



# Lubbock City & County Continuum of Care

## GEOCODE 489303 & 483288 Continuum of Care Policies and Procedures

Written Standards  
ECHO West Texas - Collaborative Applicant  
TX - 625 Lubbock City & County Continuum of Care

Versions of this document

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# Introduction

## Definition and Purpose of Written Standards

Written standards are community-wide policies and procedures that agencies funded through the federal Department of Housing and Urban Development (HUD) for Continuum of Care (CoC) Program funding and Emergency Solutions Grant (ESG) Program funding are required to implement in their programs. These written standards incorporate requirements outlined by HUD in 24 CFR 578 (CoC) and 24 CFR 576 (ESG), as well as local standards adopted by the Lubbock Continuum of Care (CoC), TX-625.

The purpose of the written standards is to:

- Establish community-wide expectations on the operations of projects within the Lubbock CoC;
- Ensure transparency and accountability for users and operators of the homeless response system;
- Set minimum quality standards for CoC and ESG-funded projects in the Lubbock region;
- Clearly communicate local priorities to CoC and ESG recipients and subrecipients; and
- Promote consistency and coordination between CoC and ESG-funded projects within the Lubbock CoC.

## Background and Purpose

Under 24 CFR §578.7(a)(9) of the Continuum of Care (CoC) Interim Rule of 2012, authorized by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), the U.S. Department of Housing and Urban Development (HUD) requires that the Lubbock City and County Continuum of Care-TX 625 (Lubbock CoC) have Written Standards that govern the following for projects funded through the Continuum of Care Program, in consultation with Emergency Solutions Grant (ESG) Program recipients:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance [24 CFR §578.7(a)(9)(i)]
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance [24 CFR §578.7(a)(9)(ii)]
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid re-housing assistance [24 CFR §578.7(a)(9)(iii)]
- Standards for determining what percentage or amount of rent each project participant must pay while receiving rapid re-housing assistance [24 CFR §578.7(a)(9)(iv)]
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance [24 CFR §578.7(a)(9)(v)]
- Where the Continuum is designated a high-performing community, as described in subpart G of the CoC Interim Rule of 2012, policies and procedures set forth in 24 CFR 576.400(e)(3)(vi), (e)(3)(vii), (e)(3)(viii), and (e)(3)(ix)

The purpose of the Continuum of Care Program is to promote a community-wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effective utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

Locally, the Lubbock CoC (TX-625) is governed by its CoC Board of Directors and facilitated by the designated Lead Agency, ECHO West Texas. The CoC Board of Directors holds final decision-making authority on written standards, while ECHO West Texas coordinates with ESG-funded jurisdictions, ensures compliance with these standards, manages updates to the document, and communicates changes to all relevant stakeholders.

By establishing Written Standards for Service Delivery in the Lubbock CoC Written Standards (referred to throughout this document as the CoC Written Standards), the Lubbock CoC seeks to achieve the vision of the Continuum of Care Program and reach the following goals:

- Unite vision and strategy for ending homelessness in the Lubbock CoC's geographic area
- Implement effective, evidenced-based guidelines for homeless assistance projects
- Provide uniformity across projects in the Lubbock CoC's geographic area
- Demonstrate project accountability to individuals and families experiencing homelessness
- Ensure project compliance with HUD regulations

The CoC Program Interim Rule also requires written standards to be developed in consultation with recipients of the

ESG Program, which in Lubbock includes the City of Lubbock or other designated ESG recipients. ESG funds may be used to support Emergency Shelter (ES), Rapid Rehousing (RRH), Homelessness Prevention (HP), and Street Outreach (SO) projects, consistent with 24 CFR Subpart B.

Each section of the written standards outlines the following components per project type: the purpose of the project, eligibility criteria, prioritization methods, minimum standards of assistance, access protocols, and performance benchmarks. At minimum, written standards must include:

- Policies and procedures for evaluating the eligibility of individuals and families for CoC and ESG assistance;
- Policies and procedures for determining and prioritizing which eligible households will receive assistance for PSH, RRH, TH, HP, ES, SSO, and SSO-SO;
- Standards for determining the percentage of rent a program participant must contribute while enrolled in RRH or HP programs.

In some cases, additional federal funding sources, such as the HOME American Rescue Plan (HOME-ARP), may also be required to adhere to these standards. Lubbock CoC encourages alignment by local and privately funded programs with these standards to ensure a high-quality, coordinated approach across the region.

### **Who must follow the Lubbock CoC Written Standards?**

The intent of this document is to standardize the quality and type of services individuals and families can expect to receive from homeless service projects across the Lubbock CoC's geographic area. Regardless of whether a family experiencing homelessness presents in Lubbock, or surrounding Lubbock County, the goal of the Lubbock CoC is to ensure that the individual or family can expect to receive the same standard of services from providers in their area.

With this goal in mind, all CoC Program-funded projects must comply with the Lubbock CoC Written Standards to the extent that their grant agreement allows. While ESG Program-funded projects are mandated to have their own Written Standards, each project should ensure that their Written Standards align with the Standards put forth in this document. It is highly recommended that projects that do not receive federal funding from any source follow the Lubbock CoC Written Standards to further the CoC's goals of transparency, equal access to quality projects, and service standardization. Additionally, should a project receiving no federal funding wish to apply for it in future, use of the Lubbock CoC Written Standards will ensure that the project is following best practices, thus increasing its likelihood to receive federal funds.

Although the Written Standards contain guidance for distinct project types, projects are still limited in the services and financial assistance they provide by their grant agreements, funding capacity, and federal regulations.

All projects in the Lubbock CoC must adhere to the following Essential Elements:

- Adhere to the Lubbock CoC Policies and Procedures, as well as all requirements under the Request for Proposals (RFP) for each year a project receives CoC Program funding
- Participate in HMIS and comply with the Lubbock CoC HMIS Policies and Procedures and Data Quality Plan. Projects serving survivors of domestic violence that cannot use HMIS must enter data into a comparable database that complies with HUD's standards.
- Participate in the local implementation of Coordinated Entry (CE) and comply with the Lubbock CoC Coordinated Entry Written Standards.
- Utilize a Housing with Support approach that prioritizes stable housing while recognizing that lasting success is built through personalized support and empowerment. Housing is the first step, but participants are active partners in setting their own goals and shaping the support they receive. This approach emphasizes personal wellness and mental health, ensuring participants have access to services that help them grow, thrive, and maintain long-term stability. Participation in supportive services is flexible and tailored to each individual's needs and desires, fostering independence, resilience, and sustainable outcomes. By valuing participants' voices and tracking progress in wellness and self-sufficiency, we help create a path toward meaningful, lasting stability.
- Operate within a philosophy of facilitating participant choice and autonomy
- Abide by and adopt federal, HUD, and CoC Policies including, but not limited to: the Americans with Disabilities Act (ADA), the Fair Housing Act, HUD's Equal Access to Housing Final Rule, the Lubbock CoC's Non-Separation of Families policy, and the McKinney-Vento regulations pertaining to the Education of Homeless Children and Youth.
- Follow HUD's preferred Order of Documentation when evaluating and documenting participant eligibility
- Attend all Lubbock CoC General Meetings
- Abide by and consistently apply these Written Standards

## **HUD Definition of Homelessness and Qualifying Populations**

HUD uses the following categories/qualifying populations to determine if a household is eligible to receive assistance through the CoC or ESG Program:

Homeless Category	Criteria
Category 1  Literally Homeless	Household that lacks a fixed, regular, and adequate nighttime residence. Examples of clients that are homeless include: <ul style="list-style-type: none"><li>• Households staying in a public or private place not meant for human habitation (such as wooded areas, cardboard boxes, sidewalks, underpasses, public bathrooms, etc.)</li><li>• Households staying in emergency shelters, transitional housing, or hotels and motels paid for by government or a charitable organization</li><li>• Households exiting an institution for 90 days or less, and stayed in a shelter or place not meant for human habitation prior to institution stay</li></ul>
Category 2  Imminent Risk of Homelessness	Individual or family who will imminently lose their primary nighttime residence, provided that: <ul style="list-style-type: none"><li>• Residence will be lost within 14 days of the date of application for homeless assistance;</li><li>• No subsequent residence has been identified; and</li><li>• The individual or family lacks the resources or support networks needed to obtain other permanent housing</li></ul>

Category 3  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 Categories 1,2 and 4, but who meet all of the following: <ul style="list-style-type: none"> <li>• Are defined as homeless under the other listed federal statutes;</li> <li>• Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;</li> <li>• Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and</li> <li>• Can be expected to continue in such status for an extended period of time due to special needs or barriers</li> </ul>
Category 4  Fleeing/ Attempting to Flee DV	Any individual or family who: <ul style="list-style-type: none"> <li>• Is fleeing, or is attempting to flee, domestic violence;</li> <li>• Has no other residence; and</li> <li>• Lacks the resources or support networks to obtain other permanent housing</li> <li>• </li> </ul> <p>*If a household also meets eligibility for Category 1: Literally Homeless, they can be assisted with RRH.</p>

Qualifying Population (QP)	Definition
1	Homeless, as defined in <a href="#">24 CFR 91.5</a> Homeless (1), (2), or (3)
2	At risk of Homelessness, as defined in <a href="#">24 CFR 91.5</a> At risk of homelessness
3	Fleeing or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD. See the <a href="#">HOME-ARP Notice</a> and <a href="#">24 CFR 5.2003</a> for specific references.
4	Other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or serve those with the greatest risk of housing instability

# Local Roles and Processes

## CoC Lead

The CoC Lead for the Lubbock City and Lubbock County region (TX-625) is the CoC Board of Directors, which governs ECHO West Texas, the designated lead agency. The CoC Board of Directors is the final decision-making body for the written standards, and ECHO West Texas coordinates with ESG-funded entities, enforces the standards locally, manages this document on the CoC website, and communicates updates to CoC and ESG programs.

## City of Lubbock and Lubbock County

The City of Lubbock and Lubbock County are entitlement jurisdictions of ESG funds and may allocate funding to subrecipients to operate ESG-funded projects within the community. The City and County are responsible for ensuring their subrecipients operate in compliance with these written standards and fulfill HUD reporting requirements related to performance and grant expenditures. The City and County coordinate closely with ECHO West Texas to ensure that subrecipients follow the written standards, utilize the Homeless Management Information System (HMIS) for data collection and reporting, and accept all referrals through the local Coordinated Entry System (CES).

## Texas Department of Housing and Community Affairs (TDHCA)

TDHCA administers ESG funds on behalf of the State of Texas and may allocate funding to subrecipients statewide. If selected annually by TDHCA, the Lubbock CoC (TX-625) may act as the local coordinator for these funds by managing the competition and recommending awards to the TDHCA Board, aligning with local priorities. While TDHCA retains final oversight, including monitoring contracts and collecting performance data, the CoC works with subrecipients to ensure alignment with local written standards, HMIS participation, and Coordinated Entry referrals.

## Recipients and Subrecipients

All recipients and subrecipients of CoC and ESG funding must align their organizational policies and procedures with these written standards and coordinate with the CoC for updates as approved by the CoC Board of Directors. Additional standards may be adopted by agencies as long as they do not conflict with HUD regulations or the standards outlined in this document. The CoC strongly encourages even non-CoC/ESG-funded programs to adopt these standards for consistency across the system.

## Process for Changes to Written Standards

Changes to the written standards are made in coordination with the CoC Board of Directors, ECHO West Texas, and the City of Lubbock in accordance with HUD guidance. Because these standards reflect community input, agencies may submit public comments and propose edits using a form available on the ECHO West Texas website. Proposed edits will undergo a 7-day public comment period, after which recommendations will be reviewed by a provider committee and presented to the CoC Board of Directors for a vote. All approved changes will be communicated to CoC and ESG-funded agencies and published on the CoC's official website.

## Agency Grievance Process

Grievances filed by one agency against another CoC or ESG-funded project must specifically relate to program components, regulations, and requirements outlined in 24 CFR Part 578 (CoC) or 24 CFR Part 576 (ESG), or those included in these Lubbock CoC (TX-625) Written Standards. Grievances may address issues such as failure to fully participate in the Coordinated Entry System (CES), violations of Homeless Management Information System (HMIS) policies and procedures, or noncompliance of Housing with Supports principles (e.g., requiring service participation or other preconditions for housing).

If an agency has a grievance against another CoC or ESG-funded agency, it is expected to first attempt to resolve the issue informally by contacting the involved agency directly. If the matter remains unresolved, the agency may submit a formal grievance appeal to the Lubbock CoC using the following steps:

1. The Executive Director or CEO of the agency completes the CoC and ESG Grievance Appeal Form,

available on the ECHO West Texas website. This form requires documentation that an informal grievance was attempted but did not result in a resolution.

2. The Quality and Performance Committee (QAP) will review the grievance and determine whether the claim is substantiated. This process may include gathering information and supporting documentation from all involved parties to evaluate the validity of the grievance.
3. A written response will be provided to both parties as soon as possible but no later than 60 business days after the grievance is received. If either party is dissatisfied with the decision, they may submit an appeal to the CoC Board of Directors.
4. The CoC Board will review the appeal and issue a final written decision within 15 business days of receiving the appeal. This decision is final and binding.

If a grievance is substantiated, the relevant funder will be notified and is expected to address the issue.

This may include:

- Issuing a formal finding to the agency;
- Requiring a corrective action plan;
- Reporting violations to HUD, if applicable.

It is the responsibility of the QAP to disclose any substantiated grievances during the CoC and ESG funding renewal process.

The Lubbock CoC (TX-625) ensures that agencies submitting grievance appeals may do so without fear of retaliation from the accused agency or its representatives. Any suspected retaliation will be addressed immediately, and the CoC may require supporting documentation from the complainant to substantiate the claim. The CoC will take all necessary steps to halt retaliation and prevent it from recurring.

### **General Standards for All CoC and ESG Project Types**

CoC and ESG recipients and subrecipients must follow requirements specified in 24 CFR 578 (CoC) and 24 CFR 576 (ESG) along with the following local standards. This section includes standards that are applicable to all project types that receive CoC and/or ESG program funding. The sections that follow are specific to certain project types. Please be sure to note all standards applicable to a specific project type upon implementation of a program.

### **Coordinated Entry System (CES) Participation (PSH, RRH, TH, TH-RRH Only)**

In accordance with the requirements outlined in the CoC and ESG Program Interim Rules and HUD CPD-17-01 Notice, the Lubbock CoC (TX-625) has established a Coordinated Entry System (CES) to streamline the local crisis response system, ensure equitable access to housing and services, and effectively prioritize those with the highest need. CES in Lubbock is locally known as the Housing Priority List (HPL) and is managed by ECHO West Texas, the CoC Lead Agency.

All providers funded through the CoC and ESG programs are required by HUD to accept referrals through CES.

- Through the centralized CES referral process, the Lubbock HPL:
- Reduces the burden on households experiencing a housing crisis;
- Identifies the most appropriate housing resource to support rapid and permanent exits from homelessness;
- Prioritizes the most vulnerable individuals and families, especially those with the longest histories of homelessness;
- Collects and uses system-wide data to identify service gaps, support resource allocation, and guide CoC-wide decision-making.

Agency staff must be trained in CES policies and procedures before accepting referrals. Agencies that wish to serve as CES Referral Partners must sign a Memorandum of Understanding (MoU) with ECHO West Texas and adhere to all CES-related training and quality standards.

CES Policies and Procedures for the Lubbock CoC can be found on the ECHO West Texas website.

### **Homeless Management Information System (HMIS) Participation**

Reference: 24 CFR 578.57 (CoC) and 24 CFR 576.107 (ESG)

Under the CoC and ESG Program Interim Rules, the Homeless Management Information System (HMIS) is a secure, electronic database used to collect person-level data on people experiencing homelessness. It is a critical tool for

tracking progress, ensuring accountability, and reporting outcomes.

The Lubbock CoC (TX-625) designates ECHO West Texas as the HMIS Lead Agency. All CoC and ESG recipients and subrecipients must participate in HMIS by:

- Becoming a Contributory HMIS Organization (CHO);
- Signing a Data Sharing and Use Agreement with ECHO West Texas;
- Maintaining data quality, accuracy, and confidentiality in accordance with HUD and local standards.

Annual data exports and reports to HUD (e.g., the Annual Performance Report, System Performance Measures) are generated from HMIS data. Agencies are responsible for ensuring timely and complete entry of required data.

Agencies restricted by law (e.g., Victim Service Providers or those receiving VAWA, VOCA, or FVPSA funding) must use a HUD-compliant comparable database and still comply with all data reporting and privacy protections required under federal rules.

For more details, the HMIS Policies and Procedures for Lubbock CoC are available through ECHO West Texas.

### **Meaningful Inclusion of People with Lived Experience**

Reference: 24 CFR 578.75(g) (CoC) and 24 CFR 576.405 (ESG)

HUD requires all CoC- and ESG-funded programs to include people with lived experience of homelessness in program and system-level planning and decision-making. The Lubbock CoC (TX-625) upholds these standards by requiring the following:

- Each funded provider must have at least one individual who is currently or formerly homeless on their Board of Directors or equivalent policymaking body.
- To the greatest extent possible, agencies must also engage people with lived experience in paid or volunteer roles to contribute to program operations, outreach, peer support, and system improvement efforts.

The CoC views this participation as essential to ensuring that services are responsive, respectful, and effective for those experiencing homelessness.

### **Housing with Supports**

**Housing with Supports** is an innovative, solutions-focused model that blends housing stability with comprehensive service coordination, helping individuals leverage mainstream and community resources to rebuild stability and independence. It fills a critical gap for people who do not require intensive permanent supportive housing but benefit greatly from consistent guidance, case management, and structured support. The model encourages creative, individualized solutions, ranging from workforce development to increased access to healthcare and benefits, to ensure participants have what they need to progress. The impact extends beyond each household, strengthening overall community resilience by reducing system strain and promoting successful edits from homelessness.

### **Acting Principles – Housing with Supports**

- Housing as a foundation for stability and growth, not the final outcome.
- Service engagement is essential, structured, and goal-driven.
- Strength-based approach that focuses on participant capabilities.
- Individualized, data-informed service planning tailored to each person.
- Empowerment through system navigation, coaching, and skill-building.
- Mutual accountability with clear expectations for participants and providers.
- Flexible, creative problem-solving to remove barriers.
- Strong integration with mainstream services and long-term community supports.
- Trauma-responsive, person-centered practices that uphold dignity.
- Time-adjusted support that tapers as independence increases.
- Cross-system collaboration to coordinate care and resources.
- Outcome-driven focus on stability, income, health, and independence.
- Culturally competent and inclusive service delivery.
- Participant choice and agency at the center of decision-making.
- Proactive risk reduction to maintain housing stability and prevent crises.

### **Fair Housing and Equal Access**

Reference: [24 CFR 578.93](#) (CoC) and [24 CFR 576.403](#) (ESG)

HUD is committed to enforcing the federal Fair Housing Act and codified commitment in the [Equal Access Rule](#) to the fair administration of its projects to serve participants regardless of sex, family composition, or marital status. CoC and ESG recipients and subrecipients must abide by the following:

- Comply with all federal statutes and rules including the Fair Housing Act, the Americans with Disabilities Act, Equal Access to Housing Final Rule, and Equal Access.
- Include non-discrimination policies in their program policies and procedures and assertively outreach to people least likely to engage in the homeless system. This includes, but not limited to, chronically homeless, homeless veterans, youth, families with children, and victims of domestic violence.
- Recognize that individuals who present together for assistance, regardless of age or relationship, are considered a household and are eligible for assistance as a household.
- If a project serves families with children, serve all types of families with children; if a project targets a specific population (e.g., women with children), serve all families with children that are otherwise eligible for assistance, including families with children that are headed by a single adult or consist of multiple adults that reside together.
- Cannot deny a family's admission to a project based on the age and gender of a child in the household under 18.

### **Termination Policy**

Reference: [24 CFR 578.91](#) (CoC) and [24 CFR 576.402](#) (ESG)

The recipient or subrecipient may terminate assistance to a program participant who violates program requirements or conditions of occupancy only under extenuating circumstances and after all options to keep the participant in the program are exhausted. Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same individual or family.

In terminating assistance to a program participant, the recipient or subrecipient must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:

- Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
- Written notice to the program participant containing a clear statement of the reasons for termination;
- A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the program participant.

Note: Hard-to-house populations. Recipients and sub recipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.

### **Grievance and Complaint Policy**

All CoC and ESG funded providers must provide a written copy of their program's rules and the grievance process before the participant begins to receive assistance. If a dispute with a project participant is reviewed during a HUD monitoring, the recipient or subrecipient will need to show proof the participant was notified of the grievance policy at intake.

At a minimum, the CoC or ESG agency must follow this process:

- Require participants to submit grievances verbally, in writing, or both. If verbally, it must be documented in case notes.
- Respond to the participant in writing within 72 hours to confirm receipt and share next steps and a timeline for the process.
- Designate an impartial entity to substantiate or dismiss the claims, and develop a solution, if appropriate, such as the agency's Board of Directors. Notify the participant of the outcome of the grievance and inform them of their right to appeal to the CoC within 30 days.

### **Appeals Policy**

Reference: [24 CFR 578.91](#) (CoC) and [24 CFR 576.402](#) (ESG)

All CoC and ESG funded providers must provide a written copy of their program's rules and the right to appeal a decision or response to a grievance, before the participant begins to receive assistance. The initial appeal of any decision shall be made to the ESG or CoC funded provider pursuant to the process described below. Should the participant not be satisfied with the appeal decision, they have the right to appeal that decision to the CoC via the CoC Board. To file a grievance appeal, a program participant will use the CoC and ESG Grievance Appeal Form on the CoC's website.

#### Reasons for Appeal

- The decision whether to admit the participant into the program
- The determination of the household's income or the households calculated rent
- Payment/occupancy charge
- Denial of a request to add a member to the assisted household
- Whether to terminate the participation of any participant
- The outcome of a grievance or complaint related to adherence to 24 CFR 578 or 24 CFR 576 or these Written Standards. This includes equal access/discrimination, Housing with Support, displacement, etc.

#### Appeal Process

- Participants request an appeal through the CoC and ESG Grievance Appeal Form.
- The CoC will respond in writing to the appeal requester and the agency involved as soon as possible but no later than thirty (30) calendar days following the request.
- As part of the appeal, the participant may present written, oral objections, or both, before a person other than the person (or a subordinate of that person) who made the decision that is subject to appeal.
- The participant may be represented in the appeal but neither the CoC, ESG recipient, nor the provider is responsible for providing or funding someone to represent the participant.
- The CoC Board will hear appeals.
- Appeals shall be addressed as soon as possible but no more than sixty (60) business days of receipt of the appeal by the CoC.
- Participants and agencies will receive prompt written notification of the outcome of the appeal.

#### **Anti-Retaliation Policy**

The CoC provides participants who wish to file an appeal the opportunity to do so without retaliation from the party accused or any representative associated. Retaliation includes, but is not limited to, harassment, intimidation, violence, program dismissal, refusing to provide services, use of profane or derogatory language to or in reference to the complainant, or breach of contract. The CoC will take immediate steps to stop retaliation and prevent its recurrence and will request supporting documentation from the alleged victim of retaliation to substantiate all claims. These steps will include, but are not limited to:

- Written documentation of retaliation brought to the CoC Board
- Written documentation of a Corrective Action Plan given to both parties involved
- Technical assistance and intervention from the CoC
- Mediation between both parties given by the CoC Board
- Implementation of an Emergency Transfer Plan for the client

#### **Violence Against Women Act (VAWA) Confidentiality, Safety, and Emergency Transfer Planning**

Reference: [24 CFR 578.99\(j\)](#) (CoC) and [24 CFR 576.409\(d\)](#) (ESG)

CoC and ESG programs are required to follow requirements set forth in the [HUD Final Rule Regarding the Implementation of Housing Protections Authorized in the Violence Against Women Reauthorization Act of 2013](#). By March 2023, CoC and ESG programs must meet the requirements in [VAWA 2022](#). These requirements include safety planning, ensuring confidentiality, and developing an emergency transfer plan.

Survivors of domestic violence, dating violence, stalking and human trafficking living in federally assisted housing may need to move to another subsidized unit to protect their safety and maintain affordable housing. The Lubbock CoC coordinates emergency transfers when survivors need to move to another safe and available subsidized unit.

The Lubbock CoC has adopted an emergency transfer plan that identifies those who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency

transfer may occur, and guidance on safety and security. That plan is included in Appendix C.

Recipients and subrecipients of federal, county, or state funds for Permanent Supportive Housing, Rapid Rehousing, and Transitional Housing projects must:

- Follow the CoC's Emergency Transfer Plan;
- Make the transfer plan publicly available whenever feasible;
- Make the plan available to participants and community partners upon request
- Ensure that refusal of a transfer unit is not a basis for terminating a tenant from assistance.

Recipients and subrecipients are encouraged, but not required, to bear moving costs related to emergency transfers. As necessary, providers are encouraged to work with survivors to identify ways to pay for moves associated with emergency transfers.

## **Access to Mainstream Resources**

Reference: [24 CFR 578.1\(b3\)](#) (CoC) and [24 CFR 576.400\(c\)](#) (ESG)

Recipients and subrecipients should assess and assist participants with obtaining any mainstream resource for which they may be eligible for including: Temporary Assistance for Needy Families (TANF), Veteran Health Care, Food Stamps, Medicaid, Children's Health Insurance Program (CHIP), Social Security Income (SSI)/Social Security Disability Income (SSDI), Texas Workforce Commission (TWC), etc. Where possible, recipients should streamline processes for participants to apply for mainstream benefits such as the use of a singular form to apply for benefits or collecting necessary information in one step.

## **Displacement**

Reference: [24 CFR 578.83](#) (CoC) and [24 CFR 576.408](#) (ESG)

A "displaced person" is defined as any participant that moves from a permanent home because of CoC- or ESG-funded acquisition, rehabilitation, or demolition of a project. The acquisition of real property for an ESG/CoC funded project is subject to the Uniform Act (URA) and Federal government wide regulations.

Displaced participants shall be provided relocation assistance and advised of their Fair Housing Rights. No temporary relocation shall be required for a CoC- or ESG--funded project. When a participant must move for a CoC- or ESG-funded project, the participant shall be treated as permanently displaced and offered relocation assistance and payments.

A participant who disagrees with the recipient's determination concerning whether the person qualifies as a displaced person or the amount of relocation assistance may file a written appeal with Close to Home. If it is determined that the appeal has merit, the appeal will be heard by the CoC Membership Council. The CoC Board will make a final determination.

Minimum standards for reducing the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) because of a project assisted under CoC and ESG shall comply with §576.408 and 578.83, respectively. No provider may implement any project or activity funded with either CoC or ESG funds without specific approval of the CoC Board of Directors. Homeless assistance funding is limited and projects involving displacement will only be approved if there is a significant disproportionate benefit provided.

Exceptions to displacement include a participant who:

- Was evicted based on a violation of the lease or occupancy agreement or violation of the law and the recipient determines that the eviction was not undertaken to evade the obligation to provide relocation assistance.
- Moved into the property after the application was submitted but was provided with written notice that he or she would not qualify as a "displaced person."
- Is ineligible under [49 CFR 24.2](#).
- Was not displaced as a result of the project by determination from HUD.

## **Involuntary Family Separation**

Reference: [24 CFR 576.102\(b\)](#) (CoC) and [24 CFR 578.93\(e\)](#) (ESG)

The age and gender of a child under age 18 must not be used as a basis for denying a family's admission to a housing or shelter project. All recipients and subrecipients of CoC and ESG program funds are required to comply with program admission and prohibition against involuntary family separation standards ([24 CFR 576.102\(b\)](#) and

[578.93\(e\)\).](#)

### **Program Coordination**

Recipients and subrecipients of CoC and ESG program funds are expected to maintain the minimum standards for on-going system and program coordination and integration of CoC- and ESG-funded activities to the maximum extent practicable. This includes coordination with the following:

- Street Outreach (SO) providers
- Emergency Shelter (ES) providers
- Homelessness Prevention (HP) providers
- Transitional Housing (TH) providers
- Permanent Supportive Housing (PSH) providers
- Rapid Rehousing (RRH) assistance providers

### Other Homeless Assistance Programs

- HUD-Veterans Affairs Supportive Housing (HUD-VASH);
- Education for Homeless Children and Youth Grants for State and Local Activities (McKinney-Vento Homeless Assistance Act);
- Grants for the Benefit of Homeless Individuals;
- Healthcare for the Homeless;
- Programs for Runaway and Homeless Youth;
- Projects for the Assistance in the Transition from Homelessness;
- Services in Supportive Housing Grants;
- Emergency Food and Shelter Program;

### Mainstream Services & Housing Programs

- Public housing programs assisted under section 9 of the U.S. Housing Act of 1937;
- Housing programs receiving Section 8 tenant based or project-based assistance;
- Supportive Housing for Persons with Disabilities;
- HOME Investment Partnerships Program;
- Temporary Assistance for Needy Families
- Other essential services providers
- Transitional Housing Assistance Grants for Victims of Sexual Abuse, Domestic Violence, and Stalking Program;
- Homeless Veterans Reintegration Program;
- Domiciliary Care for Homeless Veterans Program;
- VA Homeless Providers Grant and Per Diem Program;
- Health Care for Homeless Veterans Program;
- Homeless Veterans Dental Program;
- Supportive Services for Veterans Families Program; and
- Veterans Justice Outreach Initiative
- Health Center Program;
- State Children's Health Insurance Program;
- Head Start;
- Mental Health and Substance Abuse Block Grants;
- Services funded under the Workforce Investment Act; and
- State Housing Related Assistance Program for Adults with Serious Mental Illness

### Connections with Other Resources

Reference: [24 CFR 578.53](#) (CoC) and [24 CFR 576.105](#) (ESG)

Recipients and subrecipients of CoC and ESG program funds are expected to follow the minimum standards for assisting each participant in connecting with other supportive and stabilization resources (as applicable). Appropriate supportive services and stabilization resources include the following:

### Supportive Services

- Permanent housing;
- Medical health treatment;
- Behavioral health services;
- Counseling;

#### Stabilization Services

- Medicaid;
- Medicare;
- Supplemental Nutrition Assistance Program;
- Women, Infants, and Children (WIC);
- Federal-State Unemployment Insurance Program;
- Supervision; and

#### Other services Needed for Independent Living

- Supplemental Security Income (SSI);
- Social Security Disability Insurance (SSDI);
- Child and Adult Care Food Program; and
- Other available assistance

#### **Income Determination**

Reference: [24 CFR 5.609](#) (CoC & ESG)

Recipients and subrecipients of CoC and ESG program funds are expected to comply with the minimum standards for determining participants' annual income. This includes calculating income in compliance with [24 CFR 5.609](#). Annual income is defined as all amounts, monetary or not, which:

- Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- Are anticipated to be received from a source outside the family during the 12- month period following admission or annual reexamination effective date; and
- Which are not specifically excluded in [paragraph \(c\) of 24 CFR 5.609](#).

Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

There are no income limits for CoC assistance but in instances when participants are charged rent or occupancy charges, the amount charged must be based on participants' verified annual income for all sources.

In verifying income, CoC and ESG funded recipients are required to obtain source documents whenever possible. Self-certification or verification is to be accepted only when all efforts to obtain source documents or third-party verification have not produced results.

#### Records and Recordkeeping

Reference: [24 CFR 578.103](#) (CoC) and [24 CFR 576.500](#) (ESG)

Recipients and subrecipients of CoC and ESG program funds must follow ensure sufficient written records are established and maintained to enable the recipient, the CoC Lead Agency, and HUD to determine whether CoC and ESG requirements are being met and comply with [24 CFR 576.500](#) and [24 CFR 578.103](#).

#### Duplication of Benefits

Reference: [44 CFR 206.191](#) (CoC & ESG)

"Duplication of benefits" occurs when federal financial assistance is provided to a person or entity through a program to address losses resulting from a federally-declared emergency or disaster, and the person or entity receives or would receive financial assistance for the same costs from any other source, and the total amount received exceeds the total need for those costs. Recipients and subrecipients of CoC and ESG program funds must establish and maintain adequate procedures to prevent any duplication of benefits with emergency disaster funds.

## **Lead-Based Paint Standards**

Reference: [24 CFR 578.99\(f\)](#) (CoC) and [24 CFR 576.403](#) (ESG)

Recipients and subrecipients of CoC and ESG program funds must follow minimum standards for compliance with the lead-based paint remediation and disclosure requirements identified in [24 CFR 576.403](#) and [578.99\(f\)](#), including the [Lead-Based Paint Poisoning Prevention Act](#), the [Residential Lead-Based Paint Hazard Reduction Act of 1992](#) and implementing regulations in [24 CFR part 35](#), subparts [A, B, H, J, K, M and R](#).

## **Recovered Materials**

Reference: [24 CFR 578.99\(b\)](#) (CoC) and [24 CFR 576.407\(f\)](#) (ESG)

All recipients and subrecipients of CoC and ESG program funds must follow minimum standards for the procurement of recovered materials and shall comply with the requirements identified in [24 CFR 576.407\(f\)](#) and [24 CFR 578.99\(b\)](#), including that the recipient and its contractors must comply with [Section 6002 of the Solid Waste Disposal Act](#) [29](#), as amended by the [Resource Conservation and Recovery Act](#). The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at [40 CFR part 247](#) that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

## **Faith-Based Activities**

Reference: [24 CFR 578.87](#) (CoC) and [24 CFR 576.406](#) (ESG)

All recipients and subrecipients of CoC and ESG program funds must follow minimum standards for faith-based activities outlined in [24 CFR 576.406](#) and [578.87](#).

## **Program Income**

Reference: [24 CFR 578.97](#) (CoC) and [24 CFR 578.201\(f\)](#) (ESG)

Recipients and subrecipients of CoC and ESG program funds must follow minimum standards for private non-profit organizations regarding the program's income during the project period. Income shall be retained and used to finance the non-federal share of the project or program. Records of the receipt and use of program income shall be retained. Under the ESG Program, program income is to be used as a match, and ESG match funds must be used in accordance with [24 CFR 576.201\(f\)](#). This includes a requirement that matching funds must be contributed to the ESG program and expended for the recipient or subrecipient's allowable ESG costs.

## **Organizational Conflicts of Interest**

Reference: [24 CFR 578.95](#) (CoC) and [24 CFR 576.404](#) (ESG)

An organizational conflict of interest arises when activities or relationships with other persons or organizations (the recipient or subrecipient) is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance. Such an organizational conflict would arise when a board member of an applicant participates in a decision concerning the award of a grant, or provision of other financial benefits to the organization that member represents. It would also arise when an employee of a recipient or subrecipient participates in making rent reasonableness determinations under [24 CFR 578.49\(b\)\(2\)](#) and [578.51\(g\)](#) and housing quality inspections of property under [24 CFR 578.75\(b\)](#) that the recipient, subrecipient, or related entity owns. In 2023, HUD announced updates to housing quality standards called NSPIRE that will be required for CoC and ESG-funded projects in October 2024.

CoC and ESG assistance will not be contingent on the individual's or family's acceptance or occupancy of emergency shelter or housing owned by the provider or a provider's subsidiary or parent. No recipient or subrecipient, with respect to individuals or families occupying housing owned by the recipient or a recipient's subsidiary or parent, will carry out the initial evaluation under [24 CFR 576.401](#) or [578.75\(b\)](#) or administer homelessness prevention assistance under [24 CFR 576.103](#).

## **Individual Conflicts of Interest**

Reference: [24 CFR 84.42](#) (private, non-profit) or [24 CFR 85.36](#) (government)

When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 24 CFR 84.42 (private non-profit) or 24 CFR 85.36 (government). No CoC Board of Directors member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.

#### Prohibited Conflicts

No person involved with the CoC or ESG programs or who is in a position to participate in a decision-making process or gain inside information regarding the program's activities, shall obtain a financial interest or benefit from an assisted activity; have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity's proceeds (either personally or those with whom they have family or business ties) during their tenure or for one year following tenure.

#### Persons Covered

These conflict of interest provisions apply to any employee, agent, consultant, officer or elected or appointed official of the recipient or subrecipient's agency. The key issues to consider are the individual's role in the organization, influence over CoC and ESG funding decisions, and access to inside information.

#### Exceptions

A recipient may request an exception to the individual conflicts of interest provision from HUD, only if he or she meets the threshold requirements identified in 24 CFR 576.404 or 578.95(d)(2).

Rapid Rehousing (RRH) and Homeless Prevention (HP) Programs – CoC (RRH) and ESG (RRH and HP)

Reference: [24 CFR 578.37\(1\)ii](#) (CoC), [24 CFR 576.103](#) & [576.104](#) (ESG) and [CPD-21-10](#) (HOME-ARP)

Rapid Rehousing (RRH) and Homelessness Prevention (HP) programs provide housing relocation and stabilization services and short or medium-term rental assistance to help a family or individual retain permanent housing or move as quickly as possible to permanent housing and achieve stability in that housing.

RRH and HP projects are required to operate in compliance with the local RRH-HP Program Standards, included as an addendum to these written standards.

### **Participant Eligibility**

#### Rapid Rehousing (RRH)

To qualify for a RRH project, a program participant must meet the HUD definition of literal homelessness. Projects that are funded through YHDP can only serve youth and young adults who meet the definition of literal homelessness or who are at imminent risk of losing their housing within 14 days, including youth who are doubled-up or couch surfing. Projects that are funded through the Special Unsheltered CoC Program can only serve program participants who meet the definition of literal homelessness and have a history of unsheltered homelessness.

Projects funded by HOME-ARP must serve one of the qualifying populations described in HUD Definition of Homelessness and Qualifying Populations.

There are no income limits for CoC assistance but in all instances in which participants are charged rent or occupancy charges, the amount charged must be based on participants' verified annual income for all sources. All participants must lack sufficient resources or support networks to retain housing without ESG or CoC assistance. Individuals & families assisted under ESG are required to have annual incomes at or below 30% of the area median at annual assessment.

RRH can pay short-term (up to 3 months) and medium-term (between 4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing. Project-based rental assistance for RRH is allowable for ESG funded programs only.

- The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent (arrears covered under ESG only).
- Rent amount must not exceed HUD's published Fair Market Rent (ESG-funded RRH only) and the HUD standard for rent reasonableness (ESG- and CoC- funded RRH) (24 CFR 982.507).
- There must be a rental assistance agreement between the landlord and agency and a legally binding, written lease between tenant and landlord.
- Eligibility and income shall be reviewed no less frequently than annually.

Participants in rapid rehousing are required to meet with case managers no less frequently than monthly.

#### Homelessness Prevention (HP)

To be eligible for HP relocation and stabilization services and short-term and medium-term rental assistance, people must qualify as “at risk of homelessness” based on categories 2 or 4 of the HUD “homeless” definition, or based on the “at risk of homelessness” definition found at 24 CFR 576.2, require HP services to prevent moving into an emergency shelter or another place described in category (1) of the “homeless” definition in 24 CFR 576.2, have an annual income below 30%<sup>4</sup> of the median income for the area and be a resident of Lubbock County for at least 30 days prior to requesting assistance. (24 CFR 576.103, 576.105, 576.106). Households should be identified and prioritized for assistance using the targeted screening tool in alignment with the RRH-HP Standards.

- Rental Assistance Duration and Adjustment
- For ESG, payment shall not exceed 24 months total during a 3-year period in tenant- or project- based housing.
- For CoC, rental payments shall not exceed 24 months.
- Re-Evaluations

#### Rapid Rehousing (RRH)

- Participants shall be re-evaluated not less than once annually. Eligibility:
- The participant shall have an annual income that does not exceed 30 percent of median family income for the area or less, as determined by HUD at the time of annual re-evaluation [ESG only]; and
- The participant shall lack sufficient resources and support networks necessary to retain housing without ESG/CoC assistance.

#### Homeless Prevention (HP)

- Participants shall be re-evaluated not less than once every three months.

### **Permanent Supportive Housing (PSH) Programs**

Reference: [24 CFR 578.37\(1\)j](#) (CoC) and [CPD-21-10](#) (HOME-ARP)

Permanent Supportive Housing (PSH) for persons with disabilities is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability

## **Minimum Standards**

Minimum standards for shelters and program participant-occupied housing consist of compliance with the safety, sanitation & privacy requirements identified in 24 CFR 576.403 and 578.75. Providers shall not use ESG or CoC funding to help someone remain or move into housing if the housing does not meet the following minimum habitability standards:

- Structure and Materials: The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Space and security: Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep.
- Interior air quality: Each room or space must have proper ventilation and be pollutant free.
- Water supply: Must be free of contamination.
- Sanitary facilities: 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.
- Thermal environment: The housing must have the necessary, properly operating heating/cooling facilities.
- Illumination and electricity: The structure must have adequate and appropriate lighting and safe electrical sources.

- Food preparation: All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food.
- Sanitary conditions: The housing must be in sanitary condition.
- Fire safety:
  - There must be a second means of exiting the building in the event 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.
- If the unit is occupied by a hearing-impaired person, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom he or she occupies.
- The public areas of the housing must be equipped with enough detectors, but not less than one for each area.

## **Participant Eligibility**

Individuals and families who meet the federal criteria under category (1) or (4) of the “homeless” definition in [24 CFR 576.2](#). If the project is funded by HOME-ARP, individuals and families must meet one of qualifying population definitions.

All referrals must come from the local Coordinated Entry System and utilize the HUD recommended Order of Priority ([HUD Notice CPD-16-11](#)):

### **Priority 1**

First Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs. In essence, a chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and
- The CoC or CoC Program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for

### **Priority 2**

Second Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness. In essence, a chronically homeless individual or head of household, as defined in 24 CFR 578.3, for which both of the following are true:

- The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,
- The CoC or CoC Program recipient has not identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

### **Priority 3**

Third Priority—Chronically Homeless Individuals and Families with the Most Severe Service Needs. A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than one year; and
- The CoC or CoC Program recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

### **Priority 4**

Fourth Priority—All Other Chronically Homeless Individuals and Families. A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- The chronically homeless individual or head of household of a family has been homeless and living in a

- place not meant for human habitation, a safe haven, or in an emergency shelter for on at least four separate occasions in the last 3 years, where the cumulative total length the four occasions is less than 12 months; and
- The CoC or CoC Program recipient has not identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

### **Performance Metrics**

- 80% of participants maintain or exit to permanent housing
- The extent to which persons who exit homelessness to permanent housing destinations return to homelessness
- Number of participants who exited PSH to a permanent housing destination in the date range two years prior to the report date range, and, of those participants, how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.
- Percent participants age 18 or older with earned income at exit
- Percent participants age 18 or older who have non-cash benefits at exit
- Percent participants with 1+ source of non-cash benefits at exit
- Percent participants age 18 or older who maintained or increased their total income (from all sources) as of the end of the operating year or program exit

### **Additional Requirements for PSH Projects w/ Rental Assistance**

Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet and late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.

Payment for rental assistance shall only be made when there is a rental assistance agreement between the provider and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the subrecipient with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period and late payment penalty requirement as the participant's lease.

Payment of any late payment penalties incurred by the agency shall not be claimed for reimbursement.

Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner.

### **Participant Contribution**

Rent charges may not exceed those specified in CFR 578.7734.

### **Transitional Housing (TH) Programs – CoC Only**

Reference: [24 CFR 578.37\(2\)](#) (CoC)

Transitional Housing (TH) is designed to provide homeless individuals and families with interim stability and support to successfully move to and maintain permanent housing. ESG funds may not be provided to help individuals to remain in or move to transitional housing.

### **Minimum Standards**

Transitional housing facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering the program. Eligible persons for transitional housing meet the homeless definition based on categories 1 and 4. Providers of transitional housing services shall arrange for or make available services to participants to assist them in securing permanent housing within specified time periods. Transitional housing may be provided in scattered site or single site locations. Individuals and families assisted in transitional housing shall be provided housing accommodations as well as a services program intended to address issues that may hinder the household from obtaining or maintaining stable, long-term housing.

### **Safety, Sanitation, and Privacy**

Providers shall not use ESG or CoC funding to help someone remain or move into transitional housing that does not meet the following minimum habitability standards:

- Structure and Materials: The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Space and security: Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep.
- Interior air quality: Each room or space must have proper ventilation and be pollutant free.
- Water supply: Must be free of contamination.
- Sanitary facilities: 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.
- Thermal environment: The housing must have the necessary, properly operating heating/cooling facilities.
- Illumination and electricity: The structure must have adequate and appropriate lighting and safe electrical sources.
- Food preparation: All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food.
- Sanitary conditions: The housing must be in sanitary condition.

Fire safety:

- There must be a second means of exiting the building in the event 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.
- If the unit is occupied by a hearing-impaired person, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom he or she occupies.
- The public areas of the housing must be equipped with enough detectors, but not less than one for each area.

In October 2024, CoC providers will be required to follow updated housing quality standards called NSPIRE.

## **Participant Eligibility**

Transitional Housing (TH) programs will receive referrals based on the prioritization established in the local Coordinated Entry Policies and Procedures. This prioritization will be updated periodically through the Coordinated Entry Committee based on subpopulation data and community input. The following target populations are HUD's preferred focus for Transitional Housing:

- Youth,
- Persons seeking to continue recovery in recovery-focused housing,
- Institutional re-entry (may not be eligible for CoC funding but needed for people leaving criminal justice and mental health facilities),
- Persons fleeing domestic abuse or violence where it is not possible to find units for rapid rehousing

## **Limitations on Occupancy**

No individual or family may be assisted in transitional housing for a period of more than 24 months. No person shall be discharged from transitional housing into homelessness because of this limitation. Transitional housing programs are expected to place individuals and families into permanent housing as quickly as possible.

## **Participant Contribution**

Individuals and families residing in transitional housing are not required to pay rent. Providers of transitional housing may impose occupancy charges. If the provider elects to charge rent or occupancy charges, the charges may not exceed those specified in 24 CFR 578.77.

## **Program Fees**

No fees other than rent or occupancy charges may be charged to program participants. This includes meals, copayments for services, transportation and all other services that may be provided to program participants.

## **Occupancy Agreements**

All individuals and families served in transitional housing must be provided an occupancy agreement for a minimum of a monthly term and which can be renewed provided that the household does not remain in transitional housing for longer than 24 months. The agreement must specify the expectations for safety in housing and program expectations. Residents in transitional housing may not be discharged for failure to participate in services. No person may be terminated from transitional housing without first being provided the right to appeal that decision in accordance with the due process provisions at [24 CFR 578.91\(b\)](#).

## **Emergency Shelter (ES) Programs – ESG Only**

Reference: [24 CFR 576.102](#) (ESG)

An effective crisis response system provides immediate and low-barrier access to safe and decent shelter to anyone that needs it and aims to house people as quickly as possible. Emergency shelters, and other types of crisis housing, play a critical role in the community's system response and strategy to end homelessness.

## **Participant Eligibility**

People are eligible for these services if they qualify as "homeless" based on categories (1, 2, or 4) of the "homeless" definition found at [24 CFR 576.232](#). Eligible activities, in compliance with federal ESG rules in addition to the provision of decent, safe, and sanitary emergency shelter accommodations include:

- Case management;
- Child Care;
- Education,
- Employment and Life Skills Services;
- Legal Services;
- Health,
- Mental Health and Substance Abuse Services;

## **Transportation Minimum Standards**

### **Safety, Sanitation, & Privacy**

Any building for which ESG funds were used for conversion, major rehabilitation, or other renovation or that receives ESG assistance for shelter operations shall meet state/local government safety and sanitation standards, as well as the following:

- Structure and materials: The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Products and appliances: Any ESG funded renovation, including major rehabilitation and conversion, must use Energy Star and WaterSense products/appliances.
- Access: The shelter must comply with the applicable Rehabilitation, Fair Housing and Americans with Disabilities Acts and implement regulations.
- Space and security: Unless it is a day shelter, it must provide appropriate places to sleep, adequate space, and security for residents and their belongings.
- Interior air quality: Each shelter room/space must have proper ventilation and be pollutant free.
- Water supply: Must be free of contamination.
- Sanitary facilities: Each participant must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- Thermal environment: The shelter must have the necessary, properly operating heating/cooling facilities.
- Illumination and electricity: The shelter must have adequate and appropriate lighting and safe electrical sources.
- Food preparation: Any food preparation area must be able to store, prepare, and serve safe and sanitary food.
- Sanitary conditions: The shelter must be in sanitary condition.
- Fire safety: 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.

In October 2024, CoC providers will be required to follow updated housing quality standards called NSPIRE.

#### *Shelter Diversion*

Shelter Diversion is a strategy that prevents homelessness at the front door by helping to identify immediate alternate housing arrangements and, if necessary, connecting people experiencing homelessness with services and financial assistance to help them return to permanent housing. Diversion should be attempted with all households seeking homeless services assistance.

#### *Eligibility Documentation*

Providers of Emergency Shelter services shall admit individuals and families who meet the HUD definition of "homeless," as specified in 24 CFR 576.2 (1, 2, & 4) and agencies' eligibility criteria. No provider funded under ESG or the CoC program may serve homeless persons in Category 3 until it has been notified by SARAH that a request has been made to serve this population and the request has been approved by HUD.

Recipients and subrecipients are required to document eligibility at program entry, even for emergency shelters. Given that third-party documentation at the emergency shelter level is not feasible in most cases, subrecipients operating emergency shelters can document homeless status through a certification by the individual or head of household as the primary method of establishing homeless eligibility. In these instances, one method of meeting this standard would be to require households to complete a sign-in sheet, with a statement at the top informing the individual or head of household that by signing, they certify that they are homeless.

Under no circumstances must the lack of third-party documentation prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.

#### *Assessment*

- Individuals and families shall be assessed for Coordinated Entry using the CoC-Approved Coordinated Entry assessment, and that assessment must be recorded into HMIS.
- Families and individuals remaining in shelter for longer than thirty (30) days shall be reassessed by a Case Manager for housing every 30-45 days.

#### *Intake*

When appropriate, based on the individual's needs and wishes, the provision of or referral to Homelessness Prevention (HP) or Rapid Rehousing (RRH) services that can quickly assist individuals to maintain or obtain safe, permanent housing shall be prioritized over the provision of Emergency Shelter (ES) or Transitional Housing (TH) services. Emergency shelters will prioritize shelter services for those:

- Individuals and families lacking other resources in the community even if limited assistance could be provided to end their homelessness.
- Are literally homeless and in the absence of shelter are likely to be living in an unsheltered setting.
- Individuals and families vulnerable to injury or illness if not sheltered.

#### *Discharge and Length of Stay*

Program participants shall be discharged from Emergency Shelter services when they choose to leave or when they have successfully obtained safe, permanent housing. Any Length of Stay limitations shall be determined by the individual service provider's policies and clearly communicated to program participants. Providers of shelter services are strongly encouraged not to discharge individuals and families who have not secured permanent housing and maintain those households in shelter until they can be placed in appropriate permanent housing.

#### *Safety and Shelter Safeguards for Special Populations*

Safety and Shelter Safeguards shall be determined by the individual Special Population service provider's policies and clearly communicated to program participants.

### **Street Outreach (SO) – CoC (YHDP) and ESG**

Reference: [24 CFR 576.101](#)

YHDP project types include Supportive Services Only, including, but not limited to, housing search and placement services, case management, drop-in centers which are physical locations that offer a variety of services to individuals and families experiencing homelessness that can be funded through the drop-in center grant or through another grant, legal services, or street outreach.

### **Supportive Services Only (SSO) – CoC (Unsheltered Special Only)**

SSO projects funded through the Unsheltered Special CoC grant must follow the rules and regulations of 24 CFR 578 and must align with the CoC Plan to Address Severe Service Needs. SSO projects are funded to provide housing navigation and SSI/SSDI Outreach, Access, and Recovery (SOAR) to connect program participants with histories of unsheltered homelessness to housing and vouchers.

The standards below are based on nationally recognized best practices and developed through a series of community sessions focusing on developing local best practice in rapid rehousing and homelessness prevention implementation. The intent of developing local Rapid Rehousing (RRH) and Homelessness Prevention (HP) program standards is to ensure equal access and services are provided to all households enrolled in RRH and HP and to establish consistency in implementation at every agency.

The Lubbock CoC Rapid Rehousing and Homelessness Prevention (including all ESG/ESG-CV funded Prevention) agencies are expected to adhere to these standards for delivering assistance in addition to all federal requirements applicable to the funding source, unless otherwise indicated.

# Appendices

## Appendix A: Policy and Procedures Checklist

Note: Please refer to Rapid Rehousing and Homeless Prevention Standards in the addendum for more information specific to these project types.

### *Shelter and Housing Projects*

- Conflict of interest
- Homeless participation
- Faith-based activity
- Nondiscrimination, equal opportunity, and affirmative outreach
- Uniform administrative rules
- Program participant records are kept secure and confidential
- Participation in HMIS or comparable database
- Homeless status
- At risk of homelessness status
- Determination of ineligibility
- Annual income
- Program participant records
- Centralized or coordinated assessment systems and procedures
- Rental assistance agreements and payments
- Environmental review
- Lobbying and disclosure
- Displacement, relocation, and acquisition
- Procurement
- Utility allowance
- Emergency shelter facilities
- Services and assistance provided
- Coordination with CoCs and other programs
- Matching
- Financial records
- Subrecipients and contractors
- Period of record retention
- Access to records
- Reports

### *ESG Program Participation Records*

- Evidence of homeless status or at risk of homelessness status, as applicable
- The services and assistance provided to the program participant including, as applicable, the security deposit, rental assistance, and utility payments
- Compliance with applicable requirements for providing services to that program participant under the program components and eligible activities
- Compliance with applicable requirements for providing services to that program participant under the provision on determining eligibility and the amount and type of assistance.
- Compliance with applicable requirements for providing services to that program participant under the provision on using appropriate assistance and services.

### *Case Management*

- Notes verifying case management services were provided at least monthly, unless exempt from this requirement
- Notes verifying program participant's eligibility was re-evaluated at least every 3 months

- for homelessness prevention services or at least annually for rapid rehousing services
- Notes verifying program participant was assisted to obtain necessary mainstream and other resources
- Notes documenting reported changes in the program participant

*Eligibility Requirements*

- A copy of the CoC-approved coordinated assessment of the program participant and recording that information in HMIS
- Determination and verification/certification that the program participant was eligible for the services and/or financial assistance
- Determination and verification/certification of the program participant's homeless or at risk of homelessness status
- Determination and verification/certification that the program participant lacked sufficient resources and support networks to obtain the assistance from other sources.
- Determination and verification/certification that the program participant met income requirements, as applicable, and that an effort was made to obtain source documents or written third-party verification, when possible and applicable. This includes annual documentation of income for each program participant who receives housing assistance where rent or an occupancy charge is paid by the program participant.
- When applicable, determination that individual or family was ineligible for ESG assistance, which should include the reason for that determination in sufficient detail that the logic behind determination is clear.
- For CoC funded projects, acceptable evidence of homeless status.

*Financial Assistance Information Requirements*

- Identification of the specific services and financial assistance amounts that were provided to the program participant
- Copies of written leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with fair market rent, rent reasonableness and utility allowance requirements
- Determination and verification that the housing unit met HUD's habitability and lead-based paint standards

*Housing Relocation & Stabilization Requirements*

- When applicable, verification that the services were terminated.
- Copy of individualized housing stability plan
- For CoC funded projects, acceptable evidence of homeless status.

*Permanent Supportive Housing (PSH) Only Requirements*

- Determination and verification/certification that the only households served through permanent supportive housing dedicated for chronically homeless individuals and families meet the definition of chronic homelessness
- Units that are prioritized for the chronically homeless must maintain documentation that: the participant met the definition of chronic homeless on program entry or that there were not eligible chronically homeless participants at the time of project vacancy and this can be documented by the Coordinated Entry System
- Determination and verification/certification that the only households served through permanent supportive housing meet HUD's requirements of having a family member be a person with disabilities

*Homelessness Prevention (HP) Only Requirements*

- Determination and verification/certification that the program participant met the criteria for being Homeless or At-Risk of Homelessness and that an effort was made to obtain written third-party verification, when possible and applicable

*Rapid Rehousing (RRH) Only Requirements*

- Determination and verification/certification that the program participant met the criteria for being Category 1 or Category 4 Homeless (as long as the individuals/families fleeing or attempting to flee DV are also literally homeless) and that an effort was made to obtain written third-party verification, when possible and applicable

*Financial Records Requirements*

- Supporting documentation for all costs charged to ESG or CoC grant
- Documentation showing ESG or CoC funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles
- Time sheets and time allocation for all personnel paid for with CoC and/or ESG funding
- Documentation of the receipt and use of program income
- Documentation of the receipt and use of matching funds
- Copies of procurement contracts

## Appendix B: Engagement Projects/Services Desk Guides

### Street Outreach (SO)

Essential Project Elements	Eligibility Requirements	Performance Metrics
<p><b>Engagement-</b> Activities that locate, identify, and build relationships with unsheltered homeless people for the purpose of providing immediate support. Should occur within and outside of business hours.</p> <p><b>Assessment-</b> Complete, at minimum, a VI-SPDAT or F-VI-SPDAT with all participants</p> <p><b>Navigation-</b> Assist homeless households to enroll in services and link to housing.</p> <p><b>Case Management-</b> Arrange, coordinate, and monitor the delivery of individualized services. Service plans should be participant- and housing-centered, and emphasize participant choice.</p> <p><b>Coordination-</b> Coordinate with other outreach teams to avoid duplication of services and optimize coverage.</p>	<p><b>Category 1</b> of the HEARTH Act homeless definition</p>	<p>The extent to which persons who exit homelessness to permanent housing return to homelessness</p> <ul style="list-style-type: none"> <li>• This measures participants who exited SO to a permanent housing destination in the date range two years prior to the report date range.</li> </ul> <p>Successful placements from SO to a permanent housing destination, including some exits to temporary and institutional settings</p> <p>Percent of total engagements that are with chronically homeless/highly vulnerable individuals</p> <p>Participants who successfully move into emergency shelter, transitional housing, or permanent housing within 30 days after SO enrollment</p>

### Homeless Prevention (HP)

Essential Project Elements	Eligibility Requirements	Performance Metrics
<p><b>Assessment-</b> Complete individualized assessments that evaluate household needs, financial needs, and eligibility for mainstream resources.</p> <p>VI-SPDATs and F-VI-SPDATs should not be used.</p>	<p>If funded by any source:</p> <p><b>Category 2 of the HEARTH</b> Act homeless definition; or,</p> <p><b>Category 4 of the HEARTH</b> Act homeless definition</p>	<p>Successful exits from HP to a permanent housing destination, including maintaining current permanent housing</p>
<p><b>Case Management/ Navigation-</b> Create a housing stabilization plan and provide (or provide referrals to) needed housing stabilization services and mainstream resources using a progressive engagement approach.</p>	<p>If funded by the ESG Program:</p> <p>Individuals and families who meet the criteria under the “at risk of homelessness” definition per the ESG Interim Rule; or,</p> <p><b>Category 2 of the HEARTH</b> Act homeless definition; or,</p> <p><b>Category 4 of the HEARTH</b> Act homeless definition</p>	
<p><b>Financial Assistance-</b> Provided in compliance with a progressive engagement model, in order to provide the “lightest touch” intervention possible.</p>		

## Diverson

Essential Project Elements	Eligibility Requirements	Performance Metrics
<p><b>Assessment-</b> Complete a housing barrier assessment. If the household is literally homeless (Category 1 of the HEARTH Act definition), also complete a VI-SPDAT or F-VI-SPDAT.</p> <p><b>Specialized Services-</b> Typically conflict mediation, housing location/stabilization, and referral to mainstream resources</p> <p><b>Access to Flexible Financial Assistance-</b> A small pool of flexible funds that provide assistance for households to obtain/maintain housing (e.g., car repairs, grocery gift cards, bus tickets, child care vouchers).</p>	<p>Diversion can be performed with any household presenting with a housing crisis.</p>	<p>Percent of participant households served will be entered into HMIS, in accordance with the HMIS Policies and Procedures. This metric will apply only if the provider is using HMIS.</p>

## Appendix C: Temporary Housing Desk Guides

### Emergency Shelter (ES)

Essential Project Elements	Eligibility Requirements	Performance Metrics
<p><b>Low-Barrier-</b> Maintain as few barriers to entry as possible</p> <p><b>Safety-</b> Provide a safe physical environment</p> <p><b>Assessment-</b> Complete, at minimum, a VI-SPDAT or F-VISPDAT with all participants</p> <p><b>Services-</b> Voluntary, housing focused, client-centered services. Create a housing plan and provide (or provide referrals to) needed housing identification services and mainstream resources</p> <p><b>Coordination-</b> Work with local service providers to provide needed services to households in ES</p>	<p><b>Category 1</b> of the HEARTH Act homeless definition; or,</p> <p><b>Category 4</b> of the HEARTH Act homeless definition</p>	<p>Average and median length of time participants remain homeless is equal to or less than 30 days.</p> <p>The extent to which participants who exit homelessness to permanent housing return to homelessness</p> <ul style="list-style-type: none"> <li>• This measures participants who exited ES to a permanent housing destination in the date range two years prior to the report date range.</li> </ul> <p>Successful exits from ES to permanent housing</p> <p>Percent participants age 18 or older with earned income at exit</p> <p>Percent participants age 18 or older who have non-cash benefits at exit</p> <p>Percent participants with 1+ source of non-cash benefits at exit</p> <p>Percent participants age 18 or older who maintained or increased their total income (from all sources) as of the end of the operating year or program exit</p>

### Inclement Weather Emergency Shelter (IWES)

Essential Project Elements	Eligibility Requirements	Performance Metrics
<p><b>Low-Barrier-</b> Maintain as few barriers to entry as possible</p> <p><b>Safe, Adequate Shelter-</b> Provide a safe physical environment, including access to sleeping space, hygiene amenities, and food items.</p> <p><b>Services-</b> To the extent that funding/capacity allowed, IWES may provide case management and/or housing navigation</p>	<p><b>Category 1</b> of the HEARTH Act homeless definition; or,</p> <p><b>Category 4</b> of the HEARTH Act homeless definition</p>	Percent of participant households served will be entered into HMIS, in accordance with the HMIS Policies and Procedures. This metric will apply only if the IWES provider is using HMIS.

## Transitional Housing (TH)

Essential Project Elements	Eligibility Requirements	Prioritization	Performance Metrics
<p><b>Low-Barrier-</b> Maintain as few barriers to entry as possible</p> <p><b>Lease/Occupancy Agreement-</b> Participants must hold a valid, standard, lease/occupancy agreement with TH provider or</p> <p><b>Landlord Rental Assistance/Occupancy</b></p> <p><b>Charges-</b> Provide free or subsidized housing units</p> <p><b>Safety-</b> Provide a safe physical environment with access to residential amenities</p> <p><b>Services-</b> Voluntary, housing-focused, client-centered services. Create a housing plan and provide (or provide referrals to) needed housing identification services and mainstream resources. Must not be disability-related.</p>	<p><b>Category 1</b> of the HEARTH Act homeless definition; or,</p> <p><b>Category 4</b> of the HEARTH Act homeless definition</p>	<p>Households appropriate for TH typically score between 4 and 7 on the VI-SPDAT and between 4 and 8 on the F-VISPDAT.</p>	<p>The extent to which persons who exit homelessness to permanent housing return to homelessness</p> <ul style="list-style-type: none"> <li>• This measures participants who exited TH to a permanent housing destination in the date range two years prior to the report date range.</li> </ul> <p>Successful exits from TH to permanent housing destinations</p> <p>Percent participants age 18 or older with earned income at exit</p> <p>Percent participants age 18 or older who have non-cash benefits at exit</p> <p>Percent participants with 1+ source of non-cash benefits at exit</p> <p>Percent participants age 18 or older who maintained or increased their total income (from all sources) as of the end of the operating year or program exit</p>

## Appendix D: Permanent Housing Desk Guides

### Rapid Re-Housing (RRH)

Essential Project Elements	Eligibility Requirements	Prioritization	Performance Metrics
<b>Housing with Support-</b> A no-barrier project model that provides homeless people with housing quickly and then provides services, as needed	<b>Category 1</b> of the HEARTH Act homeless definition; or, <b>Category 4</b> of the HEARTH Act homeless definition	Financial Assistance may be provided for up to <b>24 months</b> , though the project should aim to exit participants quickly	The extent to which persons who exit homelessness to permanent housing return to homelessness <ul style="list-style-type: none"> <li>• This measures participants who exited RRH to a permanent housing destination in the date range two years prior to the report date range.</li> </ul>
<b>Housing Identification-</b> Locate housing options that take into account the household's needs and preferences. Partner with landlords.	Households appropriate for RRH typically score between 4 and 7 on the VI-SPDAT and between 4 and 8 on the F-VISPDAT.	<b>Minimum rent contribution</b> is to be determined in collaboration with the project participant, no less than every 90 days.	Successful exits from RRH to permanent housing
<b>Rent and Move-In Assistance (Financial)-</b> Utilize a progressive engagement model to provide financial assistance to allow households to move out of homelessness and into permanent housing			Percent participants age 18 or older with earned income at exit
<b>Housing-Focused Case Management and Services-</b> Must occur at least once per month. Services focused on housing goals over therapeutic goals			Percent participants age 18 or older who have non-cash benefits at exit
			Percent participants with 1+ source of non-cash benefits at exit
			Percent participants age 18 or older who maintained or increased their total income (from all sources)
			The average length of time homelessness is 30 days or less.
			At least 80% of households exit to a permanent housing
			At least 85% of households that exited to a permanent housing destination do not become homeless again within 1 year

## Permanent Supportive Housing (PSH)

Essential Project Elements	Eligibility Requirements	Prioritization	Assistance Summary	Performance Metrics
<b>Housing with Support-</b> A no-barrier project model that provides homeless people with housing quickly and then provides services, as needed Wraparound,	<b>Category 1</b> of the HEARTH Act homeless definition; or,  <b>Category 4</b> of the HEARTH Act homeless definition  AND  <b>Meets HUD's Definition of Chronic Homelessness</b> , unless the project has performed a due diligence effort to locate a chronically homeless household in the project's service area and cannot find one.	<b>If chronically homeless...</b> 1) Longest history of homelessness and most severe service needs 2) Longest history of homelessness 3) Most severe service needs 4) All other chronically homeless households (HHs).  <b>If not chronically homeless...</b> 1) HHs with longest history of episodic homelessness, a disability, and the most severe service needs 2) HHs with a disability with severe service needs 3) HHs with disabilities coming from a place not meant for human habitation/emergency shelters w/o severe service needs 4) HHs with disabilities coming from TH	Unlimited rental assistance may be provided  Minimum rent contribution must be the highest of: <ul style="list-style-type: none"> <li>30% monthly adjusted income</li> <li>10% monthly gross income</li> <li>Living allotment designated in a public agency's welfare assistance</li> </ul>	80% of participants maintain or exit to permanent housing  The extent to which persons who exit homelessness to permanent housing return to homelessness <ul style="list-style-type: none"> <li>This measures participants who exited PSH to a permanent housing destination in the date range two years prior to the report date range.</li> </ul>
<b>Community-Based Services-</b> Voluntary, housing-focused, client-centered services, including assistance in accessing communitybased/mainstream benefits.				Percent participants age 18 or older with earned income at exit
<b>Rental Assistance-</b> Unlimited rental assistance may be provided.				Percent participants age 18 or older who have noncash benefits at exit  Percent participants with 1+ source of non-cash benefits at exit  Percent participants age 18 or older who maintained or increased their total income (from all sources) as of the end of the operating year or program exit

## Appendix E: Training and Resource Tool

This tool is for CoC and ESG funders and recipients to provide resources and assist with monitoring. This tool will be updated as new resources become available.

Training and Resource List for All CoC and ESG Programs:

If CoC funded:

- [CoC Program Interim Rule](#)
- [24 CFR 578](#)

If ESG funded:

- [ESG Program Interim Rule](#)
- [24 CFR 576](#)

Both CoC and ESG funded:

- [HUD Virtual Binders](#)
- [Homeless Management Information System \(HMIS\) Policies & Procedures](#)
- [Coordinated Entry Policies & Procedures](#)

# Appendix F: Emergency Transfer Plan

Model Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

## EMERGENCY TRANSFERS:

[Insert name of covered housing provider (acronym HP for purposes of this model plan)] is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),<sup>8</sup> HP allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex.<sup>9</sup> The ability of HP to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether HP has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that [insert name of program or rental assistance here] is in compliance with VAWA.

## ELIGIBILITY FOR EMERGENCY TRANSFERS:

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

Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex or marital status.

Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of gender or marital status.

## EMERGENCY TRANSFER REQUEST DOCUMENTATION:

To request an emergency transfer, the tenant shall notify HP's management office and submit a written request for a transfer to [HP to insert location]. HP will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

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

## CONFIDENTIALITY:

HP will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives HP written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against

the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about HP's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

#### EMERGENCY TRANSFER TIMING AND AVAILABILITY:

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

If HP has no safe and available units for which a tenant who needs an emergency is eligible, HP will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, HP will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

#### SAFETY AND SECURITY OF TENANTS:

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

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY). Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE or visit the online hotline at <https://ohl.rainn.org/online/>.

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