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# ROCKLAND COUNTY CONTINUUM OF CARE: WRITTEN STANDARDS

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## Preamble

The Continuum of Care (CoC) is responsible for establishing and consistently following Written Standards for administering assistance. Written Standards provide a reference for coordinating and implementing a system to meet the needs of those experiencing homelessness within the geographic area of the Rockland County Continuum of Care. Both the Emergency Solutions Grant (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) Continuum of Care Project Interim Rules and Regulations state that CoCs, “in consultation with recipients of ESG project funds within the geographic area, are intended to coordinate service delivery and assist CoCs and their recipients in evaluating the eligibility of individuals and families consistently and administering assistance fairly and methodically” § 578.7(a)(9).

All projects that receive ESG or CoC funding are required to abide by these written standards. The CoC strongly encourages projects that do not receive either of these sources of funds to accept and utilize these written standards. The goals of the Rockland CoC written standards are to:

- Establish community-wide expectations and standards
- Provide the basis for monitoring projects
- Clarify local priorities, which will ensure a transparent system
- Document the system for prioritizing assistance per project type
- Outline a strategy for use of limited resources.

The Rockland CoC written standards have been established to ensure that persons experiencing homelessness who enter projects throughout the CoC will be given unvarying information and support to access and maintain permanent housing and enable the CoC to end homelessness.

For each project type, the standards outline:

1. Purpose of the project type
2. Eligibility criteria
3. Prioritization
4. Minimum standards of assistance
5. Client access
6. Performance standards.

As a baseline, the Rockland CoC has adopted current minimum standards set by HUD for all CoC funded projects and has adopted the standards noted by state funded ESG programs within the most recent Solutions to End Homelessness Program (STEHP) contract. Requirements set by HUD for CoC and ESG projects include:

- Projects must have written policies and procedures and consistently apply them to all participants
- Projects that serve households with children must comply with the following:
  - A staff person must be designated as the educational liaison that will ensure children are enrolled in school, connected to appropriate services in the community,

- including early childhood project such as Head Start, Part C of the Individuals with Disabilities Education Act, and the McKinney Vento education services
  - 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 that provides shelter for families with children
- Programs receiving ESG and CoC funding must participate in HMIS (Homeless Management Information System), however all homeless programs are strongly encouraged to participate in HMIS and meet the minimum HMIS data quality standards.
- Programs must coordinate and collaborate with other service providers within the geographic area (such as housing, social services, employment, education and youth programs, etc).
- Programs are required to participate in the Coordinated Entry System and use the prioritization criteria established in this document.
- Programs must keep documentation of homelessness on file.
- Programs must keep documentation of amount, source and use of resources for each match contribution.
- Programs must keep documentation of use of HMIS.
- Programs must keep documentation for all eligible costs charged to the grant.
- Eligibility requirements as defined by CoC and ESG funding are the standard for receiving assistance. Additional project requirements for eligibility are not the standard and cannot be grounds for rejection. Project participants can only be rejected because the eligibility criteria as defined by CoC and ESG funding and noted in the written standards is not met.
- Projects must have a formal procedure for terminating assistance to a participant that abides all project funding, state and federal regulations.
- All HUD funded projects must ensure equal access in housing to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status. Equal access must be granted to individuals in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family.

The *Continuum of Care Written Standards* are implemented in coordination with *the Coordinated Entry Policies and Procedures*. Specifically, the following written standards for administering assistance within the Rockland County CoC geographic area serve as a reference to:

- Assist with the coordination of service delivery across the geographic area and are the foundation of the Coordinated Entry system.
- Assist in assessing individuals and families consistently to determine project eligibility
- Set prioritization standards for administering assistance that are in line with strategies outlined by the CoC's vision and guiding principles for local targets that are complimentary to those within HUD's *Opening Doors*.
- Assist in administering projects fairly and methodically to meet funding regulations.
- Establish common core performance measures for all CoC and ESG component types.
- Provide the basis for monitoring CoC and ESG funded projects.
- Establish how standards will be reviewed regularly and evaluated for effectiveness.

## Ongoing Review & Evaluation

As a document that represents the CoC, its housing and services available, as well as local goals and values, these standards serve as a resource for providing assistance across the continuum in order to prevent end homelessness.

These standards are to be reviewed annually to ensure the system of providing assistance is transparent, local priorities are clear to all recipients, and as a CoC that limited resources are being used strategically. To guarantee the written standards are implemented comprehensively, project performance, HMIS data, Coordinated Entry tracking, as well as project participant and stakeholder input will all be considered when evaluating the written standards for effectiveness. As noted in the bylaws, ongoing review and evaluation of these standards will be completed at least annually.

## Prioritization Standards

These Written Standards establish the community-wide expectation of how resources are to be targeted within the community. This is separate from meeting eligibility requirements, and specific to prioritizing assistance according to population and household types. Project participants must always meet eligibility criteria while all individuals and household types can be prioritized for a type of assistance. As prescribed in the *Coordinated Entry Policies & Procedures*, CoCs are instructed to 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. All CoC program-funded PSH accept referrals only through a single prioritized list that is created through the CoC's Coordinated Entry process, which is also informed by the CoC's street outreach. Populations and households prioritized for assistance include:

- Those prioritized in CoC funded PSH beds **Dedicated** to Persons Experiencing CH or PSH **Prioritized** for Occupancy by CH Persons are, in order of prioritization:
  - First Priority- Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs are.
  - Second Priority- Chronically Homeless Individuals and Families with the Longest History of Homelessness are prioritized in CoC funded PSH beds **Dedicated** to Persons Experiencing CH and PSH **Prioritized** for Occupancy by CH Persons.
  - Third Priority- Chronically Homeless Individuals and Families with the most severe service needs are prioritized in CoC funded PSH beds **Dedicated** to Persons Experiencing CH and PSH **Prioritized** for Occupancy by CH Persons.
  - Fourth Priority- All other Chronically Homeless Individuals and Families
  - Fifth Priority- Non-chronically homeless households, as long as the recipient of CoC Program-funded PSH documents how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area at the point at which a vacancy becomes available.
- Those prioritized in PSH beds that are NOT Dedicated or Prioritized for Persons Experiencing Chronic Homeless, in order of prioritization:
  - First Priority–Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness, 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** Severe Service Need.
  - Second Priority - Homeless Individuals and Families with a Disability with Severe Service Needs. No 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. No minimum length of time required.
  - Fourth Priority–Homeless Individuals and Families with a Disability Coming from Transitional Housing where prior to residing in the TH 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 TH who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that TH 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 TH.

- Fifth Priority- All others that meet a lower priority of order, as long as the recipient of CoC Program-funded PSH documents how the determination was made that there were no eligible individuals or families within the CoC's geographic that met a higher priority.

## **Housing First**

Housing First is a proven approach, applicable across all elements of systems for ending homelessness, in which people experiencing homelessness are connected to permanent housing swiftly and with few to no treatment preconditions, behavioral contingencies, or other barriers. Programs ensure that no potential clients are screened out or terminated based on any criteria outlined below.

- Access to programs is not contingent on sobriety, minimum income requirements, lack of a criminal record, completion of treatment, participation in services, or other unnecessary condition.
- Programs or projects do everything possible not to reject an individual or family on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”
- People with disabilities are offered clear opportunities to request reasonable accommodations within applications and screening processes and during tenancy, and building and apartment units includes special physical features that accommodate disabilities.
- Programs or projects that cannot serve someone work through the Coordinated Entry Process to ensure that those individuals or families have access to housing and services elsewhere.
- Housing and service goals and plans are highly tenant – driven.
- Supportive services emphasize engagement and problem- solving over therapeutic goals.
- Participation in services or compliance with service plans are not conditions of tenancy, but are reviewed with tenants and regularly offered as a resource to tenants.
- Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are part of some tenants’ lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use are offered education regarding how to avoid risky behaviors and engage in safer practices.
- Substance use in and of itself, without other lease violations, is not considered a reason for eviction.
- Tenants in supportive housing are given reasonable flexibility in paying their share of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.
- Every effort is made to provide a tenant the opportunity to transfer from one housing situation, program, or project to another if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

## **Project Requirements Specific to ESG-funded Projects**

Projects funded with ESG funds will be expected to adhere to the following to be considered in good project standing and align with the standards:

- Project will be familiar with and adhere to all project requirements of ESG as stated in Title 24 of the Code of Federal Regulations, Part 576
- Project will participate in the development and implementation of the Rockland County Continuum of Care Plan
- Collaborate with other homeless providers in the operation of the project
- Participate in trainings and coordination meetings
- Cooperate with related research and evaluation activities
- Prioritize referrals from homeless service providers with the Counties' Continuum of Care System as it relates to the Coordinated Entry System
- Meet high standards of professionalism in implementing the project
- Conform to all fiscal accountability standards required by the New York State Office of Temporary and Disability Assistance (OTDA) and by the federal governments (24CFR, Part 84)

**Objectives and Outcomes Specific to ESG Projects**

- Suitable living environment
- Affordable housing and affordability of services
- Creating economic opportunities
- Availability and accessibility of services and housing
- Sustainability of the above stated objectives

**Strategic Planning Objectives Specific to CoC Funded Projects**

- Increase the number of beds dedicated and prioritized to serve chronically homeless individuals
- Increase housing stability
- Increase project participant income
- Increase the number of participants obtaining mainstream benefits
- Increase the number of individuals and families served by Rapid Rehousing

## Written Standards by Project Type

The project types directly providing homeless housing and services included within the written standards and their location within the document are listed below.

|   |      |
|---|------|
| ● Homelessness Prevention (HP)                  | p.6  |
| ● Outreach                                      | p.7  |
| ● Emergency Shelter (ES)                        | p.7  |
| ● Rapid Re-housing (RRH)                        | p.8  |
| ● Transitional Housing (TH)                     | p.8  |
| ● Permanent Supportive Housing (PSH)            | p.9  |
| ● Support Service Only (SSO)                    | p.9  |
| ● Homeless Management Information System (HMIS) | p.10 |

## ACCESSING ASSISTANCE

The Rockland County CoC's *Coordinated Entry Policies and Procedures* is to be referenced per assistance type as it relates to *accessing assistance*. The *Policies and Procedures* outline the standardized access, assessment, and referral process for housing and other services across agencies in a community. This process is not intended to determine acceptance into a program; it is meant to prioritize community services based on need. Coordinated Entry assesses the person's housing needs, preferences, and vulnerability. During

assessment, the person's needs and level of vulnerability may be documented for purposes of determining prioritization. Prioritization helps the CoC manage its inventory of community housing resources and services, ensuring that those persons with the greatest need and vulnerability receive the supports they need to resolve their housing crisis. Following prioritization, persons are referred to available CoC housing resources and services in accordance with the CoC's prioritization guidelines.

This process is intended to assure household eligibility for waiting list acceptance with programs having the ability and responsibility to ensure that household needs are best served by their program. The goal of Coordinated Entry is to link all Emergency Solutions Grant, CoC funded, and non-CoC funded programs in order to best assess households to effectively and efficiently refer households to services.

### ***HUD Required Fundamentals***

- Full coverage - The Coordinated Entry Process must cover the CoC's entire geographic area with access points that are accessible and well advertised to the people living there.
- Outreach - Any street outreach efforts must be linked to the Coordinated Entry Process.
- Emergency Services – The Coordinated Entry Process must allow people experiencing a housing crisis to access emergency services with as few barriers as possible.
- Standardized Access and Assessment – The Coordinated Entry Process must use the same assessment process at all access points.
- Marketing and Non-Discriminatory Access – CoC's and recipients of HUD CoC and ESG Programs are required to affirmatively market their housing and supportive services projects to eligible persons who are least likely to apply in the absence of special outreach.
- Safety Planning – The CoC's access must ensure the safety of persons who are fleeing, or attempting to flee, domestic violence (as well as dating violence, sexual assault, trafficking, or stalking).
- Privacy – The Coordinated Entry Process must ensure adequate privacy protections are extended to and enforced for all participants from the first point of access, through assessment and prioritization, and after participants have been offered permanent housing and even exited CoC projects.

The *Coordinated Entry Policies and Procedures* can be found on the Rockland County CoC's website [caresny.org/continuum-of-care/rockland-continuum-of-care/rockland-coordinated-entry/](http://caresny.org/continuum-of-care/rockland-continuum-of-care/rockland-coordinated-entry/).

## **HOMELESSNESS PREVENTION**

Homeless Prevention activities are available to persons who are at risk of becoming homeless. Homeless prevention assistance can be used to prevent an eligible individual or family from becoming homeless or to help to regain stability in their current housing or other permanent housing. Eligible activities include housing relocation and stabilization services as well as short and medium-term rental assistance.

### ***Eligibility Criteria (ESG)***

- Participants must meet the HUD definition of homelessness or at risk of becoming homeless.
- Participants must have combined income below 30% Area Median Income (AMI).
- Participant lacks identifiable financial resources and/or support networks.
- For continued eligibility: participant income eligibility must be reviewed every three months for continued prevention assistance.

### ***Minimum Standard of Assistance (ESG)***

- A stipend up to \$800 for up to three months
- Rental assistance is provided for a maximum of 3 months or the equivalent in utility arrears
- Case management must occur at least once per month while participant is receiving prevention assistance.

***Performance Standard: Expected Outcomes***

- Reduce the Number of Homeless Households Seeking Emergency Shelter
  - At least a 20% increase in diversions for homeless households
  - At least 80% of households served will maintain permanent housing for 90 days after discharge.

## OUTREACH

Street Outreach serves unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Services are provided to eligible participants residing in a place not meant for human habitation. Essential services of street outreach include: engagement, case management, emergency health and mental health services, and transportation, and services for special population. Please note, there are currently no outreach programs in the CoC. Should an outreach program be developed, information regarding the administration of the program will be developed and approved similar to the guidance below.

***Eligibility Criteria***

- Participants must meet the HUD definition of unsheltered homelessness.

***Minimum Standard of Assistance***

- Please note, due to the varying nature of Outreach projects that may function within the CoC, the official minimum standards of assistance are tailored to align with the specific purpose of the particular project.

***Performance Standards: Expected Outcomes***

- Expand Homeless Outreach Services
  - At least 10% more households will be provided services than the previous year.

## EMERGENCY SHELTERS

Essential services of emergency shelter includes: case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations. Please note, there are currently no emergency shelters in the CoC. Should an outreach program be developed, information regarding the administration of the program will be developed and approved similar to the guidance below.

***Eligibility Criteria***

- Participants must meet the HUD definition of homelessness

***Minimum Standard of Assistance***

- Provision of shelter, food, and personal care items.
- Assistance in transitioning to permanent housing

***Performance Standards: Expected Outcomes***

- Reduce Rates of Homelessness
  - At least 30% of households will exit to permanent housing destinations.
  - Average length of stay is less than 20 days

## RAPID RE-HOUSING PROJECTS (RRH)

Rapid Re-Housing is available to help those who are literally homeless be quickly and permanently housed. Rapid Re-Housing Projects (RRH) provide housing relocation and stabilization services and short or medium term rental assistance as needed to help a homeless individual or family move as quickly as possible to permanent housing and achieve stability in that housing. Please note, Rapid Rehousing funds are available through both CoC and ESG

***Eligibility Criteria***

- Participants must meet the HUD definition of homelessness.
- Participant lacks identifiable financial resources and/or support networks.

***Minimum Standards of Assistance***

- Rental Assistance with security deposit OR security deposit OR first and last month’s rent;
- The rental subsidy amount will account for participants paying no more than 30% of their adjusted income or 10% of their gross income towards rent;
- Supportive services designed to meet the needs of the project participants must be made available to the project participants throughout the duration of RRH assistance
- Follow-up will occur at a minimum monthly while participants are receiving assistance
- Follow-up will occur no later than 90 days after discharge up to one year.

***Performance Standards: Expected Outcomes***

- Reduce the Number the Length of Homelessness for Homeless Households
  - At least 80% of households served will be placed in permanent housing within 60 days.
  - At least 80% of households served will maintain permanent housing for 90 days after discharge.

***Performance Standards: Strategic Planning Objectives***

- 80% or more of all participants remain stable in RRH or exit to other permanent housing destinations
- 54% or more of adult participants will increase income from sources other than employment
- 20% or more of adult participants will increase income from employment

## TRANSITIONAL HOUSING PROGRAMS

Transitional Housing (TH) is designed to provide homeless individuals and families with interim stability and support to successfully move to and maintain permanent housing.

### ***Eligibility Criteria***

- Participants must meet the HUD definition of homelessness

### ***Minimum Standards of Assistance***

- Maximum length of stay cannot exceed 24 months
- Assistance in transitioning to permanent housing must be provided
- Support services must be provided throughout the duration of stay in transitional housing
- Project 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

### ***Performance Standards: Strategic Planning Objectives***

- 80% or more of all participants will exit to permanent housing destinations
- 54% or more of adult participants will increase income from sources other than employment
- 20% or more of adult participants will increase income from employment

## **PERMANENT SUPPORTIVE HOUSING**

Permanent Supportive Housing (PSH) for persons with disabilities is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability.

### ***Eligibility Criteria***

- Participants must meet 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.

### ***Minimum Standards of Assistance***

- There can be no predetermined length of stay for a PSH project
- Supportive services designed to meet the needs of the project participants must be made available to the project participants throughout the duration of stay in PSH
- Project participants in PSH must enter into a lease (or sublease) agreement for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month.

### ***Performance Standards: Strategic Planning Objectives***

- 80% or more of all participants will remain stable in PSH or exit to other permanent housing destinations
- 54% or more of adult participants will increase income from sources other than employment
- 20% or more of adult participants will increase income from employment

## **SUPPORTIVE SERVICES PROJECTS**

The supportive services only (SSO) project component allows for the provision of services to homeless individuals and families not residing in housing operated by the recipient of SSO funding. SSO projects

provide services to persons experiencing homelessness that are not tied to specific housing units. Supportive services can include conducting outreach to sheltered and unsheltered homeless persons and families, link clients with housing or other necessary services, and provide ongoing support. Please note, there are currently no SSO projects in the CoC. Should a SSO project be developed, information regarding the administration of the program will be developed and approved similar to the guidance below.

***Eligibility Criteria***

- Participants must meet the HUD definition of homelessness

***Minimum Standards of Assistance***

- Please note, due to the varying nature of SSO projects that may function within the CoC, the official minimum standards of assistance are tailored to align with the specific purpose of the particular project.

***Performance Standards: Strategic Planning Objectives***

- Please note, due to the varying nature of SSO projects that may function within the CoC, the official performance standards are tailored to align with the specific purpose of the particular project.

## HOMELESS MANAGEMENT INFORMATION SYSTEM

Under the HEARTH Act, HMIS participation is a statutory requirement for all CoC and ESG funded projects. Victims service providers cannot participate in HMIS, these providers must use a comparable database that produces unduplicated and aggregate reports in its place. The Rockland CoC is responsible for designating the HMIS lead who is responsible for the operation and administration of the HMIS.

***Minimum Standards***

- Produce an unduplicated count of persons experiencing homelessness for the CoC
- Describe the extent and nature of homelessness within the CoC
- Identify patterns of service use
- Measure program effectiveness

***Performance Standards: Expected Outcomes***

- Increase and Maintain Data Quality within HMIS
  - No more than 5% missing or null data for all required fields.