterans and veterans with families, will be served by permanent supportive housing through the HUD VASH voucher program or the Supportive Services for Veteran Families program.

Youth who are victims of trafficking (which includes exchanging sex for housing), sexual exploitation, domestic abuse or violence will be prioritized for transitional housing. Other factors to affect prioritization include length of time homeless, and youth willingness to participate in the program via program application and screening.

## Equal Access

Transitional housing will have the following standards regarding equal access and integration:

1. Transitional housing will be made available to all individuals and families who are otherwise eligible without regard to actual or perceived sexual orientation, gender identity, or marital status, in accordance with *Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity final rule* (Equal Access Rule) (77 FR 21 5662). The rule defines “gender identity” to mean “actual or perceived gender-related characteristics.”
2. Transitional housing programs will be administered in settings that are most appropriate to the needs of qualified individuals with disabilities, while ensuring that individuals with disabilities can interact with individuals without disabilities to the fullest extent possible.
3. Transitional Housing programs will take reasonable steps to ensure meaningful access to services, programs, and activities by persons with Limited English Proficiency (LEP persons).

## Point of Access

Referrals to transitional housing will be accepted through the coordinated entry system, or directly through youth emergency shelter providers. Eligibility will be determined by the homeless status, as described above, and the youth’s score on the TAY-VI-SPDAT, as described above. The eligibility determination and assessment will be conducted at the point of access. Youth who are not deemed eligible for transitional housing and are in need of permanent supportive housing or rapid re-housing will be referred to those programs.

## Program Overview & Standards

Transitional housing programs are expected to place unaccompanied youth into permanent housing within 18 months. Assistance in transitioning to permanent housing must be provided. A TAY-VI-SPDAT must be completed within 30 days of program entry, and the household name referred to the appropriate housing priority list, if not done already. A participant has the right to refuse completing the TAY-VI-SPDAT assessment.

All youth who participate in the transitional living program will have access to a full continuum of care of services to include employment and education assistance, life-skills education, counseling, housing education and placement assistance, case management, and aftercare support upon discharge to permanent housing.

In order to facilitate the movement of program participants to permanent housing within 24 months of entering TH, grant funds may be used for all of the following activities: acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services.

Under CFR 578.53 *Supportive services (b) Duration*, the following is also noted:

(1) “For a transitional housing project, supportive services must be made available to residents throughout the duration of their residence in the project.”

(3) “Services may also be provided to former residents of transitional housing and current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living.”

## Occupancy Agreements

All youth served in transitional housing will be provided an occupancy agreement upon intake into the program. The agreement must specify the requirements for program participation, including program rules and appeal process. No person may be terminated from transitional housing without first being provided the right to appeal that decision in accordance with the due process provisions at 24 CFR 578.91(b) – *Termination of assistance to program participants*.

## Limitation on Occupancy

The program participant must have an occupancy agreement for a term of at least one month and a maximum of 24 months, as determined by CFR 578.51 *Rental assistance, (1) Leases (2) Initial lease for transitional housing*, which states:

“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 term of 24 months.”

However, if it is determined that a youth needs additional assistance to remain in the transitional living program, the program will be required to request an extension through the local Anchorage CoC. No person shall be discharged from transitional housing into homelessness as a result of this limitation. CFR 578.79- *Limitation on transitional housing* states:

“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.”

## Participant Contribution

Providers of transitional housing may impose occupancy charges. If the provider elects to charge rent or occupancy charges, the charges may not exceed those specified in 24 CFR 578.77 – *Calculating occupancy charges and rent*.

## Program Fees

No fee other than rent or occupancy charges as specified above may be charged to program participants. This includes meals, copayments for services, transportation and all other services that may be provided to program participants.

## How to Determine and Prioritize Which Eligible Individuals, Families and Unaccompanied Youth Will Receive Rapid Re-Housing Assistance

NOTE: Anchorage does not currently have any CoC-funded rapid re-housing programs. The written standards outlined below for rapid-rehousing have been adopted from the Homeless Alliance of Western New York. If a rapid re-housing program is introduced in Anchorage, these standards should be reviewed to ensure they are appropriate.

### Participant Eligibility for Rapid Re-Housing for Households

In order to receive CoC program assistance, participants have to meet the first four eligibility criteria. The rest of the criteria is for providing general guidelines and could vary on a case by case basis and/or at the case manager's discretion/judgment.

1. For CoC FY2016 funded projects, participants must meet homeless definition Category 1.
2. Homeless Households whose VI-SPDAT score are 6-11.
3. Household incomes less than 50% of AMI for CoC program
4. Housing history, education level and employment history will also be considered when choice of transitional housing and rapid rehousing are both available
5. The family's assets must be less than \$2,000. For the purpose of this program, we will use the term "available assets" which is any ownership of cash or of an item that will be converted to cash immediately. A vehicle is not included as an asset when it is the primary vehicle.

NOTE: In the event an individual or family is enrolled in the program while residing in the shelter is asked to leave the shelter, the case manager may assist in securing alternative shelter placement. Individual must be homeless at the time of being housed.

### Program Participant Contributions: How to Determine What Percentage or Amount of Rent Each Program Participant Must Pay while Receiving Rapid Re-Housing Assistance

Depending on the program model rental assistance will be either a fixed rate (e.g. \$400 per month) or based on household income (e.g. 30% of the household's monthly adjusted income).



## Appendix A: HUD Definitions

### HUD Definition of Chronically Homeless

The definition of “chronically homeless” is defined in the final rule as of January 15, 2016 and is amended from the definition found in the CoC Program Interim Rule. According to 24 CFR Part 91 and 24 CFR Part 578.3, “chronically homeless” means:

(1) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

- (i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- (ii) Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

### HUD Definition of Homelessness

24 CFR §583.5 HUD Homeless Definition

- (1) An individual or family who lacks a fixed, regular and adequate nighttime residence, meaning:
- (i) 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, camping ground;
  - (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangement (including congregate shelters, transitional housing, and hotels and motels paid for by charitable

organizations or by federal, state, or local government programs for low income individuals); or

- (iii) 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;
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
- (i) The primary nighttime 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, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
- (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C.2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
  - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
  - (iii) Have experienced persistent instability as measured by two moves or more during the 60- day period immediately preceding the date of applying for homeless assistance; and
  - (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;

Or

- (4) Any individual or family who:

- (i) Is fleeing, or is 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, including a child, 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;
- (ii) Has no other residence; and lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

## **Appendix B: Recommended Additional Contents for Written Standards 2017 Update**

- Grievance process
- Reasonable accommodation request process
- Recordkeeping recommendations for CoCs that have adopted the orders of priority
- Incorporate gender identity notice

## Appendix C: Coordinated Entry Procedures

Available here:

<http://static1.squarespace.com/static/54ca7491e4b000c4d5583d9c/t/563a4f00e4b0635b7da01c29/1446661888290/AKMIS+Policies+and+Procedures+-+2015.pdf>

## Appendix D: Ranking of Target Populations by Housing Type

Note: If more than one category is met, the highest ranked will be used.

Prevention	Rank
Youth aging out of foster care	2
Category 2: Imminent homelessness	1
Court-ordered eviction or foreclosure notice	3
Housing Insecure (Severe Housing Cost Burden)	4

Emergency Shelter - Domestic Violence	Rank
High lethality risk	1

Non-ECWS Emergency Shelter & Transitional Housing - Families	Rank
Category 1: Literally Homeless or Category 4: Fleeing DV	1
Households at imminent risk of homelessness	3
Families exiting emergency DV shelter	2
Housing to Support Family Reunification	4
*Destination will be based on program entry requirements	

Transitional Housing-Adult	Rank
Exiting Shelter	2
Domestic violence	3
Clients in recovery	4
LGBTQ individuals	6
Re-entry populations	5
Coming from places not meant for human habitation or shelters	1

Transitional Housing-Youth	Rank
Homeless youth 18-24 under categories 1, 2, 4 of HUD youth homelessness definition	1
Victims of DV, trafficking and violence	2
Length of time homeless	3

<b>Rapid Re-Housing (CHA)</b>	<b>Rank</b>
First time homeless households	1
Households moving out of emergency housing	4
Longest shelter stay	5
Chronic medical conditions	6
Families enrolled in CIT Assistance	3
Coming from places not meant for human habitation	2
At risk of homelessness per HUD definition	7

<b>Permanent Supportive Housing</b>	<b>Rank</b>
Most severe service needs	1
Exiting institutions after stays of 90 days or less	4
Coming from places not meant for human habitation or shelters – non Chronically Homeless	3
Exiting recovery programs	4
Longest history of homelessness	1
Coming from TH	4
HUD qualifying disabilities – non Chronically Homeless	2
Chronic medical conditions	2
Families with children under 3	3
Veterans who are not VA eligible	3
At risk of homelessness per HUD definition	4
Meets Definition for Chronically Homeless	1
Chronic and severe MH diagnosis	2

<b>Permanent Supportive Housing – Dedicated*</b>	<b>Rank</b>
Individual or Family with a HUD Qualifying Disability that meets Definition for Chronically Homeless (CH)	threshold
CH Individual or Family; most severe service needs	1
CH Individual or Family; longest history of homelessness	1
Non-CH Individual or Family with a HUD Qualifying Disability with Severe Service Needs	2
Non-CH Individual or Family with a HUD Qualifying Disability Coming from places not meant for human habitation or shelters without Severe Service Needs	3
Non-CH Individual or Family with a HUD Qualifying Disability Coming from Transitional Housing	4

\*Ranking would be used if no CH individuals or families can be found within the Anchorage CoC's geographic boundaries, following the Order of Priority noted in Section B above and Notice CDP -16-11.

<b>Permanent Supportive Housing – Non-Dedicated**</b>	<b>Rank</b>
Individual or Family with a HUD Qualifying Disability that meets Definition for Chronically Homeless (CH)	1
CH Individual or Family; most severe service needs	1a
CH Individual or Family; longest history of homelessness	1a
Non-CH Individual or Family with a HUD Qualifying Disability with Severe Service Needs	2
Non-CH Individual or Family with a HUD Qualifying Disability Coming from places not meant for human habitation or shelters without Severe Service Needs	3
Non-CH Individual or Family with a HUD Qualifying Disability Coming from Transitional Housing	4

\*\*Non-Dedicated PSH is strongly encouraged by the CoC to use the Order of Order of Priority noted in Section B above and Notice CDP -16-11.