



YOUR WAY HOME
MONTGOMERY COUNTY



Your Way Home Montgomery County Continuum of Care Operations Manual

Policies, Procedures, & Written Standards
December 2023

Table of Contents

An Introduction to Your Way Home Montgomery County CoC	1
Coordinated Entry.....	7
Emergency Shelter	21
Code Blue and Seasonal Emergency Sheltering.....	34
Rapid Re-Housing.....	40
Transitional Housing & Joint Component Transitional Housing/Rapid Re-Housing (TH/RRH).....	53
Permanent Supportive Housing.....	56
Homelessness Prevention.....	62
Your Way Home Montgomery County CoC Policies.....	79
1. <i>System Performance Policies.....</i>	79
2. <i>General Standards & Prioritization Policies.....</i>	93
3. <i>Coordinated Entry Policies.....</i>	101
4. <i>Emergency Shelter Policies.....</i>	119
5. <i>Rapid Re-Housing Policies.....</i>	125
6. <i>Permanent Supportive Housing Policies.....</i>	145
7. <i>Homelessness Prevention Policies.....</i>	152
Glossary	157
<i>Programmatic Definitions.....</i>	157
<i>General Terminology.....</i>	158

An Introduction to Your Way Home Montgomery County CoC

Housing Instability in Montgomery County

Montgomery County, Pennsylvania is a suburban county northwest of Philadelphia. As of the 2020 census, the population was 827,100, making it the third-most populous county in Pennsylvania, after Philadelphia and Allegheny Counties. Of those, 78% identify as white, 10% Black or African American, 2% are mixed race and less than 1% are Native; 6% of Montgomery County is Hispanic or Latino.

The median household income in Montgomery County is \$93,518, about 1.5 times the median income for all of Pennsylvania, which is \$63,627. In all of Montgomery County, 5.8% of residents are persons in poverty, including 7% of children and 5% of seniors. 25% of households in Montgomery County make less than \$50,000 annually. In 2022 5.4% of rental units in Montgomery County were vacant, a 2.1% decrease in availability from 2021.

According to the National Low Income Housing Coalition, in 2023 the housing wage (the hourly wage needed to afford a two bedroom apartment) in Montgomery County was \$28.27 per hour; the minimum wage is \$7.25 hr. In order for a worker making minimum wage to afford to rent a two bedroom apartment in Montgomery County, they would have to work 156 hours per week or make \$58,800 annually. This is a 20 hour and nearly \$8,000 increase from the minimum working hours and income needed to live in Montgomery County in 2022. Between January 2022 and May 2023 there were more than 10,000 eviction filings in Montgomery County. The percentage of households has significantly increased, rising from an average of 378 per month in 2021 to an average of 635 per month in 2022- a roughly 60% increase in two years.

In 2022, Your Way Home served approximately 9,500 people experiencing homelessness and housing instability throughout Montgomery County. The population served includes working and low-income families and individuals, veterans, seniors, youth, people fleeing abuse and violence at home, and the medically frail, as well as people with one or more disabling conditions, including HIV/AIDS, serious mental illness, substance abuse and intellectual or developmental disabilities.

Historically, Montgomery County residents experiencing a housing crisis or homelessness were served by a relatively uncoordinated and fragmented continuum of care for housing and services under a complex web of public, nonprofit and community funding agencies and service providers employing a “housing ready” approach to ending homelessness. From 2009 through 2013, public, philanthropic, nonprofit and community partners gradually began a series of aligned planning initiatives, research studies, community conversations and pilot projects to explore and design a more coordinated, comprehensive community response to homelessness and housing stability based on data, best/promising practices in policy, programs and funding inclusive stakeholder engagement. The end result of these collaborative efforts is Your Way Home Montgomery County CoC.

An Overview of Your Way Home Montgomery County CoC

In January 2014, Your Way Home Montgomery County CoC was established as the county’s unified and coordinated housing crisis response system for families and individuals experiencing homelessness or at imminent risk of homelessness. Your Way Home Montgomery County CoC embraces a “housing first” approach to ending homelessness by first helping people find or maintain permanent housing with stability, without preconditions, and then connecting them with community, health, human, and financial services they need to prevent future experiences of homelessness. Through coordinated entry and assessment, Your Way Home Montgomery County CoC prioritizes housing and services based on vulnerability and need rather than on a first come, first serve basis. Through progressive engagement, consumers are given just as much services and support that they need to succeed in order to preserve costly interventions like permanent

supportive or subsidized housing for families and individuals with significant and lasting barriers to housing stability.

The major components of Your Way Home Montgomery County CoC include:

- Coordinated Entry through the Your Way Home Montgomery County CoC Call Center and Street Outreach Team
- A By-Name List to prioritize households for housing and services based on vulnerability and severity of need
- Housing-Focused and low-barrier Emergency Shelter services, including centralized shelter bed management
- Diversion and rapid resolution services to help people find alternative, safe & appropriate housing other than entering shelter
- Housing Resource Centers staffed by Housing Stability Coaches and Housing Locators to rapidly re-house people who are literally homeless
- Transitional Housing for select populations, including transitional age youth and people fleeing abuse and violence at home
- Permanent Supportive Housing for people with significant barriers to permanent housing stability
- Best practice Homelessness Prevention programs and pilots to serve those at imminent risk of homelessness
- Connections to mainstream and community services, including child care, food security, physical, mental and behavioral health, employment and job training, public benefits access and veterans' services, among others

Your Way Home Montgomery County CoC funders, service providers, landlords and community partners share a common agenda to improve the housing stability, economic security and health of people experiencing, or at imminent risk of, homelessness. As the lead agency for Your Way Home Montgomery County CoC, the Montgomery County Office of Housing and Community Development is responsible for the leadership and oversight of contracts, programs, policies, procedures, compliance, communications, community outreach, training, planning, budgeting, strategy, interdepartmental collaboration and cross-sector partnership development. The Operations Team is currently comprised of an Administrator, Deputy Director, Program Managers, HMIS Data Manager, Development and Communications Manager, and Program Coordinators. The Office of Housing and Community Development also manages the Clarity Homeless Management Information System (HMIS), which is Your Way Home Montgomery County CoC's unified data system.

The ultimate vision of Your Way Home Montgomery County CoC is to make the experience of homelessness in our community rare, brief and one time only.

The Your Way Home Montgomery County CoC Public-Private Partnership

Informed by the collective impact model of solving complex and deeply rooted social problems, the Your Way Home Montgomery County CoC Public-Private Partnership is a cross-sector collaboration between county agencies, nonprofit service providers, philanthropic foundations, landlords, faith organizations, homeless advocates, people with lived expertise, and other community partners committed to ending and preventing homelessness in Montgomery County.

Major components of the Your Way Home Montgomery County CoC Public-Private Partnership include:

- The Your Way Home PA-504 Continuum of Care Governing Board, comprised of elected representatives, including funders, service providers, community partners, advocates and people with lived experience, is responsible for ensuring that the CoC implements any and all plans, goals, activities, or actions steps reported to the United States Department of Housing and Urban Development through the CoC funding application and/or through any other reporting mechanism. It is also the responsibility of the Governing Board to approve the methodology of the Point-In-Time Count of persons experiencing homelessness.
- Your Way Home Montgomery County CoC Advisory and Action Teams that provide cross-sector, data-driven recommendations to improve Your Way Home Montgomery County CoC's system and provider performance.
- The Your Way Home Initiative Fund provides flexible private funding for Your Way Home Montgomery County CoC housing stability coaches, housing locators and homeless street outreach workers to quickly and effectively help families and individuals exit from homelessness to permanent housing with stability after all public and community resources have been exhausted.
- The Your Way Home Montgomery County CoC Community of Practice for core housing crisis response system provides for shared learning, training, and quality improvement.
- The Your Way Home website (www.yourwayhome.org), social media, forums, publications and Annual Summit to engage, inform and inspire our partners.

The Your Way Home Montgomery County CoC Public-Private Partnership is continually focused on efforts to scale the positive impact of Your Way Home Montgomery County CoC, engage a broader set of active community partners, and moving homelessness prevention “upstream” to address poverty, trauma, inequity, and other root causes of homelessness in our community.

Your Way Home Montgomery County CoC's Expansion to Eviction and Homelessness Prevention

Your Way Home Montgomery County CoC has improved service coordination, provider collaboration, and the use of metrics to inform decision-making across sectors, organizations and communities. A significant element of Your Way Home Montgomery County CoC's success has come from building in light support and diversion strategies at the access points to the homeless response system, to preserve housing when possible or resolve a housing crisis quickly without requiring further support from the homeless system.

Still, Your Way Home Montgomery County CoC believed that the homeless response system transformation was incomplete as it was missing a broader prevention component using evidence-based interventions to prevent evictions and secure ongoing housing stability. Specifically, Your Way Home Montgomery County CoC wanted to add effective homelessness prevention “upstream” at the point where households begin to experience instability, even if they are not on the immediate verge of homelessness, by connecting families, youth and single adults with opportunities to improve their mental and physical health and economic security. Your Way Home Montgomery County CoC also set out to engage, inspire and mobilize support across sectors, organizations, and communities through Montgomery County, Pennsylvania and beyond.

As Your Way Home Montgomery County CoC continues to prioritize its commitment to ending literal homelessness, we recognize that we must also develop solutions that will help prevent more families and individuals from losing their housing. Homelessness prevention is an expansion of the work already done by Your Way Home Montgomery County CoC, and targets those who are at risk of losing their housing. As Your Way Home Montgomery County CoC’s homeless crisis response system is able to more effectively divert, triage, and re-house literally homeless residents, our partnership can now begin to identify strategies for preventing homelessness from occurring among vulnerable populations.

As a result of a 2017 research study with [Barbara Poppe and Associates](#) and the [HealthSpark Foundation](#), Your Way Home has developed several homeless prevention program models that are currently being used to provide assistance to residents of Montgomery County. These programs are the Emergency Rent and Utilities Coalition (ERUC) and the Eviction Prevention Intervention Coalition (EPIC). See the results of that study by reading the report [here](#).

Your Way Home Montgomery County Equity Initiative

Despite Your Way Home Montgomery County CoC’s innovative and effective programs, partnerships and policies, the tragedy of homelessness persists in Montgomery County. Your Way Home needed to take a hard look at why. In spring of 2018, Your Way Home Montgomery County CoC adopted “advancing equity” as a core guiding principle in its work to end homelessness. Your Way Home Montgomery County CoC decided to evaluate the racial inequities in the homeless service system and use that information to design a more equitable system moving forward. Through support from the [HealthSpark Foundation](#), Your Way Home Montgomery County CoC brought in the Supporting Partnerships for Anti-Racist Communities (SPARC) initiative team at [C4 Innovations](#), a firm that is leading equity work nationally, to analyze data, conduct listening sessions with consumers, talk to providers about their experiences, evaluate board and staff diversity, and evaluate for impact, not intent. The full report can be read [here](#).

The Phase 1 report fully describes what was learned about the specific disparities in Your Way Home Montgomery County CoC, including that 23% of people experiencing homelessness are Black/African American children, compared to 5% being white children, and that the Hispanic/Latinx community and LGBTQIA2S+ community don’t feel welcome in the Your Way Home Montgomery County CoC network. These findings have led Your Way Home Montgomery County CoC to recognize that the existing approach to ending homelessness must fundamentally shift. Phase 2 of the equity report outlines key actions and best practices in order to advance equity, including recommendations on changing how decisions are made, how programs are funded and created, and how services are delivered.

In 2020, Your Way Home Montgomery County CoC began applying the best practices presented in this study. In partnership with consulting firm [Just Strategies](#) the local community was educated on historical racial inequities in Montgomery County. The firm interviewed people with lived expertise, direct service professionals

and as a result several suggestions were presented to improve access to Your Way Home's Coordinated Entry system. At the same time, the consulting firm [Focus Strategies](#) completed a national survey of equity-driven work being done in other communities and presented the findings with the goal for that work to be applied within Your Way Home Montgomery County CoC.

Policies, procedures, and programs outlined in this Operations Manual reflect Your Way Home Montgomery County CoC's commitment to advancing equity to the greatest extent possible.

Structure of the Your Way Home Montgomery County CoC Operations Manual

The Your Way Home Montgomery County CoC Operations Manual is designed to provide written standards and guidance to all Your Way Home Montgomery County CoC service partners, including those funded through federal Emergency Solutions Grants (ESG) and HUD Continuum of Care (CoC), as well as state, local, and private funding sources, for the implementation of Your Way Home Montgomery County CoC program activities, as listed below. Though all partners should be familiar with Your Way Home Montgomery County CoC programming, staff are fully responsible for understanding and implementing the policies and procedures that are related to the program they operate. For example, Housing Stability Coaches must be familiar with Street Outreach operations but will only need to fully understand the Rapid Rehousing policies and procedures.

This document is aligned with and organized to follow the major processes of Montgomery County's unified housing crisis response system:

- Coordinated Entry, including Call Center and Street Outreach activities
- Emergency Shelter
- Rapid Re-Housing
- Transitional Housing, including TH/RRH
- Permanent Supportive Housing
- Homelessness Prevention
 - Eviction Prevention and Intervention Coalition (EPIC)
 - Emergency Rent & Utility Coalition (ERUC)
 - Community Based Care Management (CBCMP) Pilot Program

The following information is included within each major process:

- **Guiding Principles:** Informed by best or promising practices in the field of homeless services, each section's Guiding Principles provide the policy foundation upon which Your Way Home Montgomery County CoC's services are built. Your Way Home Montgomery County CoC is aligned with principles, best practices, and policies promoted by *Home, Together*: the federal strategic plan to prevent and end homelessness, the United States Department of Housing and Urban Development (HUD), the United States Inter-Agency Council, the National Alliance to End Homelessness, national thought leaders, scholars, and peer communities, among others.
- **Target Population:** Describes the population that is engaged by the service or program; typically defined by the HUD Homeless categories used.

- **Major Steps:** Describe the major procedures to be undertaken by YWH Montgomery County COC service providers within the component. Links to related policies and Program Guidance are included within the Major Steps so that users may easily find other relevant information.
- **Program Guidance:** Provides additional information, tips, and strategies to YWH Montgomery County COC service providers on how to effectively carry out services related to the component. Program Guidance is meant to provide an additional, more thoughtful framework for making program-related decisions and carrying out the case management services in the manual.
- **Outcome and Output Measures:** Outline program goals, and describe how programs and services will be evaluated for effectiveness.

Following these chapters outlining program procedures, the [Your Way Home Montgomery County CoC Policies](#) then outline applicable policies across the major processes.

The Your Way Home Program Manager, in coordination with the Your Way Home Operations Team, is responsible for the review and revision of all policies and procedures outlining the written standards for all programs in this Operations Manual. The revision process is completed at least once annually with input solicited from providers, community partners, and consumers via an open-invite forum. Final approval of policies and procedures is approved by the Your Way Home Montgomery County CoC Governing Board. All housing & homeless service providers participating with Your Way Home Montgomery County CoC are required to follow the policies and procedures outlined in this manual. The latest version of the Operations Manual is publically-viewable [here](#).

Finally, the YWH Montgomery County CoC Operations Manual a companion document, called the [Your Way Home Montgomery County CoC Data Systems Policy & Procedure Manual](#) – which outlines policies and procedures related to HMIS use and data input.

Coordinated Entry

Coordinated entry is a streamlined crisis response system that provides quick access to resources for people experiencing or at risk of experiencing homelessness. Your Way Home Montgomery County is committed to creating a diverse Coordinated Entry system, with multiple points of access so each household can receive the most appropriate services. The Coordinated Entry (CE) *process* serves to ensure that all persons experiencing homelessness have fair and equal access to the same set of resources and services regardless of where they present for assistance, and that resources for households with greater service and housing needs are targeted to those who need them most. Coordinated entry can efficiently and effectively connect people to interventions that will rapidly end their homelessness and allow service providers to use equity consistent decisions.

Persons in Montgomery County experiencing homelessness can access Coordinated Entry for housing & homeless services by contacting the Your Way Home Coordinated Entry Call Center. Additionally, Your Way Home Montgomery County Homeless Street Outreach provides face-to-face access to Coordinated Entry by meeting persons in the community where they are. Your Way Home Emergency Shelters also provide Coordinated Entry services to their guests. The Call Center, Street Outreach, and Emergency Shelter staff are also Coordinated Entry Specialists who conduct triage and assessment and refer eligible clients for services.

In a coordinated system, each system entry point (“front door”) makes decisions on which programs people are referred to based on a comprehensive understanding of each program’s specific requirements, target population, and available beds and services. The Coordinated Entry *system* refers to the whole of the public and non-profit agencies and programs that participate in Coordinated Entry in any of the ways defined in and governed by these policies. Standardized person-centered assessment tools take into account the unique needs individuals, families and youth. This assessments provides the ability for households to gain access to the best options to address their needs, incorporating participants’ choice, rather than being evaluated for a single program within the system.

^{1,2}Guiding Principles of Coordinated Entry:

- **Housing focused:** The system and all programs within it will use a Housing First, low barrier approach focused on ending homelessness for each household as quickly as possible.
- **Phased assessment & necessary information-** The coordinated entry process employs a series of situational triage and assessments that allow the process to occur over time and only as necessary. The coordinated entry process only seeks information necessary to determine the severity of need and eligibility for housing and services and is based on evidence of the risk of remaining homeless. This will ensure that participants quickly receive access to the most appropriate services and housing resources available.
- **Participant autonomy-** The procedure for coordinated entry provides the opportunity for people accessing coordinated entry to freely refuse to answer questions without retribution or limiting their access to assistance. The coordinated entry process will reduce the stress of the experience of being homeless by limiting assessments and interviews to only the most pertinent information necessary to resolve the participant’s immediate housing crisis.

¹ US Department of Housing and Urban Development. HUD Coordinated Entry Policy Brief, 2015.

² US Department of Housing and Urban Development, Outline for a Continuum of Care’s Coordinated Entry, 2018

- **Person-centered-** The coordinated entry process operates with a person-centered approach, and with person-centered outcomes, as opposed to rigid decisions about what individuals or families need. For those not able to access coordinated entry independently, via telephone or at a walk-in site, enrollment in coordinated entry will be prioritized through homeless street outreach services.

Participants are experts in their own lives and will make choices about what is right for them. Such choices may be constrained by the availability of resources but will not prevent the participant from being served.

- **Cultural competence-** Historic and current racial inequalities will be considered in the design, implementation and evaluation of the CE process and system, and accountability for reducing disparities and increasing equity within the housing crisis response system will be part of the required results. Coordinated entry will incorporate cultural and linguistic competencies in all engagement, assessment, and referral coordination activities that reduce barriers to housing and services for special populations, including immigrants, refugees, youth, individuals with disabilities, and LGBTQIA2+ persons.
- **User-friendly-** Coordinated entry will implement standard assessment tools and practices that are brief and effortlessly administered by non-clinical staff (including outreach workers), to minimize the time required to utilize, and are easy for those being assessed to understand.
- **HMIS Privacy protections-** Coordinated entry will utilize HMIS for the purposes of managing participant information. Privacy protections are in place to ensure proper consent and use of client information within coordinated entry. See policy on [Entering Non-Identifying Information into YWH Montgomery County COC Data Systems](#)
- **Meaningful recommendations-** Coordinated entry will continue to integrate all mainstream housing & homeless service providers into the system, including local Public Housing Authorities and VA medical centers, among others. Coordinated entry processes & tools are designed to collect the information necessary to make meaningful recommendations and referrals to available housing and homeless services.
- **Written standards, policies and procedures-** The Continuum of Care for Your Way Home Montgomery County CoC services has written standards describing who is prioritized for assistance and how much assistance they might receive. The policies and procedures governing the coordinated assessment process are approved by Your Way Home Montgomery County CoC members and easily accessible to stakeholders in the community.
- **Sensitive to lived experiences-** Providers recognize that assessment, both the kinds of questions asked and the context in which the assessment is administered, can cause harm and risk to individuals or families, especially if they require people to relive difficult experiences. Coordinated entry scripts and messaging are delivered in a manner that is sensitive to the lived and sometimes traumatic experiences of people experiencing homelessness.

Target Population

<p>Literally Homeless (HUD Homeless Category 1)</p>	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ol style="list-style-type: none"> 1. Has a primary nighttime residence that is a public or private place not meant for human habitation; 2. 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 3. 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
<p>At Imminent Risk of Homelessness (HUD Homeless Category 2)</p>	<p>Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> • Residence will be lost within 14 days of the date of application for homeless assistance (30 days for veterans); • No subsequent residence has been identified; and • The individual or family lacks the resources or support networks needed to obtain other permanent housing
<p>Fleeing/ Attempting to Flee Domestic Violence (HUD Homeless Category 4)</p>	<p>Any individual or family who-</p> <ul style="list-style-type: none"> • Is experiencing trauma or lack of safety related to, or fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; • Has no other safe residence; and • Lacks the resources to obtain other safe permanent housing.

General Standards for Coordinated Entry and Assessment

Minimum standards for Coordinated Entry and Assessment include:

All persons presenting or contacting Coordinated Entry will be provided with triage as outlined in the policy on [Coordinated Entry Access](#).

All contracted Your Way Home Montgomery County CoC Coordinated Entry providers, except for victim service providers, shall use the designated triage, assessment, and referral process within Your Way Home Montgomery County CoC's Homeless Management Information System (HMIS) in accordance with HUD's requirements (24 CFR Part 578).

A victim service provider may not use Your Way Home Montgomery County CoC's triage, assessment, and referral process within HMIS but are required to use a comparable database and assessment system that meets HUD's standards (24 CFR 576.107).

ESG and CoC funded providers are required to have program coordination within Coordinated Entry. Other publicly and privately funded housing and homeless service programs within the PA-504 CoC geographic area are integrated into Coordinated Entry to the maximum extent practical. These programs include the following:

- Emergency Shelters
- Essential Service Providers
- Homelessness Prevention
- Transitional Housing
- Permanent Supportive Housing
- Rapid Re-Housing
- Emergency Food and Shelter Programs
- Supportive Services for Veterans Families Program
- VA Homeless Outreach Program
- Programs for Runaway and Homeless Youth
- Grants for the Benefit of Homeless Individuals
- Tenant Based Rental Assistance Programs
- Supportive Housing for Persons with Disabilities
- HOME Investment Partnerships Program

Major Steps

1. Triage

Persons in Montgomery County who are experiencing or at risk of homelessness, or their advocates, contact YWH Montgomery County COC Coordinated Entry.

If any household within Montgomery County is experiencing homelessness and cannot or will not access Coordinated Entry via the Call Center, the Your Way Home Street Outreach team or Community Connections can provide face-to-face Coordinated Entry services as outlined on the policy of [Coordinated Entry Access](#).

The YWH Montgomery County CoC Coordinated Entry Specialist follows the applicable Coordinated Entry Script to complete triage for basic eligibility for YWH Montgomery County CoC services.

Triage Questions include:

1. May I have your name and the best way to contact you if we get disconnected or are unable to finish our conversation right now?
2. May I have the zip code where you are calling from?
3. Are you currently living with, or trying to leave, an intimate partner who you are afraid of or threatens you?

Persons reporting fleeing or attempting to flee domestic violence are offered a direct transfer to the DV Hotline at 1-800-642-3150 (Laurel House Hotline). If caller declines, move forward to next question.

Call 911 if they are in immediate danger.

4. Do you feel safe where you are currently staying?

If no, ask probing questions

Person can be re-referred to a DV hotline, ChildLine if child abuse/neglect is suspected (1-800-932-0313), a mental health crisis hotline (1-855-634-4673), national suicide prevention hotline (Dial 988), a human trafficking hotline (1-888-373-7888), National Hotline for Homeless Veterans (1-877-424-3838) etc. as appropriate.

5. Have you or any other household member served in the United States military, including the Army, Navy, Air Force, Marine Corps, Coast Guard, Space Force, Reserves, or National Guard?

6. Where did you sleep last night?

Persons who do not meet basic [eligibility for YWH Montgomery County CoC services](#) are referred to appropriate community-based resources and are not enrolled in Coordinated Entry program in HMIS. These referrals include, but are not limited to:

- Legal Services (Legal Aid of Southeastern Pennsylvania)
- Budgeting and Credit Counseling Services
- Emergency Shelters
- Food Banks
- Community based or faith based rental assistance programs
- Utility assistance
- Housing Search and Location
- Substance Abuse programs
- Mental Health/Behavioral Health programs
- Physical Health services
- Employment and Job Training programs
- Non federally-funded emergency rent & utility programs

2. Homeless Management Information System (HMIS) Profile Creation

For persons that meet the basic eligibility, the Coordinated Entry Specialist reads the Your Way Home Montgomery County CoC Consent Statement to the person to determine the appropriate level of personally-identifying information to be entered into Clarity, Your Way Home Montgomery County CoCs HMIS platform. Persons that choose to not share their personally-identifying information, including victims of Domestic

Violence, are entered into Clarity following the policy on [Entering Non-Identifying Information into YWH Montgomery County CoC Data Systems](#).

The Coordinated Entry Specialist first attempts to find the Clarity profile for the Head of Household. If none exists, Specialist creates the Clarity profile for the Head of Household and for all other family members. The Coordinated Entry Specialist links the household members in Clarity.

3. Program Enrollment into Coordinated Entry

All Your Way Home Montgomery County CoC programs and partners serving the homeless community, including but not limited to Coordinated Entry providers such as the Call Center, Street Outreach, and Emergency Shelters will have access to Coordinated Entry (CE) Program in Clarity and will be expected to enroll any household experiencing homelessness into the CE Program and update the required data elements. A client's CE project enrollment is expected to overlap with other continuum project enrollments and to supplement the information collected by other project types.

Coordinated Entry Specialist will complete Coordinated Entry program enrollment in Clarity HMIS for all household members. Head of household must meet eligibility as determined during Triage, and Head of Household must be actively one of the following:

- Category 1
- Category 2 Veterans
- Category 4

4. Provide Diversion

The YWH Montgomery County CoC Coordinated Entry Specialist continues to follow the Coordinated Entry Script to provide diversion services.

- Coordinated Entry Specialists will explore natural resources available to the household to help them self-resolve their housing or homeless crisis and offer support in utilizing those natural resources as appropriate.
- Coordinated Entry Specialists will utilize motivational interviewing techniques to help the household problem solve and use their own strengths and resources to find an alternative, safe & appropriate housing solution for at least 7 days.
- Coordinated Entry Specialists will offer referrals to community resources related to income, employment, education, child care, transportation, health care, or others as appropriate to help divert the household from utilizing emergency shelter.
- Households will be informed of Your Way Home Montgomery County CoC program and service eligibility and prioritization as outlined in [Coordinated Entry Program Guidance](#).
- If the household can identify a safe & appropriate housing option, the Coordinated Entry Specialist will provide community resources as appropriate.

For households who are successfully able to be diverted, meaning the client believes they will not require further services from the homeless crisis response system (e.g., street outreach, emergency shelter, rapid re-housing) for 7 days or more, Coordinated Entry Specialist will add a *CE Event* "Problem

<u>Head of Household Current Housing Situation</u>	<u>Referrals/Assessments</u>	<u>CE Events- Entered into Coordinated Entry program</u>
Category 1 – Sleeping in a place not meant for human habitation (non-veteran)	<ul style="list-style-type: none"> ➤ Refer to Street Outreach via HMIS ➤ Complete the appropriate VI-SPDAT if reasonably verified, Refer to the By-Name list via HMIS ➤ As Needed Referrals to Food, Legal Aid, Public Benefits, and Other Community Services ➤ Emergency Declarations Only- Referral to Emergency Code Blue/Red Shelter 	<ul style="list-style-type: none"> ➤ Referral to Street Outreach Project or Services ➤ Referral to Housing Navigation project or services (if VI-SPDAT assessment was completed)
Category 1 - Staying in Emergency Shelter/ Hotel/Motel paid by a charitable organization or federal, state, or local government program	<ul style="list-style-type: none"> ➤ Complete the appropriate VI-SPDAT ➤ Refer to the By-Name list via HMIS ➤ As Needed Referrals to Food, Legal Aid, Public Benefits, and Other Community Services 	<ul style="list-style-type: none"> ➤ Referral to Housing Navigation project or services
Category 1 – Veteran Head of Household	<ul style="list-style-type: none"> ➤ Refer to the <i>Coatesville VA Street Outreach team</i> via HMIS ➤ Complete the appropriate VI-SPDAT if reasonably verified, Refer Assessment to SSVF Rapid Re-Housing Program ➤ As Needed Referrals to Food, Legal Aid, Public Benefits, and Other Community Services 	<ul style="list-style-type: none"> ➤ Referral to Street Outreach Project or Services” ➤ Referral to Housing Navigation project or services
Domestic Violence Household- Category 4	<ul style="list-style-type: none"> ➤ Complete the appropriate VI-SPDAT, Refer Assessment to the By-Name list via HMIS ➤ Refer to Street Outreach ➤ Refer to Laurel House DART Team (non-HMIS) ➤ Safety Planning (Warm Transfer to 911, DV Hotline, Human Trafficking Hotline), if needed 	<ul style="list-style-type: none"> ➤ Referral to Street Outreach Project or Services ➤ Referral to Housing Navigation project or services

	<ul style="list-style-type: none"> ➤ As Needed Referrals to Food, Legal Aid, Public Benefits, and Other Community Services 	
Veterans - Category 2 Household	<ul style="list-style-type: none"> ➤ Complete the appropriate PR-VI-SPDAT, Refer Assessment to <i>SSVF Homeless Prevention Program</i> via HMIS ➤ As Needed Referrals to Food, Legal Aid, Public Benefits, and Other Community Services 	<ul style="list-style-type: none"> ➤ Referral to Prevention Assistance Project

Solving/Diversion/Rapid Resolution intervention or service” and CE program will be closed via Clarity HMIS.

5. Assessment

If diversion is unsuccessful, the Coordinated Entry Specialist continues to follow the Call Center Script.

- The Coordinated Entry Specialist completes a VI-SPDAT for any household calling from an emergency shelter in Montgomery County (including a hotel or motel paid for by a charitable or government organization), any household verified as sleeping in a place not meant for habitation, for any household who identifies as a Veteran, and for any household who is homeless under HUD Category 4 definition, choosing the most appropriate version (single adult, family, or youth). *CE Event* “Referral to Housing Navigation project or services” is entered into CE Program Enrollment.
- The Coordinated Entry Specialist will not complete an assessment on any household who requires more immediate access to the most appropriate services, such as homeless street outreach and emergency shelter. In these instances, the Coordinated Entry Specialist will go directly to Referral. *CE Event* “Referral to Street Outreach Project or Services” is entered into CE Program Enrollment.

6. Referral

The Coordinated Entry specialist will complete the appropriate Street Outreach referral in Clarity HMIS referral for all clients who are experiencing Category 1 homeless, or any Category 4 household who requires more immediate access to services.

Referrals should be sent to the following programs:

- Valley Youth House “Youth Street Outreach” program- refer if the head of household is under age 24
- Access Services “Street Outreach” program– refer all other households experiencing Category 1 homelessness here
- Coatesville Veteran's Affairs (VA) “Veteran’s Street Outreach” program - refer if the head of household is identified as a Veteran

CE Event “Referral to Street Outreach Project or Services is entered into the CE Program Enrollment.

The Coordinated Entry Specialist will inform the household of their eligibility for programs and an estimated timeline for outreach from a Your Way Home Montgomery County CoC provider (note that Street Outreach staff respond to all referrals within no more than 48 hours) as outlined in the Your Way Home Montgomery

County CoC Coordinated Entry Script. See the chart below for referral instructions.

The Coordinated Entry Specialist will provide any other local community resources as appropriate. Persons are notified to contact Coordinated Entry again if they have not heard from a provider within the timeframe provided, or if their situation changes. *CE Program Enrollment* is ended for any household or person with no contact with any homeless service provider in 90 days.

7. Street Outreach Program Enrollment & Verification

Upon receipt of a referral for a person who reports street homelessness to the call center, the Street Outreach Team contacts the client and updates the status of the Referral Record to "Pending-In Process".

- The Street Outreach Team denies any referrals that they are unable to contact after at least 2 attempts within 48 hours.

The Street Outreach Team sets up an outreach meeting with persons reporting street homelessness, and updates the Referral Record notes in Clarity to reflect the meeting date, time and location.

- Meetings will take place in the location where the person is reporting to sleep at night, as soon as possible.
- If a person does not show up to a scheduled meeting, the Referral is denied.

The Street Outreach Team meets in-person to verify that the individual/ household's primary nighttime residence is a place not meant for human habitation.

- The Street Outreach Team engages in interview and assessment to confirm that the person's primary nighttime residence is a [place not meant for habitation](#). Once Category 1 homeless status is verified, the Street Outreach Team enrolls the household into the Street Outreach program in Clarity. The household should remain enrolled in the Coordinated Entry program.
 - Street Outreach adds the assessment *Current Living Situation* to reflect where the person is currently sleeping. This data element should be added to the Street Outreach Program Enrollment.
 - Additionally, Street Outreach pins the [enrollment location](#) in the Location Tab under the head of household, identifying the household's primary nighttime residence.
- If the Street Outreach Team encounters a household whose status can be verified as Category 1 who has not yet contacted the Call Center, the Street Outreach team should complete Clarity profile creation if necessary and enroll that household in both the Coordinated Entry program, AND the Street Outreach program in Clarity.
- Households who cannot be verified as Category 1 or Category 4 homeless should not be enrolled in the Street Outreach Program. In these instances, street outreach worker may refer to community resources. The Street Outreach worker must close the CE Program and households will be told to follow up with prevention resources and to contact Coordinated Entry again if their situation changes. *CE Event* "Referral to Non-continuum services: Ineligible for continuum services" is entered into CE Program prior to closing program enrollment.

8. Street Outreach Safety Planning

The Street Outreach Team will enter data element *Date of Engagement* for any and all household members who are verified homeless and an interactive client relationship has been developed wherein the outreach workers and client(s) are mutually engaged in deliberate assessment and beginning of a case plan around housing (emergency or permanent).

The Street Outreach Team has a conversation with the person with the ultimate goal of helping the household quickly self-resolve their homelessness.

- For confirmed households Street Outreach will explore natural resources available to the household to help them self-resolve their homelessness and offer support in utilizing those natural resources as appropriate, so that they do not have to enter emergency shelter (“diversion”). Street Outreach will utilize motivational interviewing techniques and referrals to community resources related to income, employment, education, child care, transportation, health care, or others. Street Outreach will help develop a plan for the household to enter to an alternative, safe & appropriate housing solution for at least 30 days. If financial assistance is needed to help execute this diversion plan, Street Outreach will arrange payment.
- If the household can identify a safe & appropriate housing option (Diversion is successful), Street Outreach will help them execute the plan and close the Street Outreach program enrollment and the Coordinated Entry program enrollment at that time. *CE Event* “Problem Solving/Diversion/Rapid Resolution intervention or service” is entered into CE Program prior to closing program enrollment.
- For confirmed households who have income, Street Outreach will explore the household’s ability to self-resolve their homelessness through one-time move-in assistance. In these instances, the household will be approved for [RRH Lite](#). All paperwork and policies outlined in Rapid Re-Housing must be followed. In these instances, an outreach worker will complete a Rapid Rehousing- Lite referral and contact a supervisor of one of the Housing Resource Centers to arrange payment once all paperwork is complete.
- Before contacting a Housing Resource Center supervisor, the Outreach worker should complete an appropriate VI-SPDAT (Single Adult, Youth, Family) in the Coordinated Entry Program and ensure the household has been added to the By-Name List. *CE Event* “Referral to Housing Navigation project or services” is entered into the CE program enrollment.

If the household is unable to be diverted, the Street Outreach team will assess the household’s needs and arrange access to shelter based on their knowledge of system resources. This includes:

- Contacting participating Shelter Directors via email or phone to confirm current openings.
 - If beds/ units are available, the Street Outreach Team will close the Street Outreach Program Enrollment after the household is enrolled in shelter.
- Referring households to non-HMIS participating Your Way Home Montgomery County CoC shelters. *CE Event* “Referral for Non-continuum services: No availability in continuum services” is entered into CE Program Enrollment.
- Assessing households for temporary hotel as outlined in the [Emergency Hotel Assistance Policy](#).

- Households enrolled in temporary hotel as an emergency shelter response must be enrolled in Hotel Overflow program in HMIS.
- For any household approved for a hotel due to a medical need that restricts them from being able to be safely accommodated in an emergency shelter, the Street Outreach team will complete an appropriate VI-SPDAT (Single Adult, Youth, Family) in the CE Program, referral to the By-Name List, and contact the local Housing Resource Center for potential RRH prioritization.
- *CE Event* “Referral to Housing Navigation project or services” is entered into the CE program enrollment.

9. Street Outreach Assessment of Needs and Referral to the By-Name List

The Street Outreach Team will keep the Street Outreach Program Enrollment “Open,” or “Active” on their caseload as outlined in the policy on [Street Outreach Caseload](#).

- Face-to-face homeless verification is strongly encouraged to occur monthly and required to occur at least once every 90 days. Street Outreach enters assessment [Current Living Situation](#) in Clarity each time a client is seen face-to-face. Only one *Current Living Situation* assessment should be added for each day- even if Street Outreach sees the same household multiple times. The *Current Living Situation* should be entered in the Street Outreach program. If a household cannot be verified face-to-face within the 90 day limit, both the Coordinated Entry and the Street Outreach program enrollment must be closed.
- Street Outreach Worker will also enter a *Field Interaction* into the Location section of the Client’s profile following each face-to-face interaction.

The Street Outreach Team identifies other [service needs](#).

- If other service needs are identified, the Street Outreach Team will provide referral information for appropriate services and conduct follow-up with the consumer. *CE Event* “Referral to Non-continuum services: No availability in continuum services” is entered into the CE Program Enrollment

If a household is experiencing ongoing literal homelessness for more than 2 weeks and is not yet connected to emergency shelter (either due to refusal or lack of shelter availability), and have not yet received a VI-SPDAT, the Street Outreach Team will complete an appropriate VI-SPDAT(Single Adult, Youth, Family) with the household and submit a referral to the By-Name List for housing programs.

- The Street Outreach team will continue to arrange access to emergency shelter as appropriate.
- *CE Event* “Referral to Housing Navigation project or services is entered into the CE program enrollment.

The Street Outreach Team will close the Street Outreach Program Enrollment in Clarity once a referral destination is determined and/or the Street Outreach Team’s assessment and referral activities are ended. If a household has not located permanent housing (self-resolved, Rapid Rehousing, Rapid Rehousing- Lite), they should remain enrolled in the Coordinated Entry program after they have been exited from the Street Outreach program. Households who are inactive in the Coordinated Entry program for 90 days will be automatically exited from the program. See [Clarity HMIS Automatic Exit Policy](#).

Program Guidance

Vulnerability and Dynamic Prioritization for Services

Your Way Home Montgomery County CoC's goal is for the county's capacity to meet the needs of people experiencing or at imminent risk for homelessness to exceed the demand at any given time. In practice, this would mean that any household that becomes homeless would be matched with the appropriate level of supports and subsidy within 30 days of becoming homeless.

Your Way Home Montgomery County CoC has not reached that goal yet- demand exceeds the capacity to provide all levels of service (Permanent Supportive Housing, Rapid Re-Housing, Emergency Shelter, and Prevention). As a result, Your Way Home Montgomery County CoC must prioritize who it serves first when resources don't allow us to serve everyone.

[Your Way Home Montgomery County CoC's general standards and prioritization policies](#) are based on the principle of serving the most vulnerable consumers first. This is similar to how an emergency room triages patients- the patient having a heart attack is served before the patient with the broken arm, even if the patient with the broken arm has been waiting longer. Under Your Way Home Montgomery County CoC, this means that higher acuity consumers are served first, and oftentimes more quickly, than lower acuity consumers.

Your Way Home Montgomery County CoC has embraced the approach of dynamic prioritization. The VI-SPDAT score is only one factor in determining vulnerability and prioritization. Other determining factors include length of time homeless, youth, parenting youth, human trafficking victims, pregnant people, households with children under the age of 5, households with 3 or more young children, veterans, households fleeing domestic violence, people with significant medical or mental health needs, and others. These households may be connected to a Housing Resource Center over households with a higher VI-SPDAT score in order to provide timely services. As a result, Housing Resource Centers may not always be able to predict exactly when they can schedule their next intakes for Rapid Re-Housing, or they may need to "bump" scheduled intakes in order to address the high-risk consumer's needs.

Effect on Consumers and Advocates

Your Way Home Montgomery County CoC's limited resources and its prioritization policies result in the fact that some consumers who are experiencing homelessness will not receive services in a timely manner. We are continually working to improve this, but in the meantime, this reality can present real challenges and frustrations for consumers, Your Way Home Montgomery County CoC service providers, community partners, and consumer advocates.

Communicating Prioritization Policies: Info for YWH Montgomery County COC Service Providers

Explaining why consumers may not receive certain services, or that they may be waiting a long time to receive those services, is a real and understandable challenge for Your Way Home Montgomery County CoC provider staff, community partners, and consumer advocates. In addition to the information above, Your Way Home Montgomery County CoC providers, community partners, and consumer advocates should use the following framework, messages and strategies to explain the prioritization process to consumers if questions arise:

- Emphasize the areas of strength and resources that the consumer already has, and how these can be used to obtain housing on one's own.
- Explain that subsidized housing is not available unless the consumer has already been approved for the Housing Authority's waiting list.

- Explore the cost of living and develop a budget for living on one's own. Assess this in terms of the consumer's current income.
- Explain that one-time assistance may be available to move into a unit that is affordable.
- Explore other options for housing based on the consumer's income and resources.
- Explain that the VI-SPDAT assessment score is only one part of a dynamic prioritization process and Rapid Re-Housing and/or Permanent Supportive Housing appointments are not guaranteed.

More detailed information on housing planning is provided under the [Emergency Shelter Program Guidance](#) section.

Communicating Prioritization Policies: Info for YWH Montgomery County COC Community Partners and Advocates

Community partners and consumer advocates can help consumers understand Your Way Home Montgomery County CoC's process by reinforcing Your Way Home Montgomery County CoC's messaging and contacting the Your Way Home Program Manager directly for assistance when needed. Additional strategies and guidance are below:

Community partners and advocates should review the Operations Manual policies and procedures on [Coordinated Entry](#) and [Prioritization](#). Reinforcing the intent and process for prioritization will help provide a consistent message to consumers and the larger community.

Community partners should review the notes and assessment information in Clarity HMIS (if they have access) prior to contacting the Program Manager or a Your Way Home Montgomery County CoC service provider directly. Community partners without access to Clarity HMIS should obtain a signed Release of Information form for Housing and Community Development if they do not have Clarity HMIS access and wish to discuss the consumer's prioritization with the Program Manager.

Community partners and consumer advocates can use the information in the Program Guidance above to explain how the VI-SPDAT score relates to housing support through Your Way Home Montgomery County CoC. If assistance is needed that falls within the scope of what Your Way Home Montgomery County CoC may provide to the consumer, and the consumer has been denied these resources, community partners and advocates are encouraged to contact the Your Way Home Program Manager directly.

Community advocates working with consumers who are waiting to receive Your Way Home Montgomery County CoC services should contact the Your Way Home Program Manager directly to check in on the consumer's prioritization level and anticipated timeframe for receiving services.

Community partners/ consumer advocates should not contact the Housing Resource Center staff directly if a client has not been seen for intake yet by that HRC, or to advocate for a higher prioritization level for their client.

The Your Way Home Program Manager will provide a best estimate of the timeframe in which a consumer will be connected to housing supports.

The Your Way Home Program Manager may recommend that other options be pursued if the wait time is anticipated to be longer than 60 days.

Output and Outcome Measures

The following measures will be used to evaluate the performance of the Your Way Home Montgomery County CoC Coordinated Entry process. Additionally, whenever possible, based on HMIS reporting capabilities, coordinated entry outcomes will also be evaluated for any discrepancies across demographic categories (gender, race, ethnicity, and age tier).

For Call Center Coordinated Entry Operations:

- ❖ Number of unduplicated callers calling in to the Call Center
- ❖ Number/ Percentage of callers reporting street homelessness, imminent risk of homelessness, and living in unstable housing
- ❖ Number/ Percentage of callers assessed and referred to Your Way Home Montgomery County CoC services
- ❖ Percentage of callers satisfied with call experience
- ❖ Number/Percentage of callers successfully diverted from being assessed for homeless services
- ❖ Demographic profile of program participants versus the general population of Montgomery County
- ❖ Equity of assessment scores by demographic categories

For Street Outreach Operations:

- ❖ Number/ Percentage of persons reporting street homelessness who are verified as such
- ❖ Average days to confirm street homelessness
- ❖ Average days from call to shelter entry for street homeless individuals
- ❖ Percentage of persons who exit Street Outreach to temporary or permanent housing destinations (diversion)
- ❖ Rate of engagement for persons first contacted on the street and enrolled into the Street Outreach program

Regular and ongoing evaluation of Coordinated Entry will be conducted by Your Way Home Montgomery County CoC Operations Team, including but not limited to a yearly consumer feedback survey, on-site provider monitoring, and quarterly reviews of HMIS data.

Policies

Your Way Home Montgomery County CoC Service Provider staff are encouraged to become familiar with all [Your Way Home Montgomery County CoC Policies](#).

The Your Way Home Montgomery County CoC Policy sections listed below provide guidance and direction for the implementation of Your Way Home Montgomery County CoC Coordinated Entry services.

[1. System Performance Policies](#)

[2. General Standards & Prioritization Policies](#)

[3. Coordinated Entry Policies](#)

Emergency Shelter

Your Way Home Montgomery County CoC Emergency Shelter programs empower families and individuals experiencing homelessness to regain permanent housing as quickly as possible while providing a safe place to sleep and housing-focused case management services.

Guiding Principles of Emergency Shelter

- **Prioritization of Emergency Shelter beds-** People who are literally homeless should be prioritized for shelter bed access.
- **Safe and Inclusive Spaces-** Emergency shelters will provide for the emotional and physical safety, inclusion, and support for all persons regardless of their sexual orientation or gender identity.
- **Shelter entry-** Shelter entry should be fast, uniform, culturally sensitive, and low barrier for any resident experiencing homelessness.
- **Reduced length of stay-** Living in shelter is traumatic for families/individuals and costly to the housing crisis response system, meaning length of stay in shelter should be as short as possible.
- **Exit to permanent housing-** The majority of people experiencing homelessness can and should exit from emergency shelter directly to permanent housing.
- **Intervention and other supports-** Families and individuals are more responsive to intervention and social service support once in permanent and stable housing.

Target Population

<p>Literally Homeless (HUD Homeless Category 1)</p>	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • 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
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<p>At Imminent Risk of Homelessness (HUD Homeless Category 2)</p>	<p>Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> • 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.
<p>Fleeing/ Attempting to Flee Domestic Violence (HUD Homeless Category 4)</p>	<p>Any individual or family who-</p> <ul style="list-style-type: none"> • Is experiencing trauma or lack of safety related to, or fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; • Has no other safe residence; and • Lacks the resources to obtain other safe permanent housing.

Major Steps

1. Receive referrals

When an emergency shelter bed is about to be available, emergency shelter managers or case workers will contact Street Outreach.

Street Outreach will provide the emergency shelter with 1-3 high priority referrals.

- Upon receiving a referral from Street Outreach, the emergency shelter Case Worker will contact the household. The Case Worker will collaborate with any current supports working with the individual, such as Street Outreach, in order to make contact with the eligible household.
- The Case Worker denies any referrals that they are unable to contact after at least 2 attempts within 48 hours.
- Ensure that any household who moves into an Emergency Shelter remains enrolled in the Coordinated Entry program.

2. Conduct Diversion

When an emergency shelter successfully makes contact with the referral, Case Workers will first have a discussion with the household (in person or over the phone) to explore natural resources available to the

household to help them self-resolve their homelessness and offer support in utilizing those natural resources as appropriate, so that they do not have to enter emergency shelter. The Emergency Shelter Case Worker will utilize motivational interviewing techniques and referrals to community resources related to income, employment, education, child care, transportation, health care, or others.

The Case Worker will help develop a plan for the household to enter to an alternative, safe & appropriate housing solution. If financial assistance is needed to help execute this diversion plan, the case worker will contact a supervisor from the Housing Resource Center in order to arrange payment.

If diversion is successful, the Case Worker will enter *CE Event* “Problem Solving/Diversion/Rapid Resolution intervention or service” and *Current Living Situation*. CE program will be closed in Clarity.

If diversion is unsuccessful and the household must enter shelter, the Case Worker will provide basic shelter intake information to the household, based on the Emergency Shelter’s intake and enrollment procedures. The Case Worker will arrange a plan for quick entry into emergency shelter.

3. Shelter enrollment

Once the household arrives into emergency shelter, the Emergency Shelter Case Worker will enroll the household into the emergency shelter program in Clarity.

The Case Worker and Emergency Shelter staff will provide sleeping arrangements and meals, and ensure client safety according to Your Way Home Montgomery County CoC and the Emergency Shelter’s policies and procedures.

For procedures related to intake & enrollment during declared Code Blue, reference [Montgomery County Code Blue](#).

4. Rapid Resolution

For the first two weeks while the household is in shelter, the Emergency Shelter Case Worker will meet face-to-face at minimum twice with the household to continue initial diversion conversations. Document these conversations as *CE Events* in CE Program Enrollment as appropriate, outlining the efforts to help the household be empowered to exit the shelter to a housing destination. See [Coordinated Entry Events](#) for definitions and examples.

- All case workers, monitors, managers, and other shelter personnel & residents are encouraged to have multiple, ongoing conversations with the household about self-resolution during these first two weeks.

The goal of these conversations will be to help the household rapidly resolve their situation to a more appropriate temporary or permanent housing destination. These conversations should be guided and informed in the following ways:

- Households will be fully informed of shelter expectations and communal living expectations. The challenges of living in a communal, temporary living situation are very real. If the household has an opportunity to return to a living situation with more autonomy (such as with family or friends, for example), the shelter case manager should work with the household to develop a plan to exit shelter to that more appropriate living situation.
- Shelter case managers will support households in exiting to a treatment facility for those who are in need of and agreeable to immediate treatment. A household is never obligated or required to receive treatment prior to or while in emergency shelter; however, if the household requests immediate medical, mental health, or drug & alcohol treatment, the emergency shelter case manager will help

arrange this for the household.

- In instances when a household has steady income and/or savings & assets that can maintain permanent housing, the shelter case manager will provide housing stability planning and light-touch housing location help in order to support the household in utilizing this strength. The emergency shelter case manager will immediately begin to identify housing destinations that can be maintained with the household's income and will work with the household on this housing exit plan in accordance with all Fair Housing Law and [Affirmatively Furthering Fair Housing](#).
- For confirmed households who have income, case workers will explore the household's ability to self-resolve through one-time move-in assistance. In these instances, the household will be approved for [RRH Lite](#). All paperwork and policies outlined in Rapid Re-Housing must be followed. In these instances, shelter case workers will complete a Rapid Rehousing- Lite referral and contact a supervisor of one of the Housing Resource Centers to arrange payment once all paperwork is complete.
- Before contacting a Housing Resource Center supervisor, the shelter case manager should complete an appropriate VI-SPDAT (Single Adult, Youth, Family) and ensure the household has been added to the By-Name List. *CE Event* "Referral to Housing Navigation project or services" is entered into the CE program enrollment.
- For certain priority populations, such as unaccompanied youth, or survivors of domestic violence or human trafficking, transitional housing options should be explored.

If a household is successful at identifying a more appropriate housing situation, the shelter case manager will help execute the agreed-upon plan, then close the shelter program enrollment and CE program enrollment in Clarity HMIS and write a final case note once the household has exited shelter. *CE Event* "Problem Solving/Diversion/Rapid Resolution intervention or service" is added to the CE Program Enrollment for all diversion except Rapid Rehousing-Lite

5. Assessment & Development of Housing Stability Plan

If the household is unable to resolve after two weeks of being in an emergency shelter, a Shelter Case Worker will meet face-to-face with them to begin an assessment.

- Case Workers will first complete the VI-SPDAT for Family, Single Adult, or Youth (as appropriate) in the household's Clarity profile. All assessments are done within the Coordinated Entry program.
- *CE Event* "Referral to Housing Navigation project or services" will be entered in the household's Clarity profile.
- Case workers will refer to the By-Name List for RRH and/or PSH.
 - For emergency shelters that do not participate in Clarity, the shelter case worker will assist the household in contacting Your Way Home's Coordinated Entry Call Center in order to complete the assessment and referral to By-Name List. Within the Coordinated Entry program, the call Center Specialist will complete the VI-SPDAT and *CE Event* "Referral to Housing Navigation project or services" in Clarity.

Additionally, either in the same meeting or in subsequent face-to-face meetings, the case worker will complete the following with the household in order to develop & carry out an appropriate, individualized shelter exit plan:

- Household Budget
- Housing Stability Plan
- Case Workers will upload a copy of all documents into the client's Clarity profile (for Clarity-participating shelters).
- Case Workers will create a publicly viewable note that contains a summary of the meetings and housing plan (for Clarity-participating shelters).
- Case Workers will add the appropriate *CE Event* following each face-to-face contact with a client.

Reference the [Program Guidance on Housing Stability Planning](#) for more detailed information.

6. Execution of Housing Stability Plan

Case Workers will develop Housing Stability Plans that contain the following at minimum:

- **Housing Goals-** Concrete plan and action steps for moving to housing other than the shelter, ideally to permanent housing.
- **Financial Goals-** Goal and action steps related to obtaining all public/ mainstream benefits to which the client is entitled, and obtaining or maintaining income, possibly through education, employment, job training and/or financial counseling.
- **Health Goals-** Goal and action steps related to obtaining needed physical, mental and/or behavioral health services and supports.

Case Workers will work with clients regularly, meeting in-person at least weekly, to execute the action steps and goals outlined in their Housing Stability Plan.

- Case Workers will record progress, completion of action steps, and other notes on the Housing Stability Plan during in-person meetings.
- Case Workers will create a new Housing Stability Plan whenever new goals or action items are established.
- Case Workers will record all meetings and changes in Clarity:
 - A summary of all case management meetings will be entered in the client's notes section within the Emergency Shelter program. These may be marked Private if they contain medical information, per the [Case Note Sharing policy](#).
 - A Status Assessment update will be noted whenever a client's income, benefits, health documentation status, or health services change.
 - A *CE Event* "Referral to Non-continuum services: No availability in continuum services" will be noted when a referral to social services is made. Referrals to supportive services should be guided by an assessment based upon needs and strengths, such as the full SPDAT or the Arizona Self-Sufficiency Matrix.

For low acuity clients, the Case Worker will:

- Follow the [Program Guidance on Housing Stability Planning for Shelter clients](#).

- If appropriate, collect the required documentation for payment of costs to move the client out of shelter, following the policies on [Rapid Re-Housing Lite](#) and [Eligible Activities/ Payments for Households in Shelter](#).
- Once all documentation is collected, contact the Housing Resource Center Supervisors to process payment.
- Assist in finalizing payment and move-out procedures for the client.

For clients who are medium acuity, the Case Worker will:

- Follow the [Program Guidance on Housing Stability Planning for Shelter clients](#).
- The Case Worker will continue to execute the Housing Stability Plan action steps with the client.
 - The Case Worker will upload all relevant case planning documentation (initial and updated Housing Stability Plans, budgets, etc.) to the client's profile in Clarity so that these documents are readily accessible for review by the Housing Stability Coach.
 - The Case Worker will maintain updated notes within the Emergency Shelter program in Clarity that provide accurate and complete information regarding the client's housing situation and status in shelter.
- The Case Worker will coordinate the connection to permanent housing if/ when the client is enrolled into the Rapid Re-Housing program.
 - The Case Worker will attend intake and other meetings with the client and Housing Stability Coach.
 - The Case Worker will provide all documentation and case planning information to the Housing Stability Coach.
 - The Case Worker will assist in creating and carrying out the steps of the client's Rapid Re-Housing Housing Stability Plan.
 - The Case Worker will continue weekly case management with the client to follow up with/ support the completion of the Rapid Re-Housing Housing Stability Plan as appropriate.
 - The Case Worker will keep the Housing Stability Coach informed of the client's progress on meeting action steps.
 - The Case Worker will keep the Housing Stability Coach informed of the client's location and eligibility for the program and inform the Coach within one business day if the client does not sleep in the shelter for more than two nights in a row.

For clients who are high acuity, the Case Worker will:

- Follow the [Program Guidance on Housing Stability Planning](#) for Shelter clients.
- Gather documentation to verify homeless history, showing chronic or near-chronic homelessness.
- If applicable, collect documentation of disability such as SSI award letter, Employability Assessment Form, or documentation & letters to support presumptive eligibility.

- Refer to SOAR if needed. *CE Event* “Referral to Non-continuum services: No availability in continuum services” will be added to CE Program following all SOAR referrals.
- The Case Worker will continue to execute the Housing Stability Plan action steps with the client.
- The Case Worker will upload all relevant case planning documentation (initial and updated Housing Stability Plans, budgets, etc.) to the client’s profile in Clarity so that these documents are readily accessible.
- The Case Worker will maintain updated notes in the Emergency Shelter program in Clarity that provide accurate and complete information regarding the client’s housing situation and status in shelter.
- The Case Worker will coordinate the connection to permanent housing when/if the client is enrolled into Permanent Supportive Housing or Rapid Re-Housing.
 - The Case Worker will attend intake and other meetings with the client and Housing Stability Coach/Housing Case Worker.
 - The Case Worker will provide all documentation and case planning information to the Housing Stability Coach/Housing Case Worker.
 - The Case Worker will assist in creating and carrying out the steps of the client’s Housing Stability Plan.
 - The Case Worker will continue weekly case management meetings with the client to follow up with/ support the completion of the Housing Stability Plan as appropriate.
 - The Case Worker will keep the Housing Stability Coach/Housing Case Worker informed of the client’s progress on meeting action steps.
 - The Case Worker will keep the Housing Stability Coach/Housing Case Worker informed of the client’s location and eligibility for the program, and inform the Coach within one business day if the client does not sleep in the shelter for more than two nights in a row.

Note that Case Workers should be applying the practices of progressive engagement with all clients, and should develop Housing Stability Plans that rely first on the client’s own resources and networks, and then use the least amount of system resources needed to move the client to permanent housing. Acuity should be used as general guide for case planning, but referrals should be informed through all assessment work and case management completed with the client. See [Program Guidance on Housing Stability Planning for Shelter Households](#) and [Policy on Overriding the SPDAT Score](#) for more guidance on this topic.

7. Close the case

Upon exit from shelter, the Case Worker will close out all agency paperwork according to agency procedures.

The Case Worker will exit the household from the Emergency Shelter and the Coordinated Entry program in Clarity HMIS. If a client is enrolled in Rapid Rehousing (including Rapid Rehousing Lite) ensure the household is exited from both programs on the day they exit the shelter in order to avoid overlapping Clarity enrollments.

The Program Supervisor or Manager will notify Street Outreach when bed space is available.

Program Guidance

Emergency Shelter Bed Prioritization

Emergency shelter is an expensive and scarce resource that must be preserved for those who have no other options. Emergency shelters have operated at full or overflow capacity for many years, and as such, there is no space available for persons who are street homeless to immediately be sheltered. By preserving shelter space for those who truly need it, the community can more effectively work towards the goal of providing shelter immediately to those in crisis.

When there is insufficient emergency shelter capacity to meet the need of households experiencing homelessness in Montgomery County, shelter admission should be reserved for unsheltered households who are at greatest risk for severe health and safety consequences, as assessed by the Your Way Home Street Outreach team who are in constant contact with these households. Therefore, when an emergency shelter will have an opening, shelter providers are to contact the Street Outreach team directly to discuss the households experiencing Category 1 homelessness for emergency shelter in order to receive outreach's guidance and assessment related to which household should be prioritized. Your Way Home Montgomery County CoC strongly encourages daily, ongoing collaboration and communication between providers in order to serve those most in need.

Street Outreach and shelter providers must also follow these guiding principles related to prioritization of emergency shelter beds:

- Your Way Home Montgomery County CoC should continue to prioritize Category 1, street homeless households for entry into shelter.
- Your Way Home Montgomery County CoC should use an open and transparent process for referring people to shelter.
- Your Way Home Montgomery County CoC should prioritize certain populations for limited shelter space rather than prioritization based on a first-come, first-served basis.
- Your Way Home Montgomery County CoC should not use the score from the VI-SPDAT as criteria to determine emergency shelter prioritization. The VI-SPDAT was not intended for this purpose and was developed to make recommendations for Rapid Re-Housing, Permanent Supportive Housing, and light touch housing interventions.
- The complex needs, configurations, and situations of families and individuals who are experiencing street homelessness should be assessed and addressed by Your Way Home Montgomery County CoC's trauma-informed, comprehensive homeless street outreach team.
- Homeless families with children under age 5 should be prioritized for family shelter due to the serious health consequences associated with being unsheltered.
- Homeless households with a pregnant head of household should be prioritized for family or individual shelter due to the serious health consequences associated with being unsheltered.
- Homeless individuals with health diagnoses that lead to frailty should be prioritized for single adult emergency shelter due to the potential for health consequences associated with being unsheltered.

Diversion

Your Way Home Montgomery County CoC recognizes that entering emergency shelter is traumatic for individuals and families. Therefore, diverting as many families and individuals, especially children, from entering shelters is an important step in reducing the trauma experienced by people in our community.

Households accessing Your Way Home are engaged in diversion conversations throughout multiple points in the system, including at the shelter front door, in order to help them utilize their own resources to self-resolve

their homelessness. As explained in [Coordinated Entry Program Guidance](#), there are not yet enough resources in Montgomery County to meet the needs of people experiencing homelessness. This includes not enough emergency shelter beds for people who are living in a place not meant for habitation, and not enough Rapid Re-Housing or Permanent Supportive Housing openings for people who need to exit homelessness. Thus, it is crucial that intentional, meaningful diversion conversations happen early and frequently.

The goal of diversion is for a household to not need homelessness services, including emergency shelter and referral to the By-Name List. This is accomplished by assisting the household in establishing a plan to enter a safe and appropriate housing destination. *(Note: if a household is experiencing Category 1 homelessness and only needs one-time move-in assistance in order to resolve their homelessness, this is considered [Rapid Re-Housing Lite](#), not diversion!)*

Most households receiving diversion will not need financial assistance to be diverted from shelter. Through clear communication of Your Way Home Montgomery County CoC's prioritization policies, our target population of those experiencing literal homelessness, the inability to provide RRH or PSH to every household in need, and/or the Emergency Shelter waitlist, most households receiving diversion should be encouraged to participate in the development of a safe, appropriate housing plan that does not require financial assistance. However, some households may need some limited financial assistance in order to successfully maintain permanent housing, as determined through their diversion planning sessions with their case manager. As with other Your Way Home Montgomery County CoC programs, case managers are expected to use Progressive Engagement, relying first on the client's own resources and networks, and then use the least amount of system resources while developing a safe plan. Case Managers and/or Housing Stability Coaches should first explore low-cost, creative solutions to preventing entry into emergency shelter that are reimbursable through the Your Way Home Initiative Fund. Examples of this might include car repair costs so a doubled-up family member can start driving to work; food gift cards to contribute towards staying at a friend's house; or bus tokens to attend a local vocational program or appointments with the commerce department. Case Workers are strongly encouraged to be creative and collaborate with Your Way Home and other community agency partners in the creation and execution of these diversion plans.

[Housing Stability Planning for Households in Shelter](#)

Your Way Home Montgomery County CoC's emergency shelters are united in the goal to empower households to move to permanent housing as quickly as possible. To do so, Emergency Shelters use a combination of diversion, rapid resolution, and assessment in order to identify strengths and barriers to housing stability.

1. Emergency Shelters will first attempt diversion prior to the household entering shelter. This can happen over the phone or face-to-face (particularly with anyone presenting at the shelter front door). Diversion conversations must be recorded as a case note in the household's case file in Clarity. If successful, *CE Event* "Problem Solving/Diversion/Rapid Resolution intervention or service" should be added to the CE Program in Clarity. See [diversion program guidance](#) for more tips and information.
2. Within the first two weeks of entering emergency shelter, continued diversion and rapid resolution conversations happen with the household. These conversations must happen, at minimum, twice face-to-face. Each conversation must be recorded as a case note in the Emergency Shelter program on the client's Clarity profile. The goal of these conversations is to have the household exit emergency shelter to a more appropriate housing destination based upon the client's individualized needs and strengths.

3. If the household is unable to identify a more appropriate housing destination and is still residing in emergency shelter after two weeks, emergency shelters must complete a VI-SPDAT. The results of that assessment will inform future Housing Stability Planning in the following ways:

Low Acuity: Households scoring into the low acuity category may or may not be referred to the By-Name List for a formal housing intervention, depending upon the household's circumstances. Most households with a low score will not receive a RRH or PSH appointment due to Your Way Home Montgomery County CoC's [prioritization policies](#). Households scoring in the low acuity category are encouraged to develop a Housing Stability Plan that utilizes the household's own resources and networks to gain permanent housing. Shelter Case Managers are encouraged to use motivational interviewing, housing-focused case management, and progressive engagement strategies to assist households in identifying ways in which they can move out of shelter and into housing; similar to the strategies used during Diversion. Housing stability planning for low acuity clients will be unique to each household; however, it may result in the following types of plans:

- **Moving to safe doubled-up situations-** In many cases, households simply do not earn enough to live on their own. In these cases, moving (back) in with friends or family is a reasonable option to gain housing stability. Shelter Case Managers should ensure that the household's Housing Stability Plan addresses the factors that led to the household seeking shelter in the first place- such as building conflict resolution skills through counseling services, accessing mental health services, obtaining subsidized childcare, connecting to employment services, etc.
- **Moving to an affordable unit-** In some cases, households may earn enough income to live on their own, but lack the funds or support to initially obtain a unit. Shelter Case Managers must ensure that the Housing Stability Plan includes a household budget, including guidelines on rental prices, utility expenses, and other logistics needed to make housing successful and the budget balance. As well, the Housing Stability Plan should include housing search and location services to the extent needed by the household. Shelter Case Managers will then assist clients in locating affordable units. Alternatively, shelter Case Managers can connect with the Housing Locator at the local Housing Resource Center to access additional housing location assistance once the Housing Stability Plan is completed. More information can be found on the policy for [Rapid Re-Housing Lite](#).
- **Moving out of county to permanent housing-** In rare cases, households may need or want to move outside of Montgomery County in order to obtain permanent housing or to reconnect with their support networks. Shelters should ensure that Housing Stability Plans address the logistics of moving out of county and address the factors that led to the household's homelessness.

Medium Acuity: Households scoring into the medium acuity categories will be referred to the By-Name List and are eligible for enrollment into the Rapid Re-Housing Program through one of Your Way Home Montgomery County CoC's Housing Resource Centers. However, enrollment into the program is not guaranteed and only available based upon availability of funding and Your Way Home Montgomery County CoC's [prioritization policies](#). Households scoring in the medium acuity category are encouraged to develop a Housing Stability Plan that first utilizes the household's own resources and networks to gain permanent housing, but that also identifies Rapid Re-Housing as a back-up plan for moving to permanent housing. Shelter Case Managers are encouraged to use motivational interviewing, housing-focused case management, and progressive engagement strategies to assist households in identifying

ways in which they can move out of shelter and into permanent housing; similar to the strategies used during Diversion.

When developing Housing Stability Plans for medium acuity households, shelters should help households consider:

- The household's own resources and networks to gain permanent housing- Some households may have housing options available to them, such as returning to doubled-up housing options. For some households, this may be more appropriate than moving into a unit of their own. This is particularly true of fixed income households or those waiting to receive benefit determinations (such as those waiting on SSI/SSDI applications or appeals). Shelter case managers are encouraged to have open conversations with these households about rent costs and their current income, and the time-limited nature of the Rapid Re-Housing program. If doubling up or room sharing is an option for these households, it may be more appropriate to develop a Housing Stability Plan for this option rather than referring to Rapid Re-Housing.
- Preparing for Rapid Re-Housing intake and housing search- Households eligible for Rapid Re-Housing should begin working with their shelter Case Manager to prepare for their first intake appointment with the Housing Stability Coach. This includes compiling and preparing the needed documents, working through the household's budget, identifying apartment needs/ logistics for the family, and ensuring that all current benefits are being accessed. Shelter Case Managers should share a copy of the Housing Stability Plan and the clients' progress on it with the Housing Stability Coach if an appointment is scheduled. This way, clients can transition more easily to the Rapid Re-Housing program and both Case Managers are up to date on the client's case.
- Identifying potential barriers to obtaining housing- Shelter Case Managers can help clients prepare for Rapid Re-Housing by helping to identify elements of a client's history that may make obtaining housing more difficult, so these can be mitigated if possible and/or discussed with the Housing Stability Coach and Locator at the first intake appointment. Barriers may include: recent criminal history, a history of eviction, outstanding utility debts, very poor or no credit, no income, large family size with no income, lack of transportation.
- The household's needed supports, such as mental health, physical health, public benefits, childcare, etc.- While in shelter, households should be developing plans to connect to all benefits and supportive services necessary to maintain permanent housing.

High Acuity: Households scoring into the high acuity categories will be referred to the By-Name List for housing programs and are eligible for enrollment into the Permanent Supportive Housing Program through one of Your Way Home Montgomery County CoC's Permanent Supportive Housing providers. Households are also eligible to be enrolled into the Rapid Re-Housing program in the event that a PSH bed is not immediately available (i.e. within the next 30 days). Shelters will complete a Housing Stability Plan that helps the household prepare for Permanent Supportive Housing. If PSH is not available, shelters will also help clients prepare for the Rapid Re-Housing program as a temporary solution to their homelessness.

When developing Housing Stability Plans for high acuity households, shelters should help households consider:

- Preparing documentation for PSH eligibility screening- Households eligible for Permanent Supportive Housing should begin working with their shelter Case Manager to prepare the documentation needed for the PSH referral packet and documentation standards. This includes collecting information related to disability (writing a letter for presumed eligibility, making a referral to SOAR, collecting SSI information, and/or completing the employability assessment form), as well as collecting documentation of homeless history which would outline chronic or near-chronic status (letters from street outreach providers, other emergency shelters, etc.).
- If PSH is not immediately available, prepare for their first intake appointment with the Housing Stability Coach from Rapid Re-Housing- This includes compiling and preparing the needed documents, working through the household's budget, identifying apartment needs/ logistics for the household, and ensuring that all current benefits are being accessed. Shelter Case Managers should share a copy of the Housing Stability Plan and the client's progress on it with the Housing Stability Coach once the appointment is scheduled. This way, clients can transition more easily to the Rapid Re-Housing program and both case managers are up to date on the client's case.
- Identifying potential barriers to obtaining housing- Shelter case managers can help clients prepare for housing placement by helping to identify elements of a client's history that may make obtaining housing more difficult, so these can be mitigated if possible. This is most easily done through the completion of the full SPDAT. Barriers may include: recent criminal history, a history of eviction, outstanding utility debts, very poor or no credit, no income, large family size with no income, lack of transportation.
- Identifying needed health supports, such as Critical Time Intervention, Recovery Coaching, Peer Support, physical services, and similar- The shelter Case Manager should connect any client with a mental health diagnosis (or suspected diagnosis) directly to the CTI team and/or to the local Community Base Service Unit for assessment and services.
- Identifying other needed supports, such as SSI/SSDI Outreach, Access, and Recover (SOAR), other public benefits, childcare, etc.- While in shelter, households should be developing plans to connect to all benefits and supportive services necessary to maintain permanent housing. If a good candidate, shelter Case Managers should refer households to the Your Way Home Montgomery County CoC SOAR Specialist at VNA Community Services.

In all cases, emergency shelter case workers are encouraged to collaborate closely with the household on their individualized housing stability plan, clearly explain Your Way Home Montgomery County CoC's prioritization policies, and the options & resources available to the household. Households that are not likely to receive a RRH or PSH appointment, for example, should be told this as part of the Housing Stability Planning discussion. In all cases, shelter case workers must help their clients identify reasonable plans to gain housing stability based on what is available to them through Your Way Home Montgomery County CoC.

Output and Outcome Measures

The following measures will be used to evaluate the performance of the Your Way Home Montgomery County CoC Emergency Shelter program. Additionally, whenever possible based on HMIS reporting capabilities,

coordinated entry outcomes will also be evaluated for any discrepancies across demographic categories (gender, race, ethnicity, and age tier).

- ❖ Utilization rate of shelter beds
- ❖ Number of persons/ Households served in shelter (by household composition)
- ❖ Number of persons/Households diverted from entering shelter
- ❖ Average length of stay in shelter
- ❖ Average length of stay in shelter before exiting to permanent housing
- ❖ Number/ Percentage of persons exiting to permanent housing
- ❖ Percentage of persons who exit shelter to permanent housing and return to homelessness
- ❖ Number/ Percentage of adults connected to non-cash benefits at exit
- ❖ Percentage of adults who gain or increase income from project start to exit

Regular and ongoing evaluation of Emergency Shelter will be conducted by Your Way Home Montgomery County CoC Operations Team, including but not limited to a yearly consumer feedback survey, on-site provider monitoring, and quarterly reviews of HMIS data.

Policies

Your Way Home Montgomery County CoC Service Provider staff are encouraged to become familiar with all [Your Way Home Montgomery County CoC Policies](#).

The Your Way Home Montgomery County CoC Policies listed below provide guidance and direction for the implementation of YWH Montgomery County COC Emergency Shelter services.

[1. System Performance Policies](#)

[2. General Standards & Prioritization Policies](#)

[4. Emergency Shelter Policies](#)

Code Blue and Seasonal Emergency Sheltering

The goal of Your Way Home Montgomery County CoC’s Code Blue sheltering is to provide temporary shelter, food, and clothing to those in need. In periods of extreme, life-threatening weather multiple county agencies and private health /social organizations will offer expanded services for those without adequate shelter, including the chronically homeless.

Guiding Principles of Code Blue Emergency Sheltering

- **Prioritization of Code Blue beds-** People who are literally homeless should be prioritized for Code Blue access.
- **Safe and Inclusive Spaces-** Emergency shelters will provide for the emotional and physical safety, inclusion, and support for all persons regardless of their sexual orientation or gender identity.
- **Shelter entry-** Shelter entry should be fast, uniform, culturally sensitive, and low barrier for any resident experiencing homelessness.

Target Population

<p>Literally Homeless (HUD Homeless Category 1)</p>	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • 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
<p>At Imminent Risk of Homelessness (HUD Homeless Category 2)</p>	<p>Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> • Residence will be lost within 14 days of the date of application for homeless assistance; • No subsequent residence has been identified; and

	<ul style="list-style-type: none"> The individual or family lacks the resources or support networks needed to obtain other permanent housing.
<p>Fleeing/ Attempting to Flee Domestic Violence (HUD Homeless Category 4)</p>	<p>Any individual or family who-</p> <ul style="list-style-type: none"> Is experiencing trauma or lack of safety related to, or fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; Has no other safe residence; Lacks the resources to obtain other safe permanent housing.

Major Steps

1. Code Blue Declarations

The Department of Public Safety is responsible for recommending Code Blue emergencies to the County Commissioners during periods of extreme, life-threatening weather, defined as a wind-chill factor of 32°F or below. Code Blue declarations will be issued for a specific duration, usually based on 24-hour increments, and will end as initially declared unless formally extended by the County Commissioners.

2. Shelter Entry

During times of a declared Code Blue:

- Households in need of shelter will call contact the Your Way Home Coordinated Entry Call Center. Households may also present directly to emergency shelter on declared Code Blue nights.
 - Coordinated Entry Specialist will conduct triage and referral to Street Outreach will be made as appropriate, per normal P&P.
- The Your Way Home Call Center will immediately transfer homeless crises or emergencies to the Your Way Home Street Outreach Team.
 - Providers or community partners serving those in a homeless crisis during a code blue night should contact the Street Outreach Team directly, when appropriate.
 - If there is a medical emergency during a Code Blue crisis, providers should dial 9-1-1.
- Households seeking emergency shelter on Code Blue nights will be informed of available Code Blue shelter resources and that they can present to the nearest Code Blue shelter for temporary shelter.

- Your Way Home Call Center will enter data in HMIS and send a referral to Street Outreach as necessary. Your Way Home Street Outreach will follow up with the household in order to conduct verification and engagement. Outreach will assist in diversion and rapid resolution strategies as appropriate and enroll in the Street Outreach program in HMIS per normal P&P.

3. HMIS Enrollment

Your Way Home & County-funded Code Blue shelter staff will enroll households into Code Blue Emergency Shelter and the Coordinated Entry program in HMIS when the household presents to shelter within 1 business day.

- Once a client is enrolled in the Code Blue Emergency Shelter program, shelter staff should add a Night-by-Night attendance for each resident who stays at their shelter overnight.
 - If a household will be staying in shelter past declared Code Blue days, shelter staff must end enrollment of Code Blue program enrollment and enroll household in the regular or overflow Emergency Shelter Program
 - Code Blue Emergency Shelter program enrollment will automatically exit after 90 days of inactivity within Clarity HMIS. If a household re-presents after 90 days they should be reenrolled in both the Code Blue Emergency Shelter and Coordinated Entry program. See [Clarity HMIS Automatic Exit Policy](#).

4. Shelter Capacity

Your Way Home Montgomery County CoC understands that the availability of Code Blue shelter beds will often exceed the number of households who are unsheltered on nights when Code Blue is declared.

If a household presents to a Code Blue shelter on a Code Blue night, but that shelter has reached capacity, shelter staff are responsible for:

- Coordinating with other Code Blue shelters and the Your Way Home Street Outreach Team as appropriate to arrange a transfer to a Code Blue shelter that has availability.
- Not admitting more guests than the established shelter capacity.
 - If a household presents to a Code Blue shelter on a Code Blue night, but shelters have reached maximum capacity throughout Montgomery County, shelter staff should immediately call the Your Way Home Street Outreach program.
 - Following [Your Way Home Policy](#), the Your Way Home Street Outreach provider may approve a temporary hotel subsidy for street homeless households during declared Code Blue nights. In these instances, the Street Outreach Director will make a final determination of the approval of a hotel subsidy based on case knowledge of the household, knowledge of the lack of shelter availability, and an assessment of the household's need. When approved, hotel subsidy will only cover the time period when there is a declared Code Blue.

5. Code Blue Shelter Operations:

All Code Blue shelters will have at least two trained staff or volunteers present for the entirety of each Code Blue declaration. Code Blue provider agencies will train all shelter staff to ensure they are able to successfully operate the shelter.

All Code Blue shelter guests should receive a copy of the Code Blue Shelter Code of Conduct upon entry.

- In the event a guest violates the Code of Conduct and is no longer able to safely reside at the Code Blue shelter, staff should inform the Street Outreach team and the Your Way Home Program Manager immediately.

Shelter staff are responsible for the prompt set-up and break-down of the shelter space at the beginning and end of each night, including cleaning and sanitizing all surfaces and areas used by shelter guests (bathrooms, sleeping areas, kitchens, etc.).

Shelter guests will arrive and depart the shelter in a timely fashion and in accordance with all established opening and closing times. Shelter staff will assist guests in timely arrivals and departure, including identifying any barriers to arrival or departure as soon as possible.

Shelter Staff will not admit households that the shelter is not equipped to assist such as: shelters who serve single adults or households with children; all gender vs. single gender shelters.

Code Blue emergency shelters are expected to abide by all stated policies and procedures, including but not limited to: those established by the shelter facility, Your Way Home Montgomery County CoC and County of Montgomery.

Policies

Your Way Home Montgomery County CoC Service Provider staff are encouraged to become familiar with all [Your Way Home Montgomery County CoC Policies](#).

The Your Way Home Montgomery County CoC Policies listed below provide guidance and direction for the implementation of YWH Montgomery County COC Code Blue Emergency Shelter services.

[1. System Performance Policies](#)

[2. General Standards & Prioritization Policies](#)

[4. Emergency Shelter Policies](#)

Code Red Cooling Center Sheltering and Resources

Major Steps

1. Code Red Declarations

The Department of Public Safety is responsible for recommending Code Red Hot Weather Health Warnings to the County Commissioners based on monitoring of National Weather Service forecasts. A Code Red Hot Weather Health Warning is issued in anticipation of an oppressively hot air mass with a heat index of 100°F or greater. Such conditions have been associated with excess mortality, and residents should take precautions to prevent heat-related stress and exhaustion. A Code Red is typically called for an eight (8) hour duration (usually from 12 pm to 8 pm each day during the Code Red).

2. Shelter Entry

During times of a declared Code Red:

- Households in need of daytime shelter contact the Coordinated Entry Your Way Home Call Center. Households may also present directly to cooling centers during declared Code Red hours.
- Unsheltered households in need of daytime shelter can also contact the Street Outreach team directly for more information about daytime Code Red resources.
- The Your Way Home Call Center will immediately transfer homeless crises or emergencies to the Your Way Home Street Outreach Team.
- Providers or community partners serving those in a homeless crisis during a Code Red declaration should contact the Street Outreach Team directly, when appropriate.
- The Your Way Home Street Outreach team should provide emergency hotel stays during declared Code Red days for medically fragile individuals and those with a medical condition that makes them vulnerable to dangerous temperatures.
- If there is a medical emergency during a Code Red crisis, providers should dial 9-1-1.
- Households seeking shelter during Code Red declarations will be informed of: the shelter location and operating hours, the length of the declaration, and other community Code Red resources. Resources available include:
 - Local shopping malls
 - Public libraries
 - Soup kitchens and other community spaces

3. Cooling Center Capacity

Your Way Home Montgomery County CoC understands that the ability of Code Red cooling center space will often exceed the number of households who are unsheltered during times of extreme heat.

If a household presents to a Code Red cooling center during a Code Red declaration, but that center has reached capacity, shelter staff are responsible for:

- Providing other community resources where that household can go until the declaration has lifted including:
 - Other Code Red shelters
 - Shopping malls
 - Public Libraries
 - Soup Kitchens and other community spaces

- Directing any clients in need of more information to contact the Call Center
- Not admitting more guests than the established shelter capacity.

4. Code Red Cooling Center Operations

In the event of an emergency or concern for the safety of Code Red cooling center guests, staff should inform Street Outreach and the Your Way Home Program Manager immediately.

Shelter guests will arrive and depart the shelter in a timely fashion and in accordance with all established opening and closing times. Center staff will assist guests in timely arrivals and departure, including identifying any barriers to arrival or departure as soon as possible.

Staff will not admit households that the cooling center is not equipped to assist such as: shelters who serve single adults or households with children; all gender vs. single gender shelters.

All Montgomery County Code Red Cooling Centers will be provided with adequate water for guests in order to ensure they are hydrated and safe throughout their stay.

5. Permanent Housing Code Red Resources

Flexible, philanthropic funding, such as that provide from the Your Way Home Initiative Fund should be used in order to ensure the safety for Your Way Home clients enrolled in a permanent housing program during declared Code Red emergencies.

Households where at least one member is diagnosed with a medical condition that makes them vulnerable to dangerous temperatures should immediately be provided with a window air conditioning unit, and assisted with the installation of that unit. Documentation of a qualifying diagnosis should be submitted to the Housing Stability Coach for approval after the first Code Red declaration of the season. Each household may receive one air conditioning unit per calendar year.

Rapid Re-Housing

Montgomery County residents who are living on the streets, in an emergency shelter, fleeing domestic violence, or have been placed temporarily in a motel by a charitable or government organization are referred to the Rapid Re-Housing (RRH) program. HRC Housing Stability Coaches utilize RRH assistance and Housing First strategies to help those with a medium level of service needs find permanent housing and remain stably housed in their community by connecting to other, long-term community supports.

Rapid Re-Housing is an intervention designed to help individuals and families quickly exit homelessness, return to housing in the community, and not become homeless again in the near term. The core components of Rapid Re-Housing are 1) housing location assistance, 2) move-in and rental assistance, and 3) case management and services.

Guiding Principles of Rapid Re-Housing

- **Inclusivity and flexibility-** Rapid Re-Housing is an intervention designed for and flexible enough to serve anyone not able to exit homelessness on their own. Rapid Re-Housing programs should not attempt to screen out households based on a score on an assessment tool or criteria that are assumed, but not shown, to predict successful outcomes, such as a minimum income threshold, employment, absence of a criminal history, evidence of “motivation,” etc.
- **Progressive Engagement-** A Rapid Re-Housing program should make efforts to maximize the number of households it is able to serve by providing households with the financial assistance in a progressive manner, providing only the assistance necessary to stabilize in permanent housing.
- **Finding and maintaining permanent housing-** Within the limits of the participant’s income, a Rapid Re-Housing program should have the ability to help households access units that are desirable and sustainable—those that are in neighborhoods where they want to live, that have access to transportation, are close to employment, and that are safe.
- **Landlord engagement and retention-** Housing identification efforts should be designed and implemented to actively recruit and retain landlords and housing managers willing to rent to program participants who may otherwise fail to pass typical tenant screening criteria.

Target Population

<p>Literally Homeless (HUD Homeless Category 1)</p>	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • 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
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	<ul style="list-style-type: none"> • 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
<p>Fleeing/ Attempting to Flee Domestic Violence (HUD Homeless Category 4)</p>	<p>Any individual or family who-</p> <ul style="list-style-type: none"> • Is experiencing trauma or lack of safety related to, or fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; • Has no other safe residence; • Lacks the resources to obtain other safe permanent housing.

Major Steps

1. Receive referral and conduct intake and enrollment

The Housing Resource Center Supervisor will re-assign referrals from the By-Name List to their Housing Resource Center's Pending Queue as case load space is available. The Housing Resource Center Supervisor will then assign a Housing Stability Coach (HSC) to each referral.

Upon receiving assignment for referral, the HSC contacts the client and updates the referral status to Pending-In Process.

- Within 24 hours of assignment, the HSC will connect with the client. If unable to reach client directly, HSC will make outreach to the following support networks including but not limited to:
 - Local day shelter (ex. Norristown Hospitality Center)
 - Street Outreach (ex. Access Services)
 - Shelter provider case manager (ex. Family Promise, Resources For Human Development-RHD)
- The HSC will deny any referrals that they are unable to contact after at least 3 attempts within 72 hours. These referrals are NOT sent back to the By-Name List.

The HSC meets with the client for intake and enrollment.

- The HSC schedules the meeting at the emergency shelter with client and Shelter Case Manager; or in a mutually-agreed upon location if the client is not in shelter.

- The HSC will assist the client in completing the appropriate intake paperwork, gather eligibility documentation as outlined in the [policy on Rapid Re-Housing Eligibility for New Clients](#) and confirm eligibility by completing the Certification of Eligibility Form.
- The HSC completes the VI-SPDAT and Monthly Budget with the client.
- The HSC reviews the Program Agreement, Client Rights and Responsibilities, VAWA Rights, and Grievance Procedures in detail with the client, and both parties sign the Agreement. A copy is provided to the client.
- The HSC explains the process for obtaining housing through the program, and completes the Housing Search Planner with the client. HSC agrees with client on appropriate rent ranges based on:
 - Fair Market Rent and/or local housing costs
 - Client's neighborhood of choice
 - Client's current and projected income
 - Client's utility debts (if any) that may affect their ability to pay for utilities in own name

The HSC creates a Housing Stability Plan with the client outlining action steps and follow-up timeframe for both the client and HSC.

- The Housing Stability Plan must include at a minimum:
 - **Housing Goals-** Concrete plan and action steps for moving to housing other than the shelter, ideally to permanent housing. Rent ranges, logistics, and other housing location parameters must be included.
 - **Financial Goals-** Goal and action steps related to obtaining all public/ mainstream benefits to which the client is entitled, and obtaining or maintaining income, possibly through education, employment, job training and/or financial counseling.
 - **Health Goals-** Goal and action steps related to obtaining needed physical, mental and/or behavioral health services and supports.

The HSC enrolls the household into the Rapid Re-Housing Program in Clarity. If the household is still enrolled in the CE Program in Clarity, the HSC exits the program from the household.

The HSC creates a hard copy file for the client.

2. Locate housing

The Housing Stability Coach (HSC) provides the Housing Locator with the client's contact information, rent ranges, a copy of the Housing Search Planner and other basic information as appropriate.

The Housing Locator contacts the client to provide assistance in beginning housing search:

- Housing Locator [explains process, expectations, and role of Housing Locator](#)

- Housing Locator Provides support/ orientation to housing search:
 - Provides Housing Search Tips handout to the client.
 - Provides Housing Search Log handout to the client.
 - Housing Locator contacts Landlords that work with Your Way Home to inquire about available apartments.
 - Provides 1-3 vacant apartment leads to client that fit criteria as outlined in the Housing Search Planner.

- Housing Locator assesses the household's need for [additional support in housing search](#).

The Housing Locator and client visit units to conduct visual inspection and agree on a unit.

The Housing Locator educates prospective landlords about the Rapid Re-Housing program, potential Landlord Incentives from the [Your Way Home Fund](#), and answers any questions to encourage the landlord to rent to the client.

Once a client is approved for a unit, the Housing Locator begins the unit approval process.

- The Housing Locator orders an inspection by submitting an Inspection Request Form and contacting Lynda Haley or Patti Stroman at the Montgomery County Housing Authority via email at lhaley@montcoha.org and pstroman@montcoha.org.
 - The Housing Locator provides a copy of the inspection form to the landlord at least 5 days in advance of the scheduled inspection.
 - The Housing Locator receives an emailed confirmation and completed form with the results of the inspection.
 - If a unit fails inspection, the Housing Locator may work with the Landlord to fix the problems identified. Or, the Housing Locator may move on to another unit.

The Housing Locator assembles/ completes other documentation needed to demonstrate eligibility of the unit and maintains documentation in the client's file:

- Conducts a tax lien search at www.taxclaim.montcopa.org, prints out the form showing the tax lien search results and includes it in the client file.
- Requests a W-9 from landlord.
- Housing Locator completes the Rent Reasonableness Form.

3. Provide move-in assistance

Once a unit is approved, the Housing Locator initiates the lease-signing.

- The Housing Locator contacts the landlord to negotiate costs for rent and move-in.

- The Housing Locator and Housing Stability Coach complete the Rental Agreement for Move-In letter the client. A copy is provided to the client.
 - To calculate the client's contribution to move-in costs and rent in the first three months of move-in, a Rent Calculation Worksheet must be completed after calculating the Utility Allowance, as supported by the [policy on Client Contributions to Housing Costs](#).
- The HSC completes the check request for move-in costs.

The Housing Locator assists the client with move-in logistics:

- Confirms lease signing date and location with client and landlord.
- Assists the client in turning on utilities/ transferring to client's name.

The Housing Locator reviews the terms of the lease with the client and both parties sign the lease. The Housing Locator maintains a copy of the signed lease in the client's file.

The Housing Locator confirms the transfer of keys and provides the household with a "Protect your Family from Lead in Your Home" brochure.

The Housing Stability Coach conducts an in-person meeting at the client's new home within 5 business days of the client moving in.

- Completes a new Budget with the client.
- Reviews the current Housing Stability Plan.
 - Updates action steps/ goals completed.
- Creates a new Housing Stability Plan now that housing has been obtained.

The Housing Stability Coach (HSC) updates information in Clarity:

- Records security deposit/ utility deposit/ move-in costs in Clarity
- Records the Housing Move-In Date in the RRH Program Enrollment in Clarity

The Housing Locator assists the client in identifying and acquiring household goods and furniture needed at move-in.

- The Housing Locator and client assess the client's access to basic goods, and the Housing Locator assists the client in obtaining needed goods.
- The Housing Locator purchases household goods using the Your Way Home Montgomery County CoC Initiative Fund according to the [Your Way Home Montgomery County CoC Initiative Fund policy](#).

4. Support stabilization in housing

The Housing Stability Coach (HSC) provides ongoing, at least monthly, in-person case management to support the client in gaining stability in their housing.

- The focus of the case management meetings is to execute and review progress taken towards the action steps and goals outlined in the Housing Stability Plan, with the ultimate goal of helping clients maintain their own housing.
 - HSC records progress, completion of action steps, and other notes on the Housing Stability Plan during in-person meetings.
 - HSC creates a new Housing Stability Plan whenever new goals or action items are established.
 - HSC records all meetings and documents changes in Clarity HMIS:
 - HSC creates a case note in the Rapid Rehousing program to record a summary of all case management meetings in the client's notes section.
 - These may be marked Private if they contain medical information, per the [Case Note Sharing Policy](#).
 - HSC records a Status Assessment update whenever a client's income, benefits, health documentation status, or health services change.
 - HSC uploads all file documents, including updated Housing Stability Plans, budgets, SPDAT's, and other documents.
- Within 180 days of housing, the RRH provider is required to collect state-issued photo IDs, birth certificates, and social security cards for all household members. These documents are to be kept in the household's file.

The HSC provides ongoing financial assistance to the client for housing and other needed costs, as appropriate for the household's needs.

- The HSC and client agree on housing costs to be paid by the HRC and by the client in 3-month increments and document in the Rental Agreement.
 - See [Policy on Client Contributions to Housing Costs](#).
 - The HSC processes payment for housing costs according to the Housing Resource Center Invoicing Policies.
 - The client provides proof of payment for all housing costs to the HSC within 5 days of the rent due date.
- The HSC provides other financial assistance to the client for services/ items that help the client meet their goals and that they cannot pay for on their own.
 - The HSC and client will include on the Housing Stability Plan the client's and HRC's contribution towards these items, and the due date for the client to provide proof of payment.

- The Housing Stability Coach will follow the Your Way Home Montgomery County CoC Initiative Fund policy to determine eligible items.
 - The Your Way Home Program Manager will provide final approval on payment of items not listed on the Your Way Home Initiative Fund policy.
- The HSC processes payment for these items according to the Housing Resource Center Invoicing Policies.

5. Re-certify need for continuing assistance

The Housing Stability Coach will re-certify the client's eligibility and need for Rapid Re-Housing financial assistance every three months, which includes the following:

- Completion of the Re-Certification of Eligibility for Rapid Re-Housing Assistance form and related documents:
 - Completion of the Income Eligibility worksheet to determine that the client/household's income is at or below 30% of the Area Median Income.
 - Completion of the SPDAT and-Monthly Budget to confirm continued need for Rapid Re-Housing services.
 - Update the current Housing Stability Plan to document progress on meeting goals at the time of re-certification.
 - Print case notes from the prior 3 months and attach to the Re-Certification packet.
 - The Re-Certification Form must be signed by the HRC Supervisor.
 - Create a new Status Assessment in Clarity.
 - The Status Assessment is considered an Update for each re-certification for all except the re-certification occurring closest to the 1-year anniversary of the client's Program Entry date.
 - When a client has been enrolled in RRH for 1 year, do not complete the Status Assessment that occurs closest to the 1-year anniversary of the client's Program Entry date. Instead, complete the "Annual Assessment" in Clarity.

If Re-Certification is approved:

- The HSC will complete the Rental Agreement for Re-Certification to confirm the amount of rental assistance to be provided for the next 3 months.
 - Housing Stability Coaches are expected to calculate the client's contribution towards rent after re-certification by following the [policy on client contribution to housing costs](#) and [program guidance on re-certification](#).
 - The HSC processes payment(s) for housing costs and other costs as determined by the Rental Agreement and client need.
- The HSC will complete a new Housing Stability Plan.

- The HSC continues to assist the client in their goals outlined in the Housing Stability Plan by connecting the household to mainstream & community services until the next 3-Month Assessment is due. Progress is monitored, at minimum, in monthly face-to-face meetings.

If Re-Certification is not approved:

- The HSC and client complete a Program Exit Plan.
- The HSC provides the client with a Discharge Letter to confirm program discharge.
 - Provides a copy of the [Grievance Procedures](#) to client.
- The HSC completes the procedures to close the case.

For more information, see [Program Guidance on Re-Certification of Rapid Re-Housing Clients](#).

6. Connect to Mainstream/Community Services

Housing Stability Coaches use the results of the VI-SPDAT assessment to evaluate the types of additional supports that a client will need to maintain housing stability.

For the most up-to-date information on connections to mainstream & community resources, register for YWH Newsletter and Social Media pages via yourwayhome.org or contact the Your Way Home Program Manager.

7. Close the case

The HSC exits the client from the program when:

- The client is no longer eligible for or in need of Rapid Re-Housing services, as indicated by the Re-Certification assessment, completion of goals as outlined in the Housing Stability Plan, and documented financial ability to meet basic living needs (see [Program Guidance](#)).
- The client has been discharged according to the [Rapid Re-Housing Client Exit/Termination Policy](#)

The HSC completes the exit paperwork:

- Completes the Program Exit Plan with the client.
- Sends the client and landlord a program exit letter.
 - Provides a copy of the Grievance Procedures to client.
- Updates notes and client file paperwork to document the reason for discharge.
- Exits the client from the Rapid Re-Housing program in Clarity HMIS.

Program Guidance

Re-Certification for Rapid Re-Housing Clients

Housing Stability Coaches (HSC) are required to conduct a 3-month re-certification of all Rapid Re-Housing clients to determine if a client is eligible to receive additional rental assistance and case management support from the program.

When assessing a household's eligibility for re-certification, HSCs and their Supervisors should use the following framework outlined below. It is the responsibility of the Housing Stability Coaches and their Supervisors to continuously assess the following areas during the 3 month interval in which they have last been approved. Abiding by the [Rapid Re-Housing Client Exit/Termination Policy](#), a client should be either approved for another 3 months of assistance or exited off the program at the close of the 3 months.

- **Assess income eligibility-** All households' income must be at or below 30% of the Area Median Income in order to continue to qualify for assistance through the program. If a household's income exceeds this limit at the time of re-certification, the household may not be approved for re-certification. *If a household is still in need case management services for referrals to community supports in order to meet goals outlined in the Housing Stability Plan, the household may be re-certified without financial assistance (case management services only).*
- **Assess financial resource eligibility-** All households must be in need of financial assistance in order to continue to qualify for assistance. This is most accurately assessed by reviewing the household's monthly budget, assets, and other resources available to them to support housing costs. If a household is still under 30% AMI but is able to maintain housing costs on their own through their own resources, then the household may not be approved for re-certification. The household's ability to support basic needs within their own financial resources must be clearly documented through the Program Exit Plan and Household Budget. These case management forms must outline clearly the resources available to the client (such as food banks, enrollment in LIHEAP or other utility assistance programs, etc.) and how, through the utilization of these resources, they are able to maintain housing costs. *If a household is still in need case management services for referrals to community supports in order to meet goals outlined in the Housing Stability Plan, the household may be re-certified without financial assistance (case management services only).*
- **Assess for supports eligibility-** All households must be in need of the case management supports provided by the program in order to qualify for re-certification. This is most accurately assessed by reviewing the household's VI-SPDAT history, Housing Stability Plan progress, and case notes. Households must have a demonstrated need for continued case management support as shown through these documents. Households that do not have a need for case management support may not be re-certified. *Note that Coaches are only assessing for case management need during re-certification, not compliance with case management services.*
 - VI-SPDAT: The VI-SPDAT provides information as to whether a client is able to manage barriers to housing stability. A reduction in VI-SPDAT score across multiple categories would indicate that a client has been able to access and utilize those supports needed to manage these barriers.
 - Consistently high acuity, or increasing acuity over multiple categories, would be an indication that case management supports are still needed. This is especially true if a

client has identified barriers, but is unable to access or use resources/ supports effectively to mitigate those barriers to stability.

- Alternatively, if a client has decreased in acuity as a result of improved management of issues, or connection to community supports to help manage issues, then this would indicate a decreased need for case management supports.
 - HSCs should never use a decrease in one area of the VI-SPDAT as the sole reason for discharge or re-certification- HSCs should use the whole VI-SPDAT to understand the client's "big picture" needs and barriers, and to assess overall need for case management supports as result.
- Housing Stability Plan: The Housing Stability Plan provides information about whether a client has met the goals that will enable them to maintain their housing without case management support.
- A client who has achieved most or all of the goals on the Housing Stability Plan would likely not need continued assistance from the program.
 - A client who has not been able to achieve their goals, or has only achieved their goals very recently, would likely need more case management support to continue to try to achieve the goals in the Housing Stability Plan.
 - HSCs should only be assessing clients for goal *achievement* during re-certification, not for compliance with trying to achieve goals. If a client has not followed through with actions identified in their Housing Stability Plan, this should be addressed using the policies on the Rapid Re-Housing Program Agreement and [Client Exit/ Termination policies](#).
- Case notes: Case notes will provide additional information to support the determination made by the HSC regarding achievement of Housing Stability Plan goals and ability to manage barriers to housing stability. The SPDAT and Housing Stability Plan do not provide enough justification and case history on their own to clearly demonstrate the client's eligibility for services. Detailed, timely, and accurate case notes must be included in order to properly document the eligibility determination.
- Case notes must provide a consistent case history that matches and supports the results of the VI-SPDAT and the work completed on the Housing Stability Plan.
 - Case notes should be reviewed by Supervisors periodically to ensure that enough information is recorded to support case management decisions made by the Coach.
 - Coaches must follow the [policies](#), procedures, and training provided on completing case notes.

Even with these tools, re-certification for support may be difficult to determine, and HSCs and Supervisors will need to communicate regularly about this process in order to develop consistency in practice. Supervisors are responsible for ensuring that the re-certification process is being completed fairly and consistently for all

clients, and that HSCs are completing the re-certification process without bias (such as that against “difficult” or “hard to engage” clients). Supervisors are also responsible for ensuring that HSCs are documenting their work sufficiently. Housing Stability Coaches and Supervisors should engage in training and learning opportunities offered by Your Way Home Montgomery County CoC to continue to increase assessment skills and provide consistent assessments for clients.

If a household has reached their 12th month of receiving RRH financial and case management assistance, it is advised that a *qualifying need* be identified in order to re-certify ongoing assistance for the next 3 months. These qualifying needs may include but are not limited to: zero income, disability of the head of household, transitional-aged youth as the head of household, elderly head of household (55+), family with children 5 and under, or family with a single parent and young children. While a household does not *need* to have a qualifier in order to continue receiving RRH assistance after 1 year, it is encouraged that Housing Stability Coaches and Supervisors identify households coming close to their 12th month and work with those households closely to graduate them off of the program or clearly identify a qualifying need for continuance. Households that continue past the 12th month will continue to be re-certified every 3 months thereafter.

Overall, it is important for Housing Stability Coaches, clients, and Supervisors to be engaging in discussions about the client moving to self-sufficiency from intake and throughout the client’s time in the program.

Progressive Engagement in Rapid Re-Housing

Your Way Home Montgomery County CoC’s Rapid Re-Housing program is based on the model of progressive engagement, which means that households are provided the least amount of resources needed to achieve housing stability. In practice, this is carried out in a few ways: (1) Financial assistance is provided in no more than 3 month increments, and households are assessed for continued financial need before receiving more assistance; (2) There are no standard program service requirements other than basic case management (such as savings programs, educational achievement, life skills classes, etc.).

Progressive engagement requires that Housing Stability Coaches (HSC) and their Supervisors are constantly assessing client needs and abilities and tailoring their services accordingly. In terms of case management services, the level of service and support can be adjusted in the following ways to better match client needs:

- (1) Increasing frequency of case management meetings. While the basic program requirement is that HSCs meet with clients once per month, HSCs may determine that a client needs more frequent meetings in order to accomplish goals.
 - a. Possible indications of need to increase case management frequency:
 - i. Client acuity demonstrates high barriers to obtaining housing, particularly in areas such as Tenancy, Mental Health and Wellness, History of Homelessness.
 - ii. Client is unable to stay organized or on track between case management meetings; frequently loses paperwork, is unable to remember or accomplish action steps on own.
 - iii. Client has cognitive, developmental, or behavioral issues that have or may prevent them from accomplishing tasks or daily living activities.
 - iv. Client has drug or alcohol use behaviors that may limit memory or ability to complete tasks on time.
 - b. Housing Stability Coach response:
 - i. Increase the number of in-person and/or phone meetings to more than once per month, such as biweekly or weekly.

- ii. Engage additional supportive services, such as CTI or Recovery Coaches, to help the client achieve goals. Hold joint meetings so that all supports are aware of action steps and goals and ensure that these supports are assisting in completion of goals.
 - iii. Provide text message reminders or other prompts to complete tasks such as payment of rent or other bills.
- (2) Increasing supportive services. Some clients may need additional support in achieving housing goals or support in achieving other goals from other community support resources.
- a. Possible indications of need to increase supportive services include:
 - i. Client acuity demonstrates high barriers in certain areas needing professional services, support, or care, such as Mental and Physical Health and Wellness, Trauma/ Abuse, Family, etc.
 - ii. Client's lack of history or ability with certain skills, such as employment, tenancy, or financial literacy.
 - iii. Client's high score in Managing Tenancy or lack of tenancy history; high barriers identified to obtaining housing such as evictions, criminal history, etc.
 - b. Housing Stability Coach response:
 - i. Make referral to non-housing supportive services, and follow up with referral to ensure that client is able to access these services. Hold joint meetings to ensure that all supportive services are in place, all providers understand service goals, and support is being provided to help client achieve goals.
 - ii. Increase the level of support provided to clients to achieve housing goals, such as sitting with a client to call potential landlords, teaching a client how to make a rent or bill payment, teaching a client how to keep an apartment clean, helping a client complete a benefits application, connecting client to a Representative Payee, etc.
- (3) Adjusting Housing Stability Plans. Some clients may need to break goals down into smaller action steps in order for these plans to be manageable.
- a. Possible indications of need to adjust Housing Stability Plans:
 - i. Client is unable to complete tasks as assigned or is unable to make progress on goals.
 - ii. Client has not completed similar tasks before and is unsure of how to start.
 - iii. Client has developmental or behavioral disabilities and/or significant substance use habits that make goal achievement challenging.
 - b. Housing Stability Coach response:
 - i. Engage other support service professionals in creating an appropriate Housing Stability Plan for client based on abilities.
 - ii. Break tasks down into smaller actions, and assign case management support for each action.
 - iii. Check in more regularly on progress towards achieving goals.

Housing Stability Coaches and their Supervisors are responsible for ensuring that an appropriate level of supportive services is provided to all clients. Clients with high needs should not be provided the same level of case management as those with lower needs- this is against the Progressive Engagement model. Rather, they should be provided the level and type of service and supports necessary to achieve housing stability, as soon as that level of need is identified. For example, if a higher level of support is identified from intake, then that level of support should be provided immediately.

If needs exceed the capacity or training of Housing Resource Center staff, then HRC staff must ensure that clients are referred and connected to appropriate supports.

Rapid Re-Housing Case Loads

Housing Resource Center Supervisors are expected to help Housing Stability Coaches maintain a “mixed” level of Rapid Re-Housing cases; meaning, each HSC should be working with a set of clients with a mix of acuity levels and time in program.

On average, HSCs should be carrying a case load of 30-35 clients. In general, this should correspond to the following distribution: mix of about 20% high need/ high acuity clients, 70% medium need/ medium acuity clients, 10% low acuity/ low need clients

Note that “high needs” may be indicated by VI-SPDAT score, health status/ needs, daily living needs, or be situational for clients experiencing issues that require a significant amount of case time (such as the move-in period, in a hotel, etc.).

Output and Outcome Measures

The following measures will be used to evaluate the performance of the Your Way Home Montgomery County CoC Rapid Re-Housing program. Additionally, whenever possible based on HMIS reporting capabilities, coordinated entry outcomes will also be evaluated for any discrepancies across demographic categories (gender, race, ethnicity, and age tier).

- ❖ Number of persons/households served (by household composition)
- ❖ Number/ Percentage of persons/ households re-housed
- ❖ Average length of time from HRC intake to move-in date
- ❖ Average length of stay in program
- ❖ Number/ Percentage of persons exiting to permanent housing
- ❖ Number/ Percentage of adults exiting with any income
- ❖ Number/ Percentage of adults exiting with earned income
- ❖ Number/ Percentage of adults exiting with non-cash benefits
- ❖ Number/ Percentage of persons exited to permanent housing who return to emergency shelter within 2 years of exit
- ❖ Geographic distribution of re-housed households

Regular and ongoing evaluation of Rapid Re-Housing will be conducted by Your Way Home Montgomery County CoC Operations Team, including but not limited to a yearly consumer feedback survey, on-site provider monitoring, and quarterly reviews of HMIS data.

Policies

Your Way Home Montgomery County CoC Service Provider staff are encouraged to become familiar with all [Your Way Home Montgomery County CoC Policies](#).

The Your Way Home Montgomery County CoC Policy sections listed below provide guidance and direction for the implementation of YWH Montgomery County COC Rapid Re-Housing services.

[1. System Performance Policies](#)

[2. General Standards & Prioritization Policies](#)

[5. Rapid Re-Housing Policies](#)

Transitional Housing & Joint Component Transitional Housing/Rapid Re-Housing (TH/RRH)

Many communities still operate congregate transitional housing programs – defined as facility-based programs that offer housing and services for up to two years to individuals and families experiencing homelessness. While many people who have traditionally been assisted in long-term congregate transitional housing may be served more efficiently in other program models, this model may be appropriate for some people, including persons struggling with a substance use disorder or in the early stages of recovery who may desire more intensive support; survivors of domestic violence and other forms of severe trauma who may require and prefer the security and onsite services of a congregate setting; unaccompanied and pregnant or parenting youth who are unable to live independently or who prefer a congregate setting with access to a broad array of wraparound services.

Guiding Principles of Transitional Housing

- **Reduce stays in congregate transitional housing-** Long-term stays in congregate transitional housing programs should be reserved for those individuals with severe or specific needs who choose transitional housing over other services that would help them more quickly reconnect to permanent housing.
- **Eliminate barriers-** Programs serving these populations should have as few barriers as possible to program entry (e.g. sobriety requirements) and to continuation in the program.
- **Exit to permanent housing-** Transitional housing services should focus on connecting individuals and families to permanent housing by program exit.
- **Coordination-** Entry into Transitional Housing should be coordinated with the community’s broader coordinated entry system, including prioritization of services for those most in need of this.

Target Population

<p>Literally Homeless (HUD Homeless Category 1)</p>	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • 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
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<p>Fleeing/ Attempting to Flee Domestic Violence (HUD Homeless Category 4)</p>	<p>Any individual or family who-</p> <ul style="list-style-type: none"> • Is experiencing trauma or lack of safety related to, or fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; • Has no other safe residence; • Lacks the resources to obtain other safe permanent housing.
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Program Guidance

Your Way Home Montgomery County CoC has converted the large majority of transitional housing projects to Permanent Supportive Housing. The limited remaining Transitional Housing units in Montgomery County serve special needs populations including but not limited to survivors of domestic violence, survivors of abuse, survivors of human and labor trafficking, unaccompanied youth (including parenting youth and pregnant youth) and families with multiple children and a single head of household. Vacant transitional housing units are required to take referrals from Coordinated Entry as outlined in the [prioritization policies](#).

No individual or family may be assisted in transitional housing for a period in excess of 24 months. Transitional housing programs are expected to place individuals and families into permanent housing within 12 months. Transitional Housing is intended as a best practice to be used as bridge housing (i.e., temporary housing when shelter is not available or participant is preparing to enroll in RRH or another PH program) that should not exceed 3 months (in particular for the TH/RRH programs).

Program participants must have a lease (or sub-lease) or occupancy agreement in place when residing in Transitional Housing.

Transitional Housing program staff provide participants with housing-focused, person-centered, strengths-based case management services and assistance with obtaining housing. Simultaneously, TH programs provide or connect program participants to employment, job training, financial counseling, public benefits access, savings programs, and/or other supportive services that increase income.

For TH/RRH programs, all procedures and policies listed under [Rapid Re-Housing](#) must be followed for the RRH component. Additionally, the combined time in Transitional Housing and receiving rental assistance through Rapid Re-Housing cannot exceed a total of 24 months.

If the household is still enrolled in the CE Program in Clarity when they are enrolled in Transitional Housing, the HSC exits the program for the household when the household moves into a unit leased with RRH.

Output and Outcome Measures

The following measures will be used to evaluate the performance of the Your Way Home Montgomery County CoC Transitional Housing program. Additionally, whenever possible based on HMIS reporting capabilities,

coordinated entry outcomes will also be evaluated for any discrepancies across demographic categories (gender, race, ethnicity, and age tier).

- ❖ Percentage of households exiting to permanent housing within 3-12 months
- ❖ Percentage of adults connected to non-cash benefits at exit
- ❖ Percentage of adults receiving any income at exit
- ❖ Percentage of adults receiving earned income at exit
- ❖ Percentage of all clients exiting to permanent housing

Regular and ongoing evaluation of Transitional Housing will be conducted by Your Way Home Montgomery County CoC Operations Team, including but not limited to a yearly consumer feedback survey, on-site provider monitoring, and quarterly reviews of HMIS data.

Policies

Your Way Home Montgomery County CoC Service Provider Staff are encouraged to become familiar with all [Your Way Home Montgomery County CoC Policies](#).

The Your Way Home Montgomery County CoC Policy section listed below provides guidance and direction for the implementation of YWH Montgomery County COC Transitional Housing services.

[1. System Performance Policies](#)

[2. General Standards & Prioritization Policies](#)

[3. Rapid Re-Housing Policies](#)

Permanent Supportive Housing

Your Way Home Montgomery County CoC Permanent Supportive Housing programs are targeted to serve those who are chronically homeless and are diagnosed with a disabling condition.

Guiding Principles of Permanent Supportive Housing:

- **Prioritization-** Consistent procedures for prioritization of beds based on Your Way Home Montgomery County CoC’s guiding principles;
- **Accountability-** Program accountability to individuals and families experiencing homelessness; especially those who are experiencing chronic homelessness;
- **Use of evidence-based practices-** An environment of effective, evidenced-based program guidelines for permanent supportive housing.

Target Population

<p>Literally Homeless (HUD Homeless Category 1)</p>	<p>An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> • An individual or household that is living on the street or their car, camping, living in an abandoned or condemned building, or otherwise living in a place not meant for human habitation; • Is living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements; <u>or</u> • Is exiting an institution where he or she resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
<p>Disabled</p>	<p>A person is considered Disabled if they have:</p> <p>(1) A condition that:</p> <ul style="list-style-type: none"> (i) is expected to be long-continuing or of indefinite duration; (ii) substantially impedes the individual’s ability to live independently; (iii) could be improved by the provision of more suitable housing conditions; and (iv) is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury; (v) or

	<p>(2) A development disability, as defined at 42 U.S.C. 15002; or</p> <p>(3) The disease of AIDS or any conditions arising from the etiologic agent for AIDS including infection with the Human Immunodeficiency Virus (HIV).</p>
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Major Steps

1. Receive referral and conduct intake and enrollment

The Permanent Supportive Housing provider will re-assign referrals directly from the Your Way Home Program Manager based upon the [PSH prioritization policy](#).

Upon receiving assignment for referral, the PSH provider contacts all agencies (e.g., street outreach, emergency shelter) working with the client to collect the appropriate eligibility documentation as outlined in the policy on [PSH eligibility for New Clients](#). Documentation is expected to be collected within 2 weeks.

- The provider will deny any referral that does not meet the eligibility requirements specified in the applicable grant agreement for the program, or as outlined in the [policy on Engagement and Intake into Permanent Supportive Housing](#). The provider will notify the Your Way Home Montgomery County COC Program Manager of the denial and these referrals are sent back to the By-Name List.

Once eligibility documentation has been collected, the PSH provider meets with the client for intake and enrollment.

- The PSH provider schedules the meeting at the emergency shelter with client and Shelter Case Manager; or in a mutually-agreed upon location if the client is not in shelter.
- The PSH provider collects appropriate Releases of Information for any current health, mental health, or other social service supports.
- The PSH provider reviews the YWH PSH Agreement, PSH Rights and Responsibilities, PSH Client Grievance Procedures, and PSH VAWA Rights in detail with the client, and both parties sign the Agreements. Copies are provided to the client.
- Additionally, the PSH provider completes the Self-Certification of Income form with the client and makes a plan to collect appropriate proof of income (SSI Award Letter, SSDI Award Letter, Pay Stubs, etc.).
- The PSH provider explains the process for obtaining housing through the program. PSH provider agrees with client on appropriate rent ranges based on neighborhood of choice, household composition, and Fair Market Rent. PSH provider fills out the Housing Search Planner with the household and both parties' sign. A copy is provided to the client.

The PSH provider enrolls the household into the Permanent Supportive Housing Program in Clarity. If the household is still enrolled in the CE Program in Clarity, the PSH provider exits the program for the household.

The PSH provider creates a hard copy file for the client.

2. Locate housing

The Permanent Supportive Housing provider supports the client in their housing search:

- PSH provider contacts Landlords that work with Your Way Home to inquire about available apartments.
- PSH provider gives 1-3 vacant apartment leads to client that fit criteria.

The PSH provider, the client, and/or their current case management supports visit units to conduct visual inspection and agree on a unit.

Once a client is approved for a unit, the PSH provider begins the unit approval process.

- The PSH provider orders an HQS inspection on the apartment unit by completed an Inspection Request Form and emailing Lynda Haley or Patti Stroman at the Montgomery County Housing Authority- lhaley@montcoha.org and pstroman@montcoha.org.
 - The PSH provider receives an emailed confirmation and completed form with the results of the inspection.
 - If a unit fails inspection, the PSH provider may work with the Landlord to fix the problems identified. Or, the PSH provider may move on to another unit.

The PSH provider assembles/ completes other documentation needed to demonstrate eligibility of the unit and maintains documentation in the client's file:

- Conducts a tax lien search at www.taxclaim.montcopa.org, prints out the form showing the tax lien search results and includes it in the client file.
- Requests a W-9 from landlord.
- PSH provider completes the Rent Reasonableness Form

3. Provide move-in assistance

Once a unit is approved, the PSH provider schedules the lease-signing and notifies the client's current supports.

- PSH provider calculates the Utility Allowance and completes the Tenant Rent Payment Calculation.
- PSH provider executes the Rental Assistance Contract and Rental Assistance Lease Addendum.
- The PSH provider completes the check request for move-in costs.

The PSH provider assists the client with move-in logistics:

- Confirms lease signing date and location with client, client's supports, and landlord.
- Assists the client in turning on utilities/ transferring to client's name if applicable.
- PSH provider enters housing move-in date in PSH program enrollment

The PSH provider reviews the terms of the lease with the client. The PSH provider maintains a copy of the signed lease in the client's file.

- If PSH program is Master Leased, the PSH provider, client and Landlord review and sign the Master Lease Rider lease addendum, which is to be kept in the client's file.

The PSH provider confirms the transfer of keys and provides the household with a "Protect your Family from Lead in Your Home" brochure.

The PSH provider and the client's supports assist the client in identifying and acquiring household goods and furniture needed at move-in.

4. Support stabilization in housing

Within 30 days of housing, the Permanent Supportive Housing provider conducts an assessment of service needs to connect to appropriate supports for the household (e.g., VI-SPDAT, Arizona Self-Sufficiency Matrix, or other tool). The PSH provider connects the household with local, appropriate health, mental health, or other supportive services to help the client in gaining stability in their housing.

- An updated assessment of service needs must be completed at minimum every 6 months thereafter, with a copy of the assessment maintained in the household's file.
- Updated releases of information for current health, mental health, or other social supports must also be maintained in the household's file.
- Income must be assessed at minimum annually, with proof of income and updated rental calculation kept in the client's file.
- Annual Assessment is entered in Clarity each year the household is enrolled.

The PSH provider provides ongoing financial assistance to the client for housing and other costs, as appropriate for the household's needs.

Monthly (at minimum) case notes must be entered into the PSH program in Clarity to reflect the outcome of assessment of need, connections to supports and income, and progress in housing & health stability as outlined in the policy on [case notes](#).

Within 180 days of housing, the PSH provider is required to collect state-issued photo IDs, birth certificates, and social security cards for all household members. These documents are to be kept in the household's file.

The Permanent Supportive Housing program enrollment is closed when the household has graduated successfully from the program, or as outlined in the [PSH termination policy](#). In either scenario, the household must be provided with a Program Exit Plan.

Program Guidance

Reasonable Accommodation and Progressive Engagement in PSH

The Fair Housing Act prohibits discrimination through the refusal to make reasonable accommodations in rules, policies, practices, or services when such accommodations are necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling. Permanent Supportive Housing is a program

designed to serve those with a disability and a need for the service. Therefore, it is expected that administrative and service providers working with households enrolled in PSH understand the nature of a person's disability and take this into consideration when helping to support them maintain their housing. Examples of this include utilizing progressive engagement, motivational interviewing, and trauma-informed care. Supervisors of PSH programs (both administrative and supportive services) should ensure that staff are being proactive in engagement, connection to services and benefits, and client-centered goal setting.

The level of service and support can be adjusted in the following ways to better match client needs:

- (1) Increasing frequency of case management meetings. PSH providers may determine that a client needs more frequent meetings in order to accomplish goals or maintain their housing.
 - a. Possible indications of need to increase case management frequency:
 - i. Client acuity demonstrates high barriers to maintain housing, particularly in areas such as Tenancy, Mental Health and Wellness, History of Homelessness.
 - ii. Client is unable to stay organized or on track; frequently loses paperwork, is unable to remember to follow through on lease requirements or agreements.
 - iii. Client has cognitive, developmental, or behavioral issues that have or may prevent them from accomplishing tasks or daily living activities.
 - iv. Client has drug or alcohol use behaviors that may limit memory or ability to complete tasks on time.
 - b. PSH provider response:
 - i. Increase the number of in-person and/or phone meetings to more than once per month, such as biweekly or weekly.
 - ii. Engage additional supportive services to help the client achieve goals. Hold joint meetings so that all supports are aware of action steps and goals and ensure that these supports are assisting in completion of goals.
 - iii. Provide text message reminders or other prompts to complete tasks such as payment of rent or other bills.
- (2) Increasing supportive services. Some clients may need additional support in achieving housing goals or support in achieving other goals from other community support resources.
 - a. Possible indications of need to increase supportive services include:
 - i. Client acuity demonstrates high barriers in certain areas needing professional services, support, or care, such as Mental and Physical Health and Wellness, Trauma/ Abuse, Family, etc.
 - ii. Client's lack of history or ability with certain skills, such as employment, tenancy, and financial literacy.
 - iii. Client's high score in Managing Tenancy or lack of tenancy history; high barriers identified to obtaining housing such as evictions, criminal history, etc.
 - b. PSH provider response:
 - i. Make referral to non-housing supportive services, and follow up with referral to ensure that client is able to access these services. Hold joint meetings to ensure that all supportive services are in place, all providers understand service goals, and support is being provided to help client achieve goals.
 - ii. Increase the level of support provided to clients to achieve housing goals, such as sitting with a client to talk with the landlord, teaching a client how to make a rent or bill

payment, teaching a client how to keep an apartment clean, helping a client complete a benefits application, connecting client to a Representative Payee, etc.

PSH providers are responsible for ensuring that an appropriate level of supportive services is provided to all clients. Reasonable accommodation should be explored in all scenarios when a household is struggling to maintain their housing. Instances of discharge from the PSH program should be extremely rare. It is expected that program discharges should only happen in extreme circumstances and in alignment with the [PSH Termination Policy](#).

Output and Outcome Measures

The following measures will be used to evaluate the performance of the Your Way Home Montgomery County CoC Permanent Supportive Housing program.

- ❖ Unit/ bed utilization rate
- ❖ Percentage of all clients exiting to permanent housing
- ❖ Percentage of enrolled households that were chronically homeless at entry
- ❖ Percentage of all clients retaining housing for 6 months or longer
- ❖ Number/Percentage of adults exiting with any income
- ❖ Number/Percentage of adults exiting with earned income
- ❖ Number/Percentage of adults exiting with non-cash benefits
- ❖ Number/Percentage of persons exited to permanent housing who return to emergency shelter within 2 years of exit

Regular and ongoing evaluation of Permanent Supportive Housing will be conducted by Your Way Home Montgomery County CoC Operations Team, including but not limited to a yearly consumer feedback survey, on-site provider monitoring, and quarterly reviews of HMIS data.

Policies

Your Way Home Montgomery County CoC Service Provider staff are encouraged to become familiar with all [Your Way Home Montgomery County CoC Policies](#).

The Your Way Home Montgomery County CoC Policy sections listed below provide guidance and direction for the implementation of YWH Montgomery County COC Permanent Supportive Housing services.

[1. System Performance Policies](#)

[2. General Standards & Prioritization Policies](#)

[6. Permanent Supportive Housing Policies](#)

Homelessness Prevention

Your Way Home Montgomery County CoC Homelessness Prevention programs are targeted to serve those who are at imminent risk of homelessness, homeless under other federal definitions, those who are disproportionately affected by homelessness, and those who are under-served by the homeless crisis response system as identified in Your Way Home’s [equity evaluation](#). Since 2017, Your Way Home Montgomery County CoC has launched two evidence-informed best practice pilots in homelessness prevention as identified in Your Way Home’s report, [Unlocking Doors](#). Both pilots are described within this chapter. Your Way Home Montgomery County CoC is continuously working on bringing each pilot up to scale, and develop new programming for greater impact to address the full scale of need in Montgomery County, Pennsylvania.

Guiding Principles of Homelessness Prevention:

- **Equitably Targeting Vulnerable Populations-** Your Way Home Montgomery County CoC recognizes that homelessness disproportionately affects people of color, particularly Black/African American mothers and their children in Montgomery County. Furthermore, Your Way Home Montgomery County CoC recognizes that some populations or communities are not accessing or utilizing services within Coordinated Entry or the homeless crisis response system (such as people who are transgender, or the Latinx community). To the maximum extent possible, Homelessness Prevention programs are targeted and evaluated for its effectiveness in serving these populations who are underserved, underrepresented, or overrepresented in the homeless crisis response system.
- **Flexibility-** To the maximum extent possible, Homelessness Prevention assistance (including financial assistance) should be flexible and responsive to the needs of the household.
- **Progressive Engagement-** A Homelessness Prevention program should make efforts to maximize the number of households it is able to serve by providing households with the financial assistance in a progressive manner, providing only the assistance necessary to stabilize their housing crisis. Some Homelessness Prevention programs have limits in the amount of financial assistance that will be offered; others do not. In either case, only enough financial assistance should be offered to help stabilize the household.
- **Use of evidence-based practices-** An environment of effective, evidenced-based program guidelines for homelessness prevention.

Target Population

<p>Imminent Risk of Homeless (HUD Homeless Category 2)</p>	<p>Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> • 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.
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<p>Homeless under other Federal statutes (HUD Homeless Category 3)</p>	<p>Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under the HUD definitions, but who:</p> <ul style="list-style-type: none"> • Are defined as homeless under the other listed federal statutes; • Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to a homelessness prevention program; • Have experienced persistent instability as measured by two moves or more during 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.
<p>Fleeing/ Attempting to Flee Domestic Violence (HUD Homeless Category 4)</p>	<p>Any individual or family who-</p> <ul style="list-style-type: none"> • Is experiencing trauma or lack of safety related to, or fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; • Has no other safe residence; and • Lacks the resources to obtain other safe permanent housing.

Eviction Prevention & Intervention Coalition (EPIC)

The Eviction Prevention and Intervention Coalition (EPIC) is a court-based eviction prevention program that provides individuals facing eviction with temporary financial assistance to pay rent arrears/court fees, free landlord/tenant mediation services, free legal representation where applicable, and housing stability case management services. EPIC's mission is to provide a safety net to help stabilize vulnerable low-income families and individuals in Montgomery County who are facing eviction.

EPIC is the result of a cross-system partnership between the following organizations:

- Legal Aid of Southeastern Pennsylvania
- The Montgomery County Bar Association
- The Montgomery County Bar Foundation
- Eights (8) Participating Montgomery County Magisterial District Court
- The Montgomery County Foundation Inc.
- The Montgomery County Office of Housing & Community Development
- PA-504 Continuum of Care Your Way Home public-private partnership

EPIC utilizes the resources of its major partner sponsors in the following ways:

- Free, limited legal representation is provided through the coordination of pro bono attorneys and paralegals.
- The Montgomery Bar Association serves as the volunteer recruiter and coordinator.
- Legal training for volunteer lawyers, paralegals, and social service staff is provided by the Legal Aid of Southeastern Pennsylvania.
- Court administration is supported by the Montgomery County Courts.
- General program management is provided by Your Way Home Montgomery County CoC/ Montgomery County Office of Housing and Community Development.
- The Montgomery County Foundation serves as fiscal sponsor to EPIC grants.
- The Montgomery Bar Foundation serves as a champion and partner.

EPIC was designed to address the significant and debilitating impact that evictions have on vulnerable populations. Of the 154 households served since program inception in January 2018, 61% of participants are African Americans and 53% are women. Among EPIC participants, Black or African American women paid the highest rent, yet earned the second-lowest monthly income. Both local and national data were used to design the EPIC program, and the following points were particularly important to its development:

- Of the 66 zip codes in Montgomery County, 60% of evictions are concentrated in two zip codes: 19401 (Norristown) and 19464 (Pottstown).
- Most tenants use pro se representation during eviction hearings, and most legal evictions are due to nonpayment of rent.
- Evictions disproportionately affect women, households with children, and African Americans.
- Evictions are often the cause of poverty and job loss, not a result of them. Once evicted, most households are forced to find more expensive and lower quality housing due to the negative impact that an eviction has on one's credit and rental history.

EPIC currently operates in 8 (eight) Magisterial District Judge courts:

- Hon. Marc Alfarano – East Norriton 19401
- Hon. Christopher Cerski – Jenkintown 19046
- Hon. Edward Levine – Lansdale 19446

- Hon. Scott Palladino – Pottstown 19464
- Hon. Edward C. Kropp, Sr. – Pottstown 19464
- Hon. Todd Barnes – Norristown 19401
- Hon. Denise Ashe – Norristown 19401
- Hon. Margaret Hunsicker (retiring)– Norristown 19401
(pending- Hon. Hakim Jones)

EPIC does not currently operate in the following MDJ Courts:

- Hon. Albert J. Augustine – Harleysville 19438
- Hon. Maureen C. Coggins- Upper Hanover Township 18076
- Hon. Andrea Duffy- Hatfield Township 18915
- Hon. Jay S. Friedberg-Lower Moreland Township 19006
- Hon. James P. Gallagher- Bridgeport Township 19405
- Hon. Jodi L. Griffis Plymouth -Township 19428
- Hon. John D. Kessler Abington- Township 19001
- Hon. Patrick O. Krouse- Upper Merion Township 19406
- Hon. Paul N. Leo- Hatboro Borough 19040
- Hon. Suzan Leonard -Whitpain Township 19422
- Hon. Deborah A. Lukens -Whitemarsh Township 19444
- Hon. Katherine E. McGill -Springfield Township 19075
- Hon. Elizabeth McHugh- Cheltenham Township 19046
- Hon. Harry J. Nesbitt 3rd- Horsham Township 19044
- Hon. Juanita A. Price- Abington Township 19046
- Hon. Micheal P. Quinn- Lower Merion Township 19072
- Hon. Cathleen K. Rebar- Lower Providence Township 19426
- Hon. Maurice H. Saylor –Douglass Township 19525
- Hon. Henry Schireson Lower Merion Township 19072
- Hon. Richard H. Welsh- Limerick Township 19468
- Hon. Patricia Zaffarano- Upper Dublin Township 19002
- Hon. Karen Eisner Zucker- Lower Merion Township 19072

Target Population

<p>Imminent Risk of Homeless (HUD Homeless Category 2)</p>	<p>Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ol style="list-style-type: none"> I. Residence will be lost within 14 days of the date of application for homeless assistance; II. No subsequent residence has been identified; and III. The individual or family lacks the resources or support networks needed to obtain other permanent housing.
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EPIC will target Montgomery County residents who have received an eviction notice and whose situation is one of the following:

- Nonpayment of rent due to defensible claim: Tenants who have a legal defense for withholding rent (such as non-habitability of unit).
- Nonpayment of rent due to temporary financial crisis: Tenants who have undergone a recent (temporary) life event that has caused them to fall behind in their rent.
- Vulnerable population: Tenants who are considered vulnerable populations including: Victims of domestic violence/PFA Order (where the abuser is the main source of income, and when (s)he leaves/is arrested/jailed, the victim falls behind on rent), households with children under 6 years old, women who are pregnant, senior citizens, persons who have significant medical and mental health condition, Veterans, and recently exited (24months) chronically homeless YWH clients.
- American with Disabilities Act (ADA) matters: Individuals being charged rent/fees due to a service animal or Emotional Support Animal (ESA) and being evicted on that basis.
- Scheduled to appear for an eviction hearing in one of the eight participating Magisterial District Court.
- Household income must be at or below 30% Area Median Income (AMI).
- Have not received financial assistance from any Your Way Home Homelessness Prevention program in the past 12 months

Major Steps

Prior to Hearing:

1. Schedule Hearings

- Magisterial District Court administrative staff will schedule landlord-tenant hearings in blocks of time and days so that EPIC Staff assistance may be available.

2. Written Notification Distributed to Potential Clients

- Written notification of the EPIC program is included as an attachment in the hearing notification to all persons receiving an eviction notice from participating MDJ courts.

Day of Hearing:

1. Schedule Hearing

- Court Administration staff will provide basic information on EPIC to all tenants checking in. The participating judge will hear cases for which no tenants have appeared in court first.

2. Screen Tenants for Eligibility

- EPIC Housing Stability Coach (Coach) completes Section A of the EPIC Screening Tool with all tenants who are present in court on the day of hearing and interested in the program.
- Coach will review the reason for eviction and any documentation and evidence that tenant has brought to court.
- Nonpayment of rent cases: Coach will review reason for nonpayment and future ability to pay rent, tenant's ability to pay arrearages and whether EPIC financial assistance would be sufficient to prevent eviction, and any other budgetary issues related to future ability to pay.
- Violation of lease cases: Coach will briefly interview client regarding circumstances of the violation.
- Vulnerable population cases: Coach will identify whether the household includes a vulnerable population and will make a recommendation for whether EPIC services could be used to prevent further trauma from occurring to the household.
- Coach will make social service eligibility determination (Section B) and note outcome and follow up date as appropriate on the Screening Tool.

- Coach will complete HMIS Release of Information paperwork for all households who have completed Section A of the screening tool.
- Coach will forward all completed screening tools to EPIC Attorney for free legal consultation.

3. Complete Free Legal Case Consultation

EPIC Attorney reviews Sections A & B of the Screening Tool and conducts a free, short-term (10 minute) legal consultation with the tenant.

- The EPIC Attorney will review any relevant documentation or evidence.
- The purpose of the Case Consultation is to assess the case and any counterclaims and prepare a negotiation or defense in order to help achieve one or more of EPIC's outcomes.
- If deemed ineligible for representation, the EPIC Attorney will provide the tenant with the EPIC Self-Representation Packet.
- If deemed eligible for representation, the EPIC Attorney will have the tenant sign the limited representation waiver. The EPIC Attorney will prepare the defense, possible counterclaims, and negotiation options. These could include any (or any combination of) the following:
 1. Reduction in arrearages or fees
 2. "Pay and stay" terms
 3. Payment plan
 4. Vacate without eviction
 5. Repairs
 6. Other as appropriate
- EPIC Attorney, Coach, and tenant review and agree upon the proposed defense or negotiation.
- EPIC Attorney will complete Section C of the Screening Tool and return Screening Tool to the Coach.

4. Legal mediation

EPIC Attorney meets with Landlord/ Property Manager to confirm amount of rent due and to negotiate an agreement prior to hearing. EPIC Attorney presents negotiated agreement options as discussed with Housing Stability Coach and tenant. Ideally, the EPIC Attorney and Landlord/ Property Manager will come to agreement prior to going before the Judge.

Housing Stability Coach acting as mediator meets with Landlord/Property Manager and tenant to confirm amount due and to facilitate an agreement between Landlord/Property Manager and tenant.

5. Create Housing Stability Plan & Follow Up

Housing Stability Coach meets one-on-one with the tenant to complete a Housing Stability Plan and follow-up plan for any household who is eligible for any portions of Section B or Section C of the Screening Tool.

- Note: If ineligible for all portions of Section B and Section C, client will be deemed ineligible for EPIC and no further action is needed.

The Coach will provide the tenant with one or more of the following:

A. Specific phone numbers and referral forms to connect to supportive services such as:

- Financial counseling classes or services/ credit repair services
- Health and mental health services
- Domestic violence services
- Employment services
- Childcare subsidy services
- Veteran services

- Other legal services

B. A Housing Stability Plan which outlines the steps the tenant agrees to take in order to prevent eviction or gain housing stability, as guided by client choice.

C. An EPIC Payment Letter if the tenant is offered EPIC financial assistance (pending agreement to “pay and stay” from landlord).

- If financial assistance from EPIC is included in plan, the Housing Stability Plan and Agreement Letter indicate that tenants are expected to follow the agreed upon payment terms between the tenant, landlord, and Your Way Home Montgomery County CoC.
- Confirmation of follow-up date, time and best contact information. Tenant will be provided with Coach’s contact information.

6. Hearing

- EPIC Attorney, Housing Stability Coach, and tenant review and agree upon the proposed defense or negotiation agreement.
- EPIC Attorney presents case and any negotiated mediation/settlement to the Court.
- Tenant meets with Court to present case, defense and eviction prevention plan which may include financial support from EPIC. Provides EPIC support letter.
- Judge reaches determination on case and gives notification of judgment to landlord, tenant and housing stability Housing Stability Coach.
- Housing Stability Coach will attach the notification of judgment to the screening tool as part of the tenant’s file and track EPIC outcomes.

7. Finalize Housing Stability Plan and Payment

Housing Stability Coach completes Housing Stability Plan and other paperwork as appropriate, per the judgment and provides a copy to the tenant and landlord.

- Housing Stability Coach includes clear instructions on how tenant may provide proof of payment (text picture, confirmation call from landlord, etc).
- Housing Stability Coach confirms the tenant’s contact information and confirms the follow-up date as outlined in the Screening Tool and Eviction Prevention Plan.

Provider must conduct a visual inspection and sign off on minimum habitability standards prior to financial assistance being processed.

Post- Hearing

1. Complete Data Entry

The Housing Stability Coach creates an HMIS Profile for head of household, enrolls into EPIC program in HMIS, and enters EPIC Assessment in HMIS. The Housing Stability Coach completes all data entry as appropriate.

2. Check Issuance

Initiate check request process within 48 hours and ensure check request and all related paperwork is submitted to confirm check issuance within two (2) weeks of program enrollment.

3 Follow Up

Within 30 days after the hearing, and every 30 days after, for a minimum of one year, Housing Stability Housing Stability Coach engages tenant to conduct follow-up.

- Effective follow up will:
- Ensure tenants are connected to supportive services as identified in the Housing Stability Plan.
- Ensure tenants are complying with terms of agreement, such as payment plan.
- Make referral to more intensive social services/ support as needed.
- Ensure that tenant is not evicted within one year of program enrollment.
- Housing Stability Coach updates EPIC Assessment in HMIS to include outcome as outlined in notice of judgment (once received via mail) and outcomes as discussed during follow-up phone call.
- Housing Stability Coach closes EPIC program enrollment when all referrals, follow ups and processing are complete.

Output and Outcome Measures for EPIC

The following measures will be used to evaluate the EPIC program:

- Number of persons/Households seen & pre-screened
- Number of persons/Households Eligible & Served with one or more services of EPIC (financial, social service, and/or legal services)
- Number of persons/Households with a reduction or elimination of judgment
- Number of persons/Households with eviction delayed
- Number of persons/Households residing in stable housing one year after hearing

Ongoing evaluation of EPIC will be conducted by Your Way Home Montgomery County CoC Operations Team to ensure the effectiveness and efficiency of the program. This may include a yearly consumer feedback survey, on-site provider monitoring and file review, and regular reviews of HMIS data and quarterly reporting submitted by provider.

The EPIC Social Services partner will be responsible for reporting on the following metrics quarterly:

- Number of households/clients enrolled
- Number of evictions prevented
- Number of case management service units provided per tenant
- Average time from program enrollment to rent check issuance
- Number of households with completed eviction prevention plan
- Total amount of assistance disbursed
- Average monthly rent for all participating tenants
- Total funding leveraged by project
- Average funding leveraged for all participating tenants
- Overall Project Cost

Provider Performance Goals:

- 90% of payments issued to landlord within two (2) weeks of confirming eligibility
- 75% of participants avoid eviction for the 12 months following assistance
- 90% of participants avoid homelessness for the 12 months following assistance
- 90% of participants complete eviction prevention plan
- 90% of participants connected to at least 2 eviction prevention and/or supportive service

Policies

Your Way Home Montgomery County CoC Service Provider staff are encouraged to become familiar with all [Your Way Home Montgomery County CoC Policies](#).

The Your Way Home Montgomery County CoC Policy sections listed below provide guidance and direction for the implementation of YWH Montgomery County COC Permanent Supportive Housing services.

- [1. System Performance Policies](#)
- [2. General Standards & Prioritization Policies](#)
- [7. Homelessness Prevention Policies](#)

Emergency Rent & Utility Coalition

The Emergency Rent & Utility Coalition (ERUC) Program is a project designed to provide emergency financial and housing stabilization to vulnerable families and individuals in Montgomery County who are experiencing a housing crisis. The program is designed to be as flexible as possible in order to respond to the household's presenting need(s). Eligible uses of the funding within this program include providing rental assistance, utility assistance, or move-in assistance (first/last/security deposit). To the maximum extent possible, case management services will also be provided to the household in the form of housing focused case management, connections to supportive services, and housing location services. **Assistance offered through this program is subject to available funding.**

Target Population

The Emergency Rent Coalition & Utility Program will target households located in Montgomery County who are at imminent risk of homelessness and would need to enter emergency shelter or sleep in a place not meant for habitation but for this assistance.

<p>Imminent Risk of Homeless (HUD Homeless Category 2)</p>	<p>Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> • 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.
<p>Homeless under other Federal statutes (HUD Homeless Category 3)</p>	<p>Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under the HUD definitions, but who:</p> <ul style="list-style-type: none"> • Are defined as homeless under the other listed federal statutes; • Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to a homelessness prevention program; • Have experienced persistent instability as measured by two moves or more during 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.
<p>Fleeing/ Attempting to Flee Domestic Violence (HUD Homeless Category 4)</p>	<p>Any individual or family who-</p> <ul style="list-style-type: none"> • Is experiencing trauma or lack of safety related to, or fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; • Has no other safe residence; and

	<ul style="list-style-type: none"> • Lacks the resources to obtain other safe permanent housing.
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Additionally, clients receiving assistance from the Emergency Rent Coalition and Utility Program services must:

- Not have received financial assistance from the ERUC program or any other Your Way Home Homelessness Prevention program in the past 12 months.
- Household income must be at or below 80% Area Median Income (AMI).

Major Steps

1. Screen for Housing Crisis and Eligibility

Your Way Home Montgomery County CoC Coordinated Entry will conduct initial ERUC pre-screening tool and, if deemed initially eligible, will refer households to currently funded agencies with Emergency Rent & Utility Coalition (ERUC) Program dollars. Note: households may also apply for ERUC directly with providing agencies without the intervention of Coordinated Entry staff.

Once households present for assistance, funded agencies will collect documentation of imminent risk status and current income. This may include:

- Eviction Notice
- Proof of rental or utility arrears
- Written notice from family or friends that they must leave doubled-up situation
- Proof of hotel payments and inability to continue paying for hotel
- Proof of Income
- Verbal or written testimony that household is actively fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking

Once eligibility has been determined, funded ERUC agency will update the household's information in Clarity. Any federally-funded ERUC Homeless Prevention program must enroll in a Homeless Prevention Program in Clarity.

2. Determine Assistance to be Provided

Depending on the household's unique circumstances, the funded ERUC agency will determine which of three assistance modalities will stabilize the household to meet the objective of preventing homelessness for people who are able to afford their housing after receiving assistance.

1. Providing Emergency Rental Arrears – providers can pay rental arrears for 18 total months from the time arrears began, including late fees and/or court fees.
2. Providing Utility Assistance – providers can pay utility arrears for up to 18 total months from the time arrears began, including late fees and/or court fees.
3. Providing Move-In Assistance and Ongoing Rent – if a household must relocate to a more affordable unit, they can receive move-in assistance (first/last/security deposit) for a new unit, as long as it means HUDs Rent Reasonableness standards and is below Fair Market Rent. Providers can also provide ongoing rental assistance until the household has received the total 18 months of support

Once financial assistance has been approved, the funded ERUC agency and household will complete a signed ERUC Payment Plan Agreement outlining the amount each party will pay. Ideally ERUC funds must be paid

directly to the landlord, but if the landlord is unwilling to participate, funds can be given directly to the client as long as proof of payment to the landlord is provided. If the client is unable to provide proof of payment, funds must be returned to the provider agency.

3. Housing Stability Plan

A Case Worker from the funded ERUC agency will meet one-on-one with the household to complete a Housing Stability Plan and follow-up plan.

The Case Worker will provide the household with one or more of the following:

- Specific phone numbers and referral forms to connect to supportive services such as:
 - Financial counseling classes or services; credit repair services
 - Physical health and mental health services
 - Domestic violence services
 - Employment services
 - Childcare subsidy services
 - Veteran services
 - Other legal services
- A Housing Stability Plan which outlines the steps the household agrees to take in order to maintain housing stability after receipt of assistance, as guided by client choice.

4. Follow Up

Within 30 days of receiving assistance, Case Worker calls household to complete follow-up:

- Ensures household connected to supportive services as identified in Housing Stability Plan.
- Ensures household is complying with terms of payment agreement.
- Makes referral to more intensive social services/ supports as needed.
- Ensures household does not need ongoing rental assistance funding

Case Worker will update the ERUC HMIS record in Clarity to include any relevant outcomes.

Output and Outcome Measures for ERUC Program

The following measures will be used to evaluate the ERUC Program:

- ❖ Number of persons/Households provided with financial assistance
- ❖ Number of persons/Households residing in stable housing 30 days after receiving assistance

Regular and ongoing evaluation of the ERUC Program will be conducted by Your Way Home Montgomery County CoC Operations Team, including but not limited to a yearly consumer feedback survey, on-site provider monitoring, and quarterly reviews of HMIS data.

Homelessness Prevention Policies

Your Way Home Montgomery County CoC Service Provider staff are encouraged to become familiar with all [Your Way Home Montgomery County CoC Policies](#).

The Your Way Home Montgomery County CoC Policy sections listed below provide guidance and direction for the implementation of YWH Montgomery County COC Homelessness Prevention services.

- [1. System Performance Policies](#)
- [2. General Standards & Prioritization Policies](#)
- [5. Rapid Re-Housing Policies](#)
- [7. Homelessness Prevention Policies](#)

Community Based Care Management (CBCMP) Pilot Program

The Community Based Care Management Program (CBCMP) is a Social Determinants of Health project that was established by the Montgomery County Office of Managed Care Solutions (MCS). The project provides housing interventions based upon needs as determined through assessment and collaboration with the individual, their treatment team and any additional supportive services. Housing interventions can include, but are not limited to, diversion, mediation, rapid resolution, or Rapid Re-Housing/Rapid Re-housing lite (RRH/RRH-L). The project is aimed at creating housing stability for those hospitalized for mental health treatment. The program is designed to provide short-term transitional housing for those being discharged from the hospital, as well as medium-term Rapid Rehousing assistance to those households. To the maximum extent possible, case management services will also be provided to the household in the form of housing focused case management, connections to supportive services, and housing location services.

Target Population

The CBCMP program primarily target patients at Montgomery County Emergency Services who were at imminent risk of homelessness prior to hospitalization and would need to enter emergency shelter or sleep in a place not meant for human habitation upon discharge. *Referral submissions are not currently open to CoC providers.

<p>Imminent Risk of Homeless (HUD Homeless Category 2)</p>	<p>Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> • 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.
<p>Homeless under other Federal statutes (HUD Homeless Category 3)</p>	<p>Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under the HUD definitions, but who:</p> <ul style="list-style-type: none"> • Are defined as homeless under the other listed federal statutes; • Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to a homelessness prevention program; • Have experienced persistent instability as measured by two moves or more during 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.

<p>Fleeing/ Attempting to Flee Domestic Violence (HUD Homeless Category 4)</p>	<p>Any individual or family who-</p> <ul style="list-style-type: none"> • Is experiencing trauma or lack of safety related to, or fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; • Has no other safe residence; • Lacks the resources to obtain other safe permanent housing.
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Major Steps

1. Establish Priority and Complete HMIS Referral

Hospitalized patients who identify housing stability will work with Community Health Workers (CHWs) to determine program eligibility. Patients are eligible for the program if:

- They are found not to have an affordable home to return to following discharge
- They cannot afford the rent in their current home
- They have been issued an eviction notice prior to hospitalization and must leave their current home
- It is unsafe for them to return to their previous living arrangement for some reason

Additional vulnerabilities that should be considered include:

- Households with children, especially children under five
- Households where the head of household is over the age of 65
- Households who have a history of homelessness, especially those who may be Chronically Homeless.

When a patient is found to be eligible and appropriate, CHWs will create Clarity profile based on the Your Way Home Montgomery County CoC [Data Entry and Compliance Policy](#) and send a direct referral to the Community Based Care Management Pilot Program for intake.

2. Transfer Patient to Transitional Housing Unit

Once a referral has been accepted by staff at the Community Based Care Management Pilot Program, hospital staff will contact a contracted Your Way Home Montgomery County CoC provider to establish if there is an opening in a pre-identified transitional housing unit where the patient can stay after hospital discharge while they work to locate housing.

Your Way Home Montgomery County CoC [Transitional Housing policies and procedures](#) should be followed when completing intake and transition to permanent housing.

Community Health Workers and Transitional Housing staff will coordinate transportation for the patient to the Landing Pad when a bed becomes available.

3. Rapid Rehousing Intake and Enrollment

The Housing Stability Coach will contact the patient upon the receipt of the referral to arrange a time to complete intake and enrollment into the Community Based Care Management Pilot Program. HSC should arrange the meeting in conjunction with either hospital staff, or Transitional Housing staff in order to ensure successful enrollment.

All Your Way Home Montgomery County CoC [Rapid Rehousing Policies and Procedures](#) should be followed accordingly as Housing Stability Coaches move forward working with clients, including:

- The completion of a VI-SPDAT assessment and Household Budget at intake
- All Housing Location documents including Housing Search Planner
- The completion of a Housing Stability Plan with clear goals and action items to be addressed by the client on an ongoing basis.

Coordination with other community service providers including all members of the client's mental health treatment team, is vital to ensure the success of this program.

Output and Outcome Measures for Social Determinants of Health Project

The following measures will be used to evaluate the SDOH Program:

- ❖ Number of persons/Households safely discharged from hospitalization into stable housing
- ❖ Number of persons/Households who are re-hospitalized within the first 12 months after discharge

In addition, the following measures used to evaluate the performance of the Your Way Home Montgomery County CoC Rapid Re-Housing program will also apply to the SDOH project. Whenever possible based on HMIS reporting capabilities, coordinated entry outcomes will also be evaluated for any discrepancies across demographic categories (gender, race, ethnicity, and age tier).

- ❖ Number of persons/ Households served (by household composition)
- ❖ Number/ Percentage of persons/ households re-housed
- ❖ Average length of time from HRC intake to move-in date
- ❖ Average length of stay in program
- ❖ Number/ Percentage of persons exiting to permanent housing
- ❖ Number/ Percentage of adults exiting with any income
- ❖ Number/ Percentage of adults exiting with earned income
- ❖ Number/ Percentage of adults exiting with non-cash benefits
- ❖ Number/ Percentage of persons exited to permanent housing who return to emergency shelter within 2 years of exit
- ❖ Geographic distribution of re-housed households

Regular and ongoing evaluation will be conducted by Your Way Home Montgomery County CoC Operations Team, including but not limited to a yearly consumer feedback survey, on-site provider monitoring, and quarterly reviews of HMIS data.

Homelessness Prevention Policies

Your Way Home Montgomery County CoC Service Provider staff are encouraged to become familiar with all [Your Way Home Montgomery County CoC Policies](#).

The Your Way Home Montgomery County CoC Policy sections listed below provide guidance and direction for the implementation of YWH Montgomery County COC Homelessness Prevention services.

[1. System Performance Policies](#)

[2. General Standards & Prioritization Policies](#)

[5. Rapid Re-Housing Policies](#)

[7. Homelessness Prevention Policies](#)

Your Way Home Montgomery County CoC Policies

1. System Performance Policies

All Your Way Home Montgomery County CoC programs are expected to follow System Performance Policies. Programs must be aligned and/or in compliance with the following planning and policy documents:

- The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009;
- Current Fiscal Year HUD CoC Grant Program Guidelines (for CoC grant-funded projects);
- Current Fiscal Year Emergency Solutions Grant and DCED Emergency Solutions Grant Guidelines (for ESG-funded projects);
- Home, Together: The Federal Strategic Plan to End and Prevent Homelessness; and,
- The Your Way Home PA-504 CoC Strategic Plan

1.1 File Maintenance

It is the responsibility of the social services partner to maintain complete and accurate records on clients receiving assistance through Your Way Home Montgomery County CoC. This includes: all intake documentation and paperwork, case notes, Housing Stability Plan, financial assistance records, data entry compliance, and other documents associated with the case. Client and financial records must be kept in accordance with HUD guidelines and comply with the following requirements:

- Records containing personally identifying information must be kept secure and confidential;
- Records must include:
 - Documentation of homelessness (per HUD guidelines for program type)
 - A record of services and assistance provided to each participant
 - Documentation of program entrance through Coordinated Entry, including assessment score and other factors used to inform priority, vulnerability, and housing placement
 - Documentation of all costs charged to any particular grant
 - Documentation that funds were spent on allowable costs
 - Documentation of the receipt and use of program income
 - Documentation of compliance with expenditure limits and deadlines for expenditure
 - Copies of all procurement contracts
 - Documentation of amount, source, and use of matching fund resources
- Identification must be collected for Head of Household and all household members over 18 such as:
 - State IDs Driver's Licenses, or passports, Social Security Cards, and birth certificates
 - Records must be retained for amount of time prescribed by applicable funding source.

Montgomery County Office of Housing and Community Development reserves the right to review any and all case files at its discretion.

1.2 Monitoring

All social service agencies providing programming and services under Your Way Home Montgomery County CoC are subject to yearly monitoring and review of compliance with these written standards, policies, and procedures by the Your Way Home Operations Team. Agencies will be notified in writing of an upcoming audit. Any findings or concerns will be provided to the agency in writing, and the agency will have 30 days to provide written feedback which must include a plan to correct any concerns or findings.

1.3 Participation of People with Lived Experience

To the maximum extent possible, social services partners shall provide for the participation of at least one person with the lived experience of homelessness on the board of directors or equivalent policymaking entity of the provider. Per Regulation 24 CFR 578.75(g), any Your Way Home Montgomery County CoC provider funded through Continuum of Care and/or Emergency Solutions Grant must have at least one representative of a person with lived experience of homelessness on the board of directors or equivalent policymaking entity. Your Way Home Montgomery County CoC will also have a person with lived experience of homelessness represented on the Continuum of Care Governing Board, the decision making entity of the CoC. Additionally, to the maximum extent possible, social service partners will provide opportunities in paid or volunteer work within Your Way Home Montgomery County CoC services to those with lived experience of homelessness.

1.4 Conflicts of Interest

Your Way Home Montgomery County CoC programs and services will not be contingent on a household's acceptance or occupancy of emergency shelter or housing owned by a social service provider or a provider's subsidiary or parent. No provider, with respect to individuals or families occupying housing owned by the provider or a provider's subsidiary or parent, will carry out the initial evaluation under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103. When procuring goods and services, providers will comply with codes of conduct and conflict of interest requirements under 24 CFR 84.42.

1.5 Minimizing Displacement

Your Way Home Montgomery County CoC programs and services will minimize the displacement of persons at all times. A "displaced person" is defined as any person that moves from a permanent home as a result of a Your Way Home acquisition, rehabilitation, or demolition of a project. No temporary relocation shall be required for a Your Way Home Montgomery County CoC program. If a tenant has to move, the tenant shall be treated as permanently displaced and offered relocation assistance and payments so long as they qualify under all eligibility and policies as outlined in these written standards. A displaced person shall be provided with relocation assistance and advised of Fair Housing Rights.

1.6 Residency

Your Way Home Montgomery County CoC programs will provide assistance to qualified applicants without boundaries or barriers. Programs will not place residency requirements on participants to receive assistance. However, a person experiencing or at risk of homelessness must be physically located in Montgomery County.

1.7 Participation in Your Way Home Montgomery County CoC Events

To the maximum extent possible, social service partners shall participate in all trainings (both virtual and in-person) and meetings offered by Your Way Home Montgomery County CoC. Additional events include: Provider In-Services, Action Teams, Advisory Teams, CoC Governing Board Meetings, Your Way Home Forums, Your Way Home Annual Summit, and others.

1.8 Your Way Home Montgomery County CoC Training Expectations

Your Way Home Montgomery County CoC is committed to providing the most up-to-date and quality services to all in need. In order to ensure that program staff are able to deliver these services affectively, an ongoing and comprehensive array of training and professional development is required. The information conveyed in these trainings is meant to empower all provider staff, and offer best practice skill development that can be implemented while working with consumers.

All Your Way Home Montgomery County CoC providers including Coordinated Entry, Emergency Shelter, Rapid Rehousing, Permanent Supportive Housing, and Homelessness Prevention will be expected to show evidence of completion of the following trainings:

- Trauma Informed Care
- Harm Reduction
- Assertive Engagement
- Housing First Philosophy
- Motivational Interviewing
- Domestic Violence and Safety Planning
- An introduction to Rapid Rehousing
- Fair Housing
- Child Risk and Safety Assessment
- Personal Safety in the Field
- Mandated Reporter Training
- Addiction and Suicide Prevention
- De-Escalation and Problem Solving
- Diversion
- Racial Equity
- Compulsive Hoarding

Additionally, some programs require specific trainings to be completed by new staff within 30 days of hire in order to ensure a comprehensive understanding of programmatic expectations.

All partner agency staff including direct management are expected to complete at least **10 hours** of professional training/development each year. These hours can come from trainings directly offered by Your Way Home Montgomery County CoC, trainings provided by other reputable service providers, coalitions and advocacy groups, such as the [National Alliance to End Homeless](#) and the [Pennsylvania Coalition Against Domestic Violence](#). Proof of all training should be documented by agency leadership and submitted to the assigned Your Way Home Montgomery County CoC Program Manager by January 20th of each year.

1.9 Affirmatively Furthering Fair Housing

Your Way Home Montgomery County CoC is committed to affirmatively furthering fair housing and is in full compliance with the Fair Housing Act. Your Way Home Montgomery County CoC takes meaningful actions, in addition to combating discrimination, that overcome patterns of historic segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. All Housing Location services across all Your Way Home Montgomery County CoC programs are prohibited from using race, color, religion, sex, national origin, disability, or familial status as a factor in the housing search process. All housing location services are delivered as informed by the household's neighborhood of choice, accessibility or other ADA needs, transportation needs, community support needs, and other considerations designated by the household. These housing choices are made in collaboration with the household and outlined in the household's signed Housing Search Planner (Form 5.8). All Your Way Home Montgomery County CoC providers receive yearly training in Fair Housing Law and AFFH. It is unlawful for a Landlord to refuse to make reasonable accommodations to rules, practices or services when such accommodations may be necessary to afford persons with disabilities an equal opportunity to access that dwelling. Where a policy or practice, such as criminal background checks, have a disparate impact on members of a protected class, that policy or practice is unlawful if it is not necessary to serve a legitimate nondiscriminatory interest, or if it could be served by another practice that will have less discriminatory affect.

Staff are required to work with landlords in order to provide reasonable accommodation or modification for clients with disabilities in order to offer them equal opportunity to use and enjoy a dwelling unit. If any Your Way Home Montgomery County CoC staff suspect discriminatory practices by Landlords participating in the

Your Way Home program, the staff must immediately contact the [Housing Equality Center of Pennsylvania](#) as well as the Your Way Home Program Manager.

1.10 Meaningful Communication & Translation for Persons with Limited English Proficiency

Your Way Home Montgomery County CoC will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and households will be informed of the availability of such assistance free of charge.

Language assistance will be provided through use of competent bilingual staff when available, or through the use of the telephonic interpretation service Language Line. All Your Way Home Montgomery County CoC programs will have access to the use of Language Line, free of charge.

1.11 Non-Discrimination Policy

Your Way Home Montgomery County CoC Coordinated Entry, as well as all Your Way Home Montgomery County CoC housing and homeless service providers, must be in compliance with all applicable civil rights and fair housing laws and requirements. Recipients and subrecipients of CoC Program and ESG Program funded projects must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws as specified at 24 C.F.R. 5.105(a), including, but not limited to the following:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status;
- Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance;
- Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin under any program or activity receiving Federal financial assistance; and
- Title II of the Americans with Disabilities Act prohibits public entities, which includes state and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing-related services such as housing search and referral assistance. Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.
- HUD's Equal Access Rule at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status, including any projects funded by the CoC Program, ESG Program, and HOPWA Program. The CoC Program interim rule also contains a fair housing provision at 24 CFR 578.93. For ESG, see 24 CFR 576.407(a) and (b), and for HOPWA, see 24 CFR 574.603.

All people in different populations and subpopulations in the CoC's geographic area, including people experiencing chronic homelessness, veterans, households with children, youth, LGBTQIA2+ individuals, and survivors of domestic violence, shall have fair and equal access to the coordinated entry process.

All persons accessing Coordinated Entry and/or receiving services from a Your Way Home Montgomery County CoC housing or homeless service provider have a right to file a nondiscrimination complaint. All persons receive information (verbally or in writing) that outlines how to file a complaint when they believe the nondiscrimination policy has been violated in their case, as well as information on how to access the appeal process if they are not satisfied with or have any questions regarding how their complaints are handled.

1.12 Rights under the Violence Against Women Act (VAWA) 2022

The Violence Against Women Act (VAWA), which was reauthorized in early 2023 as VAWA 2022, provides protections for victims of domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized. VAWA protections are equally available to all individuals regardless of sex, gender identity, or sexual orientation. Your Way Home Montgomery County CoC is in compliance with all updated expectations under VAWA 2022 and the CoC Emergency Transfer Plan and supports all client and tenant rights under VAWA. The following housing protections are guaranteed for survivors under the Violence Against Women Act 2022:

- **Non-discrimination:** It is illegal to deny admission to or assistance under, or to evict from or terminate participation in, a covered housing program if a client or a member of their household is or has been a survivor of VAWA violence/abuse. Clients or other household members must be otherwise eligible for the program.

In addition, it is illegal to deny tenancy or occupancy rights (for example, clients cannot be evicted) in a covered housing program solely on the basis of criminal activity directly relating to the VAWA violence/abuse. HUD refers to these protections as VAWA's "core" housing protections. (See 24 C.F.R. § 5.2005(b))

- **Confidentiality:** Housing providers have specific obligations to maintain the confidentiality of the fact that a person is a survivor of domestic violence, dating violence, sexual assault, or stalking. Any information clients provide under VAWA's housing protections, including the fact that they are a survivor, must be kept confidential by the covered housing provider. These obligations include keeping any such information out of a shared database and not disclosing such information to others unless they receive consent in writing to such disclosure, it is required for use in an eviction proceeding, or the law otherwise requires it. If client information is used by a covered housing provider in violation of the confidentiality requirements, clients may file a formal VAWA complaint with HUD. (See 34 U.S.C. § 12491(c)(4); 24 C.F.R. § 5.2007(c)).
- **Notification of Occupancy Rights:** All covered housing providers must provide applicants and tenants two HUD-approved documents: (1) Notice of Occupancy Rights under VAWA, and (2) VAWA certification form. All participants should receive the HUD 5380 Form: Notice of Occupancy Rights. The covered housing provider must provide you these forms during program enrollment. (See 34 U.S.C. § 12491(d); 24 C.F.R. § 5.2005(a))
- **Documentation:** If a client informs a public housing agency or owner or manager of housing assisted under a covered housing program that they are a survivor of VAWA violence/abuse, or are entitled to VAWA protections, the covered housing provider may request, in writing, that they submit documentation of the occurrence of the domestic violence, dating violence, sexual assault, or stalking.

If the housing provider simply provides a VAWA reporting form, without a dated letter requesting documentation, the housing provider has not sufficiently made the request in writing. All clients have the discretion to choose which documentation to provide from the list identified in HUD's VAWA rule, unless there is conflicting information of VAWA violence/abuse. For example, a housing provider may not require a police report to provide VAWA housing protections. (See 34 U.S.C. § 12491(c); 24 C.F.R. § 5.2007).

- **Lease Addendum**- Units rented using Your Way Home rental assistance funding must have leases or rental agreements that incorporate VAWA protections including prohibition of denial or eviction, lease bifurcation and emergency transfers; HUD-91067 can be used as an example
- **Lease Bifurcation**: VAWA protects clients and other household members when a housing provider removes a household member from a lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to a household member who engages in criminal activity directly relating to VAWA violence/abuse (known as "bifurcating" a lease). Providers may choose whether to bifurcate the lease, and if it is done, it must be done consistent with applicable federal, state, or local laws and the requirements the housing program. In the event of a lease bifurcation, if the household member who was removed was the tenant who made said household eligible for assistance the housing provider must give those who remain a reasonable time (90 days) to establish eligibility under the same program, under a different program, or to find other housing. (See 24 C.F.R. § 5.2009)
- **Prohibition on Retaliation**: It is illegal for a public housing agency or an owner or manager of housing assisted under a covered housing program to retaliate against any client you because they opposed any action or practice of the provider that is prohibited by VAWA. The housing provider also cannot subject any client to retaliation, coercion, intimidation, or threats because they testified, assisted, or participated in an action to enforce their VAWA rights, including encouraging another or exercising their own rights under VAWA. This includes retaliating against any client for filing a complaint with the office Fair Housing and Equal Opportunity or another entity, or for participating in an investigation of their own complaint or another complaint by giving information as a witness. This right applies even if clients did not file a complaint over what they believe was the initial violation of VAWA rights or if they filed such a complaint and received a determination that there is no reasonable cause to believe that a VAWA violation occurred or is about to occur. (See 34 U.S.C. § 12494)
- **Emergency Transfers**: All households can request an emergency transfer in a covered housing program if they:
 - Expressly request the transfer; and
 - Reasonably believe there is a threat of imminent harm from further violence if they remain in the same unit; OR
 - In the case of sexual assault, the sexual assault occurred at their housing during the 90-calendar-day period preceding the date of the transfer request.

Public housing agencies and other covered housing programs must adopt an emergency transfer plan based on a model plan from HUD. This emergency transfer plan must, among other requirements, allow clients to make an internal emergency transfer (to a unit where survivors would not be

categorized as a new applicant) when a safe unit is immediately available. A safe unit is a unit that the client believes is safe. (See 24 C.F.R. § 5.2005(e)).

All Your Way Home Montgomery County CoC programs comply with the Emergency Transfer Plan. This plan allows participants in permanent housing to request an emergency transfer to prioritize the survivor's safety needs; it also allows for funds to pay amounts owed for participants breaking the lease if a household requests an emergency transfer.

- The Right to Report Crime and Emergencies from One's Home: Landlords, homeowners, tenants, residents, occupants, guests of, or applicants for, any housing have the right to seek law enforcement or emergency assistance on their own behalf or on behalf of another person in need of assistance. They may not be penalized based on their requests for assistance, based on criminal activity for which they are a victim, or based on activity for which they are otherwise not at fault under a law, ordinance, regulation, or policy adopted by or enforced by a governmental entity that receives certain HUD funding. This means it is unlawful to threaten or subject individuals seeking assistance to any of the following: monetary or criminal penalties, fines, or fees; eviction; refusals to rent or renew tenancy; refusals to issue an occupancy or landlord permit; withdrawing certifications or permits for operation of the property; and designation of the property as a nuisance or a similar negative designation. (See 34 U.S.C. § 12495)

1.13 Your Way Home Montgomery County CoC Housing Inspection Policy and Lead-Safe Housing

Your Way Home Montgomery County CoC is committed to providing safe housing that meets basic housing standards for all residents. In order to approve move-in costs for clients, all new units must undergo and pass a Housing Inspection completed through the Montgomery County Housing Authority. Housing programs must ensure that any Your Way Home Montgomery County CoC funds used to help maintain or move in to new housing must only be used if the housing meets minimum habitability standards.

A unit that has passed a Housing Inspection through the Montgomery County Public Housing Authority does not need a new inspection completed if a new Your Way Home Montgomery County CoC client moves into that same unit, so long as the new inspection is ordered within a year of the prior inspection date.

All units for which Your Way Home Montgomery County CoC is subsidizing for a period of one year or longer must complete a new Housing Inspection once per year, and maintain a copy of this inspection report. If a unit fails an annual inspection, landlords and property owners must complete all non-emergency repairs within 30 days and schedule a second inspection. If a landlord fails to make repairs or schedule the inspection within 30 days, Housing Locators will schedule a second inspection. Housing locators and landlords should work together to ensure all necessary repairs are made in a timely fashion. If a unit fails an annual inspection twice, that unit will enter into abatement and the housing provider will withhold rental payments until the unit is able to pass inspection and communicate this decision to the landlord in writing. While a unit is in abatement, both housing providers and clients will withhold their rental payments per the Fair Housing Act. Payments will resume on the date of the passed inspection, including all withheld rent.

Additionally, before or upon move-in, any household receiving housing support must receive a copy of the Environmental Protection Agency's brochure "Protect Your Family from Lead in Your Home." The head of household must sign off that they have received this brochure. A copy of this receipt must be maintained in the client's file.

When funds are being used to maintain permanent housing (i.e., Homelessness Prevention), an HQS inspection is not required. However, a visual inspection must take place to document housing units as habitable.

Your Way Home Montgomery County CoC programs must maintain documentation in the clients' files showing that the unit has passed HQS inspection and/or meets minimum habitability standards.

1.14 Program Exit Plan

All Your Way Home Montgomery County CoC providers are expected to provide all households with sufficient guidance when exiting from services/ programs so that the household has a connection to the resources needed to maintain their housing and supports after assistance ends.

All Your Way Home Montgomery County CoC providers are required to develop a Program Exit Plan for every household that is exited from their program or services. The Program Exit Plan is a standard template for use by all Your Way Home Montgomery County CoC providers. The Program Exit Plan includes the household's plan for housing, as well as plans for connections to community supports. Any resource information- such as phone numbers of community supports- must be included on the plan.

A Program Exit Plan is required for any household being terminated from services from any Your Way Home Montgomery County CoC provider.

Case managers will complete the Program Exit Plan prior to a client's exit from a shelter, Rapid Re-Housing program, Transitional Housing Program, Homeless Prevention Program, or Permanent Supportive Housing Program, and provide the client with a copy of this plan.

Program Exit Plans are not required for clients that leave a program without notice to the case manager, or are unable to be contacted, so long as written documentation of the efforts to contact the client are documented in case notes.

Program Exit Plans will be reviewed during program monitoring visits, client grievance review, or otherwise as requested by the Your Way Home Montgomery County CoC Operations Team.

1.15. Case Notes

All interactions between clients and Your Way Home Montgomery County CoC staff must be documented in Clarity with a case note corresponding to the date of the interaction. Case notes must include the mode of communication (in person meeting, email, text, phone call, office visit) and date. It is expected that case management notes are written using proper grammar, spelling, etc., and that they convey the professionalism with which the services are provided.

The case note must include a summary of the discussion and any information provided by the case manager to the client. This summary is to be written in objective language only and should not contain any language that reflects the writer's assessment or subjective opinion.

Case notes documenting case management meetings should provide a full accounting of the work done during the meeting. This includes: case management support provided during the meeting, such as progress on meeting goals, new action items identified, income and budget work, review of service connections, etc. Any discussion that could be referenced later for an appeal- such as a discussion regarding compliance with the program's agreement policy or progress on meeting goals- must be documented clearly in the case notes.

It is the expectation that case notes are submitted into Clarity in a timely manner, reflecting current status and real-time. All case notes are to be entered into Clarity at minimum monthly. Case notes must reflect all contact

or attempted contact made (which includes voicemails left, calls put in, texts exchanged). *If a case note is not entered, it did not happen!*

For privacy issues, see policy on Case Notes in the YWH Montgomery County COC Data Systems Policies and Procedures.

1.16 Case Note Sharing

Case note features are available within Clarity for use by any participating agency, though some programs are required to keep case notes in order to better facilitate service coordination: 1) Referral notes are used by the Call Center to more fully describe housing crisis situations at the point of referral, 2) Housing Resource Center staff are required to maintain a publicly-viewable case note on client's progress towards moving into permanent housing, and 3) Shelter staff are required to maintain case notes during each meeting, documenting a client's progress while in the shelter including: the completion of Assessments, Budgets, and Housing Stability Plans, housing location efforts, and referrals to community resources.

Participating agencies and case workers may wish to maintain internal case notes within Clarity as well.

Notes that are intended to be shared with other agencies for the purposes of service coordination must be maintained as publicly viewable, including but not limited to notes on referrals and on housing plans. Case notes that are intended as internal notes should be marked as private at the discretion of the case worker.

Persons with access to Clarity are prohibited from viewing case notes recorded for clients other than those on their case load or referred for services, in accordance with the HMIS Policy on Ethical Data Use.

1.17 Data Entry & Compliance

Unless otherwise specified in writing by Your Way Home Montgomery County CoC and the Montgomery County Office of Housing and Community Development, all funded providers (including coordinated entry, street outreach, emergency shelter, transitional housing, TH/RRH, RRH, PSH, and homelessness prevention programs) must input program data into the Clarity HMIS data system.

Providers who enter program data into Clarity are required to participate in data quality monitoring every three months and/or as requested. Program Supervisors must:

1. Run a *Program Roster Report* and compare enrolled households to the program's active clients served, ensuring that household family members are properly linked in Clarity and that all individuals have been properly enrolled or closed out of a program or service.
2. Run an *HMIS Data Quality Report* and review any identified fields where a service provider entered "Client Doesn't Know", "Client Refused", "Data Not Collected", or the data field was left blank. To the best of their ability, these fields must be completely filled out to reflect accurate and proper information. **IMPORTANT: Providers must only report what is truthful. Sometimes data quality will not be 0%. If information is truly not available, then Clarity should reflect that.**

Communication for Data Quality reviews is largely done via email and other digital communication. Program supervisors are expected to respond to all communication in a timely manner and address data quality issues by the stated deadline.

1.18 Client Location

Your Way Home Montgomery County CoC provider agencies will utilize the “Location” feature in Clarity HMIS to identify the current location of any client that is receiving services. Providers should identify the following locations for all household actively enrolled in their programs:

- **Coordinated Entry**-Last Known Address: the last place a household resided that was indoors
- **Street Outreach**- current location based on previously established location types
- **Permanent Housing**- Home: the address where the client receives services; should be added with the Housing Move In Date

1.19 Housing First

Your Way Home Montgomery County CoC embraces a housing first approach to ending and preventing homelessness. Mainly, this means that Your Way Home Montgomery County CoC providers may not mandate households to participate in services or programs in order to receive housing assistance and/or financial assistance for housing. This includes, but is not limited to, mandatory participation in religious programming, drug and alcohol detox/rehab programming, mental health treatment, financial counseling, etc.

1.20 Defining Family and Preventing Family Separation

Your Way Home Montgomery County CoC programs and services must comply with HUD’s definition of family in the Equal Access Rule. Under this definition, family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family. Any group of people that present together for assistance and identify themselves as a family are considered to be a family and must be served together as such. Your Way Home Montgomery County CoC programs must make every effort to keep families together in shelter or housing unless separation is absolutely necessary for the family’s well-being or safety.

1.21 Faith-Based Program Requirements

Per CoC Interim Rule 578.87(b) and ESG Interim Rule 576.406, federal funds cannot be used to provide for nor discriminate against participants based on religion or religious belief. Faith-based providers delivering Your Way Home Montgomery County CoC programs, including but not limited to CoC-funded and ESG-funded programs, must ensure that:

- Any engagement in explicitly religious activities are performed and offered outside of programs that are supported with federal financial assistance separately from the programs or services funded in the CoC, ESG, or other-funded Your Way Home Montgomery County CoC program;
- Participation in any such explicitly religious activities must be voluntary for the program beneficiaries;
- CoC/ESG program funds do not support any explicitly religious activities, including activities that involve overt religious content, such as worship, religious instruction, or proselytization, or any manner prohibited by law; and
- Program participants are not discriminated against based on religion or religious belief.

At minimum, Your Way Home Montgomery County PA-504 CoC programs must develop, implement, and document procedures used to market services to eligible persons regardless of race, color, national origin, religion, sex, gender identity, sexual orientation, age, familial status, or disability who are least likely to apply in the absence of special outreach. In addition, programs must provide participants with information on rights and remedies available under federal, state, and local fair housing and civil laws.

1.22 Document Retention

Your Way Home Montgomery County CoC prohibits the knowing destruction, alteration, mutilation, or concealment of any record, document, or tangible object with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any local, state, or federal department or agency.

1.23 McKinney-Vento Compliance

Your Way Home Montgomery County CoC programs and their staff must understand and inform program participants with school-aged children about their children's educational rights under the federal McKinney-Vento Act and Every Student Succeeds Act (ESSA). Case managers should have strong working relationships with local school district homeless liaisons and publicly-funded Pre-K/Head Start/Early Head Start programs to ensure streamlined and prioritized access to educational programs for children experiencing homelessness. All Your Way Home Montgomery County CoC program participants are provided information relating to McKinney-Vento rights during intake.

1.24 Mainstream Benefits Access

All Your Way Home Montgomery County CoC programs must assist program participants with identifying and accessing eligible mainstream benefits, including Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), Medicaid, Health Insurance, Children's Health Insurance Program (CHIP), and SSI/SSDI, among others.

1.25 Providing Reasonable Accommodations

Section 504 of the Rehabilitation Act of 1973, as amended, requires federally-assisted housing programs to provide reasonable accommodations for people with disabilities. A reasonable accommodation is a change, exception, or adjustment to a rule, policy practice or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. Adaptation, or modification should be made to policies, programs, services, and workplaces which will allow a qualified person with a disability to participate fully. Reasonable accommodations may include those which may be necessary in order for the person with a disability to use and enjoy a dwelling, including public and common use spaces. Since persons with disabilities may have unique needs due to their disabilities, in some cases, simply treating persons with disabilities exactly the same as others may not ensure that they have an equal opportunity to use and enjoy a dwelling.

HUD's Section 504 regulations at 24 CFR 8.27 require recipients to adopt suitable means to assure that information on available accessible units reaches otherwise qualified individuals with disabilities who need the features of those units. The regulations also require reasonable nondiscriminatory steps to maximize the utilization of accessible units. Under this process, whenever a unit that meets the requirements of the Uniform Federal Accessibility Standards (UFAS) or HUD's Deeming Notice for a person with a mobility disability becomes available for occupancy, a recipient shall first offer the unit to a qualified individual with disabilities currently residing in a non-accessible unit in the same project or comparable projects, under common control, who requires the accessible features. If there are no such persons currently residing in the recipient's projects, the recipient shall then offer the unit to the next available qualified individual with disabilities on its waiting list, provided that the person requires the accessibility features of the unit. The recipient shall skip over applicants without disabilities on the waiting list to offer the unit to the next qualified individual who requires the unit's accessibility features.

If no qualified applicant with disabilities requires the accessible features of a unit, and the recipient places a household where none of the family members have disabilities in that unit, the recipient may include language

in the lease requiring this family to agree to move to a non-accessible unit, as soon as one becomes available that otherwise meets the family's needs.

1.26 Determining and Documenting the Homeless Status of Youth

Your Way Home Montgomery County CoC is in compliance with HUD guidance released in October 2018 which describes how intake workers and case managers determine and document the homeless status of youth using the definition of homelessness found in CoC and ESG programs to prevent youth from being mistakenly turned away from housing and services. Youth are not responsible for obtaining their own documentation. Instead, intake workers and/or case managers are responsible for documenting the youth's homeless status by verifying information provided by the youth starting at the initial review. Using contact information or documents provided by the youth, the intake worker should obtain the information [required by the category of homelessness]. If at any point the youth does not want someone to be contacted because they fear for their safety, the intake worker and/or case manager should not contact the person and should document the youth's feelings and statements in the case file. If the intake worker and/or case manager cannot obtain a higher level of documentation, the youth can self-certify their homelessness and the intake worker and/or case manager should document their effort to obtain a higher level of documentation, including notes about why they were not able to gain a higher level of documentation.

1.27 Documentation of Homeless Status

In order to ensure that resources are provided to the most vulnerable populations, and that all persons served comply with Your Way Home Montgomery County CoC's policies and federal funding requirements, all Your Way Home Montgomery County CoC programs requiring Documentation of Homeless Status (Emergency Shelter, Rapid Re-Housing, Transitional Housing, Joint Component TH/RRH, Homeless Prevention, and Permanent Supportive Housing) must collect documentation of a household's homeless status prior to program enrollment. Documentation of Homeless Status must be maintained in client files and will be reviewed during monitoring visits, in the case of client appeals, or otherwise as requested by the Your Way Home Montgomery County CoC Operations Team.

Third-party documentation of homeless status is always preferred to self-certification, and should be obtained in most cases.

Homeless Category	Recordkeeping Requirements
Category 1: Literally Homeless	<ul style="list-style-type: none"> • Written (HMIS record or standardized letter (Form 3.2)) observation by the street outreach worker; or • Written (HMIS record of or standardized letter (Form 3.2)) referral by another housing or service provider, or • Written certification by the individual or head of household seeking assistance that (s)he was living in the streets or in shelter; • For individuals exiting an institution- one of the forms of evidence above documenting that the individual was living on the street or in an emergency shelter immediately prior to entering the institution, and that the individual was living in the institution for less than 90 days, <u>and</u>

	<ul style="list-style-type: none"> ○ Discharge paperwork signed by the Institution Social Worker, and ○ Written record of housing plan created by the Institution Social Worker and Your Way Home Montgomery County CoC confirming Your Way Home Montgomery County CoC assistance
<p>Category 2: Imminent Risk of Homelessness</p>	<ul style="list-style-type: none"> ● A court order resulting from an eviction action notifying the individual or family that they must leave, or ● For individuals and families leaving a hotel or motel – evidence that they lack the financial resources to stay, or ● Written certification from the leaseholder/ homeowner that the family must leave the residence; <u>AND</u> ● Certification confirming that no subsequent residence has been identified, <u>AND</u> ● Self-certification or other written documentation that the household lacks the financial resources and supports necessary to obtain permanent housing.
<p>Category 3: Homeless under other Federal statutes</p>	<ul style="list-style-type: none"> ● Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute, <u>and</u> ● Certification of no permanent housing in the last 60 days, <u>and</u> ● Certification by the individual or head of household, and any available supporting documentation, that they have moved two or more times in the past 60 days, <u>and</u> ● Documentation of special needs <u>or</u> 2 or more barriers
<p>Category 4: Fleeing/ Attempting to Flee Domestic Violence</p>	<p><i>For victim service providers:</i></p> <ul style="list-style-type: none"> ● An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. <p><i>For non-victim service providers:</i></p> <ul style="list-style-type: none"> ● Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified, and

	<ul style="list-style-type: none"> • Certification by the individual or head of household that no subsequent residence has been identified, and • Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
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1.28 Grievance Procedures

All Your Way Home Montgomery County CoC partner agencies must have internal grievance procedures established. Households should first raise all relevant issues relating to Your Way Home programs or service delivery directly with the assigned partner agency. If the household is not satisfied with the outcome or the matter is not resolved, a formal grievance may be filed with the Your Way Home CoC Program Manager within 10 business days. The Your Way Home Program Manager will review the matter, interview all relevant parties, and make a final determination within 10 business days of receiving the grievance.

2. General Standards & Prioritization Policies

2.1 General Standards for Coordinated Entry and Assessment

Minimum standards for Coordinated Entry and Assessment include:

- All persons presenting or contacting Coordinated Entry will be provided with triage as outlined in the policy on [Coordinated Entry Access](#).
- All contracted Your Way Home Montgomery County CoC Coordinated Entry providers, except for victim service providers, shall use the designated triage, assessment, and referral process within Your Way Home Montgomery County CoC's Homeless Management Information System (HMIS) in accordance with HUD's requirements (24 CFR Part 578).
- A victim service provider may not use Your Way Home Montgomery County CoC's triage, assessment, and referral process within HMIS but are required to use a comparable database and assessment system that meets HUD's standards (24 CFR 576.107).
- ESG and CoC funded providers are required to have program coordination within Coordinated Entry. Other publicly and privately funded housing and homeless service programs within the PA-504 CoC geographic area are integrated into Coordinated Entry to the maximum extent practical. These programs include the following:
 - Emergency Shelters
 - Essential Service Providers
 - Homelessness Prevention
 - Transitional Housing
 - Permanent Supportive Housing
 - Rapid Re-Housing
 - Emergency Food and Shelter Programs
 - Supportive Services for Veterans Families Program
 - Programs for Runaway and Homeless Youth
 - Grants for the Benefit of Homeless Individuals
 - Tenant Based Rental Assistance Programs
 - Supportive Housing for Persons with Disabilities
 - HOME Investment Partnerships Program

2.2 General Standards for Street Outreach

People who are verified as homeless based on category (1) of the "homeless" definition found at 24 CFR 576.2 are eligible for the following minimum activities in Street Outreach:

- Engagement
- Case Management
- Emergency Health and Mental Health Services
- Transportation

When appropriate based on the individual's needs and wishes, the provision of or referral to Rapid Re-Housing services that can quickly assist individuals to obtain safe, permanent housing shall be prioritized over the provision of or referral to emergency shelter or transitional housing services.

2.3 General Standards for Emergency Shelter

People who qualify as homeless based on categories 1, 2, or 4 of the homeless definition found at 24 CFR 576.2 are eligible for the following minimum activities in Emergency Shelter:

- Case management (Housing Focused Case Management)
- Meals
- Appropriate places to sleep, adequate space, and security for residents and their belongings

Minimum standards for all shelters and program participant-occupied housing consist of compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR 576.403, including the Lead-Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4856) and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R. Additionally, compliance with the safety, sanitation & privacy requirements as identified in 24 CFR 576.403 and 578.75 is required, including:

- The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Any renovation, including major rehabilitation and conversion, must use Energy Star and Water Sense products/appliances.
- The shelter must comply with the applicable Rehabilitation, Fair Housing and Americans with Disabilities Acts and implementing regulations.
- Each shelter room/space must have proper ventilation and be pollutant free.
- Water supply must be free of contamination.
- Each person must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- The shelter must have the necessary, properly operating heating/cooling facilities.
- The shelter must have adequate and appropriate lighting and safe electrical sources.
- Any food preparation areas must be able to store, prepare, and serve safe and sanitary food.
- The shelter must be in sanitary condition.
- Each occupied unit of the shelter must have at least one working smoke detector and when possible they should be near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas must have at least one working detector and there must be a second means of exiting the building in the event of an emergency.

2.4 Prioritization for Emergency Shelter

In general, households who have been confirmed as homeless based on categories 1 or 4 of the homeless definition found at 24 CFR 576.2 are prioritized for entry into emergency shelter.

The following qualifications also factor into emergency shelter prioritization:

1. Households who are at greatest risk for severe health and safety consequences, as assessed by the Your Way Home Montgomery County CoC Street Outreach.
2. Households with a pregnant head of household.
3. Households with children aged 5 and under.

At times, a household may enter Your Way Home Montgomery County CoC's system who may need to be prioritized above others as a result of factors not listed above, such as the safety of the individual or others in the individual's presence or Your Way Home Montgomery County CoC's experience in serving the individual in the past.

More information on emergency shelter prioritization can be found in the [program guidance](#).

2.5 General Standards for Rapid Re-Housing

People who qualify as homeless based on categories 1 or 4 of the homeless definition found at 24 CFR 576.2 and who are moving into a housing unit that meets habitability and lead-based paint standards are eligible for the following minimum activities in Rapid Re-Housing:

- Rental assistance: short- to medium-term rental assistance and/or maximum of 6 months' rental arrears, including late fees and/or court fees
- Financial assistance: rental application fees, security and utility deposits, utility payments, utility arrears, last month's rent, moving costs
- Supportive Services, including Housing Stability Case Management and Housing Location case management

These activities must help the household move into permanent housing which meets the following minimum standards:

- The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep.
- Each room or space must have proper ventilation and be pollutant free.
- Water supply must be free of contamination.
- Residents must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- The housing must have the necessary, properly operating heating/cooling facilities.
- The structure must have adequate and appropriate lighting and safe electrical sources.
- All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food.
- The housing must be in sanitary condition.
- There must be a second means of exiting the building in case of an emergency.
- Each unit must include at least one properly working smoke detector on each occupied level of the unit, located when possible in a hallway adjacent to a bedroom.

2.6 Prioritization for Rapid Re-Housing

In general, households are prioritized for Your Way Home Montgomery County CoC Rapid Re-Housing services in the following order:

1. Households that have been confirmed as homeless based on categories 1 of the homeless definition found at 24 CFR 576.2.
2. Households that have been confirmed as homeless under category 4 of the homeless definition found at 24 CFR 576.2 and live in an emergency shelter or other place described in category 1 of the homeless definition.
3. Households with the highest acuity as determined by the VI-SPDAT.

In addition to the above, prioritization for Rapid Re-Housing may also factor in the following:

1. Households who are street homeless but who refuse emergency shelter due to untreated mental health issues or other good cause.

2. Households receiving emergency hotel subsidy due to medical reasons.
3. Households with an identified plan to move into permanent housing with limited (one-time) financial assistance.
4. Families with children aged 5 and under.
5. Transitional aged youth.
6. Veterans, especially those persons who have served but are not eligible for services from the Department of Veterans Affairs (VA), Supportive Services for Veterans (SSVF), or who are unable to access services from the VA.

In some instances, a household in any of the above situations may be prioritized for Rapid Re-Housing services over someone who has a higher acuity as indicated by the VI-SPDAT. Your Way Home Montgomery County CoC reserves the right to prioritize households for Rapid Re-Housing on a case by case basis. Final determinations related to Rapid Re-Housing prioritization are made by the Your Way Home Program Manager.

2.7 General Standards for Transitional Housing and Joint Component TH/RRH

People who qualify as homeless based on categories 1 or 4 of the homeless definition found at 24 CFR 576.2 and are moving into a housing unit that meets habitability and lead-based paint standards are eligible for the following minimum activities in Transitional Housing:

- Housing Accommodations
- Short- to medium-term financial assistance (for TH/RRH only)
- Case Management (Housing Focused Case Management)
- Service programs which may include financial literacy programs, budgeting programs, life skills programs

These activities must help the household move into permanent housing which meets the following minimum standards:

- The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep.
- Each room or space must have proper ventilation and be pollutant free.
- Water supply must be free of contamination.
- Residents must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- The housing must have the necessary, properly operating heating/cooling facilities.
- The structure must have adequate and appropriate lighting and safe electrical sources.
- All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food.
- The housing must be in sanitary condition.
- There must be a second means of exiting the building in case of an emergency.
- Each unit must include at least one properly working smoke detector on each occupied level of the unit, located when possible in a hallway adjacent to a bedroom.

2.8 Prioritization for Transitional Housing and TH/RRH

In general, households are prioritized for Your Way Home Montgomery County CoC Transitional Housing services in the following order:

1. Households that have been confirmed as homeless based on categories 1 of the homeless definition found at 24 CFR 576.2.
2. Households that have been confirmed as homeless under category 4 of the homeless definition found at 24 CFR 576.2 and live in an emergency shelter or other place described in category 1 of the homeless definition.

Prioritization for transitional housing may also factor in the following:

1. Presence of youth
2. Household size, particularly if a larger unit becomes available.
3. Significant barriers in obtaining permanent housing in the household's own name.
4. Households where the Head of Household is experiencing a significant but temporary medical condition or other hardship that restricts their ability to immediately increase income.

2.9 General Standards for Permanent Supportive Housing

People who qualify as homeless based on category 1 of the homeless definition found at 24 CFR 576.2, are chronically homeless, have a disabling condition, and are moving into a housing unit that meets habitability and lead-based paint standards are eligible for the following minimum activities in Permanent Supportive Housing:

- Tenant Based Rental Assistance
- Supportive Services

These activities must help the household move into permanent housing and/or maintain permanent housing which meets the following minimum standards:

- The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep.
- Each room or space must have proper ventilation and be pollutant free.
- Water supply must be free of contamination.
- Residents must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- The housing must have the necessary, properly operating heating/cooling facilities.
- The structure must have adequate and appropriate lighting and safe electrical sources.
- All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food.
- The housing must be in sanitary condition.
- There must be a second means of exiting the building in case of an emergency.
- Each unit must include at least one properly working smoke detector on each occupied level of the unit, located when possible in a hallway adjacent to a bedroom.

2.10 Prioritization for Permanent Supportive Housing

The PA-504 Continuum of Care and Your Way Home Montgomery County have adopted the recommended order of priority established in HUD Notice CPD 16-11 to ensure that those persons experiencing chronic homelessness with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens, and with the most severe service needs are given first priority in PSH beds dedicated or prioritized for occupants by persons experiencing chronic homelessness. A chronically homeless individual or head of household must meet the definition stated in the Definition of Chronically Homeless final rule:

(a) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

- i. lives in a place not meant for habitation, a safe haven, or in an emergency shelter; and
- ii. Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four 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 in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;

(b) 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 of the criteria in paragraph (a) of this definition, before entering the facility;

(c) 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 in paragraph (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.

Persons with severe service needs means an individual for whom at least one of the following is true:

- i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or
- ii. Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
- iii. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
- iv. When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high-need, high cost beneficiaries.

Severe service needs as defined in paragraphs i-iv. are identified and verified through data-driven methods such as an administrative data match or through the use of the SPDAT or VI-SPDAT assessment tools 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 individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see 24 C.F.R. § 5.105(a). Additional guidance on utilizing the SPDAT or VI-SPDAT assessment tool appears in the following sub-section.

Where there are no chronically homeless individuals and families within the PA-504 CoC, Your Way Home service providers and recipients of CoC Program-funded PSH are encouraged to follow the order of priority for non-prioritized, non-dedicated beds described below.

First Priority—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months and has been identified as having severe service needs.

Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Habitation, Safe Haven, or Emergency Shelter without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing.

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

Recipients of CoC Program-funded PSH should follow the order of priority above, as adopted by the PA-504 CoC, while also considering the goals and any identified target populations served by the project. For example, non-dedicated or non-prioritized CoC Program-funded PSH that is permitted to target youth experiencing homelessness should follow the order of priority under Section III.B.1. of this Notice, as adopted by the CoC, to the extent in which youth meet the stated criteria.

Recipients must exercise due diligence when conducting outreach and assessment to ensure that persons are prioritized for assistance based on their length of time homeless and the severity of their needs following the order of priority described in this Notice, and as adopted by the CoC. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH (see FAQ 1895). Recipients of CoC Program-funded PSH are encouraged to follow a Housing First approach to the maximum

extent practicable. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these individuals and families must continue to be prioritized until they are housed.

2.11 General Standards for Homelessness Prevention

People who qualify as homeless based on category 2, 3, or 4 of the homeless definition found at 24 CFR 576.2 are eligible for the following minimum activities in Homelessness Prevention:

- Rental assistance: short- to medium-term rental assistance and/or maximum of 6 months' rental arrears, including late fees and/or court fees
- Financial assistance: rental application fees, security and utility deposits, utility payments, utility arrears, last month's rent, moving costs
- Supportive Services

These activities must help the household move into permanent housing and/or maintain permanent housing which meets the following minimum standards:

- The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep.
- Each room or space must have proper ventilation and be pollutant free.
- Water supply must be free of contamination.
- Residents must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- The housing must have the necessary, properly operating heating/cooling facilities.
- The structure must have adequate and appropriate lighting and safe electrical sources.
- All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food.
- The housing must be in sanitary condition.
- There must be a second means of exiting the building in case of an emergency.
- Each unit must include at least one properly working smoke detector on each occupied level of the unit, located when possible in a hallway adjacent to a bedroom.

2.12 Updates to Prioritization via VI-SPDAT

Any Your Way Home Montgomery County CoC partner agency (including HRC staff, street outreach, call center, emergency shelter case worker) may update a VI-SPDAT if the current assessment is believed to be incorrect or inaccurate.

Updates will be provided when an agency or client can provide additional documentation, case records, diagnosis information, or other information that would impact the client's assessment score.

3. Coordinated Entry Policies

Coordinated Entry Policy Requirements

The U.S. Department of Housing and Urban Development (HUD) requires Continuums of Care (CoC) to develop and maintain policies and procedures covering a wide variety of Coordinated Entry (CE) practices including, but not limited to, geographic coverage and access including for specific populations; the assessment, prioritization and referral process and criteria/factors used to prioritize; privacy protections, appeals, marketing, outreach, prevention, and evaluation. This Coordinated Entry Policy document, along with procedures established for specific areas of Coordinated Entry and memorialized in other policy documents referenced herein (such as the HMIS Privacy and Security Policies, Diversion Policy, Coordinated Entry Grievance Policy and others) constitute the required Policies and Procedures for Coordinated Entry.

3.1 Coordinated Entry Participation Expectations

All CoC Program- and ESG Program-funded projects are required to participate in coordinated entry. All non-HUD funded housing and emergency service programs are actively encouraged to participate in Coordinated Entry.

3.2 Coordinated Entry Geographic Coverage

The Your Way Home Montgomery County CoC's Coordinated Entry process, including call center and street outreach operations, cover the entirety of the CoC's geographic area of Montgomery County, Pennsylvania. There are no residency requirements for Your Way Home Montgomery County CoC housing and homeless services. Your Way Home Montgomery County CoC providers are prohibited from denying services based upon residency requirements.

3.3 Coordinated Entry Access & Engagement

Your Way Home Montgomery County CoC ensures that any household experiencing homelessness within the CoC's geographic region has access to Coordinated Entry. If a household experiencing homelessness cannot access Coordinated Entry via phone for any reason, the Your Way Home Street Outreach Team will meet the household in the place where the household is reported to be sleeping for a face-to-face triage and enrollment. In these instances, the Your Way Home Street Outreach team will follow all Call Center scripting and processes as outlined in this manual.

Callers passing basic triage and reporting literal homelessness to the Call Center, but who otherwise refuse to engage further with the Call Center Specialist, will be referred directly to the Street Outreach team via Clarity. The Call Center specialist will complete the Clarity profile to the best of their ability, based on the information given by the caller. The specialist will then refer directly to Street Outreach via Clarity, passing along the information that the client was willing to share in regards to how they can be contacted or where they can be found.

Similarly, when Street Outreach observes or comes into face-to-face contact with persons in the community experiencing street homelessness, but who otherwise refuse to engage with Your Way Home services (coordinated entry, emergency shelter, RRH/PSH, etc.), street outreach will enroll the household into the Street Outreach program in Clarity without an engagement date. Street Outreach will complete the Clarity profile & program enrollment to the best of their ability, based on the information known.

Street Outreach will continue to enter an Outreach Contact service "Staying on Streets, ES, or SH" as they continue to attempt engagement. This engagement effort (which, at minimum, includes an observation out in the community) will happen at minimum once per month.

When the engagement relationship builds to the point of the household being ready to participate in a collaborative housing plan, Street Outreach will populate the engagement date and conduct an appropriate assessment and By-Name List referral. *Note: the VI-SPDAT will be completed as best as possible, based upon the household's unique circumstances and without compromising the trust & engagement built. For households whose assessment score may not be fully accurate, the street outreach director will contact the Your Way Home Program Manager.*

If the household is not observed in the community in over 90 days, Street Outreach will close the program enrollment and will be added by Street Outreach to their "Be On the Lookout" (BOLO) list. A Current Living Situation data entry must be made into Clarity HMIS at every face-to-face encounter (for street outreach) or call encounter (for Coordinated Entry).

3.4 Screening for Basic Eligibility for Your Way Home Montgomery County CoC Services

Your Way Home Montgomery County CoC Coordinated Entry will complete an initial triage on all households for basic eligibility for Your Way Home Montgomery County CoC services. Basic eligibility includes:

1. Domestic violence status: Your Way Home Montgomery County CoC services are available to persons fleeing domestic violence if services from a Domestic Violence Victims Provider Agency are not available, the household does not qualify for services from a Domestic Violence Victims Provider Agency, or the household actively prefers to go through Your Way Home Montgomery County CoC.

The Coordinated Entry Specialist will refer any person actively fleeing domestic violence to the Laurel House Domestic Violence Hotline first, before assessing for Your Way Home Montgomery County CoC services. If services are unavailable to the client through the Domestic Violence system, the household will be Triage and Assessed for Your Way Home Montgomery County CoC services. The client has a right to refuse to call the Laurel House Domestic Violence Hotline. In these instances, the Coordinated Entry Specialist will triage & assess for services through Your Way Home Montgomery County CoC.

2. Household Location: Your Way Home Montgomery County CoC services are only available to persons who are physically located in the CoC's geographic region of Montgomery County. Anyone accessing Your Way Home Montgomery County CoC Coordinated Entry who is physically located outside of Montgomery County will be referred to the coordinated entry service for the household's current location.

3. Current housing status: Your Way Home Montgomery County CoC services are only available to persons who are experiencing homelessness as defined by HUD Category 1, 2, or 4:

- Literally Homeless: An 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;
 - 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
- 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 (30 days for veterans);
 - No subsequent residence has been identified; and
 - The individual or family lacks the resources or support networks needed to obtain other permanent housing
- **Fleeing/ Attempting to Flee Domestic Violence:** Any individual or family who experienced trauma or lack of safety related to, or fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;

Households who do not meet the basic eligibility for Your Way Home Montgomery County CoC services as described above are referred to other community resources. Other community resources that have been identified may include:

- The Laurel House Domestic Violence Hotline or Women's Center Hotline
- The Coordinated Entry system and/or emergency shelters in a household's county of origin
- The United Way database for service referrals
- Legal Aid of Southeastern Pennsylvania
- Emergency Rent & Utility Services
- Budget & Credit Counseling Services

Client-level data on households that do not meet the basic eligibility identified in Triage is not entered into Clarity, but is maintained within the Your Way Home Montgomery County CoC Call Center's internal database (Resource House) for quality assurance purposes.

Client-level data on households that meet the basic eligibility is entered into Clarity.

3.5 Coordinated Entry and Emergency Services After Hours

Coordinated Entry specialists will provide telephone and in-person services to Your Way Home clients from 7:00am-7:00pm Monday through Friday. After these hours and on weekends and holidays, anyone reaching out to Coordinated Entry will be directed to report back during business hours. Coordinated Entry will not operate during the following holidays: Martin Luther King Day, President's Day, Memorial Day, Juneteenth (observed), Independence Day, Labor Day, Election Day, Veteran's Day, Thanksgiving Day, Christmas Day (observed). Households who contact Coordinated Entry after hours will be given the opportunity to request a call back, or be connected to a Montgomery County Mobile crisis for assistance.

3.6 Triage and Assessment at Your Way Home Montgomery County CoC Coordinated Entry

Your Way Home Montgomery County CoC Coordinated Entry, including the Call Center and Street Outreach, serves as the initial Triage and Assessment point for all Your Way Home Montgomery County CoC services. All people accessing Your Way Home receive an initial triage questionnaire, which determines basic eligibility for any Your Way Home Montgomery County CoC service.

Coordinated Entry specialists are prohibited from screening people out of the coordinated entry process due to perceived barriers to housing or services, including, but not limited to, too little or no income, active or a history of substance abuse, domestic violence history, resistance to receiving services, the type or extent of disability-related services or supports that are needed, history of evictions or poor credit, lease violations or history of not being a leaseholder, or criminal record.

People who do not pass the initial triage are referred to other community resources based on the information provided to the Coordinated Entry Specialist in the triage interview as outlined in the policy on [Screening for Basic Eligibility](#).

All households accessing Your Way Home Montgomery County CoC are referred to the appropriate Your Way Home Montgomery County CoC referral point based upon their presenting needs. Immediate safety and emergency needs of households accessing Your Way Home Montgomery County CoC are met first. Eligible households experiencing Category 1 or Category 4 homelessness will receive a VI-SPDAT, after all safety and emergency needs are met. Throughout the triage and assessment process, participants must not be pressured or forced to provide coordinated entry staff with information that they do not wish to disclose, including specific disability or medical diagnosis information. The participant has a right to refuse any answer during the assessment process. The participant has a right to refuse or reject referrals offered to them, without repercussion.

3.7 Households Fleeing Domestic Violence

Your Way Home Montgomery County CoC Coordinated Entry will ask all adult persons during the initial triage for basic eligibility if they are actively fleeing a domestic violence situation. If a person reports that they are fleeing domestic violence, Coordinated Entry provider will offer the person the Laurel House Domestic Violence Hotline for assessment.

The Laurel House Domestic Violence Hotline staff assesses all callers using an internal assessment. Callers who meet the Laurel House Domestic Violence Hotline assessment criteria will be connected to Laurel House's emergency shelter, or, if no space is available, with the phone numbers for other domestic violence shelters in the region and the Your Way Home Montgomery County CoC Call Center number. Callers that do not meet the Laurel House Domestic Violence Hotline assessment criteria will be referred to Your Way Home Montgomery County CoC Coordinated Entry among other referrals as determined appropriate by the Laurel House Domestic Violence Hotline staff.

Households that have already called the Laurel House Domestic Violence Hotline and had been referred back to Your Way Home Montgomery County CoC Coordinated Entry will be triaged and assessed for Your Way Home Montgomery County CoC services and may be referred to Your Way Home Montgomery County CoC emergency shelter or other services as appropriate. If a person identifies themselves as actively fleeing domestic violence, Your Way Home Montgomery County CoC Coordinated Entry will utilize the policy on [entering non-identifying information into YWH Montgomery County COC Data Systems for All Persons Fleeing Domestic Violence](#).

3.8 Households Reporting Military History

On October 17, 2017, the U.S. Department of Veterans Affairs (VA) Deputy Under Secretary for Health for Operations and Management released a memo ([CPD-17-01](#)) to the VA Network Directors, VA Network Homeless Coordinators, and VA Medical Center (VAMC) staff which issued guidance regarding the roles and responsibilities of the VA medical center homeless programs in each of the local Continuum of Care (CoC) and the CoC's Coordinated Entry Systems (CES).

This guidance from the VA to the VA medical centers is meant to support community planning and CES efforts within CoCs by clearly outlining the expectations of VA medical center involvement and Supportive Services for Veteran Families (SSVF) involvement.

Within the guidance and regulation, VA recognizes coordinated entry systems are a critical element in our collective and continued efforts to end Veteran homelessness and homelessness for all populations. Coordinated Entry ensures coordination of community-wide services for Veterans experiencing homelessness, system-wide awareness of the availability of housing and services, and easy access to and appropriate prioritization for these resources by Veterans in critical need.

To fulfill this guidance, Your Way Home Montgomery County CoC Coordinated Entry will ask all adult persons during the initial triage if they have ever served in an active component of the U.S. military. To clarify, a soldier in the U. S. Army is serving in an active component of the U. S. Military. A soldier serving in the National Guard or Army Reserve and never “deployed” they are not eligible for services as a veteran. Active Duty for Training does not constitute active service. If there are any questions please call the Office of Veteran Affairs.

If a person reports they have actively served and are experiencing Category 1 literal homelessness, coordinated entry will refer the household directly (via Clarity) to the appropriate provider.

If a person reports they have actively served and are in a housing crisis, coordinated entry will refer the household directly (via Clarity) to the appropriate provider.

An Outreach Worker from the selected provider to the veteran will follow all of the major steps and policies outlined for homeless street outreach services within Your Way Home Montgomery County CoC Operations Manual. The Outreach Worker will refer any confirmed literally homeless veteran households to a Rapid Re-Housing Program directly via Clarity. The Outreach Worker is also responsible for referring directly for a HUD VASH assessment as appropriate after the first in-person homeless verification meeting.

In these instances, a VI-SPDAT must be completed for veteran households receiving services from providers other than an SSVF Provider or a VA Medical Center Homeless Outreach Team. Then a direct referral to the By-Name List will be made by the SSVF provider the same business day the denial has been issued.

3.9 Households Being Discharged from an Institution

This policy applies to persons being discharged from Institutions including Jail, Hospital, Foster Care, or Substance Use Facility/Detox. Appropriate discharge planning from institutions is paramount to reducing homelessness among vulnerable populations, including chronically homeless persons, youth aging out of foster care, persons with forensic history, and persons with chronic substance use disorders. Discharging these vulnerable populations directly to shelters or the streets put them at increased risk for infection and poor recovery, recidivism into the prison system, and relapse, among other risks. Emergency shelters are not equipped to provide the care needed for these populations to recuperate safely following a stay in an institution, and in many cases their presence in congregate living facilities may even put others at risk.

Your Way Home Montgomery County CoC expects that institutions will not discharge vulnerable residents directly to homelessness, including directly to Your Way Home Montgomery County CoC Coordinated Entry or emergency shelter. Your Way Home Montgomery County CoC will not accept inappropriate discharges from institutions in order to protect these residents from recuperating in settings that are harmful to their health and welfare, and to protect the health and welfare of other residents and Your Way Home Montgomery County CoC staff.

Your Way Home Montgomery County CoC Coordinated Entry will screen all persons being discharged from an institution to determine if the person meets the criteria of Literally Homeless as defined by HUD. Note that HUD defines literal homelessness, as it relates to institutions, as being a person who has been in an institution for less than 90 days and was residing in a place not meant for habitation prior to entering the institution. Any person not meeting this criteria does not qualify for Your Way Home Montgomery County CoC housing programs for literally homeless persons (Rapid Re-Housing, Permanent Supportive Housing) but will be referred to homelessness prevention resources and emergency assistance, as applicable. If a representative from the institution feels that a person who is not meeting federal criteria needs special consideration, that representative will contact the Your Way Home Program Manager directly to complete a case consultation.

If a person does meet the federal criteria for homelessness in an institution, the person will receive a referral directly to Street Outreach. Street Outreach will contact the client and the client’s social worker at the institution to verify literal homeless status prior to entry into the institution. The household will be eligible for Your Way Home Montgomery County CoC housing and homeless services at that time. The household will be prioritized for Your Way Home Montgomery County CoC programs and services based on Your Way Home Montgomery County CoC’s eligibility and prioritization policies. **Your Way Home Montgomery County CoC Emergency Shelters are prohibited from accepting clients directly from public institutions over literally homeless clients still on the waitlist.**

3.10 Coordinated Entry Events

See table below for titles, definitions, and uses for the Coordinated Entry Events that can be found in Clarity HMIS for use throughout the Coordinated Entry system.

Coordinated Entry Event	Definition	Uses
Referral to Housing Navigation project or services	Qualified households referred to the Your Way Home By-Name List to receive Housing services	Should be added when the appropriate VI-SPDAT is completed.
Referral to Non-continuum services: Ineligible for continuum services	Household referred to a non-Your Way Home program when they are ineligible to receive services through Your Way Home	Should be added when provided referral/resources for: Community Rental Assistance providers, food pantries, mental health housing, etc. Note referral type in Event Notes. Households should be exited from CE program when this service is added.
Referral to Non-continuum services: No availability in continuum services	Qualified household referred to a community based program that is not funded by Your Way Home	Referred to: mental health services (case management, therapy), a medical provider, financial education providers, employment services, public welfare benefits; any other referrals as appropriate.

		Note referral type in Event Notes.
Referral to Prevention Assistance project	Qualified households are referred to Your Way Home prevention programs such as ERUC or EPIC	Households who qualify for additional assistance either before or after enrollment in Coordinated Entry should receive this service. Note referral type in Event Notes. Households should be exited from CE program when this service is added.
Referral to Street Outreach project or services	Verified Category 1 households in need of Street Outreach	All households receiving a Street Outreach referral have this service.
Problem Solving/Diversion/Rapid Resolution intervention or service	Qualified households who successfully complete diversion and are not referred to any other Your Way Home program	Should be added when a household is successfully diverted from entering Your Way Home programming, such as: finding housing, entering long-term treatment, resolving with friends/family. Note diversion type in Event Notes. Households should be exited from CE program when this service is added.

3.11 Selection and Use of the VI-SPDAT

Your Way Home Montgomery County CoC utilizes a phased assessment approach in its coordinated entry operations. After providing referrals for imminent housing and safety needs, and once it has been determined that a household cannot be diverted nor self-resolve their homeless crisis, eligible households will receive a Vulnerability Index-Service Prioritization and Decision Assistance Tool (VI-SPDAT) assessment. This form is saved within the client's record in Clarity and used for all By-Name List referral-making and prioritization.

Coordinated Entry Specialists, Street Outreach caseworkers, and emergency shelter providers will select the appropriate version of the VI-SPDAT to complete in Clarity based on the household composition. Households with children under the age of 18 will complete the VI-SPDAT for Families. Unaccompanied youth 24 years of age and younger without their own children will complete the Transition-Aged-youth (TAY) VI-SPDAT, the version for youth. Single adults over the age of 24 will complete the VI-SPDAT for single adults. Households that contain multiple adults will be asked to complete separate VI-SPDAT for Single Adults for each adult in the

household. If the adults intend to present together for services, only the highest scoring assessment will be used for referral purposes.

3.12 Third Party Assistance During Coordinated Entry Process

At times, it may be necessary or advisable for a third party to assist a person in accessing Your Way Home Coordinated Entry. Such situations may include but are not limited to: a physical disability or significant physical or mental health condition which prevents the client from speaking on the phone or from understanding/ interpreting questions and responding appropriately; presence in an institution which regulates access to phones, such as a jail. Your Way Home Montgomery County CoC encourages knowledgeable third parties to assist persons in making the call to the Call Center and/or assisting the persons in face-to-face interactions with Street Outreach, so that no person is denied access to services as a result of an inability to access coordinated entry on their own.

In any situation in which a third party is assisting a household to access Your Way Home Montgomery County CoC Coordinated Entry, the third party is expected to:

- Identify themselves to the Coordinated Entry Specialist with their name, title, and company/ organization;
- Provide their contact information for follow-up by the Coordinated Entry Specialist or a Your Way Home Montgomery County CoC service provider;
- Accurately repeat or clarify questions asked to the person, when a client needs assistance in understanding or interpreting the question;
- Allow the client to answer questions themselves, to the best of their ability;
- Give additional information to the Coordinated Entry Specialist if their experience with the client would provide more accurate responses;
- Assist the person in understanding the Your Way Home Montgomery County CoC process for referrals and help facilitate follow-up conversations or actions as necessary.

3.13 Triage, Assessment, and Referral Information Provided to Clients

All persons have a right to know the results of their triage and assessment, and as much information as possible about the services available to them and the timeframe for receiving those services.

During the Coordinated Entry Triage and Assessment, all persons will be provided the following information by the Coordinated Entry Specialist:

- The result of the Triage, including reason for meeting or not meeting the basic eligibility for Your Way Home Montgomery County CoC services.
- Eligibility for Your Way Home Montgomery County CoC programs
- How Your Way Home Montgomery County CoC prioritizes for different programs
- To the extent feasible, an approximate timeframe within which the household will receive a call back from a partner organization.
- By-Name List Check-In and update policies.

The Coordinated Entry Specialist does not provide approval for any type or duration of assistance from any Your Way Home Montgomery County CoC provider, does not refer directly to Rapid Re-Housing/ Transitional Housing/ Permanent Supportive Housing, and does not provide specific dates on which a service will be provided by a Your Way Home Montgomery County CoC provider. Coordinated Entry specialists do not provide any direct services to callers.

3.14 By-Name List Check-In

All persons referred to the By-Name List for Your Way Home Montgomery County CoC housing programs must check in with their Your Way Home provider/case manager at least once every 30 days if they have not received a call from a Your Way Home Housing Resource Center provider in that timeframe. This can be done by checking in with a street outreach worker, an emergency shelter case manager, or the call center.

The By-Name List will automatically purge any referral records for all clients that have not checked in during the past 90 days.

3.15 Changes to housing status during client check-in

After a person completes the Triage and Assessment, and while waiting for a service connection, their housing situation or other information may change. All persons must notify Coordinated Entry if their housing situation changes while they are waiting for service connection.

In the event a client contacts Coordinated Entry to update their housing status information within 30 days of the original VI-SPDAT, the Coordinated Entry specialist will update the original VI-SPDAT completed for the client.

3.16 Grievances with Coordinated Entry Triage Determination

All clients and client advocates have a right to appeal the basic eligibility determination made by the Coordinated Entry Specialist during the person's Triage.

Persons who feel that they have been denied services to which they were eligible may voice their grievance by contacting the Your Way Home Program Manager directly, send an email or notice via Your Way Home Montgomery County CoC's website or social media accounts, or through other means available to them. The Your Way Home Program Manager will assess all grievances with the Coordinated Entry Specialist's Triage of the client by: (1) Reviewing the Clarity notes and/or Coordinated Entry internal database notes (including summary transcript or recording of recorded call); (2) Speaking with the client directly to further understand their current situation; and (3) Interviewing the Coordinated Entry Specialist who completed the Triage. Persons' advocates filing a grievance on behalf of a client will submit their grievance directly to the Your Way Home Program Manager via email.

The Your Way Home Program Manager will make a final determination on the client's basic eligibility based on the information available compared against the Your Way Home Montgomery County CoC basic eligibility criteria, and will report this to the Coordinated Entry provider and advocate within 2 business days of receiving all necessary information. If a client is determined to meet the basic eligibility, Coordinated Entry will be directed to contact the client. If a client is determined to not meet the basic eligibility for Your Way Home Montgomery County CoC services at this time, the client and/ or their advocate will be provided referral information to other resources.

If the client is in disagreement with the Your Way Home Program Manager's determination, they may appeal to the Deputy Director by contacting them directly.

3.17 Confirming Street Homelessness

Your Way Home Montgomery County CoC's homeless street outreach service priority is to serve persons who are experiencing category 1 homelessness. Because Your Way Home Montgomery County CoC's initial contact with most persons is through self-report of current housing location at the Call Center, and because Your Way Home Montgomery County CoC has experienced that self-reporting of street homelessness is often inaccurate, a person reporting street homelessness to the Call Center must be confirmed as such before being prioritized for Your Way Home Montgomery County CoC emergency shelter services.

Confirmation of category 1 homelessness is conducted by the Street Outreach Team. The Street Outreach Team will confirm category 1 homelessness by verifying that an individual or household's primary nighttime residence is one of the following locations:

- A place not meant for human habitation, which can include but is not limited to:
 - Anywhere outdoors, such as a park, forest, a tent or campground, or porch
 - A car/ vehicle
 - An abandoned or condemned building, or a building in which there is no heat or electric
 - A hallway, transportation center, 24-hour store/ building, or similar
- A person residing in a hotel or motel paid for by a charitable or government organization
- A person residing in an institution (jail, hospital, etc.) and:
 - Has been in the institution for less than 90 days and
 - Came directly into the institution from a place not meant for human habitation

Persons who are experiencing homelessness may move frequently, and so the Street Outreach Team will confirm anyone as street homeless for whom sleeping in any of the above locations is a frequent or sustained activity, even if this is interrupted by periods of sleeping in non-street homeless locations (such as a family or friend's apartment or a hotel).

To the extent feasible, the Street Outreach Team is expected to confirm street homelessness by witnessing the household actually sleeping outdoors. If this is not possible, the Street Outreach Team is expected to meet the household at the location where they are reporting sleeping overnight before confirming street homelessness.

3.18 Services Provided to Street Homeless Households

The Street Outreach Team will provide referrals to services and supplies for homeless persons with whom they come into contact, whether they are confirmed as street homeless or not. These referrals will include:

- Basic needs- food pantries, community meals, clothing, supplies
- Day shelter
- Mobile mental health services, such as Critical Time Intervention or Adult Mobile Crisis
- Emergency shelters for non- Your Way Home Montgomery County CoC participating shelters in Montgomery County or a person's county of origin
- Medical services

- Referral for and transportation to hospital if needed
- County Assistance Office for public benefits
- Montgomery County Code Blue, when available
- Transportation to a Your Way Home Montgomery County CoC shelter, if shelter space is available (persons who are confirmed as street homeless only)

The Street Outreach team should note when they are providing Street Outreach case work to clients, and when they are completing Coordinated Entry referrals and log these appropriately in Clarity. This includes completing the necessary *Current Living Situation* assessments.

The team should utilize the *Street Outreach* program in Clarity when the client is not engaging in activities that will not end their homelessness. For example:

- They are meeting a client face to face to deliver survival supplies
- They are meeting a client face to face to provide food for a client
- They are meeting a client to deliver specific needed supplies such as shoes, clothing, or medical equipment

The team should utilize the *Coordinated Entry* program in Clarity when they are engaging a client in activities that will end their homelessness. See the list of [Coordinated Entry Events](#) for examples of these activities. When providing these services, all HMIS use should be through the Coordinated Entry program.

3.19 Street Outreach Caseload

Once Street Outreach meets with a household face to face, Street Outreach must enroll the household into the Street Outreach Program in Clarity. The household will remain on the Street Outreach's caseload until all service referrals have been made and one of the following happens:

- The household enters shelter (participating or non-participating with Your Way Home Montgomery County CoC)
- The household enters permanent housing through Rapid Re-Housing or another housing program (participating or non-participating with Your Way Home Montgomery County CoC)
- The household self-resolves their homelessness for 7 or more consecutive nights
- The household enters a treatment facility for a period more than 5 days
- Street Outreach is unable to verify literal homelessness face-to-face (in the community) for more than 90 days

Street Outreach will attempt face to face verification of literal homelessness status at least monthly. Street Outreach will enter a Clarity HMIS data record "Current Living Situation" in either the Coordinated Entry program or the Street Outreach program each time they are able to verify homelessness face-to-face. The program enrollment will be closed when one of the above listed events happen.

If a confirmed literally homeless household refuses to engage further with Street Outreach, the outreach case manager will open a Street Outreach program enrollment without an engagement date entered. This engagement effort (which, at minimum, includes an observation out in the community) will happen at minimum once per month.

When the engagement relationship builds to the point of the household being ready to participate in a collaborative housing plan, Street Outreach will populate the engagement date and conduct an appropriate assessment and By-Name List referral, as well as help execute that plan as appropriate. The appropriate

Coordinated Entry Events will be entered following each referral.

Any household who is known in the community to be continuously or chronically street homeless (particularly households that continue to not want to engage in services) will be added to the “Be On the Lookout” (BOLO) list if they are closed from the Street Outreach program after not being seen in the community in over 90 days. This list will be reviewed during the monthly by-name meeting.

3.20 Locations and Current Living Situations

Street Outreach case workers will add two types of locations to the client profiles.

- Enrollment Location- upon meeting a client and verifying their Category 1 homeless status, enter their primary/semi-permanent location onto the Location tab in Clarity. Identify the most appropriate address type. Utilize the address types that you are already using-
 - Encampment
 - Tunnel
 - Navigation Center
- If the client is sleeping somewhere that does not fit into those locations, select “Temporary” address type. Provide more specific information in the Name field- “vehicle,” “parking garage” etc.
- If a client relocates their semi-permanent residence (they move their encampment, etc.) you should update the Enrollment Location to best aid in finding/contacting them
- Field Interaction- each time a Street Outreach case manager meets with a client, drop a pin into the location where that meeting occurs. This will automatically document a “Field Interaction” and document where clients are located, how they move, and where your team delivers in-person services.
 - If a Street Outreach case manager is unable to drop a pin during the meeting, they do so when you return to a reliable location.
 - A pin should be added to the profile while in the field and edited later.
- A “Current Living Situation” assessment should be completed after each substantial face-to-face interaction with a client, but at minimum every 30 days.
 - For each Current Living Situation there should be a corresponding Field Interaction location

3.21 Eligible Activities/ Payments for Households Enrolled with Street Outreach

Households verified and enrolled with Street Outreach are eligible to receive the following types of payments. Street Outreach supervisors and case workers are responsible for compiling all paperwork necessary to process payments. Supervisors must also reference the Invoicing and Eligible Costs Checklist Form (Form 5.36) to ensure invoicing compliance.

- From publicly-funded budgets:
 - Engagement
 - Case Management
 - Emergency Health and Mental Health Services
 - Transportation
 - Services to Special Populations
- From the Your Way Home Initiative Fund:

- Birth certificate or ID replacement costs
- Car repair/car insurance
- Job training program costs (fees, uniforms and equipment)
- Child care/day care services
- Extermination (if not covered by public dollars or lease agreement)
- Food gift cards
- GED and College Entrance testing costs
- Motel/hotel stay (per [YWH hotel policies](#))
- School uniforms and books
- Transportation costs for housing, health, child care, employment and job training appointments (bus tokens, train passes, taxi rides, etc.)

Final approval and processing of these payments are done by the Street Outreach Supervisor.

3.22 Emergency Hotel Assistance Policy

In the event of an emergency with very vulnerable populations, Your Way Home Montgomery County CoC will assist in subsidizing a one-time hotel/ motel voucher for up to 4 nights. To receive this respite opportunity, households must meet the basic eligibility for Your Way Home Montgomery County CoC services and are in one of the following situations:

- The household is unable to safely stay in an emergency shelter due to a medical issue (physical/ mental health or developmental disability) present in any member of the household that has been confirmed by a medical professional or as informed by Your Way Home Montgomery County CoC service providers with knowledge of the household's history. In cases where medical need is unclear, the Your Way Home Program Manager will make the final determination on whether Your Way Home Montgomery County CoC will provide hotel subsidy.
- The person experiencing homelessness is pregnant.
- Children aged 5 and under are experiencing homelessness.
- A household is unable to access emergency shelter on a declared Code Blue night.

In general, persons must be confirmed as street homeless in order to qualify for hotel/ motel subsidy.

Homeless Street Outreach Supervisors will approve or deny requests for hotel subsidy. When there is a question regarding whether a client meets the definition above, the Supervisor will contact the Your Way Home Program Manager for final approval/ denial.

Households receiving hotel subsidy due to an inability to reside in emergency shelter may be prioritized for other housing services (such as Rapid Re-Housing) through Your Way Home Montgomery County CoC above others with a higher acuity, in order to provide more adequate/ appropriate living environments for these vulnerable households. The Homeless Street Outreach Supervisor must alert the Housing Resource Center Supervisor when a client is receiving a hotel subsidy due to a medical need that excludes them from being able

to be accommodated in shelter. The HRC Supervisor will then determine the prioritization level of these clients based on the client's needs, situation, and availability of other services at the HRC.

Households receiving hotel subsidy due to pregnancy and/or having children aged 5 and under may be prioritized for entry into emergency shelter.

Additional hotel voucher guidelines include:

- Household must agree to go to most cost efficient hotel found by Street Outreach.
- Client must be in agreement to take the first shelter space available regardless of shelter location and shelter rules and regulations including curfews.
- Client must go into shelter on the day and time it becomes available.
- Client must be an active participant in creating the safety plan and trying to resolve their housing crisis.
- If client is evicted from a shelter for violations, Street Outreach is unable to hotel.
- Households can only be provided with one hotel voucher per year, with the exception of declared Code Blue nights.
- Hotel stay cannot exceed 4 nights.
- Client will be provided written notification when a hotel stay will end.

The Homeless Street Outreach Supervisor may refuse to continue or take over hotel subsidy payments for any household referred by a partner organization that does not meet the criteria established in the Emergency Hotel Assistance policy.

Approval and payment of hotel subsidy is subject to available funding dollars.

3.23 Damage Incurred by Clients at Hotels

At times, households receiving hotel subsidy from Your Way Home Montgomery County CoC may incur damages at the hotel. In order to maintain positive relationships with local hotel vendors, Your Way Home Montgomery County CoC will provide funds to address damages incurred by households receiving hotel subsidy during the time of their subsidized stay. Your Way Home Montgomery County CoC will provide up to \$500 per household, per hotel stay, to pay for damages incurred by the household. (Hotel stay is defined as one continuous episode of residing in any hotel subsidized by Your Way Home Montgomery County CoC.)

Your Way Home Montgomery County CoC will not pay for expenses unrelated to damage incurred by the household or that exceed a reasonable amount needed to address the damage.

Households incurring excessive damage to a hotel room may have their hotel subsidy from Your Way Home Montgomery County CoC ended in the following instances:

- Damages were the result of persons in the room other than members of the household;
- Excessive damage was caused to the room as a result of actions taken by the household that were unrelated to medical issues/ accidents; or
- Household has caused significant damage in more than three separate incidents that were not a result of a medical issue/ accident.

Homeless Street Outreach Supervisors will make determinations on whether to end hotel stays based on damaged incurred. Any household whose hotel subsidy has been ended may appeal to the Your Way Home Program Manager according to the policy on Grievances with Hotel Subsidy Discharge.

3.24 Grievances with Hotel Subsidy Discharge

Any household for whom Your Way Home Montgomery County CoC hotel subsidy is ended may appeal this decision by writing to the Your Way Home Program Manager within 10 business days of the last day of hotel subsidy. The Your Way Home Program Manager will review the case and make a final determination on whether to reinstate the hotel subsidy or to confirm the discharge. The Your Way Home Program Manager will inform the client of the decision within 2 business days of receiving the household's written appeal.

3.25 Office of Children and Youth Mandated Childline Reporting Policy

If any Your Way Home Montgomery County CoC provider has a concern about the immediate safety of a child, local police should be contacted. Providers will complete a Child Line report either electronically or via telephone, in accordance with the Pennsylvania Child Protective Services Law (CPSL).

3.26 Reports of Street Homelessness of Families with Children Under 18

In the event that a household with children under the age of 18 reports street homelessness for the children to the Call Center or any other Your Way Home Montgomery County CoC provider, the Call Center Specialist or Your Way Home Montgomery County CoC provider will refer the household to the Street Outreach Team. The Call Center Specialist or Your Way Home Montgomery County CoC provider must call the 24-hour Street Outreach telephone line to give verbal report of children sleeping in a place not meant for human habitation.

All Street Outreach staff will complete annual training from the Office of Children and Youth to guide reporting and safety assessments in order to ensure the completion of thorough and accurate reporting. This training will be planning and organized by the Your Way Home Montgomery County CoC Operations Team.

3.27 Eligibility and Prioritization of Households Refusing Emergency Shelter

Any household has a right to refuse entry into an emergency shelter for any reason without this refusal affecting their ability to access other housing services through Your Way Home Montgomery County CoC. Households that refuse emergency shelter will remain eligible for any Your Way Home Montgomery County CoC service for which they meet eligibility requirements, and will be prioritized for these services in accordance with Your Way Home Montgomery County CoC's prioritization policies.

3.28 Entering Non-Identifying Information into YWH Montgomery County COC Data Systems

Every client has the right to choose to opt out of sharing their personally-identifying information within the YWH Montgomery County COC Data Systems. "Personally-identifying information" refers to the combination of the person's name and date of birth or their full social security number. If a client chooses to opt out of sharing personally-identifying information, then the agency staff person will use the standardized convention for entering de-identified information into Clarity, which together is known as the client's YWH Code. The staff will record the YWH Code on the client's Release of Information where indicated. The YWH Code will be used in all YWH Montgomery County COC Data Systems in place of the client's name.

It is the participating agency's responsibility to accurately update and otherwise maintain the YWH Montgomery County COC Data System records of any client choosing to opt out of entering personally-identifying information. Agencies must establish internal policies ensuring the YWH Code is properly recorded and maintained in client's file such that a supervisor would be able to locate the YWH Code within the client's file at any time.

Client Profile Data Element	De-Identified Response
First Name	First three letters of first name + First letter of last name
Last Name	Clarity-generated Unique Identifier
Quality of Name	Partial, street name, or code name provided
Social Security Number	000-00-0000
Quality of Social Security Number	Partial, street name, or code name provided
Date of Birth	1/1/year of birth
Quality of Date of Birth	Approximate or Partial DOB Reported

3.29 Entering Non-Identifying Information into YWH Montgomery County COC Data Systems for Persons Fleeing Domestic Violence

All people actively fleeing domestic violence, or who are being entered into HMIS directly from a Domestic Violence service provider, will be entered into YWH Data Systems without the use of personally-identifying information regardless of whether a client wishes to provide the data or not. A Release of Information must be signed for all persons actively fleeing domestic violence. Please note domestic violence survivors may authorize that personally-identifying information be recorded normally in HMIS after signing a Release of Information. However, an agency's primary concern must be the client's safety; profiles may remain de-identified whenever necessary.

Projects should be especially sensitive to the collection of domestic violence information from clients and should implement appropriate interview protocols to protect client privacy and safety such as: asking [about domestic violence status] in a private location and not in the presence of a romantic partner and delaying all entry of data about clients identified with a recent history of domestic violence.

If the domestic violence status changes to actively fleeing domestic violence for a person and/or household already entered into HMIS, their profile should be de-identified using the procedure below.

Client Profile Data Element	De-Identified Response
First Name	DV+ first three letters of first name + first letter of last name
Last Name	Clarity-generated Unique Identifier
Quality of Name	Partial, street name, or code name provided
Social Security Number	000-00-0000
Quality of Social Security Number	Partial, street name, or code name provided
Date of Birth	1/1/year of birth
Quality of Date of Birth	Approximate or Partial DOB Reported

For households in which the head of household is fleeing domestic violence, the profiles for other household members must also be de-identified. When recording personally-identifying information within the YWH Montgomery County COC Data Systems for each dependent child in a household, follow the same rules as above and utilize the following guidelines for recording this information.

Client Profile Data Element	De-Identified Response
First Name	DVK+ first three letters of first name + first letter of last name
Last Name	Clarity-generated Unique Identifier
Quality of Name	Partial, street name, or code name provided

Social Security Number	000-00-0000
Quality of Social Security Number	Partial, street name, or code name provided
Date of Birth	1/1/year of birth
Quality of Date of Birth	Approximate or Partial DOB Reported

3.30 Gender Identity Non-Discrimination Policy

Your Way Home Montgomery County CoC consumers shall be treated according to their self-reported gender identity regardless of appearance, genital or other physical characteristics, or inconsistent legal documentation (such as a driver's license).

No client presented for Coordinated Entry or any other Your Way Home Montgomery County CoC program shall be turned away or referred to another program because of their gender identity or presentation and/or because they do not meet the expectations of what a man or a woman is supposed to look like. Private information, such as medical information about a Your Way Home Montgomery County CoC consumer's gender identity and/or transition, is confidential.

Staff shall address Your Way Home Montgomery County CoC consumers with names, titles, pronouns, and other terms consistent with their gender identity. For example:

- A transgender woman shall be referred to by her preferred name and female pronouns.
- A transgender man shall be referred to by his preferred name and male pronouns.
- A client who requests to be referred to using they/them pronouns shall be referred to by those pronouns.

Your Way Home Montgomery County CoC does not tolerate verbal or physical harassment of any consumer, including that directed at transgender consumers. If a transgender consumer experiences harassment, the incident of harassment shall be reported to a staff member as soon as possible, and the staff shall take immediate action to ensure the safety of the transgender consumer. If harassment is committed by staff member(s), the incident of harassment shall be reported to the appropriate supervisor(s) as soon as possible and the supervisor(s) shall take immediate action to ensure the safety of the transgender consumer. All incidents of harassment must be documented in writing.

All assertions by Your Way Home Montgomery County CoC clients of their gender identity will be presumed accurate and shall not be questioned by staff without a credible, objective, demonstrable basis. When a Your Way Home Montgomery County CoC client's gender identity is questioned, staff who have been trained on the program's policy and practices with regard to transgender clients:

- May initiate a conversation with the client in order to evaluate the consumer's gender identity and any other gender-related concerns;
- May request documentation supporting the client's stated gender identity including a letter from a medical provider, therapist, social worker, member of the clergy, etc. * Note: documentation of gender identity for transgender consumers is not expected or required in the majority of cases – this provision shall only be triggered upon a credible, objective, demonstrable basis for calling into question the consumer's stated gender identity.

It is impermissible for Your Way Home Montgomery County CoC clients to assert a gender identity solely for fraudulent or other improper purposes.

Any evidence supporting the fact that the client's stated gender identity is sincerely held as part of a person's core identity, including evidence demonstrating that the client presents and lives consistent with the stated gender identity shall be accepted by Your Way Home Montgomery County CoC providers.

3.31 Coordinated Entry Accessibility and Training

Households who are included in more than one subpopulation can be referred to all services for which they qualify as a target population. For example, a parenting youth can be served in a Youth program, or a Family program. Further, all Coordinated Entry sites (including telephone, walk-in, and Street Outreach) conduct the same assessment, including standardized decision-making.

Additionally, Coordinated Entry services are affirmatively marketed and prioritized for people who are vulnerable or otherwise disconnected from Your Way Home Montgomery County CoC services; the following measures are intended to help ensure accessibility:

- Participants do not need to navigate a complex process to receive assistance, and they can access assistance, without preconditions, by:
 - Contacting a Coordinated Entry clinic by telephone
 - Attending office hours at a Walk-In site
 - Engaging with the Your Way Home Street Outreach team
- All Coordinated Entry sites must be easily accessible to individuals with disabilities.
- Coordinated Entry sites will recruit multi-lingual staff when hiring. Scheduled and on-demand interpretation services will be available to all participants utilizing Language Line services. Contact the Your Way Home operations team for instructions for utilizing the service.
- All Coordinated Entry staff will receive cultural humility training in order create greater sensitivity and awareness of life experiences presented by those experiencing homelessness.

3.32 Clarity HMIS Automatic Exit Policy

Households enrolled in the Coordinated Entry, Street Outreach and Code Blue programs will be automatically exited from the corresponding Clarity HMIS program after 90 days with no account activity- a *CE Event* was not added to the household, a Current Living Situation Assessment was not completed, or Night-by-Night attendance was not completed. Households are able to re-enroll in each program at a later date if necessary. When re-enrolling a household, Street Outreach and Emergency Shelter case workers should create a new enrollment with a start date that begins at the time of contact, and should not re-enroll the household in the original enrollment.

4. Emergency Shelter Policies

4.1 Emergency Shelter Eligibility

In order to be eligible for emergency shelter, a household must be able to provide documentation of the following:

- Homeless, as defined by HUD Category 1, 2, or 4:
 - Literally Homeless (Category 1): 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;
 - 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
 - At Imminent Risk of Homelessness: Individual or family living in the home of another or living in a hotel or motel not paid for by a charitable organization 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
 - Fleeing/ Attempting to Flee Domestic Violence (Category 4): Any individual or family who:
 - Is experiencing trauma or lack of safety related to, or fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions
 - Has no other safe residence; and
 - Lacks the resources or support networks to obtain other permanent housing

Emergency Shelters must collect documentation to determine that the household meets the eligibility criteria as defined above, following the policy on [Documentation of Homeless Status](#), within 3 business days of enrollment into shelter.

Your Way Home Montgomery County CoC emergency shelters may also maintain additional eligibility criteria, so long as these eligibility criteria comply with Fair Housing law, are documented in the program's policies and procedures, and have been shared with Your Way Home Montgomery County CoC's Operations Team and Coordinated Entry.

Your Way Home Montgomery County CoC encourages all emergency shelters to maintain as few eligibility criteria as possible in order to maintain low barriers to accessing emergency shelter.

Please also reference [General Standards for Emergency Shelter](#) and [Emergency Shelter Program Guidance](#).

4.2 Non-Discrimination in Emergency Shelter

Emergency shelters are prohibited from denying admittance or services based on race, color, religion, sex (including gender identity and sexual orientation), national origin, disability, or familial status. Minimum standards shall comply with the requirements for nondiscrimination, equal opportunity and affirmative outreach identified in § 576.407 and 578.93(a-b). More information can be found in Your Way Home Montgomery County CoC's [policy on non-discrimination](#).

4.3 Gender Identity Non-Discrimination in Emergency Shelter

All shelter clients, including transgender and non-binary individuals, shall be placed in dormitory facilities based on their self-reported gender identity regardless of appearance, genital or other physical characteristics, inconsistent legal documentation, or concerns (real or perceived) about objections or complaints of other clients.

All shelter clients, including transgender and non-binary individuals people, who have privacy concerns shall be directed to spaces, where or when available, that allow for greater privacy and spaces that provide equivalent accommodations to those provided in the sleeping dormitories.

- The use of private rooms shall not be reserved solely for transgender individuals.
- A private room may be requested and utilized for any shelter client including but not limited to transgender clients who request additional privacy.
- The unavailability of alternative space shall not be a basis for altering a transgender client's sleeping accommodation.

All shelter clients, including transgender people, who have safety concerns shall be directed to beds or private rooms, where or when available, with equivalent accommodations that are closer to staff.

- The use of private rooms shall not be reserved solely for transgender individuals.
- A private room may be requested and utilized for any shelter client including but not limited to transgender clients who request additional privacy because of safety concerns in the main sleeping area.
- The unavailability of such accommodation shall not be a basis for altering a transgender client's sleeping accommodation.

All shelter clients, including transgender and non-binary individuals, shall have access to bathrooms, showers, and all other facilities/programs separated by sex consistent with their gender identity regardless of appearance, genital or other physical characteristics, or inconsistent legal documentation.

Some shelter clients may express discomfort regarding a transgender person sleeping in or using the facility that is consistent with the transgender person's gender identity. Another client's discomfort is not a reason to deny access to equal treatment for the transgender person. Shelter staff shall work with shelter clients to address the discomfort and to foster understanding of gender identity for the purpose of creating a shelter environment that respects and values all shelter clients.

If a resident continues to disrespect a transgender individual, consider as interim steps such as:

- Requiring that the harassing resident stay away from the transgender individual

- Making changes in sleeping arrangements without limiting the freedom of the transgender individual, or
- Pursuing other interventions that do not result in the expulsion of the harassing resident.

In no instances should interim or final steps involve expulsion of the harassed client.

4.4 Prohibition Against Involuntary Family Separation

Emergency shelters are prohibited from denying any family's admission due to the age or gender of a child under the age of 18. Emergency shelters are required to reasonably accommodate all members of a family experiencing homelessness as defined by that family and not deny admittance of any custodial parent or dependent child.

4.5 Faith Based Activities in Emergency Shelter

Emergency shelters are prohibited from mandating participation in religious activities. Any religious activities must be offered separately from any ESG or CoC funded programs and services, and participation must be voluntary. Emergency shelters are prohibited from discriminating against a person based on religion or religious beliefs.

4.6 Year-Round Emergency Shelter Case Management

The common purpose of Your Way Home Montgomery County CoC's year-round emergency shelters is to provide a safe place to sleep while empowering people to connect to permanent housing as quickly as possible.

Year-round emergency shelter case management is provided consistent with each shelter's internal policies and procedures; however, Case Management services must meet the minimum standards as described below in order to qualify as an allowable activity under Your Way Home Montgomery County CoC grants:

1. Resolution conversations and strategies conducted with households during their first two weeks in shelter to help the household utilize their strengths and resources to self-resolve to a more appropriate housing destination. These conversations must be documented as case notes in Clarity (for participating shelters).
2. Case managers must ensure that all households residing in shelter longer than 2 weeks receive a VI-SPDAT and, if appropriate, a referral to the By-Name List for PSH and/or RRH.
3. Case Managers must meet with all households residing in shelter longer than 2 weeks* to assess the client's current housing situation and complete the following:
 - a. Household budget
 - b. Housing Stability Plan
 - c. Assessment of Needs & Strengths (e.g., SPDAT, Arizona Self-Sufficiency Matrix) to determine appropriate referrals to supportive services
4. At least weekly one-on-one case management thereafter to help the household obtain permanent housing as quickly as possible. Case management must follow the goals outlined in the Housing Stability Plan to obtain permanent housing. Case managers are encouraged to use skills like motivational interviewing, housing-focused case management, and progressive engagement to assist the client in obtaining permanent housing while using the least amount of system resources necessary. Case management should focus on goals related to obtaining permanent housing, obtaining

mainstream benefits, connecting to community and other supports that will help maintain housing stability long-term, and increasing income.

Shelters should complete this with clients staying longer than 2 weeks at minimum- a shelter may choose to complete these items with all households prior to 2 weeks passing, especially if it will help the household exit to a safe & appropriate housing destination.

4.7 Eligible Activities/ Payments for Households in Shelter

Households in Emergency Shelter are eligible to receive the following types of payments. Emergency Shelter supervisors and case workers are responsible for compiling all paperwork necessary to process payments. Final approval and processing of these payments are done through the Housing Resource Centers. Emergency Shelter supervisors and caser workers must contact the Housing Resource Centers directly to request payment. Supervisors must also reference the Invoicing and Eligible Costs Checklist Form to ensure invoicing compliance.

- From publicly-funded budgets:
 - Essential Services - Case management (Housing Focused Case Management)
 - Shelter Operations
 - Appropriate places to sleep, adequate space, and security for residents and their belongings
 - Meals

- From the Your Way Home Initiative Fund:
 - Birth certificate or ID replacement costs
 - Car repair/car insurance
 - Job training program costs (fees, uniforms and equipment)
 - Child care/day care services
 - Extermination (if not covered by public dollars or lease agreement)
 - Food gift cards
 - GED and College Entrance testing costs
 - School uniforms and books
 - Transportation costs for housing, health, child care, employment and job training appointments (bus tokens, train passes, taxi rides, etc.)

4.8 One-Time Assistance to Move Residents Out of County

One-time payments to shelter clients to move to permanent housing outside of Montgomery County are allowable, so long as the client and payment meets the eligibility criteria for financial assistance under [Rapid Re-Housing Lite](#). If a shelter client is moving out of county to return to a safe doubled up living situation, the shelter case worker must do due diligence to verify that the living situation is safe and appropriate prior to helping to arrange transportation.

4.9 Overriding the Assessment Score Guidance

At times, the VI-SPDAT score a household receives may provide inappropriate guidance on the type and duration of assistance that should be provided, based on the household's unique needs. This may mean that low acuity clients may need more supportive services to move out of shelter than what can be provided through one-time assistance or self-resolution strategies. Conversely, it may be that a medium or high acuity client can maintain permanent housing without the amount of supportive services provided in Rapid Re-Housing or Permanent Supportive Housing.

In cases where a shelter case manager has identified that a low acuity household will need more supportive services to move out of shelter, the Shelter Supervisor will review and approve the determination. Then, the Shelter Supervisor will contact the Your Way Home Program Manager for case review. The Your Way Home Program Manager will make the final determination on whether the household can be referred to the By-Name List for a Rapid Re-Housing program based on the information provided by the Shelter Supervisor and any additional documentation needed. In this case, the Your Way Home Program Manager will send a referral for the household to the By-Name List.

In cases where a shelter case manager identifies that a medium acuity household will not need Rapid Re-Housing, the Shelter Supervisor will review and confirm the determination. In this case, the shelter case manager will not send a referral for the client to the By-Name List for Rapid Re-Housing. The Your Way Home Program Manager does not need to approve these cases.

In cases where a shelter or Rapid Re-Housing case manager identifies that a high acuity household will not need Permanent Supportive Housing, the case manager's supervisor will review and confirm the determination. In this case, the case manager will not send a referral to the By-Name List. The Your Way Home Program Manager does not need to approve these cases.

4.10 Emergency Shelter Termination

Your Way Home Montgomery County CoC's emergency shelters are committed to empowering families and individuals to regain permanent housing. As a result, in most cases emergency shelters are expected to exit their residents directly to housing (temporary or permanent), and not to street homelessness.

However, under certain conditions it may be appropriate for a shelter to immediately terminate a household from the shelter without arranging appropriate housing:

- A client/ head of household commits a criminal offense on shelter grounds;
- A client/ head of household threatens to imminently harm another shelter resident or shelter staff person;
- A client/ head of household physically harms another shelter resident or shelter staff person.

In all cases, the shelter must document the event in case notes and in accordance with shelter policies. It is expected that the shelter will contact local police to address the incident as these cases involve criminal acts.

4.11 Transfers Between Shelters due to Congregate Living Issues

Your Way Home Montgomery County CoC's emergency shelters are committed to empowering families and individuals to regain permanent housing. As a result, in most cases emergency shelters are expected to exit their residents directly to housing (temporary or permanent), and not to another shelter or to homelessness.

However, under certain conditions it may be appropriate for a shelter to recommend/ request to transfer a household from one shelter to another in order to relieve congregate living challenges and to provide a safe place for residents.

In these cases, emergency shelters may request to transfer households to another shelter by contacting the Your Way Home Program Manager. The Your Way Home Program Manager will determine if the reason for transfer is reasonable. If so, and if shelter space is available, the Your Way Home Program Manager will work with the Street Outreach team in transferring the household to another shelter provider. If space is not available, the shelter is responsible for maintaining housing for the household until other shelter space becomes available.

4.12 Documentation of Shelter Expectations & Household Violations

Your Way Home Montgomery County CoC's emergency shelters are committed to empowering families and individuals by providing low-barrier entry into shelter and supporting the household to exit shelter to permanent housing. Your Way Home Montgomery County CoC emergency shelters are discouraged from setting burdensome or elaborate "rules" for entering or being able to stay in shelter.

However, if the shelter wishes to establish certain expectations for shelter residents to abide by (in order to provide a safe, clean, and appropriate congregate living environment), Your Way Home Montgomery County CoC requires that households receive a written copy of these expectations within 24 hours of entering shelter. If a household violates these expectations, the shelter must notify the household in writing of the violation. A copy of this written notice must be kept in the client's file. Additionally, the household must be offered the opportunity to provide a written response and/or a meeting with a shelter case manager or supervisor upon receipt of the written notification. These written responses or a record of the meeting must also be kept in the client's file.

It is the expectation that the Your Way Home Montgomery County CoC emergency shelter provide due diligence to resolve the issue causing the violation. Written records must be kept in the client's profile of notifications given to the household, attempts at mediation & resolutions, and repeated attempts to resolve the issue. Emergency shelter termination due to violations of shelter expectations should be utilized only as a last resort. If a household must be terminated due to multiple documented instances of an inability to abide by shelter expectations, which result in a safety concern for the congregate living environment, the shelter must work with the household to discharge to a housing (permanent or temporary) destination. The emergency shelter must also contact the Your Way Home Program Manager to discuss the plan for termination, or to discuss the need for a [transfer to another shelter](#).

5. Rapid Re-Housing Policies

5.1 Rapid Re-Housing Eligibility for New Clients

In order to be eligible as a new client for Rapid Re-Housing, households must be able to provide documentation of the following:

Homeless Status: households must meet one of the following definition of homeless status, and Rapid Re-Housing providers must obtain the Recordkeeping Requirements listed below and maintain in the client's file:

- *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;
 - 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
- *Fleeing or Attempting to Flee Domestic Violence*: Any individual or family who is fleeing or attempting to flee domestic violence, has no other residence, and lacks the resources or support networks to obtain other permanent housing, and live in an emergency shelter or other place described in Category 1 of the homeless definition.

Recordkeeping requirements:

- Written (printed HMIS record or standardized letter observation by the street outreach worker; or
- Self-certification of a household fleeing or attempting to flee domestic violence; or
- Written (printed HMIS record or standardized letter referral by another housing or service provider, or
- Written certification by the individual or head of household seeking assistance that (s)he was living in the streets or in shelter;
- For individuals exiting an institution- one of the forms of evidence above documenting that the individual was living on the street or in an emergency shelter immediately prior to entering the institution, and that the individual was living in the institution for less than 90 days, and
 - (1) Discharge paperwork signed by the Institution Social Worker, and
 - (2) Written record of housing plan created by the Institution Social Worker and Your Way Home Montgomery County CoC confirming Your Way Home Montgomery County CoC assistance,

There is no income limit for households at intake into Rapid Re-Housing; however, income documentation must be collected.

Once a household has been determined eligible for assistance, Housing Stability Coaches must confirm this determination by completing the Certification of Eligibility for Rapid Re-Housing Assistance Form and attaching all required supporting documentation:

- Documentation of homeless status;
- Documentation of income or Self-Declaration of Income if documentation is not available or the household does not have any income;
- Program agreements and forms:
 - Rapid Re-Housing Program Agreement
 - Monthly budget
 - SPDAT
 - Housing Stability Plan

By signing the Certification of Eligibility form, the Housing Stability Coach and Supervisor attest that the household meets all eligibility requirements for the program.

All eligibility documentation must be maintained in the client's file.

5.2 Rapid Re-Housing Intake

Intake into Rapid Re-Housing is considered the period during which an applicant has been contacted by a Housing Stability Coach to schedule their first appointment for Rapid Re-Housing, up until the applicant signs the Rapid Re-Housing Program Agreement, or until the Housing Stability Coach determines the applicant is ineligible for the Rapid Re-Housing Program. No financial assistance may be provided to clients from the Rapid Re-Housing Program during intake.

To the extent feasible, the Housing Stability Coach will schedule all intake appointments with an applicant for Rapid Re-Housing jointly with all case workers currently working with the applicant, so that a client's full case history and any current housing plans can be shared openly between case workers. Typically this will include the emergency shelter case worker, and will often also include the Critical Time Intervention worker or other mobile mental health support workers.

The intake appointment(s) with the applicant will be scheduled at a convenient location for the applicant; this will generally be at the emergency shelter, hotel, or a public facility near where they reside.

5.3 Recording Ineligibility or Denial from Rapid Re-Housing

During intake, a Housing Resource Center case manager may determine that a client is ineligible for the Rapid Re-Housing program. If the whereabouts of the client are known, the Housing Resource Center case manager must provide a written determination of ineligibility to the applicant. If the whereabouts of the applicant are unknown, the Housing Resource Center case manager will record a Case Note in Clarity to document the determination. All applicants denied entry into the Rapid Re-Housing program may appeal this determination by writing to the Your Way Home Program Manager within 10 business days of receiving the denial.

5.4 Rapid Re-Housing Enrollment

An applicant for Rapid Re-Housing is considered enrolled into the Rapid Re-Housing program when they sign the Rapid Re-Housing Program Agreement. An applicant for Rapid Re-Housing that refuses to sign the Program Agreement will not be enrolled into Rapid Re-Housing. Refusal to sign the Program Agreement must be documented in case notes in Clarity.

5.5 Rapid Re-Housing Introductory Period

The primary goal of Your Way Home Montgomery County CoC Rapid Re-Housing is to help clients move to permanent housing as quickly as possible. In order to ensure that all clients are actively working to gain housing through this program, every enrollment into the program begins with an Introductory Period, in which clients must actively participate in locating housing to the extent that is reasonable based on their skills and abilities. This Introductory Period is not meant to place undue expectations on high-need clients from obtaining housing- clients may only be evaluated on whether they are meeting expectations that are consistent with their abilities. A client's participation in housing location must be done concurrently with the Housing Locator, who is required to provide housing leads, tips, and opportunities.

During this Introductory Period, all Rapid Rehousing households will need to meet the following criteria in order to remain eligible for continued assistance through the Rapid Re-Housing Program:

- Actively participate in locating a unit and following up on housing leads provided to them by the Housing Locator, consistent with their abilities to do so, as demonstrated by follow-through on the action steps identified in the Housing Stability Plan developed during their intake appointment.
- Maintain homeless status eligibility for the program. Households living in non-homeless settings (e.g. doubling up) for longer than 5 days during this timeframe are considered to have lost their eligibility for the program.
- Maintain consistent contact with their Housing Stability Coach and Locator, defined during this time period as at least once per week.
- Provide documentation and/or payment as requested by their Housing Resource Center workers in order to move into housing.
- Attend unit inspections/walk-throughs and lease-signings as requested by their Housing Locator.
- Accept at least one out of three unit options provided, so long as all options meet the client's location requirements for work or support services, budget, and accessibility needs as outlined in their Housing Search Planner.

The Introductory Period ends on the day that the client moves into permanent housing. If a household meets the above expectations, failure to identify permanent housing during this introductory period will not be grounds for program discharge. All program discharges must follow the RRH Exit/Termination policy.

5.6 Rapid Re-Housing Lite

Some households may need limited financial assistance in order to successfully exit homelessness, as determined through their Housing Stability Plan created with their Your Way Home Montgomery County CoC case manager (emergency shelter, housing stability coach, street outreach).

Time-limited assistance to exit homelessness to permanent housing may be provided to clients verified as experiencing literal homelessness when the following conditions are met:

- The client provides all documentation necessary to process a payment according to Your Way Home Montgomery County CoC's invoicing policies and all applicable grant requirements.
- The client completes and signs a Housing Stability Plan with their case manager (emergency shelter, street outreach, housing stability coach), documenting the client's action steps to gain housing stability

and receive financial assistance. Any action steps required by the client must be taken prior to payment authorization.

- The financial assistance provided is one-time assistance only, and payment of this assistance will resolve the immediate housing crisis and allow the household to maintain permanent housing for at least 30 days.
- Clients moving into new units must be able to provide all required documentation to process a move-in under Your Way Home Montgomery County CoC's Rapid Re-Housing program, and must be able to demonstrate that the unit is affordable based on their current income. Clients may be eligible for security deposit, first, and last month's rent, depending on need.
- While there is no dollar limit on the amount of assistance a client may receive (unless specified by a grant), case managers are required to follow the principles of progressive engagement to provide the least amount of resources necessary to resolve the immediate crisis. This may include: requiring a client contribution, partnering with other local organizations to combine payments, and helping clients establish payment plans. The Your Way Home Program Manager may request additional support for a request and/or deny a request for payment if the request appears unreasonable.

Your Way Home Montgomery County CoC case managers from street outreach or emergency shelter will contact the supervisors of the Your Way Home Montgomery County CoC Housing Resource Centers to arrange for payment of one-time assistance. They will also ensure clients have completed the appropriate VI-SPDAT and are referred to the By-Name List prior to receiving Rapid Rehousing Lite assistance. A Rapid Rehousing- Lite Referral packet should be completed by case managers with the client and submitted to the Housing Resource Center for processing. The emergency shelter and/or street outreach case manager is responsible for compiling and providing all of the documentation necessary to process the payment to the Housing Resource Center before payment is authorized by the Housing Resource Center.

5.7 Rapid Re-Housing Program and Emergency Shelter Communication

In order to provide consistent, coordinated services to clients, it is imperative that all program staff from both Housing Resource Centers and Emergency Shelters maintain constant communication directly with each other regarding a shared client's services. Direct communication refers to email or phone messages between case workers; case workers should not expect or ask clients to relay messages between case workers.

Direct communication between shelter staff and Housing Resource Center staff is expected to occur when:

- Intake appointments for Rapid Re-Housing are scheduled
- Housing Stability Plans are created and signed
- Periodically during housing location to update on progress achieved in locating housing
- Inspections are approved
- Lease signings are scheduled
- Move-in dates are scheduled
- A client's enrollment in the Rapid Re-Housing program is in jeopardy or the client is otherwise not fulfilling expectations set forth in the Rapid Re-Housing Program Agreement or Housing Stability Plan

- A client's enrollment in the shelter is in jeopardy, the client does not sleep in shelter for 2 nights, or the client moves out of the shelter
- Other changes or situations arise that would affect the client's ability to obtain housing

5.8 Rapid Re-Housing Program and Communication with Community Partners

In order to provide consistent, coordinated services to clients, it is imperative that program staff from Housing Resource Centers maintain constant communication directly with case management services that are also supporting the household. Communication with services such as Critical Time Intervention (CTI), Office of Children and Youth (OCY), Recovery Coaching, and other community partners is imperative for integrated goal planning and housing success. Direct communication refers to email or phone messages between case workers; case workers should not expect or ask clients to relay messages between case workers. Housing Resource Center staff are to answer emails and phone calls from community partner case workers within 1 business day.

Direct communication is expected to occur when:

- Intake appointments for Rapid Re-Housing are scheduled
- Housing Stability Plans are created and signed
- Periodically during housing location to update on progress achieved in locating housing
- Inspections are approved
- Lease signings are scheduled
- Move-in dates are scheduled
- A client's enrollment in the Rapid Re-Housing program is in jeopardy or the client is otherwise not fulfilling expectations set forth in the Rapid Re-Housing Program Agreement or Housing Stability Plan
- A client receives a strike with the Rapid Re-Housing program
- A client experiences a crisis or additional support in order to maintain housing is needed
- A household is being discharged from the Rapid Re-Housing program

5.9 Housing Stability Case Management & Planning in Rapid Re-Housing

All Housing Stability Coaches must meet in person monthly, at a minimum, with enrolled RRH households. All Housing Stability Coaches must complete a Housing Stability Plan with every client at least once every three months, or more frequently as needed. The Housing Stability Plan must clearly outline the action steps of both the Coach and the client, the due dates for each task, and the required documentation or follow-up for each task. Every Housing Stability Plan must be signed by the Coach and the client. A copy of every Housing Stability Plan must be given to the client and a copy must be retained in the clients' file. While the client is in shelter, the Housing Stability Plan must be uploaded to the client's profile in Clarity and shared with the client's shelter case worker.

Housing Stability Coaches should use the results of the SPDAT, the client's existing housing or case plan at the shelter, and any other relevant information to develop Housing Stability Plans. It is expected that each Housing Stability Plan will identify multiple areas/ domains for action (such as Housing, Health, Public Benefits). The number of tasks included on the Housing Stability Plan should be consistent with the client's abilities.

Housing Stability Coaches must document the results of each Housing Stability Plan, including client's follow-through with tasks and completion of tasks by the assigned deadlines. The results of the Housing Stability Plan must be shared with the client, so the client is able to see their own progress on the plan, and is aware of any missed items or tasks. All follow-up documentation must be retained in the client's file.

In instances where a client is discharged from Rapid Re-Housing as a result of lack of follow-through on goals, the appropriate Housing Stability Plan(s) must be referenced as back-up documentation. A discharge for lack of follow-through on goal planning that does not include appropriate Housing Stability Plan documentation will be overturned.

5.10 Housing Location Assistance

During the initial meetings with the Rapid Re-Housing program staff, the Housing Stability Coach and Housing Locator will help the client to outline the action steps, expectations, and parameters for locating and moving into permanent housing. This plan must include:

- Identification of the client's preferred communities/ neighborhoods, including those near the household's school, work, relatives/ support network, doctors, etc.
- The target rent and utility amount, based on the client's current and projected income and the local Fair Market Rate/ Rent Reasonableness standards
- Resources to find units (online, print, landlord names, etc.)
- Expectations regarding client contact with the Housing Locator- frequency, method, and contact information.
- Expectations for finding units and contacting landlords. These should be developed based on the client's abilities, rental history, presence of barriers to housing, and in consultation with shelter staff/street outreach case workers. Housing Locators are expected to provide more assistance in locating units to clients with higher needs/ barriers (such as poor rental history or no experience calling landlords) than those with fewer needs.

Housing Locators are expected to assist clients in finding units through utilization of their own networks and relationships. Housing Locators are expected to provide approximately up to 3 promising leads to every Rapid Re-Housing household. Housing Locators must be in direct communication with the client's shelter case worker if problems arise regarding the client's follow-through with the action steps on the Housing Stability Plan. If it is determined that the client needs additional assistance in housing location, the Housing Locator must create a new Housing Stability Plan that better meets the needs of the client in obtaining housing.

5.11 Determining Rent Reasonableness and Fair Market Rent

Rapid Re-Housing programs providing financial assistance and/or ongoing rental assistance must develop and implement standards which ensure a mechanism for determining that the actual rental costs of units assisted are in compliance with HUD's Fair Market Rent, as provided under 24 CFR part 888 and complies with HUD's standard of "rent reasonableness" as established under 24 CFR 982.507. Rent Reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units. See HUD's worksheet on [rent reasonableness](#) and [Fair Market Rent Documentation System](#).

RRH programs are responsible for determining what documentation is required in order to ensure that the rent reasonableness standard is met for a particular unit. RRH programs should determine rent reasonableness by

considering the gross rent of the unit and the location, quality, size, type, and age of the unit, and any amenities, maintenance, and utilities to be provided by the owner.

To calculate the gross rent for purposes of determining whether it meets the rent reasonableness standard, consider the entire housing cost: rent plus the cost of any utilities that must, according to the lease, be the responsibility of the tenant. Utility costs may include gas, electric, water, sewer, and trash. However, telephone, cable or satellite television service and internet service should be excluded. The gross rent also does not include pet fees or late fees that the program participant may accrue for failing to pay the rent by the due date established in the lease.

Comparable rents can be checked by using a market study of rents charged for units of different sizes in different locations or by reviewing advertisements for comparable rental units. For example, a program participant's case file might include the unit's rent and description, a printout of three comparable units' rents, and evidence that these comparison units shared the same features (location, size, amenities, quality, etc.). The Your Way Home Rent Reasonableness Form is also available for this use. Another acceptable method of documentation is written verification signed by the property owner or management company, on letterhead, affirming that the rent for the unit assisted with Rental Assistance funds is comparable to current rents charged for similar unassisted units managed by the same owner.

5.12 Units Paid for with Financial Assistance and/or Rental Assistance

Rental units paid for with RRH Financial Assistance (move-in costs) and/or ongoing Rental Assistance must:

- Comply with Fair Market Rent limits as calculated in 24 CFR §982.503.
- Comply with Rent Reasonableness requirements outlined in 24 CFR §982.507.
- Comply with Housing Quality Standards, including lead-based paint requirements.
- Have a Rental Assistance Agreement with specific lease stipulations between the RRH agency and the landlord.
- Have a legally binding, written lease agreement between tenant and landlord. CoC funds require a one year lease minimum.
- The unit must not be paid for with other subsidies of the same type.
- The building/property/unit must be free of tax liens. NOTE: This is not a federal regulation. If a RRH program would like to request a waiver or accommodation on this requirement, they may contact the Your Way Home Program Manager.

If the aforementioned criteria are met, then rental assistance are an allowable expenditure of federal Financial Assistance and/or Rental Assistance funds for persons meeting RRH program client eligibility requirements. Assistance may be provided for apartments, rental houses, rented rooms in houses, etc.

5.13 Rapid Re-Housing Lease and Tenancy Education

The Housing Locator is responsible for ensuring that the client understands the terms of their lease agreement. To do so, the Housing Locator must review all provisions of the lease with the client.

The Housing Locator is responsible for helping clients to abide by the terms of lease and exhibit good tenancy skills, as appropriate for their abilities. This may include additional sessions in which the Housing Locator provide additional educational materials or guidance to the client about tenancy issues, especially following any incident that violates a lease agreement or could lead to poor landlord-tenant relationships.

The signed lease must be uploaded into Clarity HMIS.

5.14 Rapid Re-Housing Case Management

A core component of Rapid Re-Housing is providing regular case management support to clients to help them obtain and maintain stable housing.

Housing Stability Coaches are required to meet in-person with enrolled clients at least once per month, though Coaches are expected to meet more frequently with clients with identified high needs, barriers to housing stability, or difficulty meeting Housing Stability Plan goals as described in the [Program Guidance on Progressive Engagement in Rapid Re-Housing](#).

Housing Stability Coaches are required to conduct a home visit to clients within 5 days of the client moving into a new unit. Once a client has been housed, Housing Stability Coaches are required to hold case management meetings once per month at minimum. It is expected that these meetings are held in the client's home as often as feasible.

During case management meetings, Housing Stability Coaches are expected to review and record the client's progress on meeting goals identified in the Housing Stability Plan, review the client's budget and payment of bills, and to connect to supports or other services that will assist the client in maintaining their housing. Case management is not a one-size-fits-all approach, and so certain clients may require more or less work in certain areas than others. However, all case management meetings should cover the basics of progress towards attaining income to meet basic needs, and maintaining housing stability.

The level of case management support will vary based on the client's needs, and it is the responsibility of the Housing Stability Coach and their Supervisor to determine the appropriate level of case management support for each client. In general, Housing Stability Coaches are expected to provide more intensive and frequent case management support to clients with high acuity/ needs, and less intensive case management support to clients with fewer support needs. Housing Stability Coaches are expected to increase or decrease the frequency and intensity of case management supports to clients as they work with clients and are able to better assess their acuity.

Rapid Re-Housing case management also includes regular check-ins and follow-up on activities in between in-person meetings.

5.15 Connection to Supportive Services

It is expected that most Rapid Re-Housing clients will need to connect to other community or professional supports in order to maintain their housing long-term. These supports include, but are not limited to, mental health case management/ services, medical services, subsidized childcare, public benefits, employment/ career counseling, legal services, and budgeting/ credit counseling.

Housing Stability Coaches are responsible for appropriately identifying the additional areas in which the household needs more support. The primary tools for identifying these areas are the SPDAT and budget, though Housing Stability Coaches may use other information or their own assessment to inform this as well.

While Housing Stability Coaches are not expected to provide case management services in other identified support areas, Housing Stability Coaches are responsible for ensuring that clients are connecting to appropriate services. This includes:

- Including all support connections as goals and action steps on the Housing Stability Plan,
- Assisting with or making referrals on behalf of clients to the appropriate service,
- Recording the referral to these services as a Service Record in Clarity

- Ensuring that the client has completed the necessary intake paperwork for the service,
- Following up on the status of the application for service,
- Advocating for the client to receive the service by reporting connection issues to their Supervisor.

Once a client has been connected to the service(s) needed, the Housing Stability Coach is responsible for ensuring that the client is maintaining an active role in this service by:

- Identifying attendance/ participation in the service on the Housing Stability Plan,
- Maintaining regular communication with the service case worker/ contact,
- Maintaining an active knowledge of the case work or activities being completed by the client through this service,
- Reviewing meeting attendance/ participation with the client,
- Adjusting the Housing Stability Plan and/or notifying the Supervisor if services provided are not meeting the client's needs.

5.16 Rapid Re-Housing Re-Certification

All households enrolled in Rapid Re-Housing must be re-certified for eligibility every 3 months from the date they have been moved into permanent housing in order to continue receiving services from the program. The 3 Month Re-Certification confirms:

1. Income Eligibility. Household's income is at or below 30% of the Area Median Income.
2. Need for Services and Supports: All households must also demonstrate continued need for the case management services and/or financial supports provided by the program, and the lack of the other resources (family networks or community services) to meet these needs.

Households that meet the Re-Certification requirements will be certified to receive another 3 months of assistance. A household may be re-certified to receive 3 more months of case management without the financial support, if they are still in need of connection to services.

Households that do not meet either of the criteria above at the 3-Month Re-Certification period will be exited off the Rapid Re-Housing program. If a household is still under 30% of the Area Median Income but is able to afford rent and basic necessities through their own resources, the household will be exited off the Rapid Re-Housing program.

The Re-Certification must include documentation to support the household's eligibility for services:

- Current income documentation or Self-Declaration of Income Form;
- Monthly budget;
- Updated Housing Stability Plan;
- Updated SPDAT;
- Updated Rental Agreement;
- All case notes from the last 3 months.

By signing the Re-Certification form, the Housing Stability Coach and Supervisor attest that the household have been re-assessed for all eligibility requirements and have met all eligibility requirements.

5.17 Client Contribution to Housing Costs

Because Rapid Re-Housing assistance is time-limited, households are expected to contribute financially to their housing costs. Housing Stability Coaches and Housing Locators are expected to help clients identify an appropriate amount to contribute to security deposit/ move in costs, ongoing rent and utilities, and other costs (such as basic household goods) based on the household's ability to pay.

Households with income: Households with income are expected to pay 30% of their income towards their housing costs (rent and utilities) during their first three months in the program. It is encouraged, but not required, for all households with income to contribute to their move-in costs as well. Housing Stability Coaches may determine the most appropriate method for clients to contribute this amount; however, it is encouraged that clients begin paying a portion of each bill they are responsible for (rent and utility) so that they begin developing the habit of paying these bills on time and to the appropriate vendor.

During their next phases of their time in the program (4- 24 months), households with income are expected to increase their contribution to their housing costs from at least 30% to up to 100% by the time they are exited from the program. In order to determine the increase in housing costs, Housing Stability Coaches should work with clients to develop a housing budget and rent increase plan that balances the client's ability to pay with the time available in the program. An updated Rental Agreement for Re-Certification letter must be signed by the client and sent to the landlord to document the plan for rental assistance.

Households without income: Households without income are expected to contribute what they can towards their housing costs (rent and utilities). This may include bartering, recycling returns, or other safe forms of generating income from non-traditional sources. In these instances, it is expected that financial goals in the Housing Stability Plan be clear, outlining the client's expected efforts to increase his or her income based upon their ability. It is the responsibility of the Housing Stability Coach to monitor these financial goals and support the client in these goals by making appropriate referrals. The Housing Resource Center will continue to support the client as long as they make progress in their goals outlined in the Housing Stability Plan, with the household continuing to contribute what they can towards their housing costs. Once household income starts to increase, it will be expected that the household increase their contribution to their housing costs from at least 30% to up to 100% by the time they are exited from the program.

5.18 Rapid Re-Housing Rental Agreement

Your Way Home Montgomery County CoC Rapid Re-Housing guarantees payment of the Housing Resource Center's portion of housing costs only, as documented in the Rental Agreement. The portion of housing costs assigned to the client/ tenant are not guaranteed to be paid to the landlord by the Housing Resource Center.

In certain cases, the Housing Stability Coach and their Supervisor may approve payment of a client's portion of rent to the landlord. These cases include:

- Sudden loss of income source
- Financial crisis
- Landlord retention in cases when a client vacates or is evicted from a unit

In either case, the incident and inability to pay must be clearly documented. In cases where income was diverted to resolve another crisis, the client must be able to document how funds were spent (i.e. through receipt of payment).

Housing Resource Center Supervisors will provide final approval for payment of client's portion of rent due.

Because clients are expected to provide proof of payment of rent within 5 days of the rent due date, Housing Resource Center staff are expected to identify nonpayment of rent within the first month of nonpayment. In cases where the client is expected to be unable to pay their portion of rent for the remainder of the Rental Agreement period, the Housing Stability Coach, Locator, and Supervisor should adjust the Rental Agreement so that the client is not in violation of their agreement. (For example: a client who suddenly loses their income source one month would be unable to pay the following two months, and so the Rental Agreement should be re-calculated to address this).

In general, payment of more than one month of client's rent portion at once (i.e. to prevent an eviction after multiple months of non-payment) is not allowable, as HRC staff should have identified non-payment issues within 5 days. In the case a Supervisor feels payment of multiple months of a client's portion is necessary, this request must be approved by the Your Way Home Program Manager.

5.19 Rapid Re-Housing Client Exit/ Termination

Rapid Re-Housing clients may be exited or terminated from the program for the following reasons listed below. *Note that all language in this policy related to timeframe for re-enrollment only applies to households whose SPDAT scores indicate RRH as a best practice housing intervention. For households who are in need of PSH, please reference the policy on [Rapid Re-Housing and Permanent Supportive Housing](#).*

1. Lack of eligibility or need for services.
 - a. During the RRH Introductory Period, in which a client is looking for a unit, they may lose eligibility if they are no longer literally homeless for a period of 5 days or more. In these instances, the client will be terminated from the program immediately. There is no timeframe following this discharge during which a client will be ineligible for re-enrollment.
 - b. Once housed, a client may no longer meet the income eligibility (below 30% AMI) or may no longer have a demonstrated need for the services provided by the program, according to the [Program Guidance](#) and [Policy](#) on Rapid Re-Housing Re-Certification. In these instances, the client will be exited at the close of the current 3 month period. These clients successfully exited off of the Rapid Re-Housing Program are eligible for re-enrollment should they recidivate to literal homelessness in the future.
2. Documented lack of compliance with the Program Agreement as outlined in the Rapid Re-Housing Program Agreement or Client Rights and Responsibilities. In order for a client to be terminated due to non-compliance with the Program Agreement (including no contact/ no show at meetings), the Housing Stability Coach must:
 - a. Have complete, accurate case note documentation and/or additional documentation as appropriate to document lack of compliance with the Program Agreement and/or Client Rights and Responsibilities.
 - b. Have provided 2 separate letters to client, and confirmed receipt of the letters to the client, informing the client that they have received a first and second "strike".

- c. Have met with the client and their Supervisor to discuss the reason for each “Strike,” and provided written documentation to the client as to what they need to do going forward to maintain their good standing in the program, following each meeting.

Upon the third documented strike, clients will be exited from the program immediately.

Clients terminated from Rapid Re-Housing due to non-compliance with the Program Agreement or Client Rights and Responsibilities are not eligible for re-enrollment for a period of 60 days from the program exit date.

3. Documented falsification of information regarding housing status, eligibility, and/or income. In this case, clients will not be eligible for re-enrollment in Rapid Re-Housing for a period of 60 days following the date of their discharge.
4. Client received the maximum amount of financial assistance available, 24 months within a 3 year span. All case management and financial assistance ends immediately at 24 months’ rental payment assistance within the past 3 years. Clients receiving the maximum assistance allowable are not eligible for re-enrollment for a period of three years from their first month of receiving rental assistance.

Providers should contact the Your Way Home Program Manager immediately if a household will remain enrolled in Rapid Rehousing for more than the allotted 24 months (such as those awaiting a Housing Choice Voucher). All households should be exited from Rapid Rehousing after receiving 24 months of assistance unless the provider receives written permission from the Your Way Home Program Manager.

5. Client is engaging in criminal activity directly related to domestic violence, dating violence, sexual assault, or stalking of another household member. In these instances, client will be immediately discharged from the program following Your Way Home Program Manager approval. Other household members who have been the victims of this criminal activity will continue receiving assistance as outlined in the policy on [tenant protections under VAWA](#). Clients terminated from Rapid Re-Housing due to criminal activity directly related to domestic violence, dating violence, sexual assault or stalking of another household member are not eligible for re-enrollment for a period of 60 days from the program exit date.
6. Verbal or physical assault of a staff person. Clients verbally threatening to cause imminent physical harm to a Your Way Home Montgomery County CoC staff person, or any client that physically harms a staff person, will be immediately discharged from the program following Your Way Home Program Manager approval. Clients terminated from Rapid Re-Housing due to verbal/ physical assault are not eligible for re-enrollment for a period of 60 days from the program exit date.
7. Client is living in other housing. Re-housed clients that begin living in housing other than the arranged unit (such as with family or friends) will be discharged immediately from the program. In this case, clients will not be eligible for re-enrollment in Rapid Re-Housing for a period of 60 days following the date of their discharge.
8. Client is committed to a public institution (jail, detox, etc.) voluntarily or involuntarily for a time period greater than 90 days. Once it has been confirmed by a medical or social service professional that the client will be remaining in a public institution for more than 90 days, the client will be discharged from the program immediately. These clients are eligible for re-enrollment should they recidivate to literal homelessness in the future.

9. Client declines three reasonable housing leads provided by the Housing Locator, so long as the housing leads meet the following conditions:
 - a. All three units are located in the district or neighboring district of client's choice and fit all other reasonable criteria as outlined in the signed Housing Search Planner.
 - b. Housing Locator has spoken directly with the Landlord(s).
 - c. Housing Locator has provided all three unit leads clearly to the client. Housing Locator has made every reasonable effort to connect client and landlord in order to fill the vacant unit.
 - d. Unit remains vacant and available to be filled. If another tenant leases the unit (participating or non-participating with YWH), this unit will not count as "rejected" by the client.

If a client rejects all three housing leads, client will be discharged immediately from the program. In this case, clients will not be eligible for re-enrollment in Rapid Re-Housing for a period of 60 days following the date of their discharge.

In all cases of clients exiting the program (voluntarily or involuntarily), the Housing Stability Coach must provide written communication to the both the client and the landlord. Housing Stability Coaches must also inform any other Your Way Home Montgomery County CoC partner case workers with whom the client is currently working. All clients must be provided a Housing Stability Plan for Exit and the Grievance Procedures.

5.20 Rapid Re-Housing Clients Committed to Institutions

Units for clients committed to institutions for a period of 90 days or less will be held for the client, so long as the client (or their case worker at the institution) maintains regular communication with the Housing Resource Center, defined as at least once every 30 days. If a client and/or their case worker do not maintain regular contact with the Housing Resource Center during the time in the institution, the Housing Stability Coach may discharge the client from the Rapid Re-Housing program, with Supervisor approval. In this instance, any current landlord Rental Agreement will be honored but case management services will end immediately.

Clients committed to institutions for longer than 90 days will be discharged from the program immediately.

5.21 Rapid Re-Housing Program Agreement and Client Rights and Responsibilities

The Rapid Re-Housing Program Agreement outlines the expectations for both clients and case managers. The Housing Stability Coach must read and explain every provision in the Program Agreement and Client Rights and Responsibilities to the client during the intake process prior to enrollment into the program. Rapid Re-Housing clients must agree to and comply with the Rapid Re-Housing Program Agreement in order to be or remain eligible for assistance.

Clients must be provided written notice if their standing in the program is in jeopardy. Any time a client is provided notice that their standing in the program is in jeopardy, they must be provided an opportunity to meet in-person with their Coach and Coach's Supervisor to discuss the issues. In all instances, clients must be provided clear, written guidance on how to improve their standing in program.

Clients receiving more than two notices (for two separate incidents/ issues) may be terminated from the Rapid Re-Housing program, so long as the Housing Stability Coach has done the following:

1. Ensured that the client understands the terms and expectations of the Program Agreement and Client Rights and Responsibilities. Efforts should be made to ensure that clients with high needs, such as

those with disabilities, limited English proficiency, or otherwise, are held to fair and reasonable standards based on their abilities.

2. Collected all documentation necessary to clearly demonstrate lack of compliance with the Program Agreement. This includes: documentation of missed meetings through case notes, correspondence from the landlord, correspondence from partner organizations of missed meetings, documentation on the Housing Stability Plan(s) of lack of follow through on action steps, or similar.
3. Provided written communication to the client notifying them that their standing in the program is in jeopardy as a result of not meeting Program Agreement expectations. Housing Stability Coaches must be able to provide proof that they ensured the client received all notices, offered the opportunity to meet with themselves and their Supervisor, and provided guidance on how to comply with the Program Agreement.
4. Received approval from their Supervisor to terminate the case.

When appropriate and reasonable, Housing Stability Coaches are encouraged to meet with clients for a final in-person meeting in order to discuss the reason for their termination and to develop a Housing Stability Plan for Exit.

In all cases, the Housing Stability Coach must provide/ send the client written documentation explaining the client's reason for termination, termination date, and remaining financial assistance. The Housing Stability Coach must also provide a written Housing Stability Plan for Exit. Finally, the Housing Stability Coach must provide a copy of the Grievance Procedures.

The Housing Stability Coach must send a letter to the landlord informing him/her of the last date of financial assistance.

The Housing Stability Coach must also contact any other current Your Way Home Montgomery County CoC partner agency case workers with whom the client is currently working to inform them of the client's exit date from the program.

5.22 Grievances with Rapid Re-Housing Termination

Any household exited from the Your Way Home Montgomery County CoC Rapid Re-Housing program may appeal this decision by writing to the Your Way Home Program Manager within 10 business days of receiving notice of their termination from the Rapid Re-Housing program. The Your Way Home Program Manager will review the case and make a final determination on whether to reinstate the client into the Rapid Re-Housing program or to confirm the termination. When reviewing appeal cases, the Your Way Home Program Manager will assess whether the reason for termination is consistent with termination policies and procedures, and whether the documentation supporting the termination meets the standards outlined in the Rapid Re-Housing Program Agreement policy. The Your Way Home Program Manager will inform the client and the Housing Resource Center of the decision within 10 business days of receiving the household's written appeal.

5.23 Eligible Uses For Rapid Re-Housing Funding

YWH Montgomery County COC Rapid Re-Housing funding may be used to provide the following for clients enrolled in the Rapid Re-Housing program. HRC Supervisors must also reference the Invoicing and Eligible Costs Checklist Form to ensure invoicing compliance.

Rapid Re-Housing Direct Client Subsidies:

- Financial Assistance (Move-in costs)

- Rental Application Fees (When charged by owner to all applicants)
- Security Deposits
- Last Month's Rent
- Utility Deposits (When required by utility company for all customers)
- Utility Payments (Up to 24 months per household, per service (gas, electric, water/sewage), including up to 6 months of arrearages per service)
- Moving Costs (Cost of truck rental, moving company, up to 3 months of storage)
- Rental Assistance
 - Short-term rental assistance (0-3 months)
 - Medium-term rental assistance (4-24 months)

Additional Requirements

- Assistance cannot be provided to a program participant that is receiving Tenant-Based Rental Assistance or living in a unit receiving Project-Based Rental Assistance or operating assistance through other public sources.
- Utility assistance should only be provided when other utility assistance programs are not available

5.24 Your Way Home Initiative Fund Eligible Use Policy

The Your Way Home Montgomery County CoC public-private partnership maintains a Your Way Home Initiative Fund at the Montgomery County Foundation, Inc. for philanthropic grants and donations contributed to the cause of ending and preventing homelessness in Montgomery County. Resources permitting, the Your Way Home Initiative Fund provides flexible funding for Your Way Home Montgomery County CoC providers to quickly and effectively help families and individuals exit from homelessness to permanent housing with stability, divert a household from needing to utilize emergency shelter, or to prevent a household from becoming homeless in the first place. Using a progressive engagement approach, Your Way Home Montgomery County CoC service providers offer only those resources necessary to help clients succeed and only after all public and community resources have been exhausted.

Your Way Home Montgomery County CoC providers should make every reasonable effort to procure items at low prices to conserve the limited private dollars available through the generosity of grant makers and individual donors to the Fund.

Your Way Home Initiative Fund eligible uses include the following:

- Birth certificate or ID replacement costs
- Car repair/car insurance
- Job training program costs (fees, uniforms and equipment)
- Child care/day care services
- Extermination (if not paid for by public dollars or lease agreement)
- Food gift cards
- GED and College Entrance testing costs
- Motel/hotel stay per Your Way Home [hotel policy](#)

- Renters insurance
- School uniforms and books
- Transportation costs for housing, health, child care, employment and job training appointments (bus tokens, train passes, taxi rides, etc.)
- Bedroom Items (Beds, bedbug mattress protectors, pillows, blankets, sheets, etc.)
- Kitchen Items (Kitchen/cooking items, food staples, etc.)
- Living Room Items (Furniture, fans, AC Units – medical need only, etc.)
- Home Maintenance Items (Vacuums, cleaning supplies, etc.)
- Personal Care Items (Towels, bathroom items, personal hygiene, etc.)
- Landlord mitigation for damage beyond security deposit
- Landlord signing bonuses for leasing to Your Way Home Montgomery County CoC clients
- Landlord mitigation payments for back rent owed by a previous Your Way Home client
- Landlord engagement events
- Holding costs to hold a vacant unit (e.g., while it is being inspected)
- Assistance with Landlord Legal Fees

It is the responsibility of the Your Way Home Montgomery County CoC providers to budget and manage all funds awarded through the Your Way Home Initiative Fund.

5.25 Lease Violations by a Your Way Home Montgomery County CoC Rapid Re-Housing Client Policy

In the instances when a Rapid Re-Housing tenant is violating the terms of their lease, specifically when they are allowing non-leased residents to reside in the apartment being subsidized by a Rapid Re-Housing subsidy, the Housing Resource Center must review specific provisions in the lease regarding the allowance of subleasing or guests. There must be provisions in the lease against subletting or long-term guests in order for the landlord to evict a tenant. Neither the landlord nor the HRC have the ability to directly evict a subtenant or guest. Furthermore, Your Way Home Montgomery County CoC staff may not discuss tenancy directly with the subtenant or guest. The landlord is responsible for properly evicting a tenant for violation of the lease through legal measures, if they choose to do so. Your Way Home Montgomery County CoC may only take programmatic action against the tenant per YWH Montgomery County COC policies if it is determined that the tenant is in violation of their lease.

5.26 Prohibition Against Involuntary Family Separation

Housing Resource Centers are prohibited from denying housing children with their custodial parent due to the age or gender of a child under the age of 18. Housing Resource Centers are required to reasonably accommodate all members of a family experiencing homelessness as defined by that family and not deny enrollment or housing of any custodial parent or dependent child.

5.27 Tenant Protections under Violence Against Women Act (VAWA) for Rapid Re-Housing Clients

A Rapid Re-Housing Client may not be denied assistance, terminated from participation, or be evicted from rental housing because of victimization of domestic violence, dating violence, sexual assault, or stalking. Additionally, a Rapid Re-Housing client who is experiencing or has experienced domestic violence, dating

violence, sexual assault, or stalking by a household member or guest of the household may not be denied assistance from the Rapid Re-Housing program solely on the basis of criminal activity directly related to that domestic violence, dating violence, sexual assault, or stalking. Victims receiving Rapid Re-Housing assistance may request a transfer as outlined on the policy of [emergency transfer for victims](#).

In the event of a Rapid Re-Housing client who is engaging in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking (i.e., the abuser or perpetrator), the Housing Resource Center may work with the landlord to divide (bifurcate) the lease and/or immediately terminate the Rapid Re-Housing assistance of the individual who has engaged in this criminal activity as outlined in [Section 4 of the Rapid Re-Housing Client Exit/Termination Policy](#). In these instances, the Housing Resource Center may not take away the rights of eligible Rapid Re-Housing clients in the unit or otherwise punish the remaining tenants. Any and all other eligible household members will still remain in the Rapid Re-Housing program and, as mentioned above, these clients may request a transfer as outlined on the policy of [emergency transfer for victims](#).

5.28 Your Way Home Montgomery County CoC Landlord Engagement Policy

Your Way Home Montgomery County CoC Housing Resource Centers should cultivate new and existing landlords and property managers on a regular basis to ensure the availability of appropriate rental units throughout their service area. Units should not be concentrated in one municipality or neighborhood.

Your Way Home Montgomery County CoC Housing Locators work with landlords and property managers to match Rapid Re-Housing clients with appropriate rental units as quickly as possible. Your Way Home Montgomery County CoC Housing Resource Centers can access philanthropic dollars from the Your Way Home Montgomery County CoC Initiative Fund as available to incentivize landlords and property managers to lease units to Your Way Home Montgomery County CoC clients, or to help retain landlords who have experienced property damage or unpaid rent.

Housing Locators should approach landlords and property managers with the Your Way Home Montgomery County CoC Landlord Engagement Agreement, once it has been agreed upon that a landlord/property manager will be receiving an incentive payment or mitigation payment. Payments should be issued to a landlord or property manager in check form only after actual leases have been signed or after mitigation amounts have been negotiated (e.g., providing reasonable estimates for damages, providing proof of damages, providing proof of unpaid rent, etc.).

To engage landlord and property managers, Housing Resource Centers are expected to:

1. Continuously, actively engage, recruit, and find new landlords willing to work with Your Way Home program. HRCs should help plan and host a dedicated landlord event every year. HRCs are expected to work together to schedule, plan, and promote this event. Expenses for this event can be paid for out of the Your Way Home Initiative Fund.
2. Provide landlords and property managers with one telephone number (per Housing Resource Center) for any questions or concerns about the program or a specific client.
3. Be accessible and responsive to landlords and property managers via email, phone, postal mail, etc.; generally defined as responding within two business days.
4. If an issue arises between a Your Way Home Montgomery County CoC tenant, such as unpaid rent or a lease violation, connect Your Way Home Montgomery County CoC landlords, property managers and clients with neutral mediation services through the Department of Housing and Community Development's

legal services contracted provider or another nonprofit legal aid provider to avoid a costly and time consuming eviction.

5.29 Your Way Home Montgomery County CoC Landlord Client Information Policy

Your Way Home Montgomery County CoC Housing Resource Centers should help landlords and property managers to understand that families and individuals exiting from homelessness have needs and goals related to achieving housing stability, health and economic security that may change over time. Patience, flexibility and honest communications are critical to helping them succeed.

Housing Locators should communicate the following information to landlords and property managers as frequently as needed and appropriate while following the strictest protocols of client confidentiality required by policy and law:

1. Prior to referring tenants to landlords or property managers, Housing Resource Centers have assessed clients using a standard tool to identify Rapid Re-Housing as the appropriate solution to their housing crisis. Coaches have worked with clients directly to create Housing Stability Plans that include goals for housing, health and economic security related to their specific barriers to housing stability.
2. With the client's permission, Housing Locators will communicate with the landlord or property manager describing in broad terms specific barriers to housing stability identified through the assessment process and steps being taken to address them in the Housing Stability Plan.
3. Every three months that a tenant remains a client of the Your Way Home Montgomery County CoC Rapid Re-Housing program, the Housing Locator will send the landlord or property manager a letter informing them of the client's current progress towards their Housing Stability Plan, their subsidy amount and their projected timeline for program exit.
4. In the event that a client is terminated from the Your Way Home Montgomery County CoC program prematurely, Housing Locators will still be available to landlords and property managers to address their issues or concerns as per the Your Way Home Montgomery County CoC Landlord Engagement Policy.

5.30 Financial Assistance Move-In Costs for Your Way Home Montgomery County CoC Clients

Your Way Home Montgomery County CoC Housing Resource Centers may provide First Month, Last Month, and Security Deposit (equal to one month's rent) *only* for move-in costs. While there is no dollar limit on the amount of assistance a client may receive related to move-in costs (unless specified by a grant), case managers are required to follow the principles of progressive engagement to provide the least amount of resources necessary to move the client out of homelessness and into permanent housing. This may include: requiring a client contribution, partnering with other local organizations to combine payments, and helping clients establish payment plans.

Double security deposits while also paying last month rent at move-in are not allowable. Housing Locators may use the Landlord Engagement Fund and/or educate a Landlord regarding mitigation, but are not allowed to approve any payment related to an increase cost in rent or security deposit. Housing Locators, Housing Stability Coaches and Housing Resource Center Supervisors are expected to work closely with [the Housing Equality Center](#) of Pennsylvania in order to fully understand policies & law related to promoting Fair Housing.

5.31. Maximum Landlord Mitigation Policies and Payments

If a Your Way Home tenant leaves a unit with damages that are likely to slightly exceed the amount of the Security Deposit, the owner shall be eligible for an Express payment of up to \$200 with submission of a written

request, a photograph of the damage, and financial documentation to support the request for costs above the security deposit, such as a written quote of the work to be done or receipts of the repairs. The Housing Resource Center Supervisor will provide the YWH Program Manager with the landlord's written request, photographs of the damage, and financial documentation to support the request for costs above the security deposit. Once approved, the HRC will submit payment to the landlord.

Mitigation payments may cover damages during or after eviction proceedings. The Your Way Home Program Manager will approve Mitigation Payments in excess of \$200. NOTE that mitigation does not cover lost rent due to non-payment by the client.

5.32 Emergency Transfer for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Your Way Home Montgomery County CoC is concerned about the safety of its households, 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), Your Way Home Montgomery County CoC allows Rapid Re-Housing clients 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. The ability of Your Way Home Montgomery County CoC to honor such request for Rapid Re-Housing clients 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 Your Way Home Montgomery County CoC has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

A Rapid Re-Housing client 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 client reasonably believes that there is a threat of imminent harm from further violence if the client remains within the same unit, and/or
- The client was a victim of sexual assault occurring on the premises within 90 calendar days preceding a verbal request for emergency transfer.

If a client wishes to request an emergency transfer, they must do so via a written request to the Housing Resource Center supervisor. The Housing Resource Center will provide reasonable accommodations to this policy for individuals with disabilities. The client's written request for emergency transfer must include either:

- A statement expressing that the client reasonably believes that there is a threat of imminent harm of further violence if the client were to remain in the same unit OR
- A statement that the client was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the client's request for an emergency transfer.

Your Way Home Montgomery County CoC will keep confidential any information that the client submits in requesting an emergency transfer. This information will not be uploaded into Clarity. All further notes will be marked as private and all data and information being put into HMIS will follow the policy on entering [non-identified information](#).

The Housing Resource Center will act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit.

If a client reasonably believes a proposed transfer would not be safe, the client may request a transfer to a different unit in writing.

Additionally, the Housing Resource Center must provide these clients with the contact information to the local organizations that assist victims (including, but not limited to, Laurel House and The Women's Center of Montgomery County). Clients who are or who have been victims of domestic violence are urged to take all reasonable precautions to be safe and to work with Laurel House domestic violence shelter for assistance in creating a safety plan.

People who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233 (for persons with hearing impairments, 1-800-787-3224).

People 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>.

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

6. Permanent Supportive Housing Policies

6.1 Permanent Supportive Housing Eligibility Requirements

At least one adult program participant per household must meet the following program eligibility requirements:

- a. 18 years old or older
- b. Literally Homeless
- c. Disabling condition

6.2 Engagement & Intake into Permanent Supportive Housing

PSH Programs are required to offer program entry to the priority individual or family (aka “household”), unless the program can demonstrate:

- a. All program beds are full.
- b. The household does not meet the eligibility requirements outlined in this policy.
- c. The household does not meet the eligibility requirements specified in any such grant agreement for the program, for example;
 - a. Composition of the household provided such denial does not violate HUD’s Fair Housing and Equal Opportunity requirements (Singles-Only programs can disqualify households with children; Families-Only programs can disqualify single households, etc.)
 - b. If the program identifies in its grant agreement to serve a specific sub-population, then the program may disqualify referrals for households that cannot document this eligibility.
- d. The household does not meet the eligibility requirements identified in any such regulations governing the program funding source(s) (e.g. The HEARTH Act for HUD CoC funded programs).
- e. A member of the household is a registered sex offender and/or has been convicted of methamphetamine manufacturing.
- f. If the candidate has a documented history of violence with the organization within the past 2 years.
- g. If the candidate is currently in litigation against the organization.

Programs may not disqualify an individual or family from program entry for lack of income or employment status.

Programs cannot disqualify an individual or family because of evictions or poor rental history.

The program explains the services that are available and encourages each adult household member to participate in program services, but does not make service usage a requirement or the denial of services a reason for disqualification or eviction.

The program will maintain Release of Information, Case notes, and all pertinent demographic and identifying data in HMIS. Paper files can also be kept as long as they are stored in a secure location.

6.3 Documentation Requirements: Existence and Duration of Homeless Episodes

For the purposes of this policy document, and prioritization for PSH beds, the term “homeless” and “homelessness” shall refer only to HUD’s definition for Category 1 – Literally Homeless.

A household's history of homelessness can only be used to prioritize the household to the extent that the history is documented.

For all homeless documentation requirements, Your Way Home Montgomery County CoC's order of priority for obtaining documentation is:

1. third-party documentation,
2. intake/referral worker observations, and
3. certification from the person seeking assistance (aka "self-certification").

Records contained in Clarity HS, Your Way Home Montgomery County CoC's shared HMIS, are acceptable evidence of third-party documentation and intake/referral worker observations. Clarity HS meets the HUD requirement of maintaining an audit trail for this purpose.

Other examples of acceptable third-party documentation or intake/referral worker observation of homelessness include, but are not limited to:

1. Shelter stays – Letters written by shelter staff on the agency's letterhead detailing the name(s) of the individual or family and the beginning and end dates of the shelter stay(s).
2. Places not meant for human habitation – Letters written by Homeless Outreach staff written on the agency's letterhead; Police Reports; etc.

Where third-party evidence or intake/referral worker observation could not be obtained, the intake/referral worker must obtain a certification from the individual or head of household seeking assistance, and must document efforts made to secure more preferred evidence.

In general, self-certification can only be used to document up to three months of homelessness and can only be used for one episode of homelessness. In only rare and the most extreme cases, the YWH Program Manager and/or the Community Housing Coordinator at its discretion may allow a self-certification for longer periods. The referral worker is required to document the severity of the situation in which the individual or head of household has been living. An example of where this might occur is where an individual has been homeless and living in a place not meant for human habitation in a secluded area and has not had any contact with anyone during that entire period.

A break between homeless episodes is considered at least seven or more consecutive nights not residing in a shelter, safe haven, or place not meant for human habitation.

A single encounter with a homeless service provider on a single day within 1 month that is documented through third-party documentation is sufficient to consider an individual or family as homeless for the entire month unless there is any evidence that the household has had a break in homeless status during that month (e.g., evidence in HMIS of a stay in transitional housing).

For individuals currently residing in an institution, acceptable evidence must include that described in section (a) AND (b) below:

(a) Either :

- a. Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in

the institution that demonstrate the person resided there for less than 90 days. All oral statements must be recorded by the intake worker; or

- b. Where the evidence above is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence and a certification by the individual seeking assistance that states that they are exiting or have just exited an institution where they resided for less than 90 days; and

(b) AND: Evidence that the individual was homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entry into the institutional care facility.

6.4 Documentation Requirements: Evidence of a Disabling Condition

All candidates for PSH must provide evidence of a disability. Evidence of this criterion must include one of the following:

- (a) Written verification of the disabling condition from a professional licensed by the state to diagnose and treat the condition. Acceptable formats include (but are not limited to) the following:
 - a. The PA Department of Public Welfare Employability Assessment form. If the form indicates temporary disability, follow-up documentation may be needed.
 - b. Your Way Home Montgomery County CoC PSH Certification of Qualifying Condition form.
- (b) Written verification from the Social Security Administration;
- (c) Copies of a disability check (e.g., Social Security Disability Insurance check or Veterans Disability Compensation);
- (d) Intake staff (or referral staff) observation that is confirmed by written verification of the condition from a professional licensed by the state to diagnose and treat the condition that is confirmed no later than 45 days of the application for assistance and accompanied with one of the types of evidence above; or
- (e) Other documentation approved by HUD.

Please note the following:

- (a) Any documentation that includes medical information should not be uploaded to the person's Clarity HMIS file. Otherwise, in general, all referral "paperwork" should be uploaded.
- (b) Some programs may have agreed to serve specific sub-populations as part of their grant agreements (for example: Serious Mental Illness, HIV/AIDS, etc.). Providing documentation that indicates the nature of the disabling condition (ex: a diagnosis) may increase PSH options for the person.

6.5 PSH Termination Policy

Households who receive services and subsidies through Permanent Supportive Housing are the recipients of this program due to their documented vulnerability, as outlined by the SPDAT, and disability. Therefore, PSH is committed to empowering families and individuals to maintain permanent housing. As a result, in most cases PSH providers (both supportive services and administrative) are expected to utilize progressive engagement strategies with the tenants in order to avoid evictions, lease violations, or other barriers that may cause someone with such high vulnerability to lose their housing.

Examples of situations that can lead to program termination include, but may not be limited to, the following:

- Three documented lease violations within 6 months;
- Property damage, back rent, or back utility in excess of \$500;
- Being required to move more than two times while on program due to a landlord refusing to renew a lease;
- Eviction while on the program;
- A head of household being absent from the unit for more than three months;
- Any household member or guest committing fraud, bribery or any other corrupt or criminal act in connection with the program.

PSH providers are expected to document problems in case notes and to communicate the concerns and possible consequences to households in writing. PSH providers are expected to consider the role disability may play in problematic behaviors and to allow Reasonable Accommodation if appropriate. For example, if a household has fallen significantly behind in rent and/or utilities, it may be appropriate to continue the household's eligibility if they are willing to cooperate with a Representative Payee service. In all instances, it is expected that PSH providers collaborate closely with the household's natural supports and/or supportive services to resolve problems prior to termination from the program.

However, under certain conditions, it may be appropriate for a PSH provider to immediately terminate a household from the PSH program (services or subsidy) without arranging appropriate housing:

- A client/ head of household engages in drug manufacturing, drug distribution, or violent criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises;
- A client/ head of household threatens to imminently harm a staff person.

In all cases, the PSH provider must document the event in case notes. It is expected that the PSH provider will contact local police or obtain police documentation citing the incident, as these cases involve criminal acts.

6.6 PSH Grievance Policy

Any household exited from a Permanent Supportive Housing program or wishing to transfer PSH providers may file a grievance by writing to the Your Way Home Program Manager. Grievances related to discharge from a PSH rental subsidy must submit their appeal within 10 business days of exit from the program. Complaints related to quality of service by the PSH provider should first be directed to the provider's management, but otherwise may be submitted to the Your Way Home Program Manager at any time. The Your Way Home Program Manager will review the grievance or complaint and make a final determination on whether to reinstate the client into the Permanent Supportive Housing Program or to grant a transfer of PSH provider. When reviewing appeal cases or provider complaints, the Your Way Home Program Manager will assess whether the PSH services provided is consistent with Your Way Home Montgomery County CoC policies and procedures, and whether the documentation of PSH case work reflects the use of progressive engagement strategies and trauma-informed care. The Your Way Home Program Manager will inform the client and the PSH provider of the decision within 30 business days of receiving the household's written appeal.

6.7 PSH Policy Definitions

Break in homelessness - a break is considered at least seven or more consecutive nights not residing in a shelter, safe haven, or place not meant for human habitation.

Chronically Homeless

- (1) A “homeless individual with a disability,” ...who:
 - (i) lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - (ii) Has been homeless and living as described in paragraph (1)(i) continuously for at least 12 months or on at least four 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 in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;
- (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 of the criteria in paragraph (1) of this definition, before entering the facility;
- (3) 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 in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless. (24 CFR 578)

Developmental Disability – means, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002): (1) A severe, chronic disability of an individual that— (i) is attributable to a mental or physical impairment or combination of mental and physical impairments; (ii) is manifested before the individual attains age 22; (iii) is likely to continue indefinitely; (iv) results in substantial functional limitations in three or more of the following areas of major life activity: (A) self-care; (B) receptive and expressive language; (C) learning; (D) mobility; (E) self-direction; (F) capacity for independent living; (G) economic self-sufficiency. (v) reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated. (2) An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1)(i) through (v) of the definition of “developmental disability” in this section if the individual, without services and supports, has a high probability of meeting these criteria later in life. (24 CFR 578.3)

Disabling Condition – (1) A condition that: (i) is expected to be long-continuing or of indefinite duration; (ii) substantially impedes the individual’s ability to live independently; (iii) could be improved by the provision of more suitable housing conditions; and (iv) is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury; or (2) A developmental disability, as defined at 42 U.S.C. 15002; or (3) The disease of Acquired Immunodeficiency Syndrome (AIDS) or any conditions arising from the etiologic agent for Acquired Immunodeficiency Syndrome, including infection with the Human Immunodeficiency Virus (HIV). (24 CFR 583.5.)

Federal Definition of Serious Mental Illness - Adults with a serious mental illness are persons:

1. age 18 and over,

2. who currently or at any time during the past year,
3. have a diagnosable mental, behavioral, or emotional disorder of sufficient duration to meet diagnostic criteria specified within the Diagnostic and Statistical Manual of Mental Disorders (DSM)-III-R,
4. that has resulted in functional impairment which substantially interferes with or limits one or more major life activities.

These disorders include any mental disorders (including those of biological etiology) listed in DSM-III-R or their ICD-9-CM equivalent (and subsequent revisions), with the exception of DSM-III-R “V” codes, substance use disorders, and developmental disorders, which are excluded unless they co-occur with other diagnosable serious mental illness. All of these disorders have episodic, recurrent, or persistent features; however, they vary in terms of severity or disabling effects.

Functional impairment is defined as difficulties that substantially interfere with or limit role functioning in one or more major life activities including basic daily living skills (e.g., eating, bathing, dressing); instrumental living skills (e.g., maintaining a household, managing money, getting around the community, taking prescribed medication); and functioning in social, family, and vocational/educational contexts. Adults who would have met functional impairment criteria during the referenced year without benefit of treatment or other support services are considered to have serious mental illnesses.

Literally Homeless (HUD Category 1) – An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

1. Has 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;
2. Is 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 government programs for low- income individuals);
or
3. 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;

Permanent Supportive Housing projects funded through HUD’s Continuum of Care Competition have the following additional requirements

1. Individuals and Families coming from Transition Housing must have originally come from the streets or emergency shelter;
2. One of the heads of household must also have a disability.

Permanent Supportive Housing – means community-based housing without a designated length of stay, and includes both permanent supportive housing and Rapid Re-Housing. To be permanent housing, the program participant must be the tenant on a lease 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. Permanent supportive housing means permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently. (24 CFR 578.3)

6.8 PSH Engagement for Priority Populations

Your Way Home Montgomery County CoC does not expect recipients of dedicated or prioritized PSH providers to hold vacant beds open indefinitely while waiting to locate chronically homeless persons with the longest histories of homelessness and most severe service needs. Recipients are only expected to exercise due diligence and should document the efforts they have undertaken to locate and engage persons that would be considered the highest priority. It is expected that these efforts will be executed in collaboration with the household's current supports (e.g., street outreach, emergency shelter, or other case management supports) as well as the Your Way Home Program Manager and Community Housing Coordinator.

It is the expectation that a PSH priority household accept at least one out of three unit options provided, so long as all options meet the client's location requirements for work or support services, budget, and accessibility needs. If a priority household rejects all 3 appropriate housing leads, the PSH provider may move on to the next priority referral.

6.9 PSH and Housing First

Providers of permanent supportive housing shall use the Housing First model, meaning that housing is not contingent on compliance with services. Participants are provided with a standard one year lease agreement. Participants are offered and provided with services and supports to help maintain housing and prevent eviction. Participants are not required to participate in services but providers are required to persistently and consistently seek to engage participants. Providers are encouraged to support staff in implementing evidence-informed practices that support Housing First, such as Critical Time Intervention.

7. Homelessness Prevention Policies

The following policies should be applied to the delivery of services for all PA-504 Your Way Home Continuum of Care homeless prevention programming including but not limited to the Emergency Rent and Utilities Coalition (ERUC) and the Eviction Prevention and Intervention Coalition (EPIC).

7.1 Attorney Insurance

All attorneys are required to maintain and provide proof of malpractice insurance prior to providing services for EPIC. Montgomery Bar Association maintains the right to review the insurance policy of any attorneys volunteering with EPIC.

7.2 Landlord-Tenant Law Training

All attorneys and paralegals are required to attend training on Landlord-Tenant law and the EPIC program policies and procedures as determined by the Montgomery County Office of Housing and Community Development/ the Montgomery Bar Association prior to rendering their services to EPIC. Volunteers may be required to attend re-fresher training if more than a year has passed since their training date, or as otherwise required by the Montgomery County Office of Housing/ Montgomery Bar Association, to participate in EPIC.

7.3 Limited Representation

Legal representation provided to clients through the EPIC program is considered limited representation. All clients must sign a waiver for ongoing representation prior to receiving legal services from EPIC.

In the event of a continuance of a case, the tenant will request the continuance from the Judge. While efforts will be made to provide pro bono representation through EPIC on the day the hearing is scheduled, there is no guarantee that this program will provide pro bono representation in the event of a continuance (for example, if volunteers are not available).

7.4 Homelessness Prevention Eligibility for New Clients

In order to be eligible as a new client for Homeless Prevention (HP), households must be able to provide documentation of the following:

Homeless Status: households must meet one of the following definition of homeless status, and HP providers must obtain the Recordkeeping Requirements listed below and maintain in the client's file:

- *At Imminent Risk of Homelessness:* 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.
- *Homeless Under Other Federal Statutes:* Unaccompanied youth under 25 years of age, or families with 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, or occupancy agreement 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 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.
- *Fleeing or Attempting to Flee Domestic Violence, Dating Violence or Stalking:* Any individual or family who is fleeing or attempting to flee domestic violence, has no other residence, and lacks the resources or support networks to obtain other permanent housing, and live in an emergency shelter or other place described in Category 1 of the homeless definition.

Recordkeeping requirements:

For At Imminent Risk of Homelessness:

- A court order resulting from an eviction action notifying the individual or family that they must leave; or
- For individuals or families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
- A documented and verified oral statement; and
- Certification that no subsequent resident has been identified; and
- Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing

For Homeless Under Other Federal Statutes:

- Certification by the non-profit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and
- Certification of no PH in last 60 days; and
- Certification by the individual or head of household, and any available supporting documentation, that they have moved two or more times in the last 60 days; and
- Documentation of special needs or 2 or more barriers.

For Fleeing or Attempting to Flee Domestic Violence, Dating Violence or Stalking:

- An oral statement by the individual or head of household seeking assistance which states they are fleeing, they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by an intake worker.

Additionally, households must be at or below 30% Area Median Income. Income documentation must be collected.

All eligibility documentation must be maintained in the client's file.

7.5 Eligible Uses for Homeless Prevention Funding

YWH Montgomery County COC Homeless Prevention funding may be used to provide the following for clients enrolled in Homeless Prevention programs. HP providers must also reference the Invoicing and Eligible Costs Checklist Form to ensure invoicing compliance.

Homeless Prevention Direct Client Subsidies:

- Financial Assistance (Move-in costs)
 - Rental Application Fees (When charged by owner to all applicants)
 - Security Deposits
 - Last Month's Rent
 - Utility Deposits (When required by utility company for all customers)
 - Utility Payments (Up to 24 months per household, per service (gas, electric, water/sewage), including up to 6 months of arrearages per service)
 - Moving Costs (Cost of truck rental, moving company, up to 3 months of storage)
- Rental Assistance
 - One-Time Rental Arrearage assistance of up to 6 months' worth of rent, which can include late fees and court fees
 - Short-term rental assistance (0-3 months)
 - Medium-term rental assistance (4-24 months)

Additional Requirements

- Short or Medium Term Rental assistance cannot be provided to a program participant that is receiving Tenant-Based Rental Assistance or living in a unit receiving Project-Based Rental Assistance or operating assistance through other public sources.
- Utility assistance should only be provided when other utility assistance programs are not available

Distribution of assistance is provided following an assessment of client need, ability to maintain the unit after assistance is provided, and available funding. Financial assistance is not guaranteed in any amount to any client. Homelessness Prevention programs reserve the right to refuse financial assistance to clients based on a client's assets or financial ability to pay, a client's inability to maintain the rent even after arrearages are paid, or if funding is not available.

Financial assistance will only be paid directly to the approved vendor (i.e. landlord), and will not be paid directly to a client. Households must have a written lease in order to receive rental assistance or financial assistance.

Records of financial assistance must be maintained in compliance with all funding requirements as outlined by the Montgomery County Foundation and/or the Montgomery County Office of Housing and Community Development.

The program participant's income must be verified prior to approval for initial and additional financial assistance. Documentation of the participant's income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in the client's file.

Households are eligible to receive assistance with Rental Application fees only if these fees are charged by the owner to all applicants.

Households are eligible to receive Security Deposit financial assistance equal to no more than two months' rent. Households are eligible to receive Last Month's Rent financial assistance paid to the owner of housing at the time security deposit is paid if necessary to obtain housing.

7.6 Housing Stability Case Management & Planning in Homeless Prevention

All Housing Stability Coaches must meet in person monthly, at a minimum, with enrolled HP households, particularly for any HP household receiving ongoing Rental Assistance. All Housing Stability Coaches must complete a Housing Stability Plan with every client at least once every three months, or more frequently as needed. The Housing Stability Plan must clearly outline the action steps of both the Coach and the client, the due dates for each task, and the required documentation or follow-up for each task. Every Housing Stability Plan must be signed by the Coach and the client. A copy of every Housing Stability Plan must be given to the client and a copy must be retained in the clients' file.

Housing Stability Coaches should use the results of the SPDAT, the client's existing housing or case plan at the shelter, and any other relevant information to develop Housing Stability Plans. It is expected that each Housing Stability Plan will identify multiple areas/ domains for action (such as Housing, Health, Public Benefits). The number of tasks included on the Housing Stability Plan should be consistent with the client's abilities.

Housing Stability Coaches must document the results of each Housing Stability Plan, including client's follow-through with tasks and completion of tasks by the assigned deadlines. The results of the Housing Stability Plan must be shared with the client, so the client is able to see their own progress on the plan, and is aware of any missed items or tasks. All follow-up documentation must be retained in the client's file.

7.7 Determining Rent Reasonableness and Fair Market Rent

Homeless Prevention programs providing financial assistance and/or ongoing rental assistance must develop and implement standards which ensure a mechanism for determining that the actual rental costs of units assisted are in compliance with HUD's Fair Market Rent, as provided under 24 CFR part 888 and complies with HUD's standard of "rent reasonableness" as established under 24 CFR 982.507. Rent Reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units. See HUD's worksheet on [rent reasonableness](#) and [Fair Market Rent Documentation System](#).

HP programs are responsible for determining what documentation is required in order to ensure that the rent reasonableness standard is met for a particular unit. HP programs should determine rent reasonableness by considering the gross rent of the unit and the location, quality, size, type, and age of the unit, and any amenities, maintenance, and utilities to be provided by the owner.

To calculate the gross rent for purposes of determining whether it meets the rent reasonableness standard, consider the entire housing cost: rent plus the cost of any utilities that must, according to the lease, be the

responsibility of the tenant. Utility costs may include gas, electric, water, sewer, and trash. However, telephone, cable or satellite television service and internet service should be excluded. The gross rent also does not include pet fees or late fees that the program participant may accrue for failing to pay the rent by the due date established in the lease.

Comparable rents can be checked by using a market study of rents charged for units of different sizes in different locations or by reviewing advertisements for comparable rental units. For example, a program participant's case file might include the unit's rent and description, a printout of three comparable units' rents, and evidence that these comparison units shared the same features (location, size, amenities, quality, etc.). The Your Way Home Rent Reasonableness Form is also available for this use. Another acceptable method of documentation is written verification signed by the property owner or management company, on letterhead, affirming that the rent for the unit assisted with Rental Assistance funds is comparable to current rents charged for similar unassisted units managed by the same owner.

7.8 Units Paid for with Financial Assistance and/or Rental Assistance

Rental units paid for with HP Financial Assistance (move-in costs) and/or ongoing Rental Assistance must:

- Comply with Fair Market Rent limits as calculated in 24 CFR §982.503.
- Comply with Rent Reasonableness requirements outlined in 24 CFR §982.507.
- Comply with Minimum Habitability Standards, including lead-based paint requirements.
- Have a Rental Assistance Agreement with specific lease stipulations between the HP agency and the landlord.
- Have a legally binding, written lease agreement between tenant and landlord. CoC funds require a one year lease minimum.
- The unit must not be paid for with other subsidies of the same type.
- The building/property/unit must be free of tax liens. NOTE: This is not a federal regulation. If an HP program would like to request a waiver or accommodation on this requirement, they may contact the Your Way Home Program Manager.

If the aforementioned criteria are met, then financial assistance and/or rental assistance are an allowable expenditure of federal Financial Assistance or Rental Assistance funds for persons meeting HP program client eligibility requirements. Assistance may be provided for apartments, rental houses, rented rooms in houses, etc.

Glossary

Programmatic Definitions

Category 1 Homeless:

An individual who belongs to one of the following categories:

- An individual who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - An individual 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;
 - An individual 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 government programs for low-income individuals);
 - 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

Category 2 Homeless

- An individual who will imminently lose their primary nighttime residence, provided that:
 - The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance
 - No subsequent residence has been identified; and
 - The individual lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

Category 4 Homeless

- Any individual who:
 - Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual that has either taken place within the individual's primary nighttime residence or has made the individual afraid to return to their primary nighttime residence;
 - Has no other residence; and
 - Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing

Continuum of Care (CoC)

A community plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximize self-sufficiency. It includes action steps to end homelessness and prevent a return to homelessness.”

Coordinated Entry System (CES)

CES is a regionally based system that connects new and existing programs into a “no wrong-door network” by assessing the needs of individuals/ families/youth experiencing homelessness and linking them with the most appropriate housing and services to end their homelessness.

Emergency Shelter (ES)

Any facility whose primary purpose is to provide temporary shelter for homeless in general or for specific populations of the homeless.

Homeless Prevention

Activities or programs designed to prevent the incidence of homelessness, including, but not limited to:

- Short-term subsidies to defray rent and utility arrearages for families that have received eviction or utility termination notices;
- Security deposits or first month's rent to permit a homeless family to move into its own apartment;
- Mediation programs for landlord-tenant disputes;
- Legal services programs that enable representation of indigent tenants in eviction proceedings;
- Payments to prevent foreclosure on a home; and
- Other innovative programs and activities designed to prevent the incidence of homelessness.
- Permanent Supportive Housing (PSH) – Long-term, community-based housing that has supportive services for homeless persons with disabilities. This type of supportive housing enables the special needs of populations to live independently as possible in a permanent setting.
- Rapid Rehousing (RRH) – A support intervention that uses a combination of case management, Housing Navigation, and short to medium term financial assistance to assist mid-range acuity homeless households identify and stabilize in tenant-based, scattered site, permanent housing.

Transitional Housing (TH)

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

General Terminology

Americans with Disabilities Act (ADA)

A civil rights law passed in 1990 that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, housing, schools, transportation, and all public and private places that are open to the general public. ADA gives civil rights protections to individuals with disabilities similar to those provided to individuals on the basis of race, color, sex (including gender identity and expression), national origin, age, and religion.

Assigned/Designated Sex at Birth

Frequently a binary designation of "male" or "female". Based on the person's internal or external anatomy at birth. Assigned at birth, typically by a medical professional (e.g., sex listed on birth certificate). May or may not correspond to one's gender identity

Case Management

Case management is defined by the Case Management Society of America as "a collaborative process of assessment, planning, facilitation, care coordination, evaluation, and advocacy for options and services" to meet individual needs.

Chronically Homeless

A homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. In order to meet the "chronically

homeless” definition, the individual also must have been living as described above continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.

Cisgender

Refers to a non-transgender person. The prefix “cis” means “matches”. So, cisgender means that one’s sex assigned at birth “matches” one’s gender identity

Disability

A physical or mental impairment that substantially limits one or more of the major life activities of such for an individual.

Equality

The state of being equal, especially in status, rights, and opportunities

Equity

The quality of being fair and [impartial](#)

Fair Housing Act

1968 act (amended in 1974 and 1988) providing the HUD Secretary with fair housing enforcement and investigation responsibilities. A law that prohibits discrimination in all facets of the home buying process on the basis of race, color, national origin, religion, sex, familial status, or disability

Fair Market Rent (FMR)

Primarily used to determine payment standard amounts for the Housing Choice Voucher program, to determine initial renewal rents for some expiring project-based Section 8 contracts, to determine initial rents for housing assistance payment contracts in the Moderate Rehabilitation Single Room Occupancy program, and to serve as a rent ceiling in the HOME rental assistance program

Gender Expression

External expression of gender identity (note that many times people do not feel they can safely express their gender identity). Exhibited through: behavior, clothing, hairstyle, body language, and voice. Does not always correspond to a person’s gender identity. May change over time or even day-to-day

Gender Identity

Internal or innate sense of being male, female, or another gender. May or may not match their assigned sex at birth. May not be visible based on outward appearance

Gender-Neutral

Language used to describe “all gender” or unisex spaces, (i.e., gender-neutral or all gender bathrooms), language about relationships (spouse or partner, instead of wife/husband or boyfriend/ girlfriend), etc.

Gender Non-Conforming

Someone who does not conform to traditional gender roles or stereotypes. Traditional roles and stereotypes vary based on different cultural and societal ideals. Individuals may be perceived as having a different gender than their outward appearances (behavior, clothing, hairstyle, body language, voice).

Housing First

An approach that helps individuals who are unsheltered or living in an emergency shelter find permanent housing without preconditions or barriers. It then connects them with the community, health, human, and financial services they need to prevent future experiences of homelessness

Lease

A written agreement between an owner and a family for the leasing of a decent, safe, and sanitary dwelling unit to the family.

Lease Term

The period of time for which a lease agreement is written

McKinney Vento Homeless Assistance Act

A federal law created to support the enrollment and education of homeless students. McKinney-Vento is intended to provide homeless students the same educational opportunities as housed students by removing as many barriers to learning for homeless students as possible.

Non-Binary Person

A person who does not identify as male or female (male/female are the two ends of the gender spectrum).

Rent Reasonableness

The total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same period for comparable non-luxury unassisted units. Such determinations should consider: (a) location, quality, size, type, and age of unit; and (b) any amenities, housing services, maintenance and utilities to be provided by the owner. Comparable rents may be verified by using a market study, reviewing comparable units advertised for rent, or by obtaining written verification from the property owner documenting comparable rents for other units owned.

Security Deposit

A payment required by an owner to be held during the term of the lease (or the time period the tenant occupies the unit) to offset damages incurred due to the actions of the tenant. Such damages may include physical damage to the property, theft of property, and failure to pay back rent. Forfeiture of the deposit does not absolve the tenant of further financial liability

Sexual Orientation

Describes who an individual experiences physical or emotional attraction to. Distinct from one's gender expression or identity.

Transitioning (Gender Transition)

Process that some (but not all) transgender people go through to begin living as the gender with which they identify, rather than the sex assigned to them at birth. Transitioning does not require medical treatment.

Transgender

Umbrella term for people whose gender identity is different from their assigned sex at birth. Occasionally, an individual may determine they no longer identify as transgender after they transition.

Trans Woman

Someone who lives or identifies as a woman, even though they were assigned male at birth. May or may not have undergone medical treatments. Sometimes referred to as "Male-to-Female" or "MTF," but these terms

may not be preferred as they can over-emphasize that the person was born male rather than her current identity.

Trans Man

Someone who lives or identifies as a man, but was assigned female at birth. May or may not have undergone medical treatments. Sometimes referred to as “Female-to-Male” or “FTM,” but these terms may not be preferred as they can over-emphasize that the person was born female rather than his current identity

Violence Against Women Act (VAWA)

A comprehensive legislative package passed in 1994 and designed to improve criminal justice responses to sexual assault, domestic violence, dating violence, and stalking and to increase the availability of services for victims and survivors. VAWA has been reinstated 2000, 2005, 2013 and 202