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# Dutchess County Continuum of Care (CoC)

## 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 Dutchess County Continuum of Care (CoC), the CoC for Dutchess County. 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).<sup>1</sup> Please note, ESG-CV funds are not subject to consultation with the Continuum of Care or other targeted homeless services to ensure funds are deployed quickly to address the immediate public health crisis (CPD-20-08, pg. 16).

The CoC’S Written Standards serve as a reference for all CoC, ESG, and ESG-CV recipients to uphold funding source requirements 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
- Establish important community-wide policies in implementing CoC and ESG-funded programs, such as an Anti-Discrimination, Moving On, and Emergency Transfer Plan Policies

The CoC’S 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

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<sup>1</sup> 24 CFR § 576.400(e)(1) If the recipient is a metropolitan city, urban county, or territory, the recipient must have Written Standards for providing Emergency Solutions Grant (ESG) assistance and must consistently apply those standards for all program participants. The recipient must describe these standards in its consolidated plan; (2) if the recipient is a state: the recipient must establish and consistently apply or require that its sub recipients establish and consistently apply, Written Standards for providing ESG assistance.

## 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, 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.

## Accessing Assistance

The *Dutchess County'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 Coordinated Entry process is intended to assure household eligibility for the CE waitlist. Agencies have the responsibility to ensure those accepted in housing programs are able to ensure that household needs are best served by their program. The goal of Coordinated Entry is to link all Emergency Solutions Grant (including ESG-CV), CoC funded, and non-CoC funded programs in order to best assess households to effectively and efficiently refer households to services; while ensuring there is no duplication of benefits between CoC, ESG, and ESG-CV funded projects.

### *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.

## 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 to those in need. 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*, CoC's prioritize assistance based on vulnerability and severity of service needs to ensure that households needing assistance the most receive it in a timely manner. The CoC's *Coordinated Entry Policies & Procedures* and process are in alignment with HUD guidance and notices, namely:

- [24 CFR Part 578 - Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program \(specifically: 578.3 and 578.7\(a\)\(8\)\)](#)
- [CPD-016-11 - Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#)
- [CPD-017-01 - Notice Establishing Additional Requirements for a Continuum of Care Centralized Coordinated Assessment System](#)
- [CPD-20-08- Waivers and Alternative Requirements for the Emergency Solutions Grants \(ESG\) Program Under the CARES Act](#)

The CoC will refer to and implement guidance based on any subsequent notices that update or replace prior notices and guidance.

In accordance with these notices and guidance, 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 needs.
  - 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.

Please see the Prevention Vulnerability Index for a list of prioritization standards for prevention assistance. Those prioritized first include households at immediate risk of eviction; persons who are sick, quarantined, or economically impacted by COVID; households with no income or income above 80+; large households; households with prior homelessness and/or chronic homelessness; and victims and survivors of domestic violence.

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 based on 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 that cannot serve an individual or family 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 drug and alcohol use and addiction are part of some tenants' lives. Tenants 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 tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

- People at severe risk of contracting coronavirus will be prioritized for projects utilizing ESG-CV funding, per CPD-20-08, p. 6. They will subsequently be prioritized based on the factors listed above.

## Anti-Discrimination Policy

### ***Anti-Discrimination Policy in Administering Housing and Service Assistance***

All CoC and ESG Program-funded projects within the CoC shall market to and serve all eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach or accommodation and without regard to actual or perceived sexual orientation, gender identity, or marital status.

It shall be the policy of the Continuum of Care (CoC) to maintain and promote a safe environment for all persons in all CoC- and ESG-funded programs and beyond. All staff, volunteers, and contract providers are prohibited from engaging in any form of discrimination against or harassment of persons based on actual or perceived race, ethnicity, immigration status, national origin, sex, disability, sexual orientation, gender identity, or gender expression. The CoC is committed to providing a healthy and accepting setting for all persons accessing services through its programs by hosting a mandatory training for all CoC- and ESG-funded agencies annually. Any discrimination against or harassment of staff or clients within a CoC- and ESG-funded program will not be tolerated. The provision of services to lesbian, gay, bisexual, transgender, and gender nonconforming persons in CoC- and ESG-funded programs shall be free of institutional and personal bias. CoC- and ESG-funded programs shall recognize and address the individual needs of each client and shall apply policies and practices fairly to all clients. If a person experiences harassment or discrimination in violation of this policy, they should file a grievance according to facility policy. All grievances will be reviewed and investigated by the appropriate party immediately.

All CoC and ESG Program-funded projects within CoC shall also comply with all State of New York and Federal statutes relating to nondiscrimination. These include but are not limited to:

- *Fair Housing Act (Title VIII of the Civil Rights Act of 1968)*, which prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status.
- *Title VI of the Civil Rights Act of 1968*, (P.L. 88-352, 42 U.S.C. § 2000d, and implementing regulations) which prohibits discrimination on the grounds of race, creed, color, sex, religion, ancestry, age, condition of physical disability, marital status, political affiliation, or national origin in programs and activities receiving federal financial assistance.
- *24 CFR 5.105(a)(2) – Equal Access to HUD-Assisted or -Insured Housing*, which states housing assisted by HUD or subject to a mortgage insured by HUD shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.
- *Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule (2012)*, which ensures that HUD programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.
- *Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs Final Rule (2016)*, which ensures equal access for 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).
- *Sections 503 and 504 of the Rehabilitation Act of 1973*, as amended (29 U.S.C. § 794, 45 C.F.R. Part 84), which prohibits discrimination based on disabilities.
- *Americans with Disabilities Act*
  - *Title II*, which prohibits public entities, which includes states and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing-related services such

as housing search and referral assistance.

- *Title III*, which prohibits private entities that own, lease, and operate places of public accommodation, including shelters, social service establishments, and other public accommodations providing housing, from discrimination on the basis of disability.
- NYS *Sexual Orientation Non-Discrimination Act (SONDA)* (2012), which prohibits discrimination on the basis of actual or perceived sexual orientation in employment, housing, public accommodations, education, credit and the exercise of civil rights in NYS.
- NYS *Gender Expression Non-Discrimination Act (GENDA)* (2019), which prohibits discrimination, harassments, and retaliation on the basis of gender identity or expression, including a persons' actual or perceived gender-related identity, appearance, behavior, expression, or other gender-related characteristic regardless of the sex assigned to that person at birth.
- Any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made.

### ***Affirmatively Furthering Fair Housing***

CoC- and ESG-funded programs shall implement programs in a manner that affirmatively furthers fair housing, which means that the agency will:

- (1) Affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities;
- (2) Where a recipient encounters a condition or action that impedes fair housing choice for current or prospective program participants, provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan; and
- (3) Provide program participants with information on rights and remedies available under applicable federal, State and local fair housing and civil rights laws.

### ***Integrated Settings***

In alignment with HUD guidance, CoC- and ESG-funded programs will provide housing in integrated settings appropriate to the needs of qualified individuals with disabilities. This “integration mandate” requires that HUD-funded programs or activities enable individuals with disabilities to interact with non-disabled persons to the fullest extent possible.

### ***Targeting Subpopulations***

Please note, there are certain situations in which a recipient or subrecipient may limit housing to a specific subpopulation, so long as admission does not discriminate against any protected class, as well as instances where recipients or subrecipients may limit admission or provide a preference to certain subpopulations of homeless persons and families who need the specialized services provided in the housing.

### ***Implementing the Anti-Discrimination Policy***

All CoC- and ESG-funded programs shall conduct the following to be in compliance with the CoC Anti-Discrimination Policy:

- Have an active Anti-Discrimination Policy as part of their own agency policies and procedures, outlining alignment with the above listed New York State and Federal statutes, including a policy and procedure for those who require alternative means of communication for program information (i.e. Braille, large print, audiotape, American Sign Language, a language other than English).
  - Publicly post adherence to anti-discrimination statutes, affirming an environment in which housing and services are provided all to eligible persons regardless of race, color, national

origin, religion, without regard to actual or perceived sexual orientation, gender identity, sex, age, familial status, or disability; and information on who to contact if it is believed your civil rights have been violated.

- Affirmatively market housing and services to those least likely to apply.
- Annually participate in a mandatory antidiscrimination training for all CoC- and ESG-funded agencies.

***Fair Housing Violation Contact Information***

Person believing, they or a client's civil rights have been violated may file a fair housing complaint online by completing the Housing Discrimination Complaint form (HUD form 903) found at <https://portal.hud.gov/FHEO903/Form903/Form903Start.action>. Persons with questions regarding Fair Housing in New York State or who believe they have been a victim of housing discrimination may contact the Civil Rights Bureau of the New York State Attorney General's Office at **212-416-8250** or [civil.rights@ag.ny.gov](mailto:civil.rights@ag.ny.gov)

## Project Requirements for All Component Types

As a baseline, the CoC has adopted current minimum standards set by HUD for all CoC funded projects, has adopted the standards noted by state funded ESG programs within the most recent Solutions to End Homelessness Program (STEHP) contract, and has adopted the minimum standards set in the ESG-CV regulations. All projects that receive ESG, ESG-CV or CoC funding are required to abide by these Written Standards. Programs must follow DC CoC Anti-Discrimination Policy, Move-On Strategy, and Emergency Transfer Plan. The CoC strongly encourages projects that do not receive these sources of funds to accept and utilize these Written Standards.

- 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 point person 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 are not met, or when the project-specific eligibility criteria for a targeted population are not met (e.g., mental health program participants must have a mental health diagnosis).
- 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.
- Programs must follow CoC's Anti-Discrimination Policy (see pages 6-8)
- Programs must implement CoC's Emergency Transfer Plan (see pages 26-28)
- Programs must have a formal procedure for terminating assistance to a participant that abides all project funding, state and federal regulations

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 Dutchess 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 the United States Interagency Council on Homelessness (USICH) *Home Together* federal strategic plan to prevent and end homelessness
- 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
- Establish important community-wide policies in implementing CoC, ESG, and ESG-CV funded programs, such as an Anti-Discrimination, Moving On, and Emergency Transfer Plan Policies.

### Order of Documentation Requirements

Per HUD regulations, recipients must seek homeless and chronically homeless documentation in the following order: (1) third-party documentation and (2) intake worker observations and (3) self-certification from the person seeking assistance, self-report.

The following further details documentation for each category:

- (1) Third-Party Documentation
  - a. HMIS/comparable database record, or
  - b. Individual record of stay at emergency shelter, safe haven or from a street outreach contact, or
- (2). Intake Worker Observation
  - a. Written observation by an outreach or intake worker of encounters with the individual or head of household that includes a description of the conditions where the individual or head of household was living or is currently living.
  - b. Written observation by community member that has physically observed where the person or household was or is currently living or a written referral by another housing/service provider must also be included.
  - c. Written observation does not need to be notarized but intake worker must still document living situation of individual/head of household seeking assistance.
  - d. Intake worker must document all steps taken to higher order of priority evidence.

or
- (3) Self-certification\* (written) by individual/head of household seeking assistance
  - a. Does not need to be notarized
  - b. MUST be signed by individual/head of household, and
  - c. Intake worker must document all steps taken to higher order of priority evidence.

For Chronic Homelessness documentation, for each project:

- (1) 100% of households can use self-certification for 3 months of their 12 months,
- (2) 75% of households served need to use third-party documentation for 9 months of their 12 months,
- (3) 25% of households served can use self-certification as documentation for any and all months.

For more information on required homeless documentation, please see 24 CFR 576.500, 24 CFR 578.103, and the Homeless Definition and Recordkeeping Sheet.

## 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 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 county's 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 government (24CFR, Part 84)

### ***Objectives and Outcomes Specific to State Funded ESG Projects***

- Suitable living environment
- Affordable housing and affordability of services
- Increase project participant income
- Increase the number of participants obtaining mainstream benefits
- Creating economic opportunities availability and accessibility of services and housing

### ***Strategic Planning objectives specific to ESG funded programs***

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

\*Please note projects funded with ESG-CV funds will also be expected to adhere to these standards to be considered a project in good standing. ESG-CV funds are funds in which HUD has allocated funds for street outreach, shelter, rapid re-housing and eviction prevention activities to help communities prevent, prepare for, and respond to COVID-19 among individuals and families who are homeless or receiving homeless assistance. Recipients are encouraged by HUD to use ESG-CV funds to provide essential services and housing relocation and stabilization services to program participants to promote independent living, sobriety, employment, self-sufficiency, and housing stability. The CARES Act, however, prohibits requiring treatment or other activities as a condition of receiving assistance. The funds will also support additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19.

## 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.13
- Outreach . . . . . p.15
- Emergency Shelter (ES) . . . . . p.16
- Rapid Re-housing (RRH) . . . . . p.18
- Transitional Housing (TH) . . . . . p.19
- Permanent Supportive Housing (PSH) . . . . . p.20
- Support Service Only (SSO) . . . . . p.21
- Homeless Management Information System (HMIS) . . . . . p.22

## 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. When utilizing ESG-CV funds, additional eligible activities include renter's insurance, furniture & household furnishings, training, hazard pay, personal protective equipment, cell phones (with some restrictions), landlord incentives, volunteer incentives, and hotel/motel costs when needed to prevent the spread of coronavirus (i.e., when a program participant needs to isolate to keep from spreading the virus to household members).

This document is not comprehensive of all eligible activities and program requirements; rather, it specifies CoC determined minimum standards when using CoC, ESG, and/or ESG-CV funds. For further information on ESG-CV funding eligible activities and requirements, please see HUD's ESG-CV webpage.

### **ESG\***

#### ***Eligibility Criteria***

- Participants must meet the HUD definition of homelessness or at risk of becoming homeless
- Participants must have combined household income at or **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

#### ***Accessing Assistance***

- The Coordinated Entry System screens potential participants for prevention services or housing assistance needs. The Coordinated Entry System screening tools have been updated to prioritize people at severe risk of contracting coronavirus for shelter and housing.

#### ***Minimum Standard of Assistance***

- *Rental assistance of at least \$800 for one month*
- *Utility assistance is provided for a maximum of 3 months.*
- *Case management must occur at least once per month while participant is receiving prevention assistance.*

\*ESG funds may have additional flexibilities per CPD Waivers (see CARES website for summaries/updates) and/or based on ESG-CV Regulations. Please contact CARES or the grantee with questions

### **ESG-CV**

#### ***Eligibility Criteria***

- Participants must meet the HUD definition of homelessness or at risk of becoming homeless.
- ESG-CV funded participants must have combined income below 50% Area Median Income (AMI)
- Participant lacks identifiable financial resources and/or support networks
  - Examples:
    - DSS Emergency Assistance for Adults (EAA) or Emergency Assistance for Families (EAF) Approval/Denial Notification

- ERAP Approval/Denial Letter Notification
- Case note explaining effort made determine lack of resources (this includes, for example, applicants explaining their barriers in seeking out resources that put them at-risk of exposure to COVID-19)

### ***Accessing Assistance***

- The Coordinated Entry System screens potential participants for prevention services or housing assistance needs. The Coordinated Entry System screening tools have been updated to prioritize people at severe risk of contracting coronavirus for shelter and housing.
- Low-Barrier Assistance: Individuals and families experiencing homelessness may not be required to receive treatment or perform any other prerequisite activities as a condition for receiving services.

### ***Minimum Standard of Assistance***

- Up to six months of rental arrear payments
- No limit on on-going rental assistance, during the program period.
- No requirement for monthly case management
- Maximum of six months Utility Assistance
- No income requirement
- Agency not required to collect documentation for COVID-impact. Grantee establishes programs meet the criteria with HUD to one month's rent equivalent for security deposit & last month's rent to secure new housing
- Landlord incentive to obtain housing (i.e., agreed to before the tenant signs the lease): no more than 3 months' rent
- Agencies will ensure the following agreements are in place when approving for rental assistance, including rental arrears:
  - An oral or month-to-month rental agreement or fixed-term lease agreement between the tenant and the landlord (required)
  - A rental assistance or arrears payment agreement between the landlord and the homeless prevention agency (required)

### ***Homeless Prevention 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 populations. When utilizing ESG-CV funds, additional eligible activities include training, hazard pay, handwashing stations/portable bathrooms, and volunteer incentives. Please note, there are currently no CoC, ESG or ESG-CV outreach programs. Should any CoC, ESG or ESG-CV 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

### ***Accessing Assistance***

- The Coordinated Entry System screens participants for housing assistance needs. The Coordinated Entry System screening tools have been updated to prioritize people at severe risk of contracting coronavirus for shelter and housing.

### ***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.***

- Vaccine incentive for persons experiencing homelessness: no more than \$50 per dose, in alignment with ESG-CV regulations

### ***Outreach 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 include temporary shelter, case management, childcare, 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. When utilizing ESG-CV funds, additional eligible activities include training, hazard pay, volunteer incentives, and hotel/motel costs when needed to prevent the spread of coronavirus (i.e., when a program participant needs to isolate to keep from spreading the virus to other shelter guests; and to shelter homeless individuals and families where no appropriate emergency shelter is available).

### ***Eligibility Criteria***

- Participants must meet the HUD definition of homelessness

### ***Standard of Assistance***

- Provision of shelter, food, and personal care items
- Assistance in transitioning to permanent housing
- ESG/ESG-CV funded shelters should comply with the most up-to-date NYS OTDA guidance on safety and health precautions given the COVID 19 pandemic (please see: <https://otda.ny.gov/policy/directives/2021/>).
- ESG/ESG-CV funded shelters are strongly discouraged from implementing a maximum length of stay when a discharge will result in program participants returning to unsheltered settings or situations putting them at a higher risk of COVID-19 infection.

\* It is requested that any ESG-funded shelter considering closing or not accepting new residents immediately notify the local CoC and County Department(s) of Social Services.

### ***Accessing Assistance***

- The Coordinated Entry System screens participants for housing assistance needs. The Coordinated Entry System screening tools have been updated to prioritize people at severe risk of contracting coronavirus for shelter and housing.
- Low-Barrier Assistance: Individuals and families experiencing homelessness may not be required to receive treatment or perform any other prerequisite activities as a condition for receiving services (applies to ESG-CV projects only)

### **Emergency Shelter Performance Standards: Expected Outcomes**

- Reduce rates of homelessness
- At least 30% of households will exit to permanent housing destinations
- The median length of stay of less than 20 days

## TEMPORARY EMERGENCY SHELTER (ESG-CV Only)

Essential services of temporary emergency shelter include 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. Additional eligible activities include training, hazard pay, and volunteer incentives. As permitted by the CARES Act, ESG-CV funds may be used to pay for temporary emergency shelters for individuals and families experiencing homelessness in order to prevent, prepare for, and respond to coronavirus.

### ***Eligibility Criteria***

- Participants must meet the HUD definition of homelessness.

### ***Standard of Assistance***

- Provision of shelter, food, and personal care items.
- Assistance in transitioning to permanent housing.
- ESG/ESG-CV funded shelters should comply with the most up-to-date NYS OTDA guidance on safety and health precautions given the COVID 19 pandemic (please see: <https://otda.ny.gov/policy/directives/2021/>).
- ESG/ESG-CV funded shelters are strongly discouraged from implementing a maximum length of stay when a discharge will result in program participants returning to unsheltered settings or situations putting them at a higher risk of COVID-19 infection.
- ***Vaccine incentive for persons experiencing homelessness: no more than \$50 per dose, in alignment with ESG-CV regulations***

\* It is requested that any ESG-funded shelter considering closing or not accepting new residents immediately notify the local CoC and County Department(s) of Social Services.

### ***Accessing Assistance***

- The Coordinated Entry System screens participants for housing assistance needs. The Coordinated Entry System screening tools have been updated to prioritize people at severe risk of contracting coronavirus for shelter and housing.
- Low-Barrier Assistance: Individuals and families experiencing homelessness may not be required to receive treatment or perform any other prerequisite activities as a condition for receiving services.

## 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 (including ESG-CV). When utilizing ESG-CV funds, additional eligible activities include training, hazard pay, landlord incentives, volunteer incentives and hotel/motel costs when needed to prevent the spread of coronavirus (i.e., when a program participant needs to isolate to keep from spreading the virus to household members).

### ***ESG Eligibility Criteria\****

- Participants must meet the HUD definition of homelessness
- Participant lacks identifiable financial resources and/or support networks
- Participants must have combined income below 30% Area Median Income (AMI)

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

- Rental assistance with security deposit, 1st and last month's rent at \$800.00 each

### ***Accessing Assistance***

- The Coordinated Entry System screens potential participants for permanent housing assistance eligibility. The Coordinated Entry System screening tools have been updated to prioritize people at severe risk of contracting coronavirus for shelter and housing.

### ***ESG-CV Eligibility Criteria***

- Participants must meet the HUD definition of homelessness  
Exception: If the grantee has applied for and received the *Eligibility for Rapid-Rehousing Assistance* waiver under Notice CPD-21-05, households served may include individuals and families who are residing in housing and receiving time limited subsidies funded by another source and who met the definition of "homeless" prior to entering that housing and whose subsidy is within 30 days of expiring. See *Notice CPD-21-05* for more information.
- Participants lack identifiable financial resources and/or support networks

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

- Allowable assistance can be adjusted
- FMR is waived so long as the rent complies with HUD's standards of rent reasonableness
- Vaccine incentive for persons experiencing homelessness: no more than \$50 per dose, in alignment with ESG-CV regulations
- Landlord incentive: no more than 3 months' rent, in alignment with ESG-CV regulations
- No requirement for monthly contact

- Follow-up will occur at six months after discharge

### ***Accessing Assistance***

- The Coordinated Entry System screens potential participants for permanent housing assistance eligibility. The Coordinated Entry System screening tools have been updated to prioritize people at severe risk of contracting coronavirus for shelter and housing.
- Low Barrier Assistance: Individuals and families experiencing homelessness may not be required to receive treatment or perform any other prerequisite activities as a condition for receiving services.

### ***CoC\****

#### ***Eligibility Criteria***

- Participants must meet the HUD definition of homelessness
- Participants must have combined income below 30% Area Median Income (AMI)
- Participant lacks identifiable financial resources and/or support networks

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

- A set rental stipend of \$200 for three months with the possibility of a one-time three-month extension
- Up to \$300 for utility payments (arrear, deposit, or first month's rent)
- Rental assistance is provided for a maximum of 3 months (not including arrear payments)
- Assistance will not be adjusted over time
- Follow-up will occur at minimum monthly while participants are receiving assistance
- Follow-up will occur at six months after discharge

#### ***Accessing Assistance***

- The Coordinated Entry System screens potential participants for permanent housing assistance eligibility. The Coordinated Entry System screening tools have been updated to prioritize people at severe risk of contracting coronavirus for shelter and housing.

\*CoC funds may have additional flexibilities per CPD Waivers (see CARES website for summaries/updates). Please contact CARES or your HUD Field Office representative with any questions.

#### ***Rapid Rehousing System 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

## 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.

### CoC\*

#### ***Eligibility Criteria***

- Participants must meet the HUD definition of homelessness

#### ***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

#### ***Accessing Assistance***

- The Coordinated Entry System screens potential participants for housing assistance eligibility. The Coordinated Entry System screening tools have been updated to prioritize people at severe risk of contracting coronavirus for shelter and housing.

#### ***Transitional Housing Performance Standards: Expected Outcomes***

- 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 have income from employment

\*CoC funds may have additional flexibilities per CPD Waivers (see CARES website for summaries/updates). Please contact CARES or your HUD Field Office representative with any questions.

## 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. Please note, ESG-CV funds are eligible to pay for hotel/motel costs for guests in CoC-funded PSH when needed to prevent the spread of coronavirus (i.e., when a program participant needs to isolate to keep from spreading the virus to household members).

### CoC\*

#### ***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

#### ***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

#### ***Accessing Assistance***

- The Coordinated Entry System screens potential participants for permanent supportive housing assistance eligibility. The Coordinated Entry System screening tools have been updated to prioritize people at severe risk of contracting coronavirus for shelter and housing.

#### ***Permanent Supportive Housing Performance Standards: Expected Outcomes***

- 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 have income from sources other than employment
- 20% or more of adult participants will increase income from employment

\*CoC funds may have additional flexibilities per CPD Waivers (see CARES website for summaries/updates). Please contact CARES or your HUD Field Office representative with any questions.

## 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 who 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 an 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

### ***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.

### ***Accessing Assistance***

- The Coordinated Entry System screens participants for housing assistance needs

### ***Support Services Performance Standards: Expected Outcomes***

- 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 CoC is responsible for designating the HMIS lead who is responsible for the operation and administration of the HMIS.

### ***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

### ***HMIS Performance Standards: Expected Outcomes***

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

## MOVE ON STRATEGY FOR RECOGNITION OF TENANT INDEPENDENCE

The Dutchess County Continuum of Care (CoC), the CoC for Dutchess County has created a Move On Strategy to transition households in supportive housing (including Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH)) who no longer need intensive services to affordable housing. This strategy is broken into Phase I and Phase II, and sets out the actions the CoC will take to ensure the community has suitable long-term, affordable housing options for tenants ready to move on, and that tenants have the skills and are empowered to make this decision. The fundamental goal of the Move On Strategy is to promote the highest levels of independence and choice for tenants, as well as to create flow in supportive housing units to ensure these units are available for currently homeless families and individuals with disabilities who need housing combined with services. Promoting economic mobility and self-sufficiency, the Move On Strategy is first and foremost about celebrating growth, recovery and tenant success, and ensures all services are provided using strengths-based language and a recovery-focused model. Below details the CoC's process for identifying tenants who are eligible to move on; documentation needed to request ideal candidates for the strategy; and providing guidance for tenants on safety and security while prioritizing resources where they are most needed. The plan is based on a model Move On strategy discussed by the U.S. Department of Housing and Urban Development (HUD) and the Corporation for Supportive Housing. The CoC Steering Committee will be responsible for providing regular trainings, resources, relationship building, and outcome tracking to support implementation of and monitor the Moving On Strategy.

### **Recruiting Affordable Housing Providers**

The Move On Strategy targets existing tenants in supportive housing who are stable and require only minimal supportive services. These tenants are, with client choice, assisted to transition to a mainstream rent subsidy (typically the Housing Choice Voucher program) or an affordable housing unit, which frees up their subsidy for someone who is chronically homeless and needs the intensive services and long-term subsidies offered in supportive housing. The mainstream rent subsidy may include programs like Public Housing Authorities (PHAs), multifamily assisted housing owners, Low Income Tax Credit (LIHTC) developments, and local low-income housing programs. Phase I of the Move On Strategy is currently being implemented and includes recruiting local affordable housing providers to participate in the program, by setting preferences for tenants moving on from supportive housing. Phase II of the Move On Strategy will include advocating to New York State to incorporate a preference for individuals and families moving on from supportive housing units in the NYS Affordable Housing Corporation Plan.

### **Identifying Households for Moving On**

Housing providers identify households in supportive housing that may be ready to move on through ongoing case management with tenants. Specifically, program staff meet with tenants on an ongoing basis to establish tenant goals and set a plan towards meeting those goals, utilizing strengths-based language and a recovery-focused model. Program staff implement a client-choice model by ensuring tenants know there is a voluntary option to move on. Program staff ensure tenants interested in moving on (1) have demonstrated the ability to live stably and maintain housing, (2) ensure that tenants are aware of any opportunities for long term subsidized and/or affordable units such as LIHTC, any open wait lists for Housing Choice Vouchers, and (3) understand the decision to move on from supportive housing is voluntary. During Phase II of this strategy, a standardized assessment for moving on will be developed and implemented.

Program staff work with tenants to create a formal and comprehensive transition plan that identifies tenant strengths, living skills and the supports necessary to help them meet transition goals. Pre-transition plans

are individualized to meet the specific needs of each household. Some common resources or supports tenants often need and are connected to include employment supports, benefits counseling, activities of daily living skills, community living skills, and connection to community-based services. As households volunteer, housing providers make referrals to the PHA or other affordable housing providers.

### **Eligibility Considerations for Tenants**

Individuals are identified by housing provider program staff who work directly with clients in the housing programs. Clients should meet four basic criteria in order to be recommended to move on: 1) a good rental history of on-time payments, 2) evidence of “good neighbor” behavior without any complaints or property management conflicts, 3) supported progress of quantitative areas and 4) low service needs. Housing providers identify households in supportive housing who may be candidates for moving on by analyzing observations (interviews/survey’s, demonstrated ability to live stably and maintain housing or any other mitigating circumstances) combined with quantitative key areas for assessing tenant capacity, motivation, confidence and emotional readiness. These key quantitative areas include:

- Emotional independence (interest and confidence in moving on),
- Financial capacity (employment, income, savings, budgeting skills),
- Housing history (housing tenure, rent arrears, past evictions, neighbor/landlord relationships)
- Intensity of service use (need for on-site services),
- Health/behavioral health (substance use, mental health, medication management, treatment engagement, mobility),
- Connection to mainstream resources (rental supports if needed),
- Connection to family or other natural supports,
- Community living skills (self-managing behavior, limit setting relating to drugs, etc.),
- Activities of daily living skills (ability to get meals, keep apartment clean, follow lease), and
- Housing goals (location, size, affordability, live with family/friends).

### **Transition Services**

Housing providers are required to provide: assistance with locating and securing a housing unit; case management to support transition including but not limited to assistance building linkages to community supports and services, such as mental and physical health services, substance use treatment, stores for groceries and other necessities, recreational activities and public transportation options; and support with landlord negotiations. Services offered may also include providing funds to cover moving services, utility deposits/arrears and furniture/household items; and assistance with family reunification.

### **Aftercare Supports**

The CoC recommends housing providers offer voluntary aftercare services to individuals who have moved on for at least six months after their move-out, and track types of supports provided and outcomes of those supports. It is recommended housing providers provide a minimum of two check-ins per month that can be in-person, by phone or by email.

### **Creating a Culture of Moving On**

The CoC believes a programmatic reward/incentive structure for Moving On can assist in further promoting a culture of independence and self-sufficiency. The CoC will develop a variety of strategies to publicize and build interest in Moving On opportunities, including providing trainings on and working with providers to: post fliers in highly visible locations; host community meetings on Moving On; conducting one-on-one outreach to tenants; and encourage Moving On peers to talk about their experiences and engage tenants.

**Moving on Timing and Availability**

The CoC understands a Move On request may not be able to be satisfied immediately due to a variety of variables. However, the housing provider will act as quickly as possible with community partners to move a tenant into appropriate affordable housing.

**Ongoing CoC Assessment of Move On Strategy**

Once annually the CoC will assess the success of this Move On Strategy, reviewing number/percentage of persons who have moved on and rate of retention in affordable housing destinations. COC will also discuss strengths/weaknesses related to the strategy's recommendations for recruiting affordable housing providers, identifying households for moving on, eligibility considerations for tenants, transition services, aftercare supports, and creating a culture of moving on.

## EMERGENCY TRANSFER PLAN FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT OR STALKING

### **Emergency Transfers**

The Dutchess County Continuum of Care (DC CoC) is concerned about the safety of the tenants of the housing programs within its geographic area that are funded by CoC funds and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), CoC-funded programs providing permanent housing or transitional housing, except safe havens, must allow tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit.

The ability of a housing program to honor such a request for tenants currently receiving rental assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the housing provider has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer; the documentation needed to request an emergency transfer; confidentiality protections; and how an emergency transfer may occur. In addition, it provides guidance for tenants on safety and security. The plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the federal agency which ensures that CoC and the CoC funded providers within its geographic area in compliance with VAWA.

### **Eligibility for Emergency Transfers**

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L, is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit; or the tenant is a victim of a sexual assault, and the sexual assault occurred on the premises within the 90-day period preceding a request for an emergency transfer. A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

To request an emergency transfer, a tenant must notify the housing program's administrator or manager and submit a written request for a transfer to that individual. The tenant's written request for an emergency transfer should include either:

1. A statement expressing why the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains in the same dwelling unit assisted under the housing provider's program; or
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-day period preceding the tenant's request for an emergency transfer.

The housing program may request additional documentation from a tenant in accordance with the documentation policies of HUD's regulations at 24 CFR part 5, subpart L.

### **Confidentiality**

The housing program will keep confidential any information that the tenant submits in requesting an emergency transfer, unless the tenant gives the housing program written permission to release the information or disclosure of the information is required by law or in the course of an eviction or termination proceeding. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person or persons that committed the act or acts of domestic violence, dating violence, sexual assault, or stalking against the tenant.

### **Emergency Transfer Timing and Availability**

The housing program cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. However, the housing program will act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to the availability and safety of a unit. If the housing program does not expect to have another unit available within a reasonable period of time, it will contact other housing programs in the area to determine whether they have an available unit. If a unit is available, the tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant is being transferred.

### **Safety and Security of Tenants**

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe. The tenant is encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

## **ATTACHMENT 1**

### **LOCAL ORGANIZATIONS IN DUTCHESS COUNTY OFFERING SERVICES TO VICTIMS OF DOMESTIC VIOLENCE**

**Grace Smith House  
House of Hope  
Dutchess County Family Services**

#### **24-hour Violence Hotline - 845-471-3033 and we accept requests for help**

All calls are confidential. We provide information, crisis intervention, counseling, referral, and/or shelter. **The hotline is available to victims, friends, family, and other concerned individuals. Collect calls accepted.**

**Services are available to all victims and their dependent children regardless of a person's race, color, religion, national origin, sex, gender identity, orientation, age or disability.**

#### **Programs - All Services are Free and Confidential**

##### **Shelter**

The Domestic Violence Program can arrange emergency shelter which provides a safe place, food and supportive services for victims of domestic violence and their children.

##### **Legal Services**

Our staff can discuss legal options with you and assist you in obtaining Orders of Protection from the family or criminal courts. We can assist you with filing claims to the Crime Victims Board.

##### **Social Services**

You may be eligible for emergency funds from the Department of Social Services. Our staff will advocate on your behalf with the local department.

##### **Supportive Services/Counseling**

Our program provides supportive services and counseling for victims of domestic violence and their children.

##### **Educational Outreach**

The agency can provide in-service and informational trainings to school administrators, students, law enforcement, court personnel, civic groups, etc., on the dynamics of domestic violence, warning signs, healthy relationships and available resources. **All services are confidential and free of charge.**