CoC Orientation and Funding Process Overview

Amanda Borta
Sr. Program Services Coordinator
Lane County Human Services
• Welcome and Introductions
• CoC History and Context
• HUD CoC Funding Process
• CoC Program Components
• Eligible Costs and Match
• Eligibility and Documentation
• Rental Assistance vs. Leasing
• HMIS and Data Entry
• Coordinated Entry
• Housing First
• Resources
• Questions
Welcome and Introductions

Introduce yourself in the chat:

✓ Name and Pronouns
✓ Agency
✓ Role/Title
✓ How long you’ve been working with CoC programs or other efforts related to homelessness
What do we hope to get out of today?

Objectives

✓ Attendees will have an understanding of the HUD CoC Program, including what the CoC Program is, the funding process, and general context.

✓ Attendees will have an understanding of HUD CoC Program requirements, including program components, eligibility, eligible costs, etc.

✓ Attendees will have an understanding of Lane County CoC and local standards for CoC funded projects.
1987: Congress passes first federal law specifically addressing homelessness – later renamed to be McKinney Vento Homeless Assistance Act

1987-1993: HUD held national competitions each year for its homeless assistance funds; individual organizations wrote applications

1994-2009: CoC concept was first introduced by HUD – required each community to come together to submit a single, collaborative application

2009-present: HEARTH Act amends and reauthorizes McKinney-Vento – consolidated HUD’s competitive grant programs into one CoC Program, along with other substantial changes
What is the Continuum of Care?

- Community-wide planning and coordination of programs, ensuring issue of homelessness is addressed in a coordinated, comprehensive, and strategic manner
- Promotes community-wide commitment to the goal of ending homelessness
- Provides funding for local agencies (nonprofit and government) to house people experiencing homelessness
- Promotes access to and effective utilization of mainstream programs
Lane County CoC

- OR-500 Eugene, Springfield/Lane County CoC
- Governed by Poverty and Homelessness Board (PHB), the CoC Board
- Managed by the Collaborative Applicant (Lane County)
In managing the CoC, Lane County is responsible for:

- Establishing and operating the **Coordinated Entry System** (Central Waitlist, or CWL)
- Designating and operating the **Homeless Management Information System** (HMIS)
- System Operations and Planning
  - Develops local **strategic plan to end homelessness**
  - Establishes **performance targets, monitors performance, and evaluates outcomes**
  - Development of **written standards** and technical assistance
- Completing **annual application** for HUD CoC funding
HUD Funding Process

• Notice of Funding Opportunity (NOFO)
  • Collaborative Applicant (Lane County)
  • Co-Applicants SVdP and Homes for Good

• CoC Consolidated Application
  • CoC Application (System Planning)
  • Project Applications and Priority Listing (Funding Recipients and Subrecipients)
HUD Funding Process

Co-applicants complete project applications for all HUD-funded renewal projects.

Collaborative Applicant collects and reviews all applications and completes the CoC Application.

Awards Issued by HUD

Winter

Project Applications and CoC Application are submitted as one Consolidated Application to HUD

Spring/Summer

NOFO Released by HUD
The CoC determines eligible **new projects** to be submitted in the upcoming Competition.

The CoC determines eligible **renewal projects** to be submitted in the upcoming Competition by completing an Evaluation process.

The CoC ranks all eligible **new and renewal** projects for submission in the Competition.

- **NOFO Released**
- **CoC Intent to Renew/Evaluation**
- **Lane County Selection Process** (Request For Proposals)
- **CoC Ranking** (Priority Listing)

**Local Process**

**Consolidated Application submitted to HUD**

**Collaborative Application and Project Applications**
CoC Program Components

CoC funding primarily supports **Permanent Housing** programs:

- Permanent Supportive Housing (PSH)
- Rapid Re-housing (RRH)

CoC funding also supports **System Capacity**:

- CoC Planning
- Homeless Management Information System (HMIS)
- Coordinated Entry (SSO-CE)

**Other Program Types:**

- Joint Transitional Housing and Rapid Re-housing (Joint TH-RRH)

CoC Funding **no longer supports** the following component types:

- Transitional Housing (TH)
- Supportive Services Only (SSO)
- Safe Haven
<table>
<thead>
<tr>
<th>Recipient</th>
<th>Current Subrecipient(s)</th>
<th>Project</th>
<th>Type</th>
<th>FY21 Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lane County</td>
<td>ShelterCare</td>
<td>Camas</td>
<td>PSH</td>
<td>$206,855</td>
</tr>
<tr>
<td></td>
<td>ShelterCare</td>
<td>Cascades</td>
<td>RRH</td>
<td>$124,433</td>
</tr>
<tr>
<td>Mainstream Housing, Inc.</td>
<td>Emerald</td>
<td></td>
<td>PSH</td>
<td>$215,259</td>
</tr>
<tr>
<td></td>
<td>HMIS</td>
<td></td>
<td>HMIS</td>
<td>$135,995</td>
</tr>
<tr>
<td>ShelterCare; Looking Glass; CCS</td>
<td>McKenzie</td>
<td></td>
<td>RRH</td>
<td>$664,677</td>
</tr>
<tr>
<td></td>
<td>ShelterCare</td>
<td>Sahalie</td>
<td>PSH</td>
<td>$234,148</td>
</tr>
<tr>
<td>SVdP</td>
<td>Shankle/MLK</td>
<td></td>
<td>PSH</td>
<td>$537,958</td>
</tr>
<tr>
<td></td>
<td>Connections</td>
<td></td>
<td>RRH</td>
<td>$239,316</td>
</tr>
<tr>
<td></td>
<td>VET LIFT</td>
<td></td>
<td>PSH</td>
<td>$235,389</td>
</tr>
<tr>
<td></td>
<td>LIFT</td>
<td></td>
<td>PSH</td>
<td>$305,489</td>
</tr>
<tr>
<td>Homes for Good</td>
<td>ShelterCare</td>
<td>Madrone/SPC</td>
<td>PSH</td>
<td>$1,035,575</td>
</tr>
<tr>
<td><strong>Total Renewals</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>$3,935,094</strong></td>
</tr>
<tr>
<td>Lane County</td>
<td>-</td>
<td>Planning (New)</td>
<td>Planning</td>
<td>$118,053</td>
</tr>
<tr>
<td>BONUS</td>
<td>n/a</td>
<td>New PSH and DV</td>
<td></td>
<td>$339,245</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>$4,392,392</strong></td>
</tr>
</tbody>
</table>
Permanent Housing under the CoC Program:

- PSH and RRH
- Community-based housing without a designated length of stay
- Program participant must be tenant on lease or sublease for a term of at least one year and must be renewable
In PSH, **both** the **housing assistance** and the **services** are meant to be **permanent**

Long-term housing and supportive services to assist persons experiencing homelessness who **have a disability** (at least one adult or child)

Can be project-based or scattered site

Emphasis on serving those who are **chronically homeless, prioritizing individuals with the highest needs and vulnerabilities.**

**New PSH** funded through the CoC typically must only serve individuals who are chronically homeless

**Ongoing supportive services** must be available throughout enrollment in the program
In RRH, the housing is meant to be permanent, but the services and assistance are temporary.

Short-term (1-3 months) or medium-term (4-24 months) of housing and supportive services to assist persons experiencing homelessness in obtaining and maintaining stability in housing.

Tenant-based assistance.

May or may not include individuals with a disability.

Prioritized locally for individuals who are chronically homeless, but may or may not serve those who have the highest needs and vulnerabilities.

At least monthly case management must be provided.
Rapid Re-Housing under the CoC Program must follow locally established CoC Standards

Standards outline:

• Core Components - Housing Identification, Case Management, and Rental Assistance
• Limits on Amount and Type of Assistance
• Calculating Tenant Contribution to Rent
• Termination Guidelines

Households enrolled in RRH must complete re-evaluation every three months for continued eligibility and assistance
Eligible Costs

- Acquisition/Rehabilitation/New Construction
- Leasing
- Rental Assistance
- Supportive Services
- Operating
- HMIS
- Project Admin
Not all eligible costs are eligible under each program component:

<table>
<thead>
<tr>
<th>Eligible Costs</th>
<th>Permanent Housing</th>
<th>Program Components</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>PH: PSH</td>
<td>PH: RRH</td>
</tr>
<tr>
<td>Acquisition</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Rehabilitation</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>New construction</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Leasing</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Rental assistance</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Supportive services</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Operating costs</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>HMIS</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Project Administration</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>
Eligible vs. Approved Costs

*Eligible* costs are those included in the CoC Interim Rule

*Approved* costs are the budget line items specifically approved by HUD in the recipient’s grant agreement

In the project application submitted to HUD, the agency requests CoC Program funds to pay for specific costs

*Example*: If a project does not have operating budget line items in their approved budget, they cannot spend on operating costs even if they are eligible costs for the program

Approved costs can be adjusted through amendment or budget changes with Lane County and the local HUD field office
Match

- CoC programs are required to provide *at least 25% match* of all line items other than Leasing
- Match is cash or in-kind resources from other sources that is spent on eligible program costs and activities
- Cash match requires a commitment in writing prior to grant agreement
- In-kind match requires additional documentation (MOU)
- Since FY15, HUD has allowed recipients to use program income as match
- HSC funding provided in Lane County CoC contracts can be used toward the match requirement when spent on eligible costs
Leasing

• Eligible under PSH
• Funds to pay rent on structures or individual units to provide supportive housing or supportive services
• Leasing is tied to property
• May not be use CoC leasing funds to lease units or structures owned by the recipient, sub-recipient, or any related organization
• May be used for rent, security deposits, first/last month rent, as well as staff or related costs to carry out leasing activities
• Does not require match
Rental Assistance

- Eligible under PSH or RRH
- CoC Rental Assistance funds pay part of the rent for a unit in which a program participant will reside
- Rental Assistance is tied to persons
- May be short (1-3 months) or medium (4-24 months) term assistance
- May be tenant-based, project-based, or sponsor-based
  - RRH is tenant-based under local CoC Standards
- Does require match
Rental Assistance

Includes:
- Processing rental payments for landlords
- Examining participant income and family composition
- Providing housing information and assistance
- Inspecting units for compliance with housing quality standards
- Receiving new participants into the program

Can be paid by:
- Using match funds
- Rental Assistance funds (if not 100% leased)
- Excess (if 100% leased below FMR rates)
• Eligible under PSH
• Costs associated with day-to-day \textit{physical operation} of housing in which participants are housed
• Maintenance and repair, major building systems, building security, utilities, furniture, equipment, etc.
• May \textbf{NOT} fund general staffing (case manager FTE), but can fund overhead costs related to above activities (e.g. security personnel)
• Equipment and furniture stay with the program when paid for using operating funds, except mattresses which can stay remain with a participant
Supportive Services

Eligible Service Costs:

- Assessing service needs
- Moving Costs
- Case Management
- Child Care
- Education services
- Employment assistance or job training
- Food
- Housing Search and Counseling
- Legal services
- Life Skills Training
- Mental health services
- Outpatient health services
- Outreach services
- Substance Use Treatment services
- Transportation
- Utility Deposits

All supportive services provided must help program participants obtain and maintain housing. Any service not listed in the CoC Interim Rule is NOT an eligible cost.
Any project may use CoC Program funds to pay for staff and overhead costs directly related to contributing and maintaining data in HMIS.

Eligible costs include:

- Purchasing or leasing computer hardware or software, and licenses
- Leasing office space, equipment, furniture, and utilities for HMIS activities
- Salaries, operating costs, and duties as required to operate an HMIS
- Trainings related to the use of HMIS and associated costs
- Paying HMIS participation fees charged by HMIS Lead
• Projects are generally allowed up to 10% administration in the overall CoC program budget
• Lane County retains 50% of admin costs for programs subcontracted
• Eligible Costs
  • General management, oversight, and coordination
  • Training on CoC Requirements
  • Environmental Review costs
• Ineligible Costs
  • Staff and overhead costs directly related to carrying out other eligible activities under the CoC Program
• Indirect Costs
  • Those that have been incurred for shared or joint objectives that cannot be identified with any particular activity
Can CoC Supportive Service Funds pay for a program participant’s linens and bedding to furnish a new apartment?

No.

This is not an eligible cost. Items like dishes, cookware, linens, bedding, or other consumable supplies that are used by the program participant rather than the recipient or subrecipient are not specified as eligible costs in the CoC Program Interim Rule, and therefore cannot be funded with CoC Program grants.
Which of the following is not an eligible operating cost?

A. Furniture
B. Mortgage Payments
C. Snow Removal
D. Non-Beautification Landscaping

B. The cost of periodic mortgage payments or of paying off a current mortgage on a property are not eligible operating costs under the CoC Program Interim Rule.
Eligibility

Program Participants
✓ Housing Status
✓ Disability Status
✓ Chronic Homeless Status

Definitions and Documentation
• Order of Preference
All CoC program participants must meet housing status requirements to be eligible for enrollment.

**Categories of Homelessness**

- ✓ Category 1: Literally Homeless
- X Category 2: Imminent Risk
- X Category 3: Homeless Under Other Federal Statutes
- ✓ Category 4: Fleeing/Attempting to Flee DV

In general, individuals meeting definitions of Categories 1 or 4 may be served in CoC programs.

CoCs are only permitted to serve individuals meeting Categories 2 or 3 with HUD approval or High Performing Community designation.
Literal Homelessness

- An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - Has a primary nighttime residence that is a place not meant for human habitation or ordinarily used as a regular sleeping accommodation; OR
  - Living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels/motels paid for by charitable organizations or by fed/state/local government; OR
  - Exiting an institution where they resided for 90 days or less and were residing in one of the above immediately before entering institution
Fleeing or Attempting to Flee DV

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

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

Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability.
Must have written policies and procedures that:

- require staff to document eligibility at intake
- specify the evidence to rely upon and the order of preference
- include standards for documenting due diligence

Order of Preference:

1. Third Party documentation
2. Intake worker observation
3. Certification from the person seeking assistance (self-report)
Appropriate Documentation:

Criteria and Recordkeeping Requirements for Definition of Homeless

Most common types of documentation

- **Category 1**: letter from service provider (emergency shelter, outreach worker, or other)
- **Category 4**: Oral statement certifying status

Don’t forget to document due diligence – if unable to obtain third party documentation, **MUST** document attempts to do so!

**Self Report = Last Resort!**
Disability Status

• Required only when a disability is a requirement for entry into the program (i.e. PSH programs that require CH status or disability for Entry)

• Must document the disability status of all program participants at intake

• Disability is defined as:
  • Physical, mental or emotional impairment, including impairment caused by alcohol or drug abuse, post-traumatic stress disorder, brain injury or a chronic physical illness that:
    • Is expected to be long-continuing or of indefinite duration; and
    • Substantially impedes the person’s ability to live independently; and
    • Could be improved by more suitable housing.
  • Developmental Disability as defined in Section 102 of the Developmental Disability Assistance and Bill of Rights Act of 2000
  • Disease of acquired immunodeficiency syndrome or any condition arising from the etiologic agency for acquired immunodeficiency syndrome
PSH participants must have a documented disability in order to be eligible

- Written verification of the disability from professional licensed by the state to diagnose and treat the disability;
- Written verification from the Social Security Administration;
- The receipt of a disability check (e.g. SSDI check or Veteran Disability Compensation);
- Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, accompanied by evidence above
Chronic Homeless Status

A person meeting the definition of literally homeless (category 1)

AND

Has been homeless continuously for at least 12 months

OR

On at least 4 separate occasions in the last 3 years where the combined occasions equal a total of 12 months

✓ Occasions must be separated by a break of at least seven nights
✓ Stays in institutions of fewer than 90 days do not constitute a break
A family with an adult head of household (or minor if no adults in family) who meets all of the criteria, including a family whose composition has fluctuated while the head of household has been homeless.
Chronic Homelessness Documentation

Required to have **written intake procedures**

Must have **all** of the following to document CH status:

- ✓ Evidence of homeless status
- **AND**
- ✓ Evidence of disability
- **AND**
- ✓ Evidence of duration of homelessness
Continuous (12 months):

At least 9 months of the 12 months must be documented by one of the following:

- HMIS data; written referral; written observation of outreach worker
- Single encounter within 1 month is sufficient to count the entire month unless there is evidence of a break during that month (e.g. stay in TH documented in HMIS)

Episodes (if using episodic criteria):

At least 3 occasions must be documented using the following:

- HMIS data; written referral; written observation of outreach worker
Overview-of-Dedicated PLUS-Eligibility-and-Recordkeeping-Requirements

A DedicatedPLUS project is a permanent supportive housing (PH-PSH) project where the entire project will serve individuals and families where the head of household has a disability and who meet any of the following criteria at project entry (in any order):

1. Experiencing chronic homelessness as defined in 24 CFR 578.31;
2. Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
3. Residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;
4. Residing in transitional housing funded by a Joint transitional housing (TH) and rapid re-housing (PHRRH) component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
5. Residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
6. Receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA’s homeless assistance system.
TRUE OR FALSE:

Income is used to determine eligibility for CoC Rapid re-housing.

False.

In order to be eligible for CoC RRH assistance, a household must meet the definition of homeless under Category 1 (literally homeless) or Category 4 (fleeing DV).

The CoC Program Interim Rule does not establish an income eligibility guideline for continued RRH assistance. A CoC may establish an income requirement to align with ESG or other written standards.

At re-evaluation, CoC RRH participants must lack resources and support networks to help them remain housed and must have a demonstrated need for continued assistance.
Are there any circumstances when a program participant’s disability diagnosis can be documented via self-report?

No - The condition must be documented with third-party documentation.

For eligibility in PSH, a program participant’s disability must also be of long and continuing duration, substantially impede the program participant’s ability to live independently, and be improved by the provision of more suitable housing conditions.
Can a child with a disability qualify a household as chronically homeless?

No - Only if the child is a minor head of household.

Under the definition of chronically homeless, the head of household (either an adult or a minor if there is no adult present) must have the qualifying disability and meet all of the other criteria (i.e., length of time homeless) in order for a family to be considered chronically homeless.

Where there is no adult member of the family, then a minor can be identified as the head of household and that individual is who must meet the criteria.

Note: when there are multiple adults in the presenting family, or multiple minors in a family with no adult, HUD does not specify which adult or minor must be the head of household and relies upon the family to self-determine which adult is the head of household.
Individuals should be actively engaged in the housing search process and assisted in locating housing that meets their individual needs to the greatest extent possible.
Both leasing and rental assistance units must meet **Housing Quality Standards (HQS)**

- Each unit must be physically inspected
- Owner has 30 days to correct any deficiencies
- Inspect units at least annually
- HQS inspectors do not need to be certified, but this is recommended
- Must also meet state/local codes; occupancy standards
- Must also document Lead Based paint visual assessment (constructed before 1978, children under 6 or pregnant woman)
Leases

Must have signed lease agreement in place before disbursing any funds:

- ✓ One year lease – CoC PSH or RRH
- ✓ Automatically renewable – CoC PSH
- ✓ Renewable and terminable only for cause – CoC RRH
- ✓ Must be between tenant and owner – CoC RRH

<table>
<thead>
<tr>
<th>Summary of Lease/Occupancy Agreement Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Component</td>
</tr>
<tr>
<td>-----------</td>
</tr>
<tr>
<td>PH:PSH</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>PH:RRH</td>
</tr>
</tbody>
</table>
## Leasing vs. Rental Assistance

<table>
<thead>
<tr>
<th>Leasing</th>
<th>Rental Assistance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recipient or subrecipient must be the tenant of the landowner</td>
<td>Program participant is the sole party on the lease with the landowner</td>
</tr>
<tr>
<td>Program participant must be sublessee or have an occupancy agreement (TH only)</td>
<td>Recipient or subrecipient must have written agreement with landowner</td>
</tr>
<tr>
<td>Recipient or subrecipient must pay rent directly to the landowner</td>
<td>Program participant pays rent directly to landowner</td>
</tr>
<tr>
<td>Recipient or subrecipient is responsible for 100% of the rent</td>
<td>Recipient or subrecipient makes rental payments to landowner based on the difference between total rent and amount paid by participant</td>
</tr>
<tr>
<td>Rent can be paid on a vacant unit</td>
<td>Recipient or subrecipient not responsible for portion of rent paid by the participant</td>
</tr>
<tr>
<td>Leasing funds do not have a matching requirement</td>
<td>Cannot make payments on a vacant unit, with exceptions</td>
</tr>
<tr>
<td></td>
<td>Rental Assistance funds have a match requirement</td>
</tr>
</tbody>
</table>
**Fair Market Rent (FMR)** applies to both leasing and rental assistance.

**Rent Reasonable**

Ensures HUD program participants do not pay more than non-program participants for rent.

Must be reviewed annually.

Must document appropriately—conduct comparison of similar units (at least 3).
### RA vs. Leasing

#### FMR and RR Requirements

<table>
<thead>
<tr>
<th>Rental Assistance</th>
<th>Leasing</th>
</tr>
</thead>
<tbody>
<tr>
<td>CoC RA costs can exceed FMR</td>
<td>CoC Leasing costs cannot exceed FMR</td>
</tr>
<tr>
<td>Must meet rent reasonable guidelines</td>
<td>Must meet rent reasonable guidelines</td>
</tr>
<tr>
<td>May use CoC funds for costs exceeding FMR as long as rent reasonable</td>
<td>May pay above FMR if using non-CoC leasing funds</td>
</tr>
<tr>
<td></td>
<td>• Program income or match</td>
</tr>
<tr>
<td></td>
<td>• Other non-CoC funds</td>
</tr>
<tr>
<td>Security Deposit – up to 2 months rent</td>
<td>Security Deposit – up to 2 months rent</td>
</tr>
<tr>
<td>Property damage – up to 1 month rent</td>
<td>Property Damage not eligible</td>
</tr>
<tr>
<td>• NOT RRH</td>
<td></td>
</tr>
</tbody>
</table>
Tenant Rent Contribution: PSH RA

**PSH Programs with Rental Assistance:**

Rent **must** be charged and be equal to the *highest* of:

- 30% of family’s monthly adjusted income;
- 10% of the family’s monthly gross income; or
- The portion of the family’s welfare assistance, if any, that is designated for the payment of rent.
- No payment required for those with no income.

*This regulation does not apply to programs with Leasing funds.*
*This regulation does not apply to programs under RRH component.*
PSH Programs with Leasing:

Rent *may* be charged, and if charged, may not exceed the highest of:

- 30% of family’s monthly adjusted income;
- 10% of the family’s monthly gross income; or
- The portion of the family’s welfare assistance, if any, that is designated for the payment of rent.

- No payment required for those with no income

For all CoC PSH projects, income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a).

The provider must examine a participant's income initially at Entry, and at least annually thereafter.

If there is a change in family composition (e.g., birth of a child) or a decrease in the household income during the year, the participant may request an interim reexamination, and the occupancy charge or rent will be adjusted accordingly.
The initial amount of rental assistance and level of participant contribution is determined for each household based on income and budget, client need, and other factors using a progressive engagement approach.

Adjustments should be made as circumstances change or no less than every three months at re-certification.

**General Guidelines**

- The program may pay up to 100% of rent only for the first three months of subsidy, for households with income.
- On average, participants will pay between 30-50% of their gross monthly income toward rent.
- Participant rent contribution should not exceed 50% gross monthly income while enrolled in RRH.
- Subsidy should follow a graduated model, reducing subsidy over time, and be individualized to the household.
- Households with zero income will have no contribution to rent until income is gained.
**Other Requirements**

**Participation from individuals experiencing homelessness:**

- Must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient.

- Each recipient and subrecipient of assistance must, *to the maximum extent practicable*, involve homeless individuals and families through employment; volunteer services; or otherwise in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project.
**Service Requirements:**

- Both PSH and RRH are required to make supportive services available throughout the duration of the enrollment.
- Each recipient and subrecipient must conduct an *ongoing assessment of the supportive services needed*, the availability of such services, and the coordination of services needed to ensure long-term housing stability.
Other Requirements

All CoC funded projects must comply with:

• Fair Housing
• VAWA
• Equal Access to Housing Final Rule
Which service activities can a CoC program participant be required to participate in?

A. Taking prescribed medications
B. Accepting case management
C. Engaging in mental health counseling
D. None of the above

B. Case Management.

Recipients and subrecipients may require that program participants participate in services that are not disability-related such as case management. However, individuals should not be terminated for a failure to participate in services or case management.
Can a program participant who is evicted from a unit continue to receive rental assistance?

Yes. A program participant may be evicted from living in a property without having all assistance terminated and continue to be served in another location.

This is particularly true when providing Permanent Supportive Housing for hard-to-house populations of homeless. For these households, services may continue to be supplied by the current housing provider or the program participant may be transferred to another provider's PSH program.
• Coordinates access to resources across the CoC
• All CoC funded projects are required to fully participate in Coordinated Entry
• All referrals must come from the established Coordinated Entry based on local policies and procedures
• Assessment and Prioritization are determined locally
  • Front Door Assessment (FDA) and VI-SPDAT
• Continuous improvement process
Homeless Management Information System (HMIS)

- Lane County uses Wellsky for the HMIS
- Managed by the HMIS Lead (Lane County)
- All CoC funded projects are required to fully participate in the HMIS and enter all client level data
  - Universal Data Elements
  - Additional Program Specific Data Elements
  - Program Component Workflows
- Reporting and Data Quality
  - Annual Performance Reports (APR) must be submitted to HUD within 90 days of grant end date
  - Other: Longitudinal System Analysis (LSA) and Annual Homeless Assessment Report (AHAR); System Performance Measures (SPM); Point in Time (PIT) and Housing Inventory Count (HIC)
System Performance Measures

- The length of time individuals and families remain homeless
- The extent to which individuals and families who leave homelessness experience additional episodes of homelessness (returns to homelessness)
- Overall reduction in the number of homeless individuals and families
- Jobs and income growth for homeless individuals and families
- Reduction in the number of individuals and families who become homeless
- Successful placement from street outreach
- Successful housing placement to or retention in a permanent housing destination
All CoC Programs must review and follow locally established CoC Standards:

- Core Values
- General Standards
- Program Specific Standards
- Policies
- Standard Forms
Housing First

Best Practice emphasized by HUD, the CoC and Lane County
Required under all CoC grant agreements

Homeless assistance approach that:

- Emphasizes permanent housing first without additional steps
- Does not require that people meet certain “pre-requisites” or conditions in order to access housing
- Promotes client choice in ongoing supportive services
- Utilizes a Harm Reduction framework

Housing First does not mean Housing only
Questions?

Amanda Borta
Amanda.borta@lanecountyor.gov
CoC Interim Rule:  
https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/

CoC HUD Exchange:  
https://www.hudexchange.info/programs/coc/

**HUD CoC Virtual Binders:**  
https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/

CoC Toolkit:  
https://www.hudexchange.info/programs/coc/toolkit/

CoC Standards – Lane County: linked here