

Reading/Berks County Continuum of Care Written Standards

Berks Coalition to End Homelessness, Inc.

PA-506

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United Way of Berks County



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Introduction

Berks Coalition to End Homelessness, Inc. (BCEH) began in 1995 as a volunteer group working to end homelessness in Reading and Berks County, PA. Since then it has grown to include over 60 agencies, businesses, and individuals, working toward preventing, reducing, and ending homelessness in Berks County. In 2008, BCEH applied for non-profit corporation status and is a 501(c)3. BCEH is the primary decision-making body of the Reading/Berks County Continuum of Care (PA-506), and is responsible for the oversight of all Continuum of Care (CoC) policies, procedures, and CoC project funding decisions. BCEH is the collaborative applicant for the CoC Program Competition, the HMIS lead, and the Coordinated Entry lead agency for PA-506.

The Continuum of Care works to coordinate community-based processes relating to the experience of homelessness and works to build a system of housing and services to address the needs of those at-risk of/currently experiencing homelessness. The CoC works to establish local priorities for system planning and evaluations of system-wide performance with the goal of making homelessness rare, brief, and non-recurring.

Membership in the CoC is open to all stakeholders interested in its purposes, including nonprofit organizations, victim service providers, faith-based organizations, government representatives, businesses, advocates, public housing agencies, school districts, mental health agencies, medical organizations, hospitals, universities, affordable housing developers, law enforcement, and people who have formerly or are currently experiencing homelessness.

The CoC must prepare and submit a collaborative application to the U.S. Department of Housing and Urban Development (HUD) for Federal CoC Program funding to support the operation of homeless assistance projects. This requires designing and implementing a local funding competition and local project ranking strategy. The CoC also engages in Consolidated Planning as it relates to homelessness and CoC and Emergency Solutions Grant (ESG) spending.

CoC Background

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act. Among other changes, the HEARTH Act consolidated the three separate McKinney-Vento homeless assistance programs (Supportive Housing Program, Shelter Plus Care program, and Section 8 Moderate Rehabilitation Single Room Occupancy program) into a single grant program known as the Continuum of Care (CoC) Program. The overall goal of the HEARTH Act is to make homelessness rare, brief, and non-recurring by reducing the duration of time people spend homeless and reducing recidivism back into homelessness. The CoC also partners with other funding streams, such as the Emergency Solutions Grant (ESG), Emergency Food and Shelter Program (EFSP) and Pennsylvania Homeless Assistance Program (HAP) to provide support for these goals.



Continuum of Care (CoC) Program

The CoC Program interim rule clarifies the CoC's responsibilities; HUD published the CoC Interim Rule in the Federal Register on July 31, 2012 and was updated in 2017. The Interim Rule can be found at [24 CFR 578](#).

The CoC Program is designed to assist individuals, youth, and families experiencing homelessness, and to provide the services needed to return these households to permanent housing within 30 days, with the goal of long-term stability. The program promotes community-wide planning and strategic use of resources to address homelessness; improved coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness; improved data collection and performance measurement; and allows each community to tailor its program to the particular strengths and needs within that community.

The Interim Rule requires CoCs to establish and consistently follow written standards for providing CoC assistance, in consultation with recipients of the Emergency Solutions Grant (ESG) Program. At a minimum, these written standards must include:

- Policies and procedures for evaluating households' eligibility for assistance in the CoC Program;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance, rapid re-housing assistance, and transitional housing assistance;
- Standards for determining what percentage or amount of rent each participant must pay while receiving rapid re-housing assistance

The goals of the written standards are to:

- Establish community-wide expectations on the operations of projects within the community to create consistency and coordination among recipients' and subrecipients' projects;
- Ensure that the system is transparent to users and operators;
- Establish a minimum set of standards and expectations in terms of the quality expected of projects;
- Make the local priorities transparent to recipients and subrecipients of funds
- Create consistency and coordination between recipients and subrecipients projects within PA-506

Recipients and subrecipients of CoC and local funds may develop additional standards for administering project assistance, but these additional standards cannot be in conflict with those established by PA-506, the CoC Program interim rule, or any other federal guidance.

Project Standards

All projects funded under the CoC program or ESG program shall apply the following standards consistently for the benefit of all project participants. The CoC strongly



encourages projects that do not receive the above-mentioned funds to adopt and utilize these standards to guide their provision of services

Non-Discrimination

The CoC is committed to ending homelessness across Berks County. To provide all individuals and families equal access to necessary housing and services, the Continuum of Care (CoC) has adopted policies and procedures to ensure no one seeking services from the CoC is discriminated against. Each provider must have a policy prohibiting discrimination against persons based on race, ethnicity, color, sex, sexual orientation, gender identity, religion, national origin, ancestry, disability, marital status, age, source of income, familial status, or domestic or sexual violence victim status, ensuring that all participants are afforded equal opportunities, as stipulated in Federal Law and regulations. CoC and Emergency Solutions Grants (ESG) programs must operate in compliance with federal nondiscrimination and equal opportunity requirements, including the Fair Housing Act, Title VI of the Civil Rights Act, the Age Discrimination Act of 1975, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act. The requirements of the Equal Access in Accordance with an Individual's Gender Identity regulation, and the requirements of executive orders regarding equal employment opportunity and opportunities for minority and female owned businesses also apply. Please see 24 CFR 5.105 for a full list of applicable federal laws, regulations and Executive Orders. All agencies in the CoC including, but not limited to, the CoC Lead Agency (Berks Coalition to End Homelessness), agencies funded through CoC and ESG programs, and homeless service agencies funded by other federal and state programs, commit not to discriminate against any individual or family seeking homeless services based on race, color, national origin, religion, sex, familial status, disability, age, gender, LGBTQIA (lesbian, gay, bisexual, transgender, queer/questioning, intersex, allies) status, or marital status. See full non-discrimination policy in Appendix A.

CoC Participation

All CoC funded projects are required to participate in at least 75% of the CoC-wide meetings, and all required CoC trainings. CoC participation is a “threshold requirement” for renewal project applications for the CoC Program Competition. CoC projects will be notified in advance of required trainings and attendance at all trainings will be recorded. CoC-funded projects should also participate in CoC subcommittees and/or ad hoc workgroups as appropriate. ESG-funded programs are encouraged to participate in any of the above as well.

HMIS Participation

All CoC and ESG funded projects are required to participate in the Reading/Berks CoC's Homeless Management Information System (HMIS), as specified in the HMIS Policies and Procedures Manual. This includes ensuring data is accurate, complete, and timely and protecting data security.



Victim service providers are prohibited from entering participant information into HMIS under federal guidelines, and therefore will use a comparable database in order to report data as necessary.

Participant Inclusion

Each CoC funded project is expected to engage participants in ongoing project evaluation and quality improvement processes. Each project should survey or interview participants at least annually to obtain feedback on project service quality, the housing and service environment, and opportunities for improvement. As per 24CFR 578.75(g), all CoC funded projects must provide for the participation of not less than one person currently or formerly experiencing homelessness on the board of directors or other equivalent policymaking entity to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part.

The CoC engages a group of diverse individuals with recent or current lived experience titled the Lived Experience Advisory Panel (LEAP) to inform CoC policies, procedures, funding decisions, and other decisions regarding CoC operations.

Involuntary Family Separation Policy

According to CoC Program interim rule 24 CFR 578.93(e), involuntary family separation is prohibited in projects funded through CoC and ESG dollars. In accordance with the interim rule, the CoC will work with providers to ensure shelter placement efforts are coordinated to avoid involuntary family separation. CoC- and ESG-funded projects may not deny admission to any household on the basis of:

- The age or gender of a child under 18
- The gender of a parent or parents, or
- The marital status of a parent or parents

All CoC funded projects are required to comply with HUD's Equal Access Rule; this requires equal access to HUD housing programs without regard to a person's actual or perceived sexual orientation, gender identity, or marital status.

Access to Resources

The CoC expects that every project that is funded through the CoC or ESG programs will coordinate with and access mainstream and other targeted homeless resources.

Organizations should assess and assist participants with obtaining any mainstream resource for which they may be eligible, including: TANF, Veterans benefits, SNAP, Medicaid, Federally Qualified Health plan (Affordable Care Act), CHIP, SSI/SSDI, and others as appropriate. Organizations should streamline processes for applying for mainstream benefits such as the use of a singular form to apply for benefits or collecting necessary information in one step wherever possible.



Organizations should work with project participants to procure all identification documents whenever possible to ensure success in future projects and in obtaining benefits and resources.

Record Retention

All records pertaining to Continuum of Care funds must be retained for the greater of 5 years or the period specified below. Copies may be substituted for the original records.

Documentation of each project participant's qualification as a family or individual at risk of homelessness or as a family or individual experiencing homelessness and other project participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served.

Where CoC funds are used for the acquisition, new construction, or rehabilitation of a project site, records must be retained until 15 years after the date that the project site is first occupied or used by project participants.

Organizations must dispose of all documents and files in a manner that will protect client confidentiality. Methods include:

- Shredding applicable paper records
- Deleting any information from computers and destroying the files before disposal
- Triple formatting hard drives of any machine before transfer of property and/or destruction of hard drives of any machine that has contained client records before disposal.

Educational Services

The CoC requires all projects that serve households and families with children experiencing homelessness to have written policies in place to ensure families are connected with educational services. This includes working with the school district's homeless liaison and the local Education Children and Youth Experiencing Homelessness (ECYEH) liaison through the Berks County Intermediate Unit. The written policies should have a protocol to ensure children and youth experiencing homelessness are enrolled in school and connected to services in the community. Every CoC Program funded organization is required to attend an educational rights training facilitated by the ECYEH at least once annually. Every organization is required to have at least one staff member identified as a point person to ensure this requirement is fulfilled.

Termination & Grievance Procedures

CoC funded projects must have a written grievance procedure. Organizations must have written termination policies outlining the project's rules and termination processes, including a formal due process.

Terminations should only occur in the most severe and rare situations, to ensure the safety of participants or comply with regulations, laws, or a signed lease agreement. Termination from a



project may not bar the household or individuals within the household from participation in the project at a future date.

Termination processes should include, at a minimum:

- Providing the participant with a written copy of the rules and the termination process before assistance begins; participant signature agreeing to these rules is encouraged
- Written notice to the project participant containing a clear statement of the reason(s) for termination
- A review of the decision, in which the project participant is given the opportunity to present written or oral objections/appeal before a person other than those who made/approved the termination decision; and
- Prompt written notice of the final decision for the project participant.

Eviction by a landlord in a scattered site or tenant-based rental project cannot result in termination from the CoC or ESG project; the project must work with the project participant to quickly find alternative housing.

Discharge Planning

The CoC will strive to develop and implement policies and protocols for the discharge of persons from publicly funded institutions and systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons (42 USC 11362).

Compliance with the Emergency Transfer Plan and VAWA

All CoC and ESG projects must comply with the CoC's Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, Stalking, and/or Human Trafficking. All CoC funded projects will ensure that applicants are prioritized according to the emergency transfer priority required under 24 CFR 578.99(j)(8). See the full plan in Appendix B.

All CoC and ESG programs must comply with HUD's Violence Against Women Act (VAWA) rule providing housing protections for Domestic Violence survivors. The final rule includes core protections across HUD programs covered by VAWA that ensure individuals are not denied assistance, evicted, or have their assistance terminated because of their status as survivors of domestic violence, dating violence, sexual assault, or stalking, or for being affiliated with a victim. First priority for project availability shall be given for eligible individuals and families who are relocating as per the Emergency Transfer Plan.

Guiding Principles

All projects funded under the CoC program or ESG program shall incorporate the following guiding principles consistently for the benefit of all project participants. The CoC strongly encourages projects that do not receive the above-mentioned funds to accept and utilize these principles to guide their provision of services.



Housing First

Housing First is a programmatic and systems approach that prioritizes providing housing to people experiencing homelessness quickly, and without preconditions or service participation requirements. This ends their homelessness quickly and serves as a stable platform from which they can pursue personal goals and improve quality of life.

This approach is guided by the belief that people need basic necessities, like food and a place to live, before attending to anything such as getting a job, budgeting properly, or attending to substance use issues.

It is the policy of the CoC that all CoC funded projects operate in accordance with the Housing First approach as follows:

- Few to no programmatic prerequisites to permanent housing entry
- Low barrier admission policies
- Rapid and streamlined entry into housing, including streamlined application and approval processes
- Supportive services are voluntary, but can and should be used to persistently engage tenants to ensure housing stability
- Tenants have full rights, responsibilities, and legal protections
- Practices and policies to prevent lease violations and evictions

Prioritization

Assistance is prioritized based on vulnerability and severity of service needs to ensure households needing the most help receive it in a timely manner. Prioritizations of specific populations are determined by soliciting feedback from the entire CoC and analyzing our community's data.

Priority shall be given for eligible individuals and families who are relocating as per the Emergency Transfer Plan. All CoC funded projects will ensure that applicants are prioritized according to the emergency transfer priority required under 24 CFR 578.99U(8).

See each project type for specific prioritization guidance.

Collaboration

Provider organizations are expected to coordinate and collaborate when a project participant moves from one program to another or when more than one project is serving the same participant. When a participant presents to an organization that cannot assist, the organization is expected to connect the participant to the Coordinated Entry program.

Person-Centered and Strength-Based

All organizations should use a person-centered and trauma-informed approach that is dignified, safe, and centers participant choice. With this approach, assistance is allocated effectively and households are linked to the most appropriate intervention strategy. The strength-based approach



focuses on inherent strengths of participants and deploys these personal strengths to aid in the achievements of the participants' goals. Specifically:

- Every individual, group, family, and community has strengths.
- Trauma, illness, and struggle may be harmful, but they may also be sources of challenge and opportunity.
- There is no limit to a person's growth, achievement, or success.
- Participants are best served when providers collaborate with them.
- Every environment is full of resources and strengths.

Coordinated Entry

Coordinated Entry (CE) is a process developed to ensure that all people experiencing a housing need have fair and equal access and are quickly identified, assessed, referred, and connected to housing and assistance based on their strengths and needs. Provisions in the CoC Program interim rule at 24 CFR 578.7(a)(8) require that CoCs establish a Centralized or Coordinated Assessment System. BCEH is the lead for Coordinated Entry Management, including multiple access sites in Berks County. The CE Manager at BCEH is responsible for referrals, training other agencies on system and assessment requirements, and facilitating monthly CE meetings to discuss the master list.

The CE process makes referrals to all projects receiving ESG and CoC Program funds as well as other housing and homelessness projects. The CE process is linked to street outreach efforts so that people experiencing unsheltered homelessness are prioritized for assistance in the same manner as sheltered persons assessed through the CE process.

It is the policy of the CoC that persons fleeing domestic violence, and their accompanying family, are offered safe housing and services through CE. Specifically, CE assessors will refer these households to a domestic violence or victim services provider for immediate concerns. Persons fleeing domestic violence are eligible for housing and services available through the CoC Program, ESG Program, programs funded by the Department of Justice, programs funded by the Department of Health and Human Services, and programs funded otherwise.

The CoC Program rule does not require CoC-funded victim service providers to use the CoC's coordinated entry process; however in PA-506 the local DV provider does participate in the CoC's Coordinated Entry. DV providers are prohibited from participating in HMIS or sharing client information. The Coordinated Entry protocols accommodate management of prioritization lists by maintaining a separate list of referrals from the DV provider and taking precautions to protect their information.

The Reading/Berks County CoC ensures that any person who is homeless and seeking assistance



has access to the Berks Coordinated Entry System. Every homeless service provider is equipped to complete the VI-SPDAT assessment with any person experiencing homelessness who presents at their location. These providers are spread throughout the geographic region of the CoC. All CoC and ESG funded projects are required to participate in the Reading/Berks County CoC's Coordinated Entry process. Street Outreach and the 2-1-1 hotline are also used as Coordinated Entry access points, allowing anyone in the geographic region to access the Coordinated Entry system.

Coordinated Entry participation requires following all established policies and procedures outlined in the Reading/Berks Coordinated Entry Policies & Procedures Manual. Participation also includes attending the majority of the monthly Coordinated Entry meetings.

Homeless Management Information System (HMIS)

The CoC Program interim rule 24 CFR 578.7(b) specifies that the CoC is responsible for:

- Selecting an HMIS software solution
- Designating an eligible applicant to serve as the HMIS lead and manage the system
- Providing oversight for HMIS policies
- Working with the HMIS lead to ensure consistent provider participation
- Ensuring the quality of HMIS data

HUD expects CoCs to use HMIS data to track their progress in meeting CoC and project-specific performance goals, to support community-wide planning, and to identify how best to direct resources to prevent and end homelessness. CoCs rely on high-quality HMIS data to meet HUD reporting requirements, such as the required Point-in-Time Count, Housing-Inventory-Count, Annual Performance Report (APR) and the Longitudinal Systems Analysis (LSA) used in the Annual Homeless Assessment Report (AHAR). HUD and other planners/policymakers use aggregate HMIS data to better inform homeless policy and decision making at the federal, state, and local level.

The CoC Program interim rule specifies HMIS as an eligible use of CoC Program funds. CoC funds can be used to support the expense of operating the HMIS, under the HMIS program component, and the expense of contributing data, as an eligible cost under the other program components. Only BCEH, the CoC designated HMIS lead, may apply under the HMIS program component, but agencies that use the HMIS can add an HMIS line item to their budget and use CoC funds for the costs of attending training on HMIS, data collection, and data entry. See the HMIS Policies and Procedures and HMIS Governance Charter for more detailed information.

CoC Project Requirements

Permanent Supportive Housing

Permanent supportive housing (PSH) is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist people experiencing homelessness who have a disability or families with at least one member (adult or child) with a disability achieve housing



stability and live independently. To be considered permanent housing, the project participant must be the tenant on a lease or occupancy agreement for a term of at least one year, which is renewable for terms that are a minimum of one month long and is terminable only for cause. PSH projects may be facility-based or scattered-site.

As its name implies, the core components of Permanent Supportive Housing include:

- Permanent: Tenants may live in their homes as long as they meet the basic obligations of tenancy;
- Supportive: Tenants have access to the support services that they need and want to retain housing; and,
- Housing: Tenants have a private and secure place to make their home, just like other members of the community, with the same rights and responsibilities.

Eligibility

For permanent supportive housing, households must meet both the HUD definition of homelessness under Category 1 or both Category 1 and Category 4, and have a disability. For beds prioritized for Chronically Homeless individuals and families, the head of household must have a qualifying disability and meet all of the criteria required as defined in 24 CFR 578.3

The following categories of individuals or families are eligible for PSH services:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence and Category 1
AND
- At least one member of the household must have a disability

To be eligible for PSH under the CoC Program, the potential project participant must also meet any additional eligibility criteria set forth in the Fiscal Year NOFO under which the project was funded (e.g., be experiencing chronic homelessness).

Projects may not establish additional eligibility requirements beyond those required by funders.

See Appendix C for definitions of homelessness categories.

Prioritization

The most severe service needs will be determined by the household's Coordinated Entry assessment, and will prioritize those with the highest scores within each category first. These priorities have been established to ensure that the CoC's most vulnerable people and high users of resources are quickly transitioned into permanent supportive housing.



The following types of individuals and families experiencing homelessness must be prioritized in the following order; however higher service needs/assessment score should override this prioritization list:

1. Chronically homeless, unsheltered youth
2. Chronically homeless, unsheltered families
3. Chronically homeless, unsheltered single adults
4. Chronically homeless, sheltered youth
5. Chronically homeless, sheltered families
6. Chronically homeless, sheltered single adults

Priority shall be given for eligible individuals and families who are relocating as per the Emergency Transfer Plan. All CoC funded projects will ensure that applicants are prioritized according to the emergency transfer priority required under 24 CFR 578.99U(8).

Minimum Standards

All referrals to PSH will be made through the CE system.

The following minimum standards will be applied to all permanent housing projects:

- Support services must be made available throughout the duration of stay in housing
- There is no designated length of stay for project participants
- Scattered-site projects should engage in landlord outreach, including identifying available units, facilitating move-in, and ensuring participants' ongoing success in housing.
- **Site-based projects** must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a PSH participant's assistance is terminated only in the most severe cases.
- For **scattered-site projects**, if a participant is evicted by the landlord from housing, it is the project's responsibility to assist the participant in finding new housing as quickly as possible.
- PSH must follow the Housing First model meaning that the primary focus is moving households into housing quickly without preconditions. Projects cannot screen out households based on criteria that are assumed to predict successful outcomes, such as income, employment, criminal history, mental health history, medical history, or evidence of "motivation." Additionally, Housing First projects must not require sobriety or medication/treatment compliance as a condition of project participation.

Duration and Amounts

Each project participant should be assessed at least annually to determine whether they are able to move from PSH to other permanent housing without supportive services (either subsidized or market rate) in order to make PSH resources available for those with the greatest need for supported housing. If it is determined that it is feasible for a participant to exit from PSH and the



client is in agreement, project staff should support them in this transition, including assistance with identifying alternative housing and connection to community support. To support transitions from PSH, staff should assist project participants in signing up for all appropriate subsidized housing waiting lists, including: Housing Choice Vouchers, Public Housing, Senior Housing, and other privately owned assisted housing. Project participants must never be exited into homelessness.

The rent contribution or the maximum occupancy charge is the highest of the following amounts (rounded to the nearest dollar). Households with zero income are eligible and would not be required to pay a rent/occupancy charge:

- 30% of the household's monthly adjusted income
- 10% of the household's monthly gross income; or
- If the household is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the household's actual housing costs) is specifically designated by the agency to meet the holdhold's housing costs, the portion of the payments that is designated for housing costs.

PSH projects in which rental assistance is provided, the rent contribution/occupancy charge is not optional and must equal the rent contribution specified above. For projects that provide PSH using funds other than rental assistance funds (such as leasing funds), the occupancy charge is optional and can be lower but not higher than the maximum occupancy charge specified above.

If an assisted unit paid for by rental assistance funds is vacated before the expiration of the lease, the project may pay no more than 30 days from the end of the month in which the unit was vacated. Brief periods of stays in institutions (not to exceed 90 days) by project participants are not considered "vacancies", and rent can continue to be paid on the unit while the project participant is in the institution. If the lease is between the organization and the landlord and is funded with leasing assistance, the organization is liable for paying the rent even if a leased unit is not occupied.

Rapid Re-Housing

Rapid re-housing (RRH) is permanent housing that provides short-term (up to 3 months) and medium-term (4-24 months) tenant-based rental assistance only and supportive services to households experiencing homelessness.

Regarding Chronic Status: Participants who were chronically homeless prior to RRH entry maintain their chronically homeless status while they are receiving RRH.

All referrals to RRH will be made through the CE system.

Eligibility

The following categories of individuals or families are eligible for RRH:

- Category 1: Literally Homeless



- Category 4: Fleeing/Attempting to Flee Domestic Violence

There are no income eligibility requirements for households at the time of initial eligibility/enrollment in an RRH project. Refer to City of Reading and Berks County ESG policies regarding ESG-specific requirements.

Projects may not establish additional eligibility requirements beyond those required by funders.

See Appendix C for definitions.

Prioritization

The most severe service needs will be determined by the household's Coordinated Entry assessment, and will prioritize those with the highest scores within each category first. These priorities have been established to ensure that the CoC's most vulnerable people and high users of resources are quickly transitioned into RRH.

The following types of individuals and families experiencing homelessness must be prioritized primarily in the following order; however higher service needs/assessment score should override this prioritization list:

1. Families/individuals experiencing homelessness for the first time
2. Non-chronically homelessness, unsheltered families/individuals
3. Chronically homelessness, unsheltered families/individuals
4. Non-chronically homelessness, sheltered families/individuals
5. Chronically homelessness, sheltered families/individuals

Priority shall be given for eligible individuals and families who are relocating as per the Emergency Transfer Plan. All CoC funded projects will ensure that applicants are prioritized according to the emergency transfer priority required under 24 CFR 578.99(U)(8).

Individuals and families currently residing in transitional housing are eligible to move into RRH projects.

Minimum Standards

RRH is a Housing First intervention meaning that the primary focus is moving households into housing quickly without preconditions. Projects cannot screen out households based on criteria that are assumed to predict successful outcomes, such as income, employment, criminal history, mental health history, medical history, or evidence of "motivation." Additionally, Housing First projects must not require sobriety or medication/treatment compliance as a condition of project participation.

Housing Stability Plan with Exit Strategy: Staff should develop with each project participant a housing plan with the amount and duration of rental assistance each client will receive and a project exit strategy with plans to reduce the client's financial assistance over time. Project staff



should consider the participant’s current or expected income and expenses, any public/private assistance, and the relative affordability of housing in the CoC.

Amount and Duration of Rental Assistance

The CoC is leaving to each project the discretion to set its own caps and conditions related to the amount and duration of rental assistance and supportive services.

Households with zero income are eligible at time of entry.

Grant funds may be used for security deposits in an amount not to exceed 2 months of rent. An advance payment of the last month's rent may be provided to the landlord, in addition to the security deposit and payment of the first month's rent.

The rental assistance may be short-term, up to 3 months of rent; medium-term, for 3 to 24 months of rent; or long-term, for longer than 24 months of rent. RRH projects may provide supportive services no longer than 6 months after the rental assistance ends. 24 CFR 578.37(a)(1)(ii)

Transitional Housing and TH-RRH

Transitional Housing is designed to provide individuals and families experiencing homelessness with the interim stability and support to successfully move to and maintain permanent housing. Project participants must have a lease (or sublease) or occupancy agreement in place when residing in Transitional Housing.

Transitional Housing with Rapid Re-Housing (TH-RRH) is a project type that includes two existing project components—TH (TH) and RRH (RRH)—in a single project to serve individuals and families experiencing homelessness. Generally, TH-RRH can be appropriate in areas with low emergency shelter housing stock, and emphasis should be on rapid movements from TH to permanent housing (short length of stay).

Projects administering Joint TH-RRH projects should defer to the “RRH” and “TH” sections of the CoC’s Written Standards. The areas which deviate from those standards or have additional nuances associated with them for the Joint TH/RRH project type addressed below.

Regarding Chronic Homelessness Status: A household enrolled in TH for longer than 7 days loses their chronic homelessness status. The only exception is a household that is unsheltered and eligible for PSH may be provided a bed in a TH facility for up to 7 days if ES and Hotel Vouchers are unavailable. During these 7 days, they are not enrolled in the actual TH project and do not lose their Chronic designation. The household must comply with basic project rules related to occupancy but does not participate in the project (e.g., job training, life skills, etc.). It will be important for the TH Provider and the CE program to assist the household in making an informed decision (explaining other services they may be eligible for and what they may forfeit if accepting a TH enrollment and helping the household navigate the likelihood of being connected to these other, potentially more appropriate resources).



Eligibility

The following categories of individuals or families are eligible for TH & TH-RRH:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence

CoC projects should refer to the NOFO for the year they were funded since the above categories are subject to change.

See Appendix C for definitions.

Prioritization for TH

While many people who have traditionally been assisted in long-term congregate TH may be served more efficiently in other project models, this model may be appropriate for some people, including:

- Households in early recovery from a substance use disorder who may desire more intensive support to achieve their recovery goals.
- Survivors of domestic violence or other forms of severe trauma who may require and prefer the security and onsite services provided in a congregate setting to other available housing options.
- Unaccompanied and pregnant or parenting youth (age 16-24) who are unable to live independently or who prefer a congregate setting with access to a broad array of wraparound services to other available housing options.

Priority shall be given for eligible individuals and families who are relocating as per the Emergency Transfer Plan. All CoC funded projects will ensure that applicants are prioritized according to the emergency transfer priority required under 24 CFR 578.99U)(8).

Minimum Standards

The following minimum standards for this project type include:

The project will provide enough RRH assistance to ensure that at any given time a project participant may move from TH to permanent housing (generally, there should be twice as many RRH than TH at any point in time, but variations can be found if appropriate for the population served).

HMIS/reporting requirements:

- TH/RRH projects must be set-up in HMIS data system as two-different Projects: one TH project and one RRH project
- CoC-funded TH/RRH must submit one APR for TH and one APR for RRH.

Duration and Amounts



TH facilitates the movement of homeless individuals and families to PH within 24 months of entering TH, however the CoC encourages the length of stay be 90 days or less.

TH-RRH Projects must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the PH-RRH component, to all project participants for up to 24 months as needed by the project participants.



Appendix A: Anti-Discrimination Policy

Berks County PA-506 Continuum of Care Anti-Discrimination Policy

Overview

The Berks Coalition to End Homelessness is committed to ending homelessness across Berks County. To provide all individuals and families equal access to necessary housing and services, the Continuum of Care (CoC) has adopted policies and procedures to ensure no one seeking services from the CoC is discriminated against. Each provider must have a policy prohibiting discrimination against persons based on race, ethnicity, color, sex, sexual orientation, gender identity, religion, national origin, ancestry, disability, marital status, age, source of income, familial status, or domestic or sexual violence victim status, ensuring that all participants are afforded equal opportunities, as stipulated in Federal Law and regulations.

CoC and Emergency Solutions Grants (ESG) programs must operate in compliance with federal nondiscrimination and equal opportunity requirements, including the Fair Housing Act, Title VI of the Civil Rights Act, the Age Discrimination Act of 1975, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act. The requirements of the Equal Access in Accordance with an Individual's Gender Identity regulation, and the requirements of executive orders regarding equal employment opportunity and opportunities for minority and female owned businesses also apply. Please see 24 CFR 5.105 for a full list of applicable federal laws, regulations and Executive Orders. All agencies in the CoC including, but not limited to, the CoC Lead Agency (Berks Coalition to End Homelessness), agencies funded through CoC and ESG programs, and homeless service agencies funded by other federal and state programs, commit not to discriminate against any individual or family seeking homeless services based on race, color, national origin, religion, sex, familial status, disability, age, gender, LGBTQIA (lesbian, gay, bisexual, transgender, queer/questioning, intersex, allies) status, or marital status (Protected Classes).

Equal Access Policy

Providers of federal and/or state-funded housing and services in the Berks CoC shall not discriminate on the basis of race, color, national origin, religion, sex, familial status, disability, age, gender, LGBTQIA status, or marital status. Homeless services providers will make housing available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status. The CoC and all participating agencies will provide housing and services in accordance with a client's gender identity, determine eligibility without regard to actual or perceived sexual orientation, gender identity, or marital status, and will serve all persons regardless of actual or perceived barriers to services. The CoC's coordinated assessment system will provide equal access to all persons, especially those least likely to seek or receive



services, and that permits all agencies to comply with applicable civil rights and fair housing laws and requirements.

Equal Access Procedures

Berks CoC will:

- Provide as-needed training (at least once per year) to agencies and agency staff regarding the Equal Access Rule and related requirements.
- Use appropriate, inclusive language in communications, publications, trainings, personnel handbooks, and other policy documents that affirms the CoC's commitment to serving all eligible clients in adherence with the HUD Equal Access Rule.
- Ensure that communications and resources pertaining to housing and services are accessible to individuals with disabilities.
- Continue to develop partnerships with organizations that can provide expertise around the process of changing gender markers on identification and benefit applications or can ensure subject matter expertise among staff.
- Support all clients in understanding their privacy rights and the implication of releasing information.
- Monitor CoC Program funded agencies annually to ensure compliance with applicable fair housing and civil rights laws and related requirements.

Agencies will:

- Include policies and procedures in employee handbooks and training that prohibit discrimination and provide guidance to staff to ensure equal access to all groups to the agency's services.
- Ensure all staff, volunteers, and contractors maintain the confidentiality of a client's legal name and sex at birth and understand the potential impact that disclosure can have on a client's progress to self-sufficiency.
- Ensure staff, volunteers, and contractors understand that a client may present their gender differently than the way they identify.
- When possible, ensure that construction or property rehabilitation includes and promotes privacy and safety in sleeping areas, bathrooms, and showers.
- Mediate and resolve conflicts between clients in a way that respects clients and treats them fairly and equally.
- Take immediate action to resolve inappropriate behavior, treatment, harassment, or equal access issues by any person (staff, volunteers, contractors, or clients). Follow the prescribed agency grievance policy as with any other grievance.

Agency staff will:



- Honor all requests, to the extent possible, for special accommodations for anyone who has a disability or who feels discriminated against or unsafe.
- Honor the request of an individual for accommodations based on their personal safety and privacy concerns, whenever feasible.
- Try to ensure client safety and prevent harassment. If at all possible, staff will remove perpetrators of harassment before asking victims to move.
- Assist clients without identification documents to understand the resources available to obtain identification.
- Make available intake materials that allow individuals to indicate both their legal name and the name they prefer to be called.
- Treat a client's gender identity and sex assigned at birth as confidential medical information that will not be disclosed without specific, time-limited client consent. Similarly, a client's legal name shall be treated as confidential information.
- Not consider a client or potential client ineligible because their appearance or behavior does not conform to gender stereotypes and will serve all individuals eligible for the program.
- Not ask questions or seek information concerning a person's anatomy or medical history beyond elements necessary for the purpose of providing services.
- Not require an individual's gender identity to match the gender listed on an ID or other documents.

Involuntary Family Separation Policy

According to CoC Program interim rule 24 CFR 578.93(e), involuntary separation is prohibited in projects funded through CoC and ESG dollars. In accordance with the interim rule, the CoC will work with providers to ensure shelter placement efforts are coordinated to avoid involuntary family separation. CoC- and ESG-funded projects may not deny admission to any household on the basis of:

- The age or gender of a child under 18
- The gender of a parent or parents, or
- The marital status of a parent or parents

Faith Based Activities Policy

In providing project assistance, CoC agencies and staff shall not discriminate against a project participant or prospective participant on the basis of religion or religious belief. In providing services supported in whole or part with federal financial assistance and in their outreach activities related to such services, projects shall not discriminate against current or prospective project beneficiaries on the basis of religion, a religious belief, a refusal to hold a religious belief,



or a refusal to attend or participate in a religious practice. All activities must adhere to federal requirements, as established in 24 CFR § 5.109.

Reporting

Berks Coalition to End Homelessness (BCEH) has implemented a retaliation-free violation reporting policy to ensure adherence to policy regulations. Conduct prohibited by this policy and found to be unacceptable is subject to report, investigation, and response.

BCEH requires the prompt reporting of all incidents of discrimination and non-compliance with this policy. A formal complaint procedure for the reporting of violations of the Anti-Discrimination Policy has been instituted. It is established that all project participants must be advised at intake of their legal rights, including an explanation of this policy, and must be given the written policy and instructions for reporting violations, as well as an accompanying BCEH reporting form, and must sign to acknowledge receipt.

Initially, reporters should contact administrators of the specific project demonstrating non-compliance with concerns, except in cases where retaliation is feared. If the concern is not resolved after administrators are involved, reporters may contact BCEH at 610-372-7222 or by faxing 610-372-7223 or mailing the completed report form to the office.

Monitoring and Enforcement

Berks Coalition to End Homelessness will ensure that all CoC-funded, ESG-funded, and BCEH-funded agencies are familiar with this policy and are adhering to the guidelines. All funded projects are to keep timely written documentation regarding specifics of placement/treatment/incidents and exceptions involving individuals and families served.

Organizations will be found in violation of this Anti-Discrimination Policy for actions including, but not limited to:

- Denial of services based on membership in a protected class.
- Publishing, circulating, issuing, displaying, posting, or mailing any written statement or utterance of any verbal statement disparaging any member of any protected class, that may result in exclusion from services or denial of fair treatment.
- Institution of rules limiting freedom of attire, especially affecting religious observance or gender identity, except in cases where decency, health, and safety are concerned.
- Real or implied creation of any quota system intent on limiting the number of protected class members to be served by an organization.
- Allowing an offensive and hostile living environment, promulgated by staff, other participants, or both, to discourage, demean, or otherwise disenfranchise participants as members of a protected class.



- Segregating any participant to a specific location based on protected class status.
- Refusal to make requested reasonable accommodations and modifications as outlined by the ADA, the Equal Access Rule, and the Fair Housing Act, for members of a protected class; or refusal or withholding of any accommodation, advantage, or privilege based on protected class status.

Confirmed acts of discrimination, harassment and misconduct will be dealt with appropriately. Responsive actions will include training, counseling and progressive correction measures. The purpose of these responses in cases of confirmed violation is to promote adherence to this policy.

References:

Fair Housing Act (42 USC 3601-19): <https://legcounsel.house.gov/Comps/civil68.pdf>

HUD Equal Access Final Rule:

<https://www.hudexchange.info/resource/1991/equal-access-to-housing-final-rule/>

HUD's Portal for Online Fair Housing Complaints:

https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint

Materials from HUD 11/16/16 Equal Access and Gender Identity Rules Training:

<https://www.hudexchange.info/course-content/equal-access-and-gender-identity-rules-training/Implementing-HUDs-Equal-Access-and-Gender-Identity-Rules-Slides-2016-11-17.pdf>



Appendix B: Emergency Transfer Plan

Reading/Berks County Continuum of Care (PA-506) Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Emergency Transfers

Reading/Berks County Continuum of Care CoC and ESG funded housing providers are concerned about the safety of our tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),[1] the Reading/Berks CoC along with other applicable housing providers allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.[2] The ability of the Reading/Berks CoC or other applicable housing providers to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the Reading/Berks CoC or other applicable housing providers has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that rapid re-housing, tenant based rental assistance, and all other CoC and ESG funded rental assistance programs are in compliance with VAWA.

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall notify the Reading/Berks CoC or other applicable housing providers' management office and submit a written request for a transfer to



the assigned case manager. The Reading/Berks CoC or other applicable housing providers will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

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

Confidentiality

The Reading/Berks CoC or other applicable housing providers will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives the Reading/Berks CoC or other applicable housing provider written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered project. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about the Reading/Berks CoC or other applicable housing providers' responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

The Reading/Berks CoC or other applicable housing providers cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. The Reading/Berks CoC or other applicable housing providers will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. The Reading/Berks CoC or other applicable housing provider may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If the Reading/Berks CoC or other applicable housing providers has no safe and available units for which a tenant who needs an emergency is eligible, the Reading/Berks CoC or other applicable housing providers will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, the Reading/Berks CoC or other applicable housing provider will also assist tenants in contacting the



local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>



Appendix C: Definitions

HUD's Four Categories of Homelessness

Within the homeless definition there are four categories of homelessness:

1. Literally Homeless
2. Imminent Risk of Homelessness
3. Homeless Under Other Federal Statutes
4. Fleeing/Attempting to Flee Domestic Violence

Category 1: Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation; or
- Is living in a 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 and local government programs); or
- Is exiting an institution where (s)he has 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.

An individual or family only needs to meet one of the three subcategories to qualify as Homeless Category 1: Literally Homeless.

Category 2: Imminent Risk of Homelessness

An individual or family who will imminently lose their primary nighttime residence, provided that:

- Residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified; and
- The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Includes individuals and families who are within 14 days of losing their housing, including housing they own, rent, are sharing with others, or are living in without paying rent.

Category 3: Homeless Under Other Federal Statutes

Unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition, but who:



- Are defined as homeless under the other listed federal statutes;
- Have not had a lease, ownership interest in permanent housing during the 60 days prior to the homeless assistance application;
- Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and
- Can be expected to continue in such status for an extended period of time due to special needs or barriers

HUD has not authorized any CoC to serve the homeless under Category 3. HUD determines and approves the use of CoC Program funds to serve this population based on each CoC's Consolidated Application. See 24 CFR 578.89. Individuals and families that qualify as homeless under Category 3 may be served by the ESG program if they meet required eligibility criteria for certain ESG components.

Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing

“Domestic Violence” includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).

HUD Definition of “At Risk of Homelessness”

Category 1: Individuals and Families

An individual or family who:

- Has an annual income below 30% of median family income for the area; AND
- Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND
- Meets one of the following conditions:
 - Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
 - Is living in the home of another because of economic hardship; OR
 - Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR



- Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR (F) Is exiting a publicly funded institution or system of care; OR (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan

Category 2: Unaccompanied Children and Youth

A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute

Category 3: Families with Children and Youth

An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with them.

Definition of “Chronic Homelessness”

- The definition of chronically homeless is a homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who:
 - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and
 - Has been homeless and living as described for at least 12 months* or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described.
- An individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility**, or
- A family with an adult head of household (or, if there is no adult in the family, a minor head of household) who meets all of the criteria of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

*A “break” in homeless is considered to be 7 or more nights.

**An individual residing in an institutional care facility does not constitute a break in homelessness.



Definition of a Disability

has an adult head of household (or a minor head of household if no adult is present in the household) with a diagnosable substance use disorder, serious mental illness, developmental disability (as defined in section 15002 of this title), post traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability, including the co-occurrence of 2 or more of those conditions.



Appendix D: Resources

CoC Program Components:

<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/coc-program-components-overview/>

CoC Eligible Activities:

<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-eligible-activities/coc-eligible-activities-overview/>

HUD Categories of Homelessness:

<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/coc-and-esg-homeless-eligibility-overview/>

HUD Criteria for Definition of At Risk of Homelessness:

https://files.hudexchange.info/resources/documents/AtRiskofHomelessnessDefinition_Criteria.pdf

The CoC Program Rule - 24 CFR 578

<https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml>

