

**HOMELESS CONTINUUM OF CARE OF STARK COUNTY**  
**Board Meeting**  
**Tuesday, January 9, 2017**  
**9:30 a.m. at Goodwill Campus**  
**Meeting Minutes**

**Members Present**

Cheli Curran  
Marty Chumney  
Shirene Starn-Tapryik  
Amanda Fletcher  
John Aller  
Beverly Lewis  
Lynne Dragomier  
Rollin Seward  
Kim Kroh  
Lt. Gabbard

**SHNI**

Marcie Bragg  
Melissa Terrell

**Conference Call**

Jean Van Ness

**Members Absent**

Cathy M ick-Jennings  
JoAnn Breedlove  
Maria Heege  
DeAnn Covey

**I. Welcome/Approval of Minutes**

At 9:35 a.m., John Aller, who assumed the role of board chair upon Kurt Williams's resignation, called the meeting to order and welcomed everyone.

John expressed that he will need to excuse himself during the meeting and Marcie will continue to chair the meeting for the remainder of the agenda items.

Marcie addressed the Board regarding the HCCSC Board meeting minutes for the months of November and December and asked that willing Board members edit the minutes and return them to her via email. Marcie suggested an approval of a summarized version of the detailed minutes that were presented to the board for the months of November and December.

**Motion:** Shirene made a motion; Kim seconded the motion, and it passed by a unanimous vote of all members present.

**II. Conflict of Interest Policy**

John reminded the Board of the conflict of interest policy. The Executive committee discussed providing a conflict of interest policy presentation to the HCCSC Board, and over the next several months, arrangements will be made for a local law firm to provide this presentation.

**III. Approval of Board Officers**

John explained that Coe policies delineate that the HCCSC Board has to approve the HCCSC Board Officers. According to the CoC Governance Charter, John will assume a position on the Executive committee as the past HCCSC Board Chair.

**Motion:** John requested a motion to approve the recommended Homeless Continuum of Care Stark County Board Officers; Marcie Bragg as Chair and JoAnn Breedlove as Secretary. Lynne made a motion; Shirene seconded the motion; and it passed by a unanimous vote of all members present.

#### IV. Review/Approval of 2018 ESG Priorities

The System Performance Committee recommended that the HCCSC Board forward the following priorities (in no particular order) for 2018 Emergency Solutions Grant funding to the City of Canton: shelter, homelessness prevention, and HMIS. In forming this recommendation, the committee considered the past three years of ESG funding awards, some performance data, and the relatively limited availability of funding for these project types (as compared to the other eligible project types, rapid re-housing and outreach). The ESG Request for Proposal (RFP) will be distributed to the public on January 10<sup>th</sup> 2018 and the RFP is due back to the City of Canton on January 26<sup>th</sup> 2018.

**Motion:** Marcie requested a motion to approve the recommended priorities for the 2018 Emergency Solutions Grant competition. Amanda made a motion. Beverly seconded it; and it was passed by an affirmative vote of all those present except for John and Cheli, both whom abstained.

John Aller departed the meeting.

Jennifer Keaton joined the meeting.

#### V. Review/Approval of Coordinated Entry Guide

The Coordinated Entry Guide was distributed to the Board prior to the HCCSC Board meeting. The Central Intake and Assessment (CIA) committee met on January 3<sup>rd</sup> to make final revisions to the guide.

Jean addressed the Board regarding correspondence between herself, Anthony Forte (HUD Regional Representative), Natalie McCleskey (CIA Co-Chair), and Scott Schnyders (CIA Co-Chair). The discussion was focused on how Stark County's CIA does not refer applicants to specific housing projects. Jean made a recommendation that provisions for monitoring projects (when pulling names from the priority list) be re-added to the policies. During the 2017 HUD competition, the Recipient Approval and Evaluation (RAE) committee reallocated funding from a supportive services project to CIA for additional personnel. The additional CIA personnel will assist in monitoring the priority list. Jean made the recommendation to add reviews in cases of apparent violation of admission rules. If the Collaborative Applicant finds that the project has not acted in accordance with CIA policies, it will take corrective action against the project and report the violation to the RAE committee for consideration in the scoring and ranking of the project for CoC or other grant funds. *(The Central Intake and Assessment committee and policies will be renamed the Coordinated Entry System (CES) committee and Coordinated Entry (CE) policies.)*

#### **Discussion:**

- Other CoCs' are completing an assessment, gathering documentation, and determining eligibility prior to sending referrals to projects based on the bed inventory. The Stark County CES is slightly different than other models, traditional models will not place applicants on the list until all documentation is received, our CES model assists those most vulnerable and we help applicants through the process of obtaining all the documentation needed for housing services .

#### **D.2 HCCSC Coordinated Entry Guide** *(See Appendix 1)*

When reviewing HUD' s guidance for Coordinated Entry, the following changes were made to section D.2 of the Coordinated Entry Guide:

- Language will be added to allow the Homeless Hotline, Collaborative Applicant, and Quality Assurance Workgroups to develop written rules to describe in more detail how the CES will interpret and apply Board-approved policies.

- The prioritization of participants for transfer within permanent supportive housing (PSH) will be removed. This information is outlined in the eligibility prioritization policies.
- The provisions that require a new SPDAT for PSH cases transferred between PSH units will be removed.
- The CES Evaluation Improvement section of the guide requires evaluations to be performed annually through feedback or focus groups from users of the HMIS system. The CIA committee has concluded that the Quality Assurance workgroup would hold three focus groups per year to receive feedback from HMIS users and identify areas for improvement of the CES.
- **Motion:** Jean made a motion to approve D.2 Coordinated Entry Guide with the understanding that (1) the provisions that were discussed to monitor, enforce rules, and to hold projects accountable for non-compliance are restored in the Coordinated Entry Guide and (2) the provision that the Homeless Navigation, Collaborative Applicant, and Quality Assurance workgroups have the authority to develop written rules to describe in more detail how the CES will interpret and apply Board-approved policies; Lynn seconded it; and the motion was passed by a unanimous vote of all members present.

### **D.3 HCCSC Policies Governing Eligibility and Prioritization to Receive COC Assistance and Standards for Administering Assistance** (See Appendix 2)

When reviewing HUD's guidance for Coordinated Entry, the following changes were made to D.3:

- Terminology
  - Before entering into the HMIS system, individuals are referred to as people or persons; people/persons that have been SPDAT assessed are referred to as applicants; once accepted into a project applicants will be referred to as participants.
  - System Diversion- will reference anyone that does not meet housing criteria and will be given resources for public housing.
  - Shelter Diversion- will reference persons that go to shelter to receive emergency solutions, but that do not meet eligibility for housing, and will be diverted to other public housing solutions.
    - CommQuest's SHAPE would be a shelter diversion program for those that do not qualify for housing.
- Section VII, the rule was eliminated for Rapid Re-housing (RRH) projects to serve lower ranked RRH applicants; RRH can no longer by-pass higher ranked applicants and RRH must serve those most vulnerable.
- Section VIII, language will state that those on the transfer list will be the highest priority for vacancies in housing.
- Basic income requirements will reflect that applicants must have below 60% area median income at the time they are admitted into the project.

**Motion:** Jean made a motion to approve and adopt as reflected in the draft for D.3 HCCSC Policies Governing Eligibility and Prioritization to Receive Coe Assistance and Standards for Administering Assistance. Amanda seconded it; and it was passed by a unanimous vote of all present.

### **D.4/F.4 Adherence to Approved Eligibility and Exclusionary Rules** (See Appendix 3)

When reviewing HUD's guidance for Coordinated Entry, the following changes were made to D.4/ F.4:

- The complaint procedures have been removed and replaced with a reference to the general complaint process outlined in CE guide.

**Motion:** Jean motioned to approve and adopt changes as reflected in the draft for the D.4/F.4 Adherence to Approved Eligibility and Exclusionary Rule. Beverly seconded it; and it was passed by a unanimous vote of all members present.

**D.5/F.5 Adherence to Housing First Principles and Terminating Participants** (See Appendix 4)

When reviewing HUD's guidance for Coordinated Entry, the following changes were made to D.5/F.5:

- The complaint procedures have been removed and with a reference of the general complaint process outlined in CE guide.

**Motion:** Jean made a motion to approve and adopt the changes as reflected in the draft for the D.5/ F.5 Adherence to Housing First Principles and Terminating Participants. Amanda seconded it; and it was passed by a unanimous vote of all members present.

**F.6/D.6 Fair Housing and Equal Access Standards** (See Appendix 5)

When reviewing HUD's guidance for Coordinated Entry, the following changes were made to F.6/ D.6:

- Equal Access Rule has been updated to reflect the Final Rule adopted by HUD.
- The complaint procedures have been removed and replaced with a reference of the general complaint process outlined in CE guide.

**Motion:** Jean made a motion to approve and adopt the changes as reflected in the draft for the F.6/ D.6 Fair Housing and Equal Access Standards. Lynne seconded it; and it was passed by a unanimous vote of all members present.

**D.8/ F.8 HCCSC Policies Governing Emergency Transfers for Victims of Domestic Violence** (See Appendix 6)

When reviewing HUD's guidance for Coordinated Entry, the following changes were made to D.8/ F.8:

- The policy will refer to the CE Guide policy for transfers.

**Motion:** Jean made a motion to approve and adopt the changes as reflected in the draft for the D.8/F.8 HCCSC Policies Governing Emergency Transfers for Victims of Domestic Violence. Kim seconded it; and it was passed by a unanimous vote of all members present.

**Discussion:**

- The Governance Charter needs to be updated to reflect the changes of HUD language. The Governance Charter is required to be brought before the HCCSC Members for approval.
- Marcie thanked Jean for the tremendous amount of work that she has done with the policies and for commuting back and forth for committee and Board meetings.

**VI. Review/Approval of Point in Time Count Methodology** (See Appendix 7)

The Point -In-Time (PIT) count is an annual HUD mandated count that takes place during the last week of January. This count is used to determine the extent of homelessness in our community. This information is submitted with the Continuum of Care grant to the U.S. Department of Housing and Urban Development (HUD). Stark County will use the following methods during the 2018 PIT count; service-based count, street count, and youth count.

**VII. Adstech Software Update**

HUD has new data collection requirements for the HMIS. Stark County's HMIS vendor, Adstech, has built a new version, Version 6, of the software. The conversion to the new Version 6 software began on December 27<sup>th</sup>. The system has been experiencing technical difficulties and is not currently available for users. The majority of the technical issues were centered on access or permission. Once all system issues have been addressed, Jennifer will contact agencies and users.

**VIII. Old Business**

N/A

**IX. New Business**

- a. The HCCSC will be welcoming two Junior Field Placement students from Malone College. Both students will be working with the Stark Housing Network, ICAN, and StarkMHAR. The focus for these students will be mainly towards PIT details and PIT data analysis. The students will be working across the three agencies until mid-April.
- b. The Domestic Violence (DV) shelter flooded and all project participants have been relocated to a new location. Participants may be able to return to the DV shelter by the end of the week, but may have to live in a construction zone for approximately two-three weeks. A Go Fund Me account has been established on the Domestic Violence Project, Inc.'s Facebook page.

**X. Adjournment**

With no further business to be discussed, at 11:20am Beverly motioned to adjourn the meeting.



## D.2.

### The Homeless Continuum of Care of Stark County's Coordinated Entry Guide

#### I. Overview of the HCCSC Coordinated Entry System

- A. Purpose. The policies and procedures in this Coordinated Entry Guide (the *CE Guide*) govern the operation of the coordinated entry system (CES) that the Homeless Continuum of Care of Stark County (HCCSC) has established to register, assess, and prioritize requests for shelter, housing, and supportive services made by people who are homeless or at risk of becoming homeless. The purposes of the CES are to ensure that Stark County:
1. Affirmatively markets and provides easy access to assistance for all people in the county who are experiencing housing crises;
  2. Assesses in a fair and consistent manner all requests for help in securing or stabilizing housing and follows uniform rules in prioritizing those requests; and
  3. Makes available to people the assistance that best suits their needs and preferences.
- B. Participation in the System and Use of this Guide. All homeless service providers in Stark County that are receiving Continuum of Care (CoC) or Emergency Solutions Grant (ESG) funds or funds from Ohio Development Services Agency (ODSA) programs, including the Homeless Crisis Response Program, are required to (1) participate in the CES described in the *CE Guide* and (2) follow the *CE Guide* and the HCCSC's *Policies Governing Eligibility and Prioritization to Receive Assistance and Standards for Administering Assistance (Eligibility and Prioritization Policies)* in prioritizing eligible persons for service. In addition, the Collaborative Applicant will make every effort to encourage other Stark County providers of housing and services for the homeless to participate in the CES and follow the policies and procedures established for its operation.
- C. Management of the Coordinated Entry System. The combined staff of the Homeless Navigation Hotline (the Hotline) and the Homeless Management Information System (HMIS) is responsible for operating the CES; prioritizing people for assistance based on their assessments and on the HCCSC's *Eligibility and Prioritization Policies*; maintaining one or more prioritization lists from which housing and homelessness prevention service projects must select people for assistance in the order of their ranking; and referring people to emergency shelter. Quality Assurance Workgroups help Hotline and HMIS staff ensure that the CES is working properly, and the HCCSC Board's Coordinated Entry Committee oversees the operations of the CES as a whole. The HCCSC Board must approve any changes to the *CE Guide*, the *Eligibility and Prioritization Policies*, and any other policies governing the CES. However, where existing policies lack necessary administrative details, HMIS and Hotline staff, working with the Collaborative Applicant and the Quality Assurance Workgroups, may develop written rules to describe in more detail how the CES will interpret and apply Board-approved policies.

#### D. Quality Assurance Workgroups.

1. Various Groups and Their Composition. Every provider participating in the CES must participate in each “Quality Assurance Workgroup” relevant to its projects. The workgroups are:
  - a. Supportive Housing (Transitional Housing (TH), Safe Haven (SH), and Permanent Supportive Housing (PSH) projects);
  - b. Prevention and Rapid Re-housing (RRH);
  - c. Emergency Shelters; and
  - d. Outreach Programs.
2. Workgroup Chairs. A representative of the Collaborative Applicant and the HMIS Program Manager will co-chair all of the workgroups
3. Frequency of Meetings. Each Quality Assurance Workgroup will meet as often as necessary to ensure the prompt resolution of any problems regarding referrals and admissions to the projects within their purview.
4. Scope of Work. It is the responsibility of the Quality Assurance Workgroups to determine whether CES policies and procedures are working fairly and effectively for the projects within their purview and for the people seeking help from those projects and to recommend improvements where needed. Among other things, the workgroups are expected to:
  - a. Provide feedback on the accuracy of the Hotline’s assessments of persons requesting assistance and on its prioritization of those persons and their project placements and recommend changes to improve the quality of the Hotline’s decisions in these areas;
  - b. Provide feedback on procedures governing intake, assessment, referral, and project admission and recommend changes where appropriate;
  - c. Provide feedback on policies governing eligibility for projects as well as on policies governing exclusion from and termination by projects and recommend changes where appropriate;
  - d. As requested by the Collaborative Applicant, consider complaints made to the Collaborative Applicant about exclusions, terminations, or discriminatory treatment by projects; and
  - e. Review the by-name list of persons at the top of the prioritization list for PSH and persons that have proven difficult to serve in order to develop housing solutions for those persons.

## II. **Access to the Coordinated Entry System Through the Hotline**

- A. Role of the Hotline – Overview. All persons seeking HCCSC help in responding to a housing crisis must contact the Hotline. Hotline staff will be responsible for:

1. Informing persons seeking help that the homeless system operates in accordance with policies and procedures that they can find on the HCCSC's website and that they have the right to file a complaint ("appeal") with the Collaborative Applicant if they believe they have been the victims of discrimination in the application of these policies and procedures;
  2. Screening people to determine:
    - a. Whether they are victims of domestic violence or veterans and, therefore, eligible for services from another system of care that they may wish to contact to maximize their options; and
    - b. Whether they have the resources to obtain shelter and housing without entering the homeless system;
  3. Diverting from the homeless system persons who do not meet the threshold criteria for eligibility to receive help from the system;
  4. Conducting a formal intake and assessment of those who cannot be diverted from the homeless system and prioritizing them for service;
  5. Obtaining consent from people entering the homeless system to store and share their personal information for purposes of assessing their needs and connecting them through the coordinated entry process (CEP) to appropriate shelter, housing, and services.
    - a. Verbal consent delivered over the phone is sufficient to constitute consent for these purposes as long as it is memorialized in writing by Hotline staff at the time it is received. However, any project that meets in person with a project participant or potential project participant must also obtain written consent signed by that person to store and share with others the personal data it collects as well as data it obtains from the CES.
    - b. Under no circumstances will CES services be denied to any persons who refuse to allow their data to be shared unless a federal statute requires collection, use, storage, and reporting of the persons' personally identifiable information as a condition of program participation.
- B. Marketing the Hotline. The HCCSC will take the following steps to market the Hotline to all eligible persons regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, or marital status:
1. Prominently publicize on its website the role of the Hotline in linking persons experiencing housing crises to housing and supportive services, both in English and in Spanish, along with contact information for the Hotline, including a phone number, e-mail address, and FAX number;
  2. Ensure that, at least once a year, information about the role of the Hotline and contact information for the Hotline is shared with all police departments and emergency services agencies in Stark County, with the 2-1-1 information and referral service covering the county, and with all schools,

hospitals, jails, city councils, county commissioners, township trustees, and mayors' offices in the county;

3. Identify organizations that serve individuals with language barriers that may prevent them from accessing information about the Hotline and ensure that, at least once a year, they receive information about the role of the Hotline and contact information for the Hotline; and
4. Identify organizations that target services to populations protected by fair housing and equal access laws and ensure that, at least once a year, they receive information about the role of the Hotline and contact information for the Hotline.

C. Access for Non-English Speakers and Others with Communication Challenges.

1. Initial Access by Phone, E-mail, or FAX. Anyone seeking help through the Hotline to solve a housing crisis must make initial contact with the Hotline by phone, e-mail, or FAX.
2. Identifying Need for Communication Assistance. Hotline staff must respond promptly to people contacting them for help and determine in all cases whether the persons requesting help require special assistance in communicating their needs and completing the Hotline's standardized assessment process.
3. Addressing Need for Communication Assistance. It is the responsibility of the Hotline staff to do the following to address the needs of individuals who cannot communicate effectively without special assistance:
  - a. Maintain a list of resources available to provide translation services or other communication services or devices to individuals who need help in communicating with Hotline staff;
  - b. Use those resources as appropriate to eliminate any barriers to communication with people contacting the Hotline; and
  - c. As much as possible, honor the preferences of the person requesting help in selecting the services or devices that will be used to eliminate communication barriers.

D. Access for People Encountered by Street Outreach Projects.

1. Responsibilities of Street Outreach Program Staff to Facilitate Access.
  - a. Responsibilities in General. Street outreach projects funded by CoC or ESG grants and other outreach programs cooperating with the HCCSC will encourage homeless people they encounter on the streets or in other places not meant for human habitation to register with the Hotline. In addition, outreach staff will facilitate registration by providing the homeless people they encounter with the means to contact the Hotline by phone, e-mail, or FAX and working with them to complete the CEP.

- b. Responsibilities When Homeless Person Declines to Contact the Hotline. When outreach staff cannot persuade a person living on the street or in another place not meant for human habitation to register with or undergo assessment by the Hotline, they will make every effort to collect basic information about the person (at least their name and date of birth) and share that information with Hotline staff so that staff can create an HMIS record of the person's episodes of homelessness. In addition, as long as the person remains on the street or in place not meant for human habitation, outreach staff will attempt to contact the person at least weekly and report those contacts to the Hotline.
- 2. Responsibilities of Hotline Staff. In dealing with homeless persons encountered by street outreach, the Hotline will follow the same policies and procedures it follows in dealing with other persons who make contact with the Hotline, using outreach staff as needed to facilitate completion of the CEP. In the case of homeless persons who decline to complete the CEP even with the help of outreach staff, as long as the Hotline has sufficient information to clearly identify those persons, it will preserve records of their homeless episodes as reported by outreach staff for at least three (3) years.
- E. Hotline Hours and Access to Emergency Services After Hours. The Hotline staff is on duty from 8:30 a.m. to 4:00 p.m., Monday through Friday. During hours when the staff is not on duty, calls to the Hotline will be answered by the staff of Crisis Intervention and Recovery Service (Crisis Intervention). Crisis Intervention staff will maintain current information about homeless outreach services, shelters, and other emergency services and share that information with callers experiencing an urgent housing crisis. For all persons attempting to contact the Hotline after hours, Crisis Intervention staff will collect names and contact information and share them with Hotline staff on the next day Hotline staff is on duty. It will be the responsibility of the Hotline to contact these persons for formal intake and assessment as soon as possible after it receives their names and contact information from Crisis Intervention.

### **III. The Coordinated Entry and Assessment Process**

- A. Screening for Presence of Domestic Violence and Human Trafficking. When people initially contact the Hotline for help, Hotline staff will ask whether they are fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and whether they are victims of human trafficking.
  - 1. Cases of Positive Screening for Domestic Violence. In cases where persons contacting the Hotline report that they are (1) fleeing domestic violence or stalking and are in imminent danger or (2) are experiencing homelessness to which domestic violence or stalking has been a contributing factor, Hotline staff will ask the callers their preferences and refer them, if they prefer, either to Domestic Violence Project, Inc. (with shelters in Canton and Massillon) or to the Alliance Area Domestic Violence Shelter, informing them that these organizations specialize in serving people with current safety concerns. If eligible persons are unwilling to contact a domestic violence project, the Hotline staff will proceed to conduct intake and assessment following the policies outlined below in Section III.C.3.
  - 2. Cases of Positive Screening for Human Trafficking. In cases where persons report that they are victims of human trafficking, Hotline staff will ask whether they wish to be referred to Domestic Violence Project, Inc. (with shelters in Canton and Massillon), informing them that this organization specializes in serving survivors of human trafficking. If eligible persons are unwilling to contact

Domestic Violence Project, Inc., the Hotline staff will proceed to conduct intake and assessment following the policies outlined below in Section III.C.3.

B. Screening for Diversion and Referral to Other Resources.

1. Diversion Due to Lack of Eligibility for HCCSC Services. Before conducting an intake on persons contacting the Hotline for help, Hotline staff will collect, at a minimum, their names, dates of birth, and the last four digits of their social security numbers, along with information gathered through a diversion questionnaire which is designed to determine whether the persons meet the threshold criteria for receiving assistance from the HCCSC's homeless programs. Persons only meet those criteria if:
  - a. They are homeless within the meaning of 24 CFR Section 578.3 or if they are at risk of homelessness and are potentially eligible for any of the prevention or shelter diversion programs that operate under the auspices of the HCCSC and participate in HMIS; and
  - b. They lack other resources or support networks to help them solve their immediate housing crisis.
2. Referral to Mainstream Programs and Resources. If an initial screening reveals that people seeking help from the HCCSC do not meet threshold eligibility criteria for HCCSC programs and services, Hotline staff will provide them with information about mainstream programs and resources they can contact for help. To that end, the Hotline will maintain and annually update a list of mainstream programs and resources in Stark County that could be useful to people experiencing problems of housing instability. In all cases in which callers are safely housed, the Hotline staff will urge them to stay where they are as long as possible and work independently with appropriate mainstream resources to stabilize their housing.

C. Formal Intake and Standardized Assessment of People Not Diverted from the HCCSC

1. Formal Intake – In General. If a person lacks alternatives to entering the homeless system, the Hotline staff will conduct a formal intake, collecting all the HUD-required universal data elements, program-specific elements, and other data required by federal regulations or HCCSC policies, and entering that data directly into HMIS.
2. Standardized Assessment – In General.
  - a. Assessment Tools. For all persons admitted to the homeless system through formal intake, the Hotline staff will conduct an assessment using the appropriate Service Prioritization and Assistance Decision Tool (SPDAT): the SPDAT for individuals, the Family SPDAT for persons presenting as a family or single household, or the Youth SPDAT.
  - b. Right to Refuse to Answer Assessment Questions. Persons undergoing assessment may refuse to answer any of the questions on the assessment without forfeiting their right to assistance from the HCCSC. However, if the failure to answer particular questions jeopardizes a person's

eligibility for certain types of housing or services available through the HCCSC, the individual administering the assessment must advise people refusing to answer those questions that, in the absence of an answer, they may not qualify for housing or services for which they could otherwise be eligible.

- c. Training to Administer Assessments. Any person who administers a SPDAT assessment must have received training within the previous 12 months from an instructor who has followed the protocols established by OrgCode Consulting, Inc., SPDAT's developer, to become qualified to train others to administer SPDATs. By the end of January of each year, the Collaborative Applicant will publish on the HCCSC's website the year's schedule of trainings that will satisfy this requirement.

### 3. Special Intake Protocols for Victims of Domestic Violence or Human Trafficking.

- a. People Not Admitted to Domestic Violence Projects. In cases where domestic violence projects cannot serve people who have contacted them for help, the projects will refer the people to or, in the case of people referred to the project by the Hotline, refer them back to the Hotline and work with the Hotline as necessary to facilitate their completion of the CEP.
- b. Participants in Domestic Violence Projects. For people referred by the Hotline and admitted to a domestic violence project who need additional homeless services, the domestic violence project will help them contact the Hotline and work with the Hotline as necessary to facilitate their completion of the CEP as soon as possible after they are admitted to the domestic violence project.
- c. Special Rules to Ensure Safety and Confidentiality.

In all cases where CES intake is conducted for persons reporting that they are victims of domestic violence or human trafficking, the following rules will apply:

- i. The Hotline staff will collect no more information about those persons than they are comfortable sharing and will make the accommodations necessary to preserve the safety of those persons and protect their identity and location from disclosure;
- ii. The Hotline staff will contact staff from domestic violence projects for advice in any instances in which they are unsure about the best course of action to take to keep victims of domestic violence or human trafficking safe; and
- iii. The effective date and time of the intake will be the date and time that the victims of domestic violence or human trafficking first contacted the Hotline even if, at the time of the initial contact, they declined to complete the CEP and opted instead to work exclusively with a domestic violence project.

#### 4. Special Intake Protocols for Veterans.

- a. Hotline Duties. As part of its initial screening of persons seeking assistance, the Hotline will determine whether those persons are veterans. If they are veterans, the Hotline will:
  - i. Give them contact information for the Veterans Service Commission of Stark County and the Veterans Administration's Community Resources and Referral Center in Akron and advise them to contact those agencies to find out what housing and services are available to them as veterans; and
  - ii. After conducting a full intake and assessment, notify the HCCSC's Veterans' Coordinator of the intake.
- b. Duties of Veterans' Coordinator. The HCCSC's Veterans' Coordinator will maintain a by-name list of all homeless veterans in Stark County and will coordinate efforts with the Veterans Service Commission and the Veterans Administration to:
  - i. Determine the eligibility of those on the list for special benefits and resources that are available to help veterans secure stable, affordable housing;
  - ii. Provide them with necessary assistance in accessing those special benefits and resources; and
  - iii. Maximize use of the special benefits and resources available to veterans and, if no such benefits and resources are available, other resources to house the veterans as quickly as possible.

#### **IV. Use of Central Prioritization Lists to Refer and Select Persons for Shelter, Housing, and Services**

- A. Hotline's Role in Maintaining Central Prioritization Lists. The Hotline will maintain central prioritization lists of persons awaiting shelter diversion services, prevention services, emergency shelter, and housing and assign places on the appropriate lists to persons registered for services in the order prescribed by HCCSC's *Eligibility and Prioritization Policies*.
- B. Prioritization List for Prevention Services. If, based on information collected during intake, the Hotline staff determines that someone is at risk of losing their housing within the next 21 days and is likely to meet other eligibility criteria for available prevention services, the Hotline staff will place the person on a prioritization list for prevention services. In filling vacancies for services, prevention projects will choose people from this prioritization list in the order of their rank on the list.
- C. Prioritization List for Pilot Shelter Diversion Project. If, based on information collected during intake, the Hotline staff determines that someone may be eligible for the shelter diversion pilot project launched by CommQuest in 2017, the staff will place the person on a shelter diversion list, discuss the pilot project with the person, and instruct the person to send income verification to the project to indicate an interest in enrolling in the project.

D. Prioritization for and Referrals to Emergency Shelters.

1. Referrals from the Hotline. All shelters will update their inventories of available beds as changes occur. Based on these inventories, the Hotline will refer eligible persons to available shelter beds when they register with the Hotline or, if no shelter beds are immediately available, place them on a shelter prioritization list from which they will be referred to shelters in the order in which they are ranked. Participating shelters will not accept referrals from any sources other than the Hotline except during hours when the CES is closed.
2. Referrals from Other Sources When the CES is Closed. The following rules apply when shelters accept referrals from sources other than the Hotline when the CES is closed:
  - a. Within 24 hours after the CES has reopened, a shelter must notify the Hotline of any person it accepted when the CES was closed and facilitate coordinated entry for that person.
  - b. No shelter may guarantee ongoing shelter to any person accepted from other sources during hours when the CES was closed.
3. Documentation by Shelter of Refusal to Admit or Retain Referred Client. In the event that a shelter refuses to admit a person referred to it or expels a client after admission, it must note the reasons for its action in the CES database.

E. Prioritization and Selection for Housing.

1. Creation of Prioritization Lists for Housing. For each category of housing available through the HCCSC, the Hotline will create a list of people awaiting housing that will be accessible online to participating housing projects. If, based on information gathered during intake, Hotline staff determines that someone is likely to be eligible for housing from one or more HCCSC projects, the staff will put the person on the appropriate housing prioritization list. Before doing so, however, Hotline staff will:
  - a. Advise the person to vigorously pursue other options if, based on their low SPDAT scores or other factors influencing their prioritization, they are not likely to receive a housing placement within one year; and
  - b. If the person hopes to qualify for permanent supportive housing (PSH), counsel that person to:
    - i. Download a verification of disability form (VOD) from the HCCSC's website or obtain a VOD from the Collaborative Applicant; and
    - ii. Identify a suitable licensed professional to complete and sign the VOD and fax it to the Hotline in accordance with directions that appear on that form.
2. Exclusive Use of Prioritization Lists by Projects to Select Participants. To the extent they can do so without violating applicable legal or funding restrictions, RRH, TH, SH, and PSH projects receiving Continuum of Care, Emergency Solutions Grant, or Ohio Development Services Agency funds as well as other cooperating projects must offer placement only to persons on the appropriate prioritization

list and only in the order in which they are ranked on that list. (Certain exceptions to this general rule are explained below in this guide and in HCCSC's *Eligibility and Prioritization Policies*.)

F. Duty of Housing Projects to Update the Hotline and the Prioritization Lists.

1. Informing the Hotline of Vacancies. When vacancies occur, housing projects must report them immediately to Hotline staff by secure means and inform the Hotline when the vacated housing unit will be available for occupancy.
2. Using the Prioritization Lists and Documenting Interactions with Prospective Participants.
  - a. Direct Access to the List for Providers. All housing projects will have direct access to the central prioritization lists and to relevant information regarding persons on those lists so they can identify the persons with highest priority for their projects and contact those persons when a vacancy occurs.
  - b. Documenting Activities with Clients. Projects will document in a manner prescribed by the Hotline their activities with any person on the central prioritization lists so the history of that person's interactions with participating projects is available to all other participating projects and to Hotline and HMIS staff. Activities to be documented include, but are not limited to, ongoing efforts by projects to find housing for a person; steps taken to evaluate a person for a current project vacancy, as further described in Section V.D. of this guide; and decisions to offer or deny a vacancy to a client.
  - c. Presenting People with One Housing Option at a Time. In cases where one provider ("the first provider") has documented either attempts to contact a person or interactions with a person in preparation for admitting that person to a project, other providers with an opening will move to the next available person on the prioritization list. If the first provider does not ultimately admit the person to its project, it will document the reason why and date and initial the explanation. Other projects are then free to contact the person about their next vacancy.

G. Consequences of Inability to Reach Person on the Prioritization List or Certify Eligibility for Housing

1. Bypassing Persons Awaiting Emergency Shelter Who Cannot be Reached. If, after using all available contact information to reach the most highly ranked person on the shelter prioritization list, the Hotline is unable to notify that person of a shelter vacancy, it will immediately offer the vacancy to the next person on the list.
2. Bypassing Persons Awaiting Housing Who Cannot be Reached or Certified as Eligible. If, within 5 business days after a vacancy occurs, a project has been unsuccessful in contacting or certifying the eligibility of a more highly ranked person or persuading that person to accept a placement despite diligent efforts, it may offer the vacancy to a lower-ranked person whose eligibility has been confirmed. "Diligent efforts" must be documented and must include, at a minimum, two attempts to use all available contact information and resources to notify the person next in line for a vacancy and make reasonable accommodations to enable that person to complete the certification process.

3. Consequences When Persons Cannot be Reached for Placement or Verification of Continuing Need for Help

- a. Consequences of Inability to Reach Persons for Program Placement. If, after making the efforts described in the two preceding paragraphs to contact the person who is next in line for placement, the Hotline or a project is unable to make contact, the person will be classified as “inactive,” and no further efforts will be made to notify that person when shelter beds or housing units become available. In such cases, projects will document inactive status in the manner prescribed by the Hotline.
- b. Consequences of Inability to Reach Persons to Verify Continuing Need. If, after being on a prioritization list for 4 months, people have not been contacted by a project for possible placement, the Hotline staff will try to contact them to verify their homeless status and confirm their ongoing need for HCCSC assistance. If the Hotline is unsuccessful in contacting them after 2 documented attempts extending over the course of at least 2 weeks and using all available contact information, it will reclassify the persons as “inactive.” By January 31, 2019, the HCCSC hopes to meet its goal of reducing the wait on prioritization list to no more than 60 days.
- c. Reactivation of People Removed from the Prioritization List.
  - i. If, within 6 months after being classified as inactive, people contact the Hotline to confirm their ongoing need for HCCSC assistance, the Hotline will return them to the appropriate prioritization lists, assigning them ranks based on an updated SPDAT score and on the date and time of the intake that resulted in their original placement on the list.
  - ii. If people contact the Hotline more than 6 months after they have been removed from the prioritization due to the inability of the Hotline or providers to contact them, they will be treated as new applicants for assistance.

H. Consequences of Refusing Referral or Placement.

1. Removal from the Prioritization List. During the CEP, people will have the opportunity to express their preference to be sheltered or housed in one or more areas of Stark County. In offering people shelter or housing, the Hotline and participating projects will honor expressed preferences to the best of their ability. However, people will be classified as “inactive” and removed from the prioritization list in the event they have refused two project placements.
2. Reactivation of People Removed from the Prioritization List. If, six months or more after being removed from the prioritization list pursuant to Section IV.H.1, people wish to be reinstated on the list, they may register with the Hotline and undergo intake and assessment in accordance with the procedures set out for new applicants.

I. Consequences of Failure to Appear at Shelter.

1. Unless they are working, people referred to a shelter by the Hotline must present themselves at the shelter on the day they are referred. If, however, they are working and, because of work, are unable

to get to the shelter on the day they are referred, they will maintain their right to a place at the shelter if they present themselves for admission no later than the following day.

2. A person's failure to appear at a shelter by the deadline identified above will constitute a refusal of service.

## V. Procedures for Admitting People to Projects

### A. Duty to Follow Eligibility Criteria and Other HCCSC Rules.

As reflected in the HCCSC's policy entitled *Adherence to Approved Eligibility and Exclusionary Rules*, in selecting people from a central prioritization list and admitting them to their projects, housing providers must comply with the eligibility criteria approved by the HCCSC for those projects. In addition, to the extent allowed by their funding sources, they must adhere to the system-wide eligibility criteria outlined in the HCCSC's *Eligibility and Prioritization Policies* and HCCSC's policies mandating adherence to Housing First principles and fair housing and equal access laws.

### B. Duty of Providers to Interview Prospective Project Participants and Collect and Upload Documents to Prove Their Eligibility.

Before admitting people to a project, project staff must meet them to conduct a personal interview and, as necessary, collect the documentation required to certify their eligibility for the project. Every project must follow the recordkeeping requirements specified in HCCSC Policy No. F-10. If, when verifying a person's eligibility for a project, project staff finds that the documentation necessary to confirm eligibility is not already uploaded in HMIS, project staff must upload the documentation to ensure its availability to all HMIS users.

### C. Corrections to Standardized Assessment and HMIS Data.

1. Corrections to HMIS Data. If, while certifying a person's eligibility for a project or at any other time, a housing, shelter, or service project learns that any information about the person that was entered in HMIS is incorrect, it will enter the correct information directly in HMIS and notify HMIS staff in writing within one working day.
2. Reassessment and Reprioritization. If, while certifying a person's eligibility for a project or at any other time, a housing, shelter, or service project learns that material information obtained during the person's original assessment has changed, the project will complete a new assessment in HMIS and notify HMIS staff in writing within one working day. In cases where the new information suggests that someone is ineligible for a type of project for which the person is being considered or that the person's need for housing assistance is much less or greater than previously supposed, Hotline staff will reassess the person's eligibility for housing interventions as well as his/her placement on the waiting list.

### D. Duty of Housing Projects to Report on Person Being Considered for Vacancies.

A housing provider must take the following steps when filling a vacancy:

1. Signify that a person is being considered for a vacancy by placing a “pending placement” notation on the applicable prioritization list;
  2. Notify the Hotline in writing within two working days after a vacancy is filled if the provider has bypassed the most highly ranked eligible person on the relevant prioritization list in favor of a person with a lower ranking; and
  3. Within two days after a vacancy is filled, update information in the prioritization list database to reflect its interactions with persons considered for the vacancy, indicating, among other things, why those persons were or were not offered the available unit. All entries should include the initials of the staff member entering the information, the name of his or her agency, and the date of the entries.
- E. Reviews in Cases of Apparent Violation of Admission Rules. If it comes to the attention of CES staff or other persons using the CES database that a housing project has bypassed a person whom the Hotline has identified as eligible for that project or that type of project and offered an available unit to a person to whom the Hotline has assigned a lower rank on the relevant prioritization list, they will report the matter to the Collaborative Applicant unless notations on the prioritization list indicate that the project tried to contact the bypassed person in the manner required by Section IV.G. of this *CE Guide* and was unsuccessful. In such cases, the Collaborative Applicant must verify that the housing project has acted consistently with CES policies. If the Collaborative Applicant finds that the project has not acted in accordance with these policies, it will take corrective action against the project and report the violation to the Recipient Approval and Evaluation Committee to ensure that the violation is considered in the scoring and ranking of the project for CoC and other grant funds.

## **VI. Procedures for Transferring Project Participants from one PSH Project to Another**

- A. Circumstances Justifying Transfers. Permanent supportive housing (PSH) project participants may request a transfer to another PSH unit when the participants no longer meet the eligibility criteria for the project that currently houses them or when their current housing unit no longer satisfies their needs. Appropriate reasons for granting a transfer include the following:
1. Circumstances in which the participants qualify for emergency transfers as victims of domestic violence under 24 CFR Part 5, Subpart L, or circumstances that justify the participants’ belief or their housing project’s belief that the participants’ continued residence in their current unit poses an imminent danger to the themselves or others;
  2. The existence of verified disabilities that cannot be reasonably accommodated in the participants’ current unit; and
  3. Changes in the size or composition of a participants’ household.
- B. Procedures for Effecting Transfers. The following procedures will be observed in effecting transfers, regardless of whether they are transfers within the same project, between housing projects operated by the same agency, or between projects operated by different agencies:

1. Any PSH project serving a participant who is seeking a transfer (the “transferring project”) to another PSH unit must:
  - a. Complete and submit to the Hotline a form in which it explains the participant’s reasons for requesting a transfer; outlines the steps it has taken to address the participant’s needs; and, if applicable, explains any reasons it has for objecting to the transfer; and
  - b. Except in cases where the participant qualifies for an emergency transfer due to domestic violence or imminent risk of other violence, complete a new assessment for the participant and upload it in HMIS.
2. The Hotline will review the transfer request with the current project, determine whether the transfer is justified by any of the reasons specified in Section VI.A., and, if justified, place the participant requesting the transfer at the top of the PSH prioritization in the priority specified in Section IX.B. of the *Eligibility and Prioritization Policies*.
- C. Effect of New SPDAT Score on Eligibility for Housing. Under no circumstances will a SPDAT score resulting from the re-administration of the SPDAT pursuant to Section VI.B.1.b. constitute cause for treating the client as no longer eligible for PSH.

## VII. Procedures for Appealing Coordinated Entry Actions or Decisions

- A. The Right to Appeal. Persons who have been adversely affected by a decision or action that violates the policies or procedures outlined in the *CE Guide* or in any other policies or procedures governing the CES may appeal the decision or action to the HCCSC’s Collaborative Applicant. “Other policies and procedures” include, but are not limited to:
  1. *Policies Governing Eligibility and Prioritization to Receive CoC Assistance and Standards for Administering Assistance, aka, HCCSC’s Eligibility and Prioritization Polices (Policy D.3);*
  2. *Adherence to Eligibility and Exclusionary Rules (Policy D.4/F.4);*
  3. *Adherence to Housing First Principles for Admitting and Terminating Participants (Policy D.5/F.5);*
  4. *Fair Housing and Equal Access Standards (Policy D.6/F.6).*
- B. How to File an Appeal. Persons may exercise the right to appeal the actions or decisions described in Section VII. A. by completing an HCCSC Complaint Form and following the instructions on that form to submit it to the Collaborative Applicant. The form may be found on the HCCSC’s website under *How to Get Help*.
- C. Procedures for Deciding Appeals
  1. Steps to be Taken by the Collaborative Applicant

- a. Within 5 working days after receiving a completed HCCSC Complaint Form, the Collaborative Applicant will contact the appellant to gather any additional information needed to help clarify the grounds for the appeal.
  - b. Within 7 working days after receiving a completed HCCSC Complaint Form, the Collaborative Applicant will contact the agency or agencies responsible for the decision or action being appealed and gather any information needed to clarify the reasons underlying the decision or action.
  - c. Within 10 working days after receiving a completed HCCSC Complaint Form, the Collaborative Applicant will prepare a written decision on the appeal and deliver it by mail, e-mail, or in person both to the appellant and to the agency against whom the appeal was filed. That written decision will explain the reasons underlying the conclusions reached, and, in the event that the decision is favorable to the appellant, the corrective action that will be taken to rectify any wrongdoing.
2. Postponement of Action by the Collaborative Applicant for Reconsideration by the Appellee Agency. In the event that an agency accused of wrongdoing has in place a process that people may use to resolve their complaints against the agency, appellants will be required to pursue that process first before the Collaborative Applicant will act on their appeals. However, in no event will the Collaborative Applicant postpone commencing its own review of an appeal longer than 15 working days following its receipt of a completed Complaint Form.
  3. Consultation by Collaborative Applicant with Quality Assurance Workgroups and Coordinated Entry Committee. As time permits and as the case warrants, the Collaborative Applicant will consult with appropriate Quality Assurance Workgroups and the Coordinated Entry Committee before making a final judgment on complaints, especially complaints that may reflect:
    - a. Misinterpretations or misapplications of CES policies and procedures;
    - b. The need for reconsideration or refinement of CES policies and procedures; or
    - c. The existence of a persistent problem with one or more participating projects.
  - D. Notice of Rule Violations to Recipient Approval and Evaluation Committee. If, when judging an appeal, the Collaborative Applicant determines that a project has violated HCCSC policies, it will notify the Recipient Approval and Evaluation Committee of the violations. As specified by Board-approved policies, that committee will take the violations into account in scoring and ranking the project for CoC funding and endorsing it for funding from other sources.

### **VIII. Coordinated Entry System Evaluation and Improvement**

- A. Quality Assurance Workgroups. As described more fully in Section I.D. of the *CE Guide*, CES and project staff will use Quality Assurance Workgroup meetings to analyze and propose improvements to the CES on an ongoing basis.

- B. Obtaining Feedback through Focus Groups. In the first quarter of each year, the HCCSC will also conduct focus groups to collect feedback on the CES from users of that system. Those focus groups will include at least three groups consisting of project participants who have experienced CES intake, assessment, or referral during the previous calendar year.
- C. Selection of Focus Group Members. Members of the project participant focus groups will include all those who respond affirmatively to an invitation to attend any of three sessions that will be held in different areas of the county at times and places that are likely to be convenient for a large number of those invited. Invitations will be sent to all individuals with an e-mail address who have experienced CES intake, assessment, or referral during the previous calendar year.
- D. Choice of Focus Group Leaders. All focus groups will be facilitated by one or more individuals chosen by the Collaborative Applicant. Those facilitators must be familiar with the CES but may not be employees of participating projects, project participants, or members of the CES staff.
- E. Development of Focus Group Questions. Working with the Coordinated Entry Committee, the Collaborative Applicant will develop lists of questions to be posed to the focus groups. In formulating these questions, the Collaborative Applicant and the committee will take pains to ensure that:
  - 1. The questions solicit sufficient information to enable them to evaluate the quality and effectiveness of each facet of the CES experience for all users of that system; and
  - 2. The questions provide opportunities for respondents to give their perspectives on how the system is functioning as a whole along with their suggestions for improving the system.
- F. Protecting the Source of Information and Opinions Gathered During Focus Groups. At the beginning of each focus group session, group leaders will inform those present that:
  - i. They intend to share information and opinions gathered during the session with individuals who are responsible for analyzing and improving the system; and
  - ii. To the best of their ability, they will protect the identity of the individuals whose information or opinions they share.

Members of project participant focus groups need not share their names if they prefer not to do so.

- G. Using Focus Group Feedback to Improve the System.
  - 1. Within two weeks after each focus group session, the session leaders will:
    - a. Summarize in writing and share with the Collaborative Applicant and the Coordinated Entry Committee the information and opinions they gathered during the focus group; and
    - b. In the same document, list any recommendations for changes to the CES that they conclude are warranted based on the information and opinions they have summarized.

2. Within three months after the Collaborative Applicant and the Coordinated Entry Committee have received the focus group leaders' recommendations, they must share the recommendations with the HCCSC Board and explain in writing what, if any, changes to the CES they will be proposing in response to these recommendations.

## **IX. Privacy and Security of Coordinated Entry Data**

All CES staff and all staff of participating projects who have access to CES data are subject to the same restrictions on their use of that data that apply to HMIS users. To ensure that, before they obtain access to CES data, CES and project staff understand the applicable privacy and security restrictions, they must undergo training delivered by experienced CES staff and sign a user agreement that outlines the restrictions and attests to the fact that they have received training on the proper care and handling of CES data.

## D.3

### Homeless Continuum of Care of Stark County Policies Governing Eligibility and Prioritization to Receive CoC Assistance and Standards for Administering Assistance

- I. **Purpose.** The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) requires the Homeless Continuum of Care of Stark County (HCCSC) to establish and consistently follow standards for providing Continuum of Care (CoC) assistance. These standards must include:
- A. Policies and procedures for evaluating individuals' and families' eligibility for CoC assistance;
  - B. Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
  - C. Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid re-housing assistance;
  - D. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid re-housing assistance; and
  - E. Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance.

Another document -- the HCCSC's *Coordinated Entry Guide (CE Guide)* -- outlines procedures for making requests for HCCSC assistance as well as the procedures that the Homeless Navigation Hotline (the Hotline) and HCCSC projects will follow in assessing and responding to those requests in a consistent manner.

This document defines various categories of homeless projects operated by agencies participating in HCCSC's coordinated entry system (CES), including all agencies receiving Continuum of Care or Emergency Solutions Grant funds as well as all agencies receiving funds from grant programs administered by the Ohio Development Services Agency, including the Homeless Crisis Response Program ("Participating Agencies"). In addition, this document outlines common eligibility criteria for each project category and policies that the HCCSC follows in prioritizing individuals and families for services in each project category.

**Note:** Transitional and permanent housing projects may adopt more restrictive eligibility criteria consistent with their respective missions to serve a particular homeless subpopulation if the projects address a need identified by the HCCSC and otherwise meet the requirements of 24 CFR Section 578.93(b) pertaining to housing for specific subpopulations.

In addition, projects may adopt more restrictive eligibility criteria if their funding sources impose limits or conditions on the clients they can serve. If mandated by their funding sources, projects may also adopt different service prioritization rules as long as they adhere to the prioritization policies established herein to the best of their ability. However, in all cases where projects adopt more restrictive eligibility criteria or service prioritization rules based on the requirements of their funding sources, those requirements

must be documented and approved by the HCCSC as prescribed in the HCCSC policy entitled *Adherence to Approved Eligibility and Exclusionary Rules*.

## II. Eligibility for System and Housing Diversion Assistance

### A. System Diversion Assistance.

1. Who Receives System Diversion Assistance. Hotline staff will inform people that they are ineligible for HCCSC projects and advise them to pursue other options if the information those people provide, either during pre-screening or during formal intake and assessment, reveals that:
  - a. They have other resources or support networks that they can use to solve their homeless crisis; or
  - b. They are not homeless within the meaning of 24 CFR Section 578.3 or at risk of homelessness and potentially eligible for any of the prevention or shelter diversion programs operating under the auspices of the HCCSC.
2. The Assistance Provided. The Hotline staff will explore other options with people not eligible for HCCSC projects and help them make well-informed decisions about which options they should pursue. To this end, the staff will maintain a list of mainstream resources available in the community to people experiencing housing instability.

- B. Housing Diversion Assistance. If, based on information and assessment gathered during formal intake and assessment, the Hotline staff concludes that people are eligible for shelter but do not meet minimum requirements for any of the HCCSC's housing projects, staff will inform those people that they are ineligible for HCCSC housing projects and advise that they will need to work with shelter staff to pursue other housing options.

## III. Eligibility and Prioritization for Homelessness Prevention Programs

- A. Independent Prevention Programs. Many organizations in Stark County offer funds to help individuals and families pay the arrears in rent and utilities that put them at risk of losing their housing. Since many of these programs are funded by private sources and operate independently of HCCSC, the Hotline is unaware in many instances of what programs have funding available and what criteria they use in determining eligibility for funding. However, the HCCSC will attempt to identify and will convene representatives of prevention programs at least once a year in an effort to:
1. Ensure that the Hotline staff is aware of the assistance these programs provide and the criteria they use in determining eligibility for this assistance so that they can refer eligible callers to the programs; and
  2. Encourage the programs to develop a well-coordinated system for preventing homelessness that uses a common set of criteria in determining eligibility for services.

B. Prevention Programs Receiving ESG or ODSA Funds.

1. Eligibility for Prevention. To be eligible for homelessness prevention services operated by Participating Agencies, individuals and families must:
  - a. Be residents of Stark County;
  - b. Have experienced an event or be undergoing a crisis which is expected to result in a housing loss within 21 days or less (e.g., an eviction; a foreclosure; a property condemnation; a sudden and significant loss of income; an exit from prison, foster care, or a health care institution; a sudden and significant increase in utility costs or rents);
  - c. Be at least 2 months behind in their rent or utilities;
  - d. Have an income at or below 30% of area median income (AMI);
  - e. Be ineligible for system diversion;
  - f. Need no more than \$1,500 in financial support over 4 months;
  - g. Have or reasonably expect to have a source of income to maintain their current housing or relocate to sustainable housing after financial assistance and services have ended; and
  - h. Score in one of the following ranges on the Service Prioritization and Decision Assistance Tool (SPDAT):<sup>1</sup>
    - i. No lower than 14 and no higher than 26 on the F-SPDAT for families; or
    - ii. No lower than 11 and no higher than 19 on the SPDAT for individuals.
2. Prioritization for Prevention. The following rules will be followed in prioritizing households for prevention services:
  - a. Prioritization of Families with Minor Children. Households with minor children will be prioritized for services before households without children.
  - b. Prioritization of Veterans. Households with veterans will be prioritized for services before households without veterans.
  - c. Prioritization Based on Acuity of Need. Within each household category (e.g., households with minor children, households with veterans, households without veterans or minor children), families and individuals with higher SPDAT scores will be prioritized for service before those with lower scores.

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<sup>1</sup> Effective January 20, 2015, HCCSC adopted SPDAT as its standardized assessment tool..

- d. Prioritization Based on Susceptibility to Homelessness. In cases where SPDAT scores are equal, prevention staff may determine which should be prioritized for service due to higher susceptibility to homelessness by considering such factors as history of evictions and numbers of previous homeless episodes.
3. Requirement to Exhaust Other Resources. Before providing prevention services to any household, prevention staff must determine whether they have exhausted other options available to them.
    - a. In the case of families with minor children, staff should determine whether they are eligible for services provided by the Department of Job and Family Services and, if they are, collaborate with DJFS to help families access those services.
    - b. In the case of households with veterans, staff should determine whether they qualify for emergency housing assistance from the Veterans Services Commission or any other source that provides special assistance to veterans.

#### **IV. Eligibility and Prioritization for CommQuest's Shelter Diversion Pilot Project**

- A. Eligibility for Shelter Diversion Pilot Project. To be eligible for the shelter diversion pilot project operated by CommQuest, individuals and families must:
  1. Be residents of Stark County;
  2. Be precariously housed currently;
  3. Have an income below 50% of the area median income (AMI);
  4. Have completed the Hotline's intake and assessment, requested emergency shelter, and been placed on the shelter diversion list;
  5. Have or expect to have a source of income to maintain their current housing or relocate to sustainable housing; and
  6. Score in one of the following ranges on the Service Prioritization and Decision Assistance Tool (SPDAT):
    - a. No lower than 30 and no higher than 39 on the F-SPDAT for families; or
    - b. No lower than 22 and no higher than 29 on the SPDAT for individuals.
- B. Access to the Shelter Diversion Pilot Project.
  1. Hotline staff will identify eligible individuals and families from the shelter diversion prioritization list.
  2. Hotline staff will inform the identified eligible individuals and families of the shelter diversion pilot project using a uniform description provided by CommQuest and instruct them to send income verification to CommQuest to indicate their commitment to enrolling.
  3. CommQuest staff will maintain a record of eligible individuals and families who send their income verification and only admit to the project eligible individuals and families from that record.

- C. Prioritization for Shelter Diversion Pilot Project. The following rules will be followed in prioritizing households who send income verification to CommQuest for shelter diversion pilot project services:
1. Families with Minor Children. Households with minor children will be prioritized for services before households without children.
  2. Veterans. Households with veterans will be prioritized for services before households without veterans.
  3. Acuity of Need. Within each household category (e.g., households with minor children, households with veterans, households without veterans or minor children), families and individuals with higher SPDAT scores will be prioritized for services before those with lower scores.
  4. Susceptibility to Homelessness. In cases where SPDAT scores are equal, shelter diversion pilot project staff may determine which should be prioritized for services due to higher susceptibility to homelessness by taking into account such factors as history of evictions, history of prevention assistance, history of emergency assistance, and numbers of previous homeless episodes.
- D. Inability to Locate Appropriate New Housing for Shelter Diversion Pilot Project Clients with Higher Priority Who Must Relocate to Sustainable Housing. Although the shelter diversion pilot project must make a diligent effort to serve clients in the order of priority outlined in this section, in cases where Services for Those Ineligible for HCCSC Projects. The Hotline staff will explore other options with people not eligible for HCCSC services and help them make well-informed decisions about which options they should pursue. To this end, the staff will maintain a list of programs and services available in the community to help individuals and families experiencing a housing crisis who do not qualify for assistance from the HCCSC and will make those individuals and families aware of services that may meet their needs. clients must relocate to new sustainable housing, the project may deviate from that order when housing becomes available that does not meet the needs of households with higher priority but does meet the needs of those with lower priority.
- E. Requirement to Exhaust Other Resources. Before providing shelter diversion pilot project services to any household, shelter diversion pilot project staff must determine whether they have exhausted other options available to them.
1. In the case of families with minor children, staff should determine whether they are eligible for services provided by the Department of Job and Family Services and, if they are, collaborate with DJFS to help families access those services.
  2. In the case of households with veterans, staff should determine whether they qualify for emergency housing assistance from the Veterans Service Commission or any other source that provides special assistance to veterans.

## **V. Eligibility and Prioritization for Emergency Shelter**

- A. Definition of Emergency Shelter. An “emergency shelter” is any facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless in general or for a specific population of homeless persons. On average, stays in emergency shelters should be no more than 90 days.

- B. Eligibility for Shelter. To be eligible for emergency shelter offered by Participating Agencies, individuals and families must:
1. Be present in Stark County when requesting shelter; and
  2. Lack other nighttime shelter meant for human habitation, apart from a motel or hotel room paid for by a charitable organization or by a federal, state, or local government program for low-income individuals.
- C. Permissible Reasons for Excluding or Expelling People from Shelter. Shelters may deny admission or terminate service to people for the following reasons only:
1. Because they need medical services that the shelter is not equipped to provide;
  2. Because they exhibit violent or aggressive behavior that suggests that they may be a danger to others;
  3. Because they exhibit behavior that suggests that they may be a danger to themselves;
  4. Because they have brought illegal drugs or alcohol onto the premises;
  5. Because they have violated fire or other safety rules; or
  6. Because they have failed to appear at a shelter to which they have been referred in accordance with the requirements of Section IV.I. of the *CE Guide* or have failed to make use of a shelter bed or unit assigned to them.
- D. Ten-Day Time-out Rule. In the event that it declines to admit or expels a person for permissible reasons, a shelter may exercise its discretion to refuse to admit or readmit that person for ten days. Longer periods of exclusion must be justified by compelling facts and circumstances.
- E. Impermissible Reasons for Denying or Terminating Service. Shelters may not deny or terminate services for any of the following reasons:
1. Because a person lacks ID, income, or employment;
  2. Because a person was previously expelled from the shelter – unless the refusal to accept the person conforms to a system-wide rule allowing certain waiting periods before such returns; or
  3. Any reason that violates the Fair Housing and Equal Access Rules adopted by the HCCSC. (See policy entitled *Fair Housing and Equal Access Standards*.)
- F. Prioritization for Shelter. In the event there is a waiting list for shelter, the following rules will apply:
1. Chronically Homeless. Chronically homeless individuals and families will be prioritized for shelter before those who are not chronically homeless.

2. Families with Minor Children. Families with minor children will be prioritized for available units at all family shelters.
3. Acuity of Need. Among the chronically homeless as well as among those who are not chronically homeless, individuals and families receiving the highest SPDAT score will be served first.
4. Veterans. Households with veterans will be served before households with equal acuity of need.

## **VI. Types of Housing Projects and Common Eligibility Criteria**

- A. Categories of Available Housing Projects. Eligible households may access the following types of housing projects through HCCSC's coordinated entry system:
  1. Rapid Re-housing (RRH). Rapid re-housing projects help homeless families and individuals locate and secure appropriate rental housing in the community; help in paying move-in costs, deposits, and rental and utility expenses for a limited period; and provide case management and other services designed to address issues that may prevent clients from achieving sufficient independence to maintain housing after RRH assistance ends.
  2. Transitional Housing (TH). Transitional housing projects provide homeless individuals and families with rent-subsidized housing either in the community or in properties leased to or owned by the agency operating the program, typically for no more than 12 months but up to a maximum of 24 months. Designed for clients who need more intensive, longer-term support than those who are appropriate for RRH, TH also provides case management and other services, either directly or through referral, that are designed to prepare clients for independent living after their eligibility for TH expires.
  3. Permanent Supportive Housing (PSH). Permanent supportive housing projects are designed to serve only homeless persons with long-term disabilities that substantially impede their ability to live independently. They provide community-based housing and the supportive services necessary to maintain disabled persons in that housing without limit on their length of stay.
- B. Common Eligibility Criteria for Admission to All Housing Projects.
  1. Presence in Stark County: To gain admission to any of the housing projects operated by Participating Agencies, individuals and families must have resided in Stark County for at least 60 days.
  2. "Literally Homeless" or Fleeing Domestic Violence.
    - a. With the exception of TH projects, housing projects operated by Participating Agencies may serve only persons who are either:

- i. “Literally homeless”;<sup>2</sup> or
  - ii. Fleeing or attempting to flee domestic violence, dating violence, sexual assault or stalking and have no other residence and no resources or support networks they can use to obtain permanent housing.
- b. In addition to serving persons who are literally homeless or who are fleeing or attempting to flee domestic violence, TH projects may also serve young adults (ages 18 through 24) who are at imminent risk of homelessness<sup>3</sup> and who otherwise qualify for TH. However, in no circumstances, may young adults at risk of homelessness be prioritized for TH housing over other individuals who are literally homeless or fleeing domestic violence.
3. Income. Individuals and families must have incomes below 60% of the area median income (AMI) at the time they are admitted to a housing project.
  4. Age. Individuals must be at least 18 years old, and families must be headed by at least one individual who is at least 18 years old.
  5. ID Number. Prospective participants must provide their social security number or alien identification number.

## **VII. Additional Eligibility Criteria and Prioritization Rules for Rapid Re-housing**

- A. Eligibility for RRH. To be eligible for RRH projects operated by Participating Agencies, individuals and families must be literally homeless. In addition, they must be meet the following criteria:
  1. Individuals must score no lower than 20 and no higher than 34 on the SPDAT; and
  2. Families must score no lower than 27 and no higher than 53 on the F-SPDAT.
- B. Prioritization for RRH. In the event there is a waiting list for RRH, the following rules will apply:

<sup>2</sup> For purposes of these policies, “literally homeless” means meeting the criteria outlined in the first paragraph of the definition of “homeless” set forth in 24 CFR section 578.3. Thus, to be “literally homeless,” an individual or family must lack a fixed, regular, and adequate nighttime residence, including:

- i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- ii. An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local programs for low-income individuals); or
- iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

<sup>3</sup> In accordance with 24 CFR section 578.3, an individual or family is at imminent risk of homelessness if:

- i. They will lose their residence within 14 days of the application for homeless assistance;
- ii. They have identified no subsequent residence; and
- iii. They lack the resources and support networks needed to obtain other permanent housing.

1. Households with Minor Children. To achieve the goal of re-housing all families with minor children within 30 days after they become homeless, all such households will be prioritized for RRH before all other households.
2. Chronically Homeless. Among both households with minor children and other households, chronically homeless individuals and families will be prioritized for RRH before those who are not chronically homeless.
3. Acuity of Need. Among both the chronically homeless and those who are not chronically homeless, households with higher SPDAT scores will be prioritized for RRH before those with lower scores.
4. Veterans. Among households with equal SPDAT scores, households with veterans will be prioritized for RRH before households without veterans.
5. Date and Time of Intake. Among households with equal SPDAT scores without either veterans or minor children, priority will be given to the household that has been waiting longest for housing, as determined by date and time of intake into HCCSC.

C. Re-Scoring Persons Who Seem Unlikely to Succeed in RRH.

1. If, in processing people for intake into an RRH project, project staff determines that it is highly unlikely that they will succeed in RRH, staff should re-administer the SPDAT assessment to determine whether they are eligible for PSH. Reasons for re-administering the SPDAT include the following:
  - a. Evidence that persons have been chronically homeless or homeless repeatedly and for significant periods of time; and
  - b. Evidence that persons are suffering from one or more disabilities that have prevented them and will prevent them in the future from securing the income necessary to sustain housing.
2. If people score within the SPDAT range for RRH but have already received the maximum amount of assistance available from RRH projects, staff at the shelter serving the people or, if the people are unsheltered, staff at the Hotline will re-administer the SPDAT to determine whether they qualify for PSH.
3. If, upon re-administration of the SPDAT under the circumstance described in subsections VII.D.1 or VII.D.2 above, people continue to fall within the range of scores that make them eligible for RRH rather than PSH, the staff that has re-administered the SPDAT must bring their cases to the Quality Assurance Workgroup for case conferencing.

**VIII. Additional Eligibility Criteria and Prioritization Rules for Transitional Housing**

- A. Eligibility for TH. To be eligible for TH projects operated by Participating Agencies, individuals and families must satisfy both of the following criteria relating to SPDAT scores and income:

1. Standardized Assessment Scores

- a. Individuals must score above 34 on the SPDAT; and
- b. Families must score above 53 on the F-SPDAT.

2. Income Minimum/Maximum. Individuals and families must have incomes at or below 50% of AMI.

- B. Prioritization for TH. In the event there is a waiting list for TH, the Hotline and HCCSC projects will give priority to individuals and families who qualify as chronically homeless. Among those who qualify as chronically homeless as well as those who do not qualify as chronically homeless, priority will be given to those with the greatest acuity of need as measured by SPDAT. Among those with equal acuity of need, priority will be based on the date and time of intake, with those who have been waiting longer receiving higher priority.

**IX. Additional Eligibility Criteria and Prioritization Rules for Permanent Supportive Housing**

- A. Eligibility for PSH. To be eligible for PSH projects operated by Participating Agencies, individuals and families must satisfy the following criteria relating to standardized assessment scores and disability:

1. Standardized Assessment Scores.

- a. Individuals must score above 34 on the SPDAT; and
- b. Families must score above 53 on the F-SPDAT.

2. Disability. Only individuals with disabilities and families in which at least one adult has a disability are eligible for PSH projects operated by Participating Agencies.<sup>4</sup>

- B. Prioritization of Participants Transferring Between PSH Units. Current PSH project participants whose requests for transfers to another PSH unit have been approved for any of the reasons outlined in the Section VI.A. of the HCCSC's *CE Guide* will be prioritized for PSH vacancies before all other persons awaiting PSH. Current PSH participants awaiting transfers will be prioritized in the following order:

- 1. First priority will be given to victims of domestic violence who are eligible for emergency transfers;
- 2. Second priority will be given to other individuals whose residence in their current units poses an imminent danger to themselves or others;
- 3. Third priority will be given to those with disabilities that cannot be accommodated in their current units; and
- 4. Fourth priority will be given to those whose transfers are warranted by a change in the size or composition of their households.

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<sup>4</sup>For purposed of this section, the definition of "disability" is the same as that outlined in 24 CFR 582.5.

## C. Prioritization of Prospective PSH Participants

### 1. Order of Priority for PSH Beds Dedicated to or Prioritized for Occupancy by Clients Experiencing Chronic Homelessness

Following the recommendations outlined in HUD’s Notice CPD-16-11, the Hotline and HCCSC projects will observe the following rules in prioritizing individuals and families for vacancies in PSH beds dedicated to or prioritized for occupancy by persons experiencing chronic homelessness:

- a. First Priority – Chronically Homeless Individuals and Families with the Longest History of Homelessness and with Severe Service Needs. Highest priority will be given to chronically homeless individuals or heads of household (in the case of families), as defined in 24 CFR 578.3,<sup>5</sup> for whom both of the following are true:
  - i. The chronically homeless individuals or heads of household have been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least 4 separate occasions in the last 3 years, where the cumulative total length of the 4 occasions equals at least 12 months; and
  - ii. The individuals or heads of household have been identified as having “severe service needs” that are identified and verified by standardized assessment.<sup>6</sup>

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<sup>5</sup> 24 CFR 578.3 defines “chronically homeless” as:

- 1) An individual who:
  - i. Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
  - ii. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and
  - iii. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;
- 2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all the criteria in paragraph 1 of this definition before entering that facility; or
- 3) A family with an adult head of household (if there is no adult in the family, a minor head of household) who meets all the criteria in paragraph 1 of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

<sup>6</sup> For purposes of CPD-16-11, a person with severe service needs is one for whom at least one of the following is true: (1) History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or (2) Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support to maintain permanent housing. The notice goes on to say that, for youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living conditions may constitute severe service needs.

The notice further specifies that severe services needs should be “identified and verified through data-driven methods such as an administrative data match or by using a standardized assessment tool and process and should be documented in a program participant’s case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individu

- b. Second Priority – Chronically Homeless Individuals and Families with the Longest History of Homelessness. Second highest priority will be given to chronically homeless individuals or heads of household (in the case of families), as defined in 24 CFR 578.3, for whom both of the following are true:
    - i. The chronically homeless individuals or heads of household have been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least 4 separate occasions in the last 3 years, where the cumulative total length of the 4 occasions equals at least 12 months; and
    - ii. The individuals or heads of household, though meeting all the criteria of paragraph 1 of the definition of “chronically homeless,” have not been identified as having severe service needs.
  - c. Third Priority – Other Eligible Individuals and Families. Where there are no chronically homeless individuals and families within Stark County, HCCSC will follow the order of priority outlined in Section IX.C.2 below, in assigning eligible, but not chronically homeless, individuals and families, to beds dedicated or prioritized for the chronically homeless.
2. Order of Priority for PSH Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness and for Dedicated and Prioritized Beds When Chronically Homeless Persons Cannot be Identified for Those Beds

Following the recommendations outlined in HUD’s Notice CPD-16-11, the Hotline and HCCSC providers will observe the following rules in prioritizing individuals and families for vacancies in PSH beds not dedicated to or prioritized for occupancy by the chronically homeless and in PSH beds that have been dedicated to or prioritized for the chronically homeless when no chronically homeless individuals or families can be identified to occupy those beds:

- a. First Priority - Homeless Individuals and Families with a Disability and with Long Periods of Episodic Homelessness and Severe Service Needs. The highest priority will be given to homeless individuals or heads of household (in the case of families), as defined in 24 CFR 578.3, who are eligible for CoC Program-funded PSH for whom both the following are true:
  - i. The homeless individual or head of household has been literally homeless on fewer than 4 separate documented occasions in the last 3 years, where the total length of those separate occasions equals is at least 12 months; **and**
  - ii. The homeless individual or head of household has been identified as having severe service needs.
- b. Second Priority – Homeless Individuals and Families with a Disability and Severe Service Needs. Second priority will be given to homeless individuals or heads of household (in the case families), as defined in 24 CFR 578.3, who are eligible for CoC Program-funded PSH and who have severe service needs. In the case of individuals or heads of household with equally severe service needs, those with the longest cumulative length of documented homelessness during the last 3 years will receive priority.

- c. Third Priority – Homeless Individuals and Families with a Disability Without Severe Service Needs. Third priority will be given to individuals and heads of households (in the case of families) who are eligible for CoC Program-funded PSH but who have not been identified as having severe service needs. In the case of individuals or heads of household in this category, those with a higher SPDAT score will be prioritized before those with a lower score. Where scores are equal, those with the longest cumulative length of documented homelessness during the last 3 years will receive priority.
- d. Fourth Priority – Homeless Individuals and Families with a Disability Coming from Transitional Housing. Fourth priority will be given to individuals and heads of households (in the case of families) who are:
  - i. Eligible for CoC Program-funded PSH and currently residing in a transitional housing project, where, before residing in the transitional housing, they had lived in a place not meant for human habitation, in an emergency shelter, or in a safe have; or
  - ii. Eligible for CoC Program-funded PSH and currently residing in a transitional housing project if they were fleeing or attempting to flee domestic violence before residing in the transitional housing even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven before entering the transitional housing.

## **X. Acceptable Deviations from Prescribed Priorities**

- A. Projects Targeting Specific Populations. In serving people, projects must follow the orders of priority specified in Sections II-IX of these policies while also taking into consideration their own specific goals and any identified target populations they are intended to serve. For example, a PSH project that is permitted to target homeless persons with a serious mental illness should follow the order of priority prescribed for PSH projects in selecting for service those people on the PSH prioritization list who have a serious mental illness.
- B. Projects with Funding Sources that Establish Different Rules for Prioritization. Projects that have funding sources that require them to follow different rules for prioritizing services to people are expected to follow the appropriate order of priority specified in Sections II-IX of these policies to the best of their ability without jeopardizing their funding.
- C. Inability to Locate or Engage Persons with Higher Priority. Both the Hotline, in making referrals to emergency shelter, and projects, in selecting people from the central prioritization lists, must exercise due diligence to ensure that persons are served in the order of priority outlined in Sections II-IX of these policies. However, projects are not required to keep beds or units vacant and available to persons who meet a higher priority if those persons cannot be contacted, certified as eligible for the project, or persuaded to accept the beds or units offered to them within the time specified in Section IV of HCCSC's *Coordinated Entry Guide*.

## **XI. Standards for Administering Assistance**

- A. Requirement for Lease or Occupancy Agreement. All CoC-funded housing programs must require a lease or occupancy agreement with tenants that must be at least one month (TH) or one year (RRH and PSH) in duration. The lease agreement must observe Fair Housing Act regulations.
- B. Tenant Rent Portion for TH and PSH. TH and PSH project participants must pay rent in the amount dictated by the funding source(s) of their housing projects. In the absence of any more restrictive rules imposed by those funding sources, participants must pay rent equal to the highest of 30% of their monthly, adjusted income or 10% of their monthly gross income or the portion of the family's welfare assistance, if any, designated for the payment of rent (including utilities). If participants have zero income, they are not required to pay rent, but, in that event, the housing project staff or its supportive services partner staff is expected to work with the participants to secure income (either earned or unearned) as soon as possible.
- C. Rules Regarding Nature, Amount, and Duration of Assistance in Rapid Re-Housing. The following rules govern the nature, amount, and duration of financial assistance and other services available to households participating in RRH programs:
1. As necessary to secure housing for participants, RRH projects will pay their first month's rent and security deposit;
  2. RRH projects will provide rental assistance and security deposits only for housing that:
    - a. Meets reasonable rent standards as determined by HUD regulations;
    - b. Meets HUD's Housing Quality Standards (in the case of CoC-funded housing) or "habitability standards" (in the case of ESG-funded housing); and
    - c. Is made available to a participant through a lease agreement between the participant and the landlord that permits occupancy for at least one year, subject only to early termination for cause.
  3. Households must pay a minimum of 30% of their monthly, adjusted income toward their rent;
  4. Participants must re-certify their income at least every 90 days, and, if their income changes, they will receive a 30-day notice before the financial assistance they receive is reduced or terminated;
  5. If RRH participants have no income and are unable to contribute to their rent, they will receive rental assistance in declining amounts over the course of their participation in the program as outlined below:
    - a. Rental assistance sufficient to cover 100% of their rent and utilities during their first 90 days in the program;

- b. Rental assistance sufficient to cover 75% of their rent and utilities during their second 90 days in the program and, under extenuating circumstance, rental assistance of the same amount for an additional 90 days;
  - c. Rental assistance sufficient to cover 50% of their rent and utilities during their third 90 days in the program; and
  - d. Rental assistance sufficient to cover 25% of their rent and utilities during their fourth 90 days in the program.
- 6. Households will receive rental assistance for no more than 12 months, except in the extenuating circumstances referred to above, in Section XI.C.5.b.
  - 7. RRH projects will provide case management services to participants, which must include help in developing a realistic plan for weaning the participants from rental assistance within 12 months. In addition, RRH case managers must meet with participants at least monthly to evaluate their progress in executing their plan and to provide additional assistance, as needed. If they choose, households may continue to receive case management services through RRH projects for an additional 90 days after they have secured income sufficient to cover 100% of their rent and utilities and ceased to receive financial assistance.
  - 8. Households may not receive additional assistance from an RRH project for at least 12 months after exiting that or another RRH project.
  - 9. Households may not receive assistance from an RRH project for more than 24 months over a period of 5 years.
- D. Occupancy Charges in Leasing Programs. Participants in leasing programs may be charged an occupancy charge up to 30% of their monthly adjusted income or 10% of their monthly gross income or the portion of the family's welfare assistance, if any, designated for the payment of the rent (including utilities), whichever is the greatest.

## D.4/F.4

### Adherence to Approved Eligibility and Exclusionary Rules

#### I. Duty to Adhere to Common and Project-Specific Eligibility Rules

- A. As reflected in the HCCSC's *Policies Governing Eligibility and Prioritization to Receive CoC Assistance and Standards for Administering Assistance (Eligibility and Prioritization Policies)*, all ESG-, CoC-, and ODSA-funded projects must comply with the common eligibility rules adopted by the HCCSC for projects of the same type (e.g., shelters, transitional housing, rapid re-housing, and permanent supportive housing). Exceptions to this rule are allowed only to the extent necessary to meet the legal requirements of or contractual obligations to another funding source.
- B. Projects must also comply with their own written rules as approved by the HCCSC and avoid applying either unwritten rules or rules not approved by the HCCSC in admitting or excluding clients.

#### II. Duty to Seek Approval for Eligibility and Exclusionary Rules and Rule Changes

- A. Projects must submit proposed eligibility and exclusionary rules and proposed rule changes to the Collaborative Applicant before adopting or making changes to (1) their written eligibility standards and exclusionary rules; (2) any plans and policies relating to client selection; and (3) any regulations or contractual provisions that restrict the population the project can serve or the order in which the project prioritizes eligible clients for service.
- B. Unless the Collaborative Applicant communicates to a project its objections to the project's proposed rules or rule changes within 10 business days after the project has submitted them to the Collaborative Applicant, the project may assume the rules or rule changes have been approved.

#### III. Filing Complaints for Violations of this Policy.

Any person or any authorized agent of a person who believes that the person has been denied admission or been terminated from permanent housing in violation of these rules, may file a complaint with the Collaborative Applicant by following the appeal procedures outlined in Section VII of the HCCSC's *Coordinated Entry Guide*.

## D.5/F.5

### Adherence to Housing First Principles in Admitting and Terminating Participants

#### I. Admissions to Housing

In screening individuals and families for admission to housing projects, both the Homeless Navigation Hotline (the Hotline) and CoC- and ESG-funded housing projects will adhere to Housing First principles. Among other things, these principles prohibit screening out prospective participants based on any of the following:

- A. Having no income or too little income;
- B. Having a poor credit or financial history;
- C. Having a history of evictions from housing;
- D. Exhibiting behaviors that indicate a lack of “housing readiness”;
- E. Having an active substance use disorder or a history of such disorders;
- F. Having a criminal record, unless that record includes one or more convictions for crimes which result in state- or federally-mandated restrictions on housing;
- G. Refusing, in the case of permanent supportive housing, to accept or participate in treatment or supportive services; or
- H. Being a domestic violence victim, whether or not:
  - 1. The domestic violence has resulted in the involvement of law enforcement;
  - 2. The prospective participant has a protective order; or
  - 3. The prospective participant is currently separated from the abuser.

#### II. Terminations from Housing

- A. Grounds for Termination. ESG- and CoC-funded projects providing permanent housing, including either permanent supportive housing or rapid re-housing projects, may not base decisions to terminate a participant from their projects on any of the following:
  - 1. The participant’s use of alcohol or drugs, in and of itself (without other lease violations);
  - 2. The participant’s engagement in services, although rapid re-housing projects may require clients to accept case management as a condition to receiving rental assistance;

3. The participant's failure to make progress on a service plan;
  4. The participant's loss of income or failure to increase income; or
  5. The participant's engagement in any activities that are not commonly prohibited in other lease agreements found elsewhere in Stark County.
- B. Steps to be Taken Before Terminating a Participant. Before terminating a participant, providers of CoC- or ESG- funded housing must do the following:
1. Give the participant reasonable flexibility in paying their share of rent (after subsidy) and offer them special payment arrangements (*e.g.*, a payment plan) for rent arrears and/or assistance with financial management (including representative payee arrangements).
  2. Exercise judgment and examine all extenuating circumstances to ensure that the participant is terminated only in the most severe cases; and
  3. Follow formal policies and procedures for terminating assistance, which provide due process to the client as required by 24 CFR section 578.91.

### **III. Filing Complaints for Violations of These Rules**

Any person or any authorized agent of a person who believes that the person has been denied admission to or been terminated from permanent housing in violation of these rules, may file a complaint with the Collaborative Applicant by following the appeal procedures outlined in Section VII of the HCCSC's *Coordinated Entry Guide*.

## D.6/F.6

### Fair Housing and Equal Access Standards

#### I. Fair Housing Requirements – In General

A. Relevant Laws. Providers should be aware of and follow the nondiscrimination and equal opportunity requirements outlined in 24 CFR Section 578.93 of the CoC Interim Rule. The HCCSC, all its participating projects, and the Homeless Navigation Hotline (the Hotline) will take all necessary steps to ensure that the HCCSC's coordinated entry system (CES) is administered in compliance with the Fair Housing Act, promoting housing that is accessible to and usable by persons with disabilities. In addition, they will ensure that the CES complies with the non-discrimination requirements of the Fair Housing Act; Section 504 of the Rehabilitation Act of 1973; Title VI of the Civil Rights Act of 1964; and Titles II or III of the Americans with Disabilities Act, as applicable. These laws may be summarized as follows:

1. The Fair Housing Act prohibits discrimination in all housing transactions on the basis of race, national origin, sex, age, color, religion, handicap, and familial status.
2. Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.
3. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.
4. The Americans with Disabilities Act (ADA) prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. Title II of the ADA protects qualified individuals with disabilities from discrimination on the basis of disability in services, programs, and activities provided by state and local government entities. Title III of the ADA prohibits discrimination on the basis of disability in commercial facilities and public accommodations.

If any provider has doubts about whether a certain action constitutes a violation of one or more of these laws, it should consult with its attorney.

- B. Duty to Provide Reasonable Accommodation. In assessing people for eligibility for particular projects, the Hotline and the projects themselves must honor the right of persons with disabilities to request reasonable accommodation in rules, policies, practices, or services when those accommodations are necessary to afford those persons equal opportunity to access housing and other programs and services available to the homeless.
- C. Situations Where Preferences May be Allowed. Shelter and housing projects cannot prefer any protected class unless allowed by statute, regulation, or a written waiver from their funding or regulatory source. However, the HCCSC recognizes that these statutes allow projects to establish missions to serve only selected subpopulations within the homeless population and to restrict access to its projects accordingly as long as they do not discriminate in selecting or prioritizing for service people within the subpopulations they serve.

#### D. Equal Access Regardless of Sexual Orientation or Gender Identity.

1. All HUD-funded programs must be familiar with the following regulations and adhere to them to the extent they are applicable:
  - a. HUD's final rule entitled *Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity* (77 Fed. Reg. 5662, February 3, 2012), which requires that HUD-funded housing programs be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status. (Among other things, this rule prohibits recipients and subrecipients of HUD funds from inquiring about sexual orientation or gender identity to determine eligibility for HUD-assisted housing); and
  - b. HUD's final rule entitled *Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs* (81 Fed. Reg. 64763, September 21, 2016), which requires recipients and sub-recipients of funding under grant programs administered by HUD's Office of Community Planning and Development (CPD ) as well as owners, operators, and managers of shelters and other buildings and facilities and providers of services funded in any part by a CPD program to provide equal access to the funded programs, benefits, services, and accommodations in accordance with any individual's gender identity. Pursuant to this rule, programs to which the rule applies must, among other things:
    - i. Establish or amend their admissions, occupancy, and operating policies and procedures to conform to the requirements of the rule; and
    - ii. Maintain records of the policies and procedures demonstrating their compliance for at least 5 years.
2. All housing, shelter, and other facilities to which these rules apply must post a notice of clients' rights under these rules on bulletin boards and in other public spaces where information is made available.

#### II. **Rules Governing Service to Families in Shelter and In Housing**

- A. Requirement to Serve as Families All Groups that Present as Families. All ESG- and CoC-funded shelters and housing projects must serve as a family any group of individuals presenting themselves for assistance together. Further, such projects may not discriminate against a group of people presenting as a family by denying the family or one or more of its members admission based on the family's composition (e.g., adults and children or just adults), the age of any family member, the disability status of any family member, or the marital status, actual or perceived sexual orientation, or gender identity of any family member.
- B. Prohibition Against Involuntary Separation of Families. In screening families for CoC- or ESG-funded emergency shelter or housing, the Hotline and all providers of such shelter or housing must honor the prohibition against denying admission to any family based on the age of any child under Section 404 of the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act).

### **III. Filing Complaints for Violations of These Rules**

Any person or any authorized agent of a person who believes that the person has been denied admission to a project or otherwise suffered due to a violation of these fair housing and equal access rules may file a complaint with the Collaborative Applicant by following the appeal procedures outlined in Section VII of the HCCSC's *Coordinated Entry Guide*.

## D.8/F.8

### Homeless Continuum of Care of Stark County's Policies Governing Emergency Transfers for Victims of Domestic Violence

#### I. Requirement that All CoC- and ESG-Funded Housing Projects Develop Emergency Transfer Plans

- A. Regulatory Basis of the Requirement. As set forth in 24 CFR Part 5, Subpart L, HUD requires that "covered housing programs," including homeless programs receiving funds from the Emergency Solutions Grant (ESG) Program or the Continuum of Care (CoC) Grant Program, adopt emergency transfer plans that enable program participants who are beneficiaries of the Violence Against Women Act (VAWA) to transfer from one housing unit to another in the event they feel unsafe in their current housing unit.
- B. Project Participants Covered by the Required Plans. The required plans are intended to benefit tenants who receive rental assistance from or reside in a unit subsidized by a covered housing program if those tenants are victims of domestic violence, dating violence, sexual assault, or stalking (VAWA tenants) and if:
1. They expressly request a transfer; and
  2. They satisfy either of the following requirements:
    - a. They reasonably believe there is a threat of imminent harm from further violence if they remain within their current housing unit; or
    - b. They have been victims of sexual assault and either reasonably believe that they are at imminent risk of further violence if they remain in their current housing unit or the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for a transfer.
- C. Internal and External Emergency Transfers. The mandated transfer plans must include provisions that allow VAWA tenants to make "internal emergency transfers," *i.e.*, transfers within the same housing project, when a safe unit is immediately available. For cases in which a safe unit is not immediately available, the plans must, among other things, describe reasonable efforts the covered housing program will make to assist VAWA tenants who wish to make external emergency transfers, *i.e.*, transfers out of their current housing project.

#### II. The HCCSC's Role in Promoting Emergency Transfers for Victims of Domestic Violence

- A. Ensuring that Housing Projects Have Compliant Transfer Plans. To ensure that all CoC-funded and ESG-funded housing projects have adopted emergency transfer plans that comply with the requirements of in 24 CFR Part 5, Subpart L, HCCSC's Collaborative Applicant will include a review of those plans in its annual review of all CoC-funded housing projects and will encourage the sole ESG

recipient in its geographic area, the City of Canton, to include a similar review in their annual assessment of all ESG-funded projects.

B. Facilitating Emergency Transfers between Housing Projects.

1. Through the Homeless Navigation Hotline (the Hotline), HCCSC's coordinated entry system (CES) will facilitate emergency transfers of VAWA tenants by taking the steps outlined in Section VI of the HCCSC's *Coordinated Entry Guide* when housing projects have received requests for an emergency transfer from VAWA tenants.
2. In facilitating emergency transfers, the Hotline will be subject to the same confidentiality rules that apply to covered housing projects under 24 CFR Part 5, Subpart L. Section 5.2005 (e)(1).

# Homeless Continuum of Care (CoC) of Stark County Homeless Services Collaborative

## 2018 Annual Point-In-Time (PIT) Count

### Methodology

#### Summary

**Background:** Local agencies and organizations conduct a count to determine the extent of homelessness in our community. This information is used to submit the Continuum of Care grant to the U.S. Department of Housing and Urban Development (HUD). Stark County receives approximately \$2.6 million each year from the Continuum of Care grant to serve people who are homeless.

**Approach:** To get the best count, Stark County will conduct a Housing Survey. Flyers will be posted around

### Everyone will be asked where they stayed on January 28, 2018.

- ❑ **Service-Based Count:** Local agencies who serve the homeless will conduct the Housing Survey at their worksites from January 29<sup>th</sup> through January 31<sup>st</sup>, with a couple exceptions where surveys will also be conducted on Thursday, February 1<sup>st</sup> and Friday February, 2<sup>nd</sup>. Volunteers will be assigned to assist at some sites such as libraries, hot meal sites, food pantries and bus stations.
- **Street Count:** Volunteer Teams will go out on Monday, January 29<sup>th</sup> from 5:00 am – 7:00am to cover known locations (where homeless people are known to congregate or sleep overnight). The Volunteer Teams will count and survey homeless people on the street. Known locations in Stark County are found in the cities of Canton, Massillon, and Alliance, which are jurisdictions referenced in local Consolidated Plans. Information regarding known locations was shared by the Homeless Navigation (Hotline) Coordinated Entry System, local homeless providers, and local street outreach staff. Police Departments and City/Village/Township Offices and zoning inspectors, in both the cities and other, more rural, areas of the County were also contacted to determine level of needed outreach in these areas. Homeless persons will be offered assistance to connect with needed service providers and provided “Blessing Bags” (donated by StarkMHAR) with items such as hygiene products, blankets, hats, gloves, water, granola bars, etc.
- ❑ **Youth Count:** Locations identified as sites where youth (under 25 year olds, including unaccompanied minors) may frequent will be used as youth service-based sites from Monday, January 29<sup>th</sup> to Wednesday, January 31<sup>st</sup>. Volunteers will be assigned to assist

**YOU count!**

at these sites. Incentives will be given to youth as surveys are completed. An online survey will also be available for youth to complete but they will still meet with a volunteer while completing the survey.

**Survey:** Questions on the survey determine if the individual is homeless (including chronically homeless); ask for identifiers to prevent duplicate counts; and request information to indicate veteran status, family composition, and disabling conditions. Individuals can also fill out the survey by contacting the Homeless Navigation (Hotline) at 330-452-4363.

The methodology was developed with input from the Homeless Continuum of Care (CoC) of Stark County PIT Count Committee, Subcommittee(s), and via outreach to law enforcement and youth focus groups and in compliance with:

- ▣ **U.S. Department of Housing and Urban Development (HUD): Notice for Housing Inventory Count (HIC) and Point-in-Time (PIT) Data Collection for Continuum of Care Program and the Emergency Solutions Grant (ESG) Program (CPD-15-010, November 18, 2015); and**
- **HUD's PIT Count Methodology Guide 2014 (latest version).**

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