



**STANDARDS OF ADMINISTRATION OF ASSISTANCE (CoC AND ESG)**  
**POLICIES AND PROCEDURES FOR PROVIDING ASSISTANCE**  
**UNDER THE CONTINUUM OF CARE (CoC)**

**PURPOSE:** The HEARTH Act requires Continua to have written policies and procedures that govern the provision of assistance to individuals and families under the HUD Continuum of Care (CoC) Program and Emergency Solutions Grant (ESG). The following standards apply to projects receiving HUD CoC and ESG funding within the MACCH (NE-501) coverage areas of Douglas and Sarpy Counties in Nebraska, and Pottawattamie County, Iowa. These policies and procedures provide guidance to local providers in administering HUD CoC Program and ESG-funded assistance in the following areas:

- Eligibility and Documentation standards for HUD CoC Program and ESG projects
- Targeting and prioritization for Permanent Supportive Housing (PSH), Transitional Housing (TH), and Rapid Rehousing (RRH);
- Standards for administration of rental assistance; and

The policies and procedures are not intended to be in lieu of or in place of the Interim Regulations for the HEARTH Act, but are intended to clarify local decisions regarding program administration. All HUD funded providers must follow the Interim Regulations in its entirety.

**I. PARTICIPANT ELIGIBILITY AND DOCUMENTATION STANDARDS:**

- A. As set forth in the [HEARTH Act](#), there are four categories of eligibility:
- 1) Literally Homeless,
  - 2) Imminent Risk of Homelessness
  - 3) Homeless Under Other Federal Statutes (subject to cap), and
  - 4) Fleeing/Attempting to Flee Domestic Violence. Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility.

- B. Projects serving households in any of the Homeless Categories above must ensure all necessary documentation is captured and retained, per [HUD Recordkeeping Requirements](#).

## II. STANDARDS FOR ADMINISTERING ASSISTANCE:

- A. The Continuum of Care will develop policies and procedures to administer the following project types:
  - 1. Prevention and/or Diversion
  - 2. Street Outreach
  - 3. Emergency Shelter
  - 4. Transitional Housing
  - 5. Rapid Rehousing
  - 6. Permanent Supportive Housing
- B. All HUD CoC Program and ESG-funded programs must enter into a lease or occupancy agreement with tenants that must be at least one month (TH and RRH) or one year (RRH and PSH) in duration. The lease agreement must observe [Fair Housing Act](#) regulations. ES and Prevention programs are not required to enter into lease or occupancy agreements with tenants.
- C. Projects receiving HUD CoC Program funding will comply with the [HUD Interim Rule](#) regarding participant rent calculations, based on the project type being administered (PSH and TH only). In no circumstance may a tenant be charged an amount above the Fair Market Rent (FMR) standard established by HUD.

### **A. WRITTEN STANDARDS FOR PROVIDING HUD CoC PROGRAM AND ESG ASSISTANCE (based on project type)**

#### **1. Prevention**

- a. Procedures for determining eligibility and prioritizing households for assistance
  - i. Eligibility
    - a. 30% or lower AMI
    - b. At imminent risk of homelessness (Category 2) or Fleeing DV (Category 4)
    - c. Cannot have exceeded 24 months of any prevention assistance (across all prevention programs) in past 3 years

- ii. Prioritization
  - a. Prior history of literal homelessness in past 3 years
- b. Procedures for Screening, Assessment and Admission
  - i. Screening
    - a. Assessing initial eligibility (per 1. a. i. above)
      - i. If eligible, prioritization will be determined and an appointment will be scheduled based on available appointments
      - ii. If not eligible or all appointments are full, referrals to other community agencies will be provided
  - ii. Assessment/Admission
    - a. Documentation and verification obtained per eligibility criteria
    - b. Official admission to program
- c. Procedures for coordination among providers
  - i. Upon development, coordinated entry will determine how providers coordinate services.
- d. Supportive services assistance
  - i. Ongoing case management is not provided if one-time assistance is provided.
  - ii. If multiple months of assistance is provided, participants must meet for case management at least monthly.
- e. Financial assistance (rent, utilities, etc.) requirements
  - i. Participants are eligible for financial assistance upon determination of rent reasonableness, verifying lease agreement, and passing unit inspection (based on Habitability Standards).
  - ii. Projects will determine participant financial assistance on a case-by-case basis until implementation of Coordinated Entry for prevention resources.
- f. Standards for determining length and amount of assistance
  - i. Projects cannot exceed the HUD regulation of 24 months in a single project.

- ii. Further limitations on length and amount of assistance will be determined upon implementation of Coordinated Entry for prevention resources.

## **2. Street Outreach**

- a. Standards for targeting
  - i. All persons living in places not meant for human habitation (24 CFR part 91.5) in MACCH's service area are eligible for street outreach.
  - ii. The MACCH Street Outreach team is out 5 days per week searching for individuals residing on the streets. Additionally, insight from local providers/services (i.e. homeless services, law enforcement, local government, etc.) provide information on the whereabouts of unsheltered individuals to participating agencies.
- b. Standards for providing essential services
  - i. Street outreach service participation is completely voluntary and available to any individual residing on the streets or in other uninhabitable situations, regardless of financial status or other resources. Engagement is person-centered and open to any unsheltered homeless individual.
  - ii. Street outreach services are available indefinitely and is based on the individual desire to maintain participation by the unsheltered participant.
- c. Standards for coordination among providers
  - i. With participant consent, Street Outreach providers will coordinate with other providers across the CoC to procure basic needs assistance, supportive services, and permanent housing for individuals receiving services.

## **3. Emergency Shelter**

- a. Procedures for determining eligibility, assessing, and prioritizing households for assistance
  - i. Persons experiencing homelessness (24 CFR part 91.5) in Douglas, Sarpy, and Pottawattamie Counties are eligible for emergency shelter. Emergency shelters will verify

homeless status upon intake in accordance with the [HUD Interim Rule](#). Per HUD regulation ([24 CFR 576.500 \(b\)](#)): The recipient must maintain and follow written intake procedures to ensure compliance with the homeless definition in §576.2. The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

- ii. Individuals residing in Emergency Shelter services will be offered the MACCH Coordinated Entry Assessment as follows (in accordance with MACCH Coordinated Entry procedures):
  - a. The individual has been in the emergency shelter for 14 days and does not currently have a plan to self-resolve their homelessness.
  - b. The individual has a plan to self-resolve, but has resided in the emergency shelter for 30 days.
  - c. Assessments should not be completed within 7 days of admission, unless the individual or family has a prior history of homelessness in the past 2 years.

- d. The individual's Assessment is older than 6 months.
- b. Procedures for Admission, Diversion, Referral, and Discharge
  - i. Admission
    - a. For purpose of admission, diversion, and referral, Emergency Shelter providers shall comply with MACCH's Coordinated Entry initiative upon development.
  - ii. Diversion
    - a. Emergency shelters will make all reasonable attempts to divert households from entering shelter, when applicable and appropriate. Shelter diversion may include but is not limited to: seeking alternative placement for the household with friends or family, utilization of flexible funding for hotel/motel stay, or direct referral to alternative supportive housing.
  - iii. Referral:
    - a. Emergency Shelter staff will make all necessary referrals for individuals needing further assistance to alleviate their homelessness.
    - b. Individuals screened via the MACCH Coordinated Entry Assessment that score for appropriate supportive housing will be referred to the MACCH Coordinated Entry By-Name List (BNL) for supportive housing.
  - iv. Discharge:
    - a. Emergency shelters are not required to have guests sign leases or occupancy agreements; yet, all have basic requirements for resident behavior. Requirements are written and posted and include the process for appealing the discharge decision. Guests are informed of and expected to comply with those requirements, and of their rights including appeal process. If a guest violates program requirements, Emergency Shelters may terminate their assistance in accordance with the

shelters' established process that recognizes the rights of individuals affected. The Shelter staff will exercise judgment so that a program participant's assistance is terminated only in the most severe cases. Residents will be informed of the reasons for termination and right to appeal. Reason will also be recorded in HMIS as "reason for leaving" so terminations can be tracked and reviewed community-wide.

- b. The Cities of Omaha and Council Bluffs provide property ban and bar documentation. Permanent bans are to be documented in HMIS and include a scanned, completed copy of this form from the respective police department.
- c. Procedures for coordination among providers
  - i. With guest consent, emergency shelters will coordinate with other providers across the CoC to procure basic needs assistance, supportive services, and permanent housing for individuals residing in their facilities.
- d. Service participation, rent, and utility payment requirements
  - i. Service participation is not required for Emergency Shelter services; instead, guests may voluntarily participate in supportive services available at shelters. Emergency shelters do not have rent or utility requirements.
- e. Standards for determining length and amount of assistance
  - i. Length of shelter services is determined on a case-by-case basis, but should be a minimum of 30 days, unless the guest violates any rules that jeopardizes the safety or wellbeing of other guests.
- f. Shelter Safeguards
  - i. All emergency shelters will implement safeguards to meet the safety and shelter needs of special populations, including: victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest.

#### **4. Transitional Housing (TH)**

- a. Procedures for determining eligibility and prioritizing households for assistance
  - i. Persons eligible for TH will meet the HUD definition of homelessness as listed in Categories 1, 2, and 4 of the [HUD Interim Rule](#).
- b. Procedures for Admission, Referral, and Discharge
  - i. As TH has not yet been added to the Coordinated Entry system, individual programs will operate their own referral solicitation, assessments for admission, and determine prioritization among the eligibility listed in 4 (a; i) above.
  - ii. All TH projects will have Discharge procedures in place, inclusive of involuntary or “for cause” terminations and the right to and process for appeals.
- c. Procedures for coordination among providers
  - i. With guest consent, TH providers will coordinate with other providers across the CoC to procure basic needs assistance, supportive services, and permanent housing for individuals residing in their facilities.
- d. Service participation, rent, and utility payment requirements
  - i. Service participation requirements vary across TH projects. If a TH project operates as “Housing First”, service participation is not required.
  - ii. TH projects may charge rent, but are not required to do so. If rental requirements exist, they may not charge more than 30% of adjusted gross income, in accordance with HUD regulation.
  - iii. Utility payments are not required in TH projects. If a project charges for utilities, it must be calculated in accordance with HUD regulations and be combined with rental requirements, to not exceed 30% of adjusted gross income for the participant.
- e. Standards for determining length and amount of assistance
  - i. Participation in a single TH program may not exceed 24 consecutive months, in accordance with HUD regulations.



## **5. Rapid Rehousing**

- a. Procedures for determining eligibility and prioritizing households for assistance
  - i. Eligible RRH households are prioritized according to the following. Within each category, households are sorted by number of months homeless in the past 3 years, length of current homeless episode, then by score on the MACCH Coordinated Entry Assessment:
    - a. Veteran Households with Children
    - b. Non-Veteran Households with Children
    - c. Veteran Households without Children
    - d. Non-Veteran Households without Children
- b. Procedures for Admission, Referral, and Discharge
  - i. All referrals for RRH will be submitted through the CoC's Coordinated Entry system. Providers are to sort the By-Name-List according to the levels listed above, thus pulling referrals based on the CoC's Prioritization Policy.
  - ii. Once referrals are identified, providers will conduct project-level assessments and determine admission into the program.
  - iii. Discharge planning will begin at intake, through the establishment of a service plan. Participants must meet at least monthly with their assigned case manager in order to remain eligible for services. Failure to meet for case management monthly will result in program discharge.
- c. Procedures for coordination among providers
  - i. With participant consent, RRH providers will coordinate with other providers across the CoC to procure basic needs assistance, supportive services, and permanent housing for individuals residing in their facilities.
- d. Service participation, rent, and utility payment requirements
  - i. Participants receive case management services at least once per month for the duration of assistance. The participant and case manager develop a housing stability plan with specific goals and referral linkages.

- ii. A participant must pay 30% of his or her income toward rent and utilities while receiving rapid re-housing assistance. A client may request an individualized waiver regarding this provision given the documentation of exceptional circumstances.
- iii. Each program participant must pay a contribution toward their rent that is equal to 30% of the family's monthly gross income. If utilities are NOT included in the unit rent, a utility allowance (the monthly allowance for utilities [excluding telephone] established by the public housing authority for the area in which the housing is located) is subtracted from the participant's portion contribution toward rent. If this amount comes to a negative number, that amount can be reimbursed to the utility company on behalf of the tenant. The participant's portion of rental cost is calculated initially and every three months thereafter, unless otherwise requested by the participant. The participant's portion of rental costs for the first month of assistance, whether a full month or partial month, is waived so that no amount is due upon move-in. Their portion of rental costs is due on the due date identified in their lease beginning in the next month.
- iv. Verification of income occurs prior to approval for financial assistance and again before approving any additional financial assistance. Documentation of the participant's expenses, including how the participant is contributing to housing costs will be determined and on file. This will serve as documentation of need and will determine the amount of the financial assistance provided. The participant's file also will contain a plan to sustain housing following financial assistance, including either a plan to increase income or decrease expenses.
- e. Standards for determining length and amount of assistance
  - i. Participants receive approval for the minimum amount of financial assistance necessary to prevent

homelessness and, if rapidly re-housed, prevent re-entry into homelessness. Documentation of a financial need should be kept with the participant's file. Generally, assistance should be approved for no more than three months at a time. In all, a participant cannot receive assistance for more than 15 months (not including any rent/utility/storage arrears paid for) with the amount of assistance adjusted in accord with participant income.

## **6. Permanent Supportive Housing**

- a. Procedures for determining eligibility and prioritizing households for assistance
  - i. Eligible persons will meet the HUD criteria of being literally homeless and having a disabling condition, as outlined in the [HUD Interim Rule](#). Persons eligible for PSH meet the HUD definition of chronic homelessness and/or have severe service needs as identified through MACCH's Coordinated Entry Assessment.
  - ii. Eligible participants will be prioritized in accordance with the [MACCH Supportive Housing Wait List and Prioritization Policy](#).
- b. Procedures for Admission, Referral, and Discharge
  - i. All referrals for PSH will be submitted through the CoC's Coordinated Entry system. The MACCH Case Conferencing Work Group will identify referrals for PSH openings based on the MACCH Prioritization Policy. Referrals will be submitted to providers via Service Point within 1 business day of the work group meeting.
  - ii. Once referrals are identified, providers will conduct project-level assessments and determine admission into the program. Once determined, projects will report back to the Case Conference Work Group for documentation and referral tracking.
  - iii. All TH projects will have Discharge procedures in place, inclusive of involuntary or "for cause" terminations and the right to and process for appeals.

- c. Procedures for coordination among providers
  - i. With participant consent, RRH providers will coordinate with other providers across the CoC to procure basic needs assistance, supportive services, and permanent housing for individuals residing in their facilities.
- d. Service participation, rent, and utility payment requirements
  - i. Participants in PSH programming are not required to participate in services, if the project is established as a “Housing First” program.
  - ii. Participants may be expected to pay rent and utilities, but the amount charged for both may not exceed 30% of adjusted gross income.
- e. Standards for determining length and amount of assistance
  - i. There is no maximum participation in PSH, so long as the need for the supportive services and rental subsidy remains.
  - ii. Case managers will assess the need for ongoing PSH services and document all services provided in the participant file.

**B. WRITTEN PROCESS FOR TERMINATION OF ASSISTANCE**

All HUD CoC Program and ESG projects must have a written policy for voluntary and involuntary (for cause) termination of assistance that complies with the HUD Interim Rule, including the process for appeal.