KS-505 JOHNSON COUNTY CONTINUUM OF CARE
WRITTEN STANDARDS & POLICIES

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Preamble

The Continuum of Care (CoC) is responsible for establishing and consistently following written standards for administering assistance. Written standards provide a reference for coordinating and implementing a system to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of the KS-505 Johnson County Continuum of Care (KS-505). Both the Emergency Solutions Grant (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) Continuum of Care Project Interim Rules and Regulations state that CoCs, "in consultation with recipients of ESG project funds within the geographic area, are intended to coordinate service delivery...and assist CoCs and their recipients in evaluating the eligibility of individuals and families consistently and administering assistance fairly and methodically" § 578.7(a)(9).

The KS-505 written standards serve as a reference for all CoC and ESG recipients to uphold these funding source requirements by establishing community-wide expectations and standards, clarifying local priorities, documenting the system for prioritizing assistance per project type, and outlining a strategy for use of limited resources. The KS-505 written standards have been established to ensure that persons experiencing homelessness who enter projects throughout the CoC will be given consistent information and support to access and maintain permanent housing and enable the CoC to end homelessness.

The written standards establish the community-wide expectation of how resources are to be targeted within the community separate from meeting eligibility requirements and specify prioritizing assistance according to population and household types. Project participants must always meet eligibility criteria while all individuals and household types can be prioritized for a type of assistance. For each project type, the standards outline the purpose of the project type, eligibility criteria, prioritization, minimum standards of assistance, client access, and performance standards. As a baseline, the KS-505 has adopted current minimum standards set by HUD for all CoC funded projects and has adopted the Johnson County ESG standards as noted in the most recent Consolidated Plan. All projects that receive ESG or CoC funding are required to abide by these written standards. The CoC strongly encourages projects that do not receive either of these sources of funds to accept and utilize these written standards.

The *Continuum of Care Written Standards* are implemented in coordination with *the Coordinated Entry Policies and Procedures*. Specifically, the following written standards for administering assistance within the Johnson County CoC geographic area serve as a reference to:

- Assist with the coordination of service delivery across the geographic area and are the foundation of the Coordinated Entry system
- Assist in assessing individuals and families consistently to determine project eligibility
- Set prioritization standards for administering assistance that are aligned with current HUD guidance
- Assist in administering projects fairly and methodically to meet funding regulations
- Establish common core performance measures for all CoC and ESG component types
- Provide the basis for monitoring CoC and ESG funded projects
- Establish how standards will be reviewed regularly and evaluated for effectiveness

Ongoing Review & Evaluation

As a document that represents the CoC, its housing and services available, populations, as well as local goals and values, these standards serve as a resource for providing assistance across the continuum in order to end homelessness.

The standards are to be reviewed regularly in order to ensure the system of providing assistance is transparent, ensure local priorities are clear to all recipients, and as a CoC that limited resources are being used strategically. To guarantee the written standards are implemented comprehensively, project performance, HMIS data, Coordinated Entry tracking, as well as project participant and stakeholder input will all be considered when evaluating the written standards for effectiveness. As noted in the KS-505 Governance Charter, ongoing review and evaluation will be completed at least annually. HUD's standard System Performance Measures include:

1. Length of time persons remain homeless
2. The extent to which persons who exit homelessness to permanent housing destinations return to homelessness
3. Number of persons experiencing homelessness
4. Employment and income growth for homeless persons in CoC Program-funded projects
5. Number of persons who become homeless for the first time
6. Successful placement from street outreach, AND successful placement in or retention of permanent housing

Project Requirements for All Component Types

- Projects must have written policies and procedures and consistently apply them to all participants
- Projects that serve households with children must comply with the following:
  - ✓ A staff person must be designated as the educational liaison that will ensure children are enrolled in school, connected to age-appropriate services in the community, including childcare, early childhood providers, Early Head Start, Head Start, Part C of the Individuals with Disabilities Education Act, and the McKinney Vento education services
  - ✓ The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that provides shelter for families with children
- Projects that serve young adults ages 18 to 24 must comply with the following:
  - ✓ A staff person must be designated as the educational liaison that will assist youth in creating education goals and applying for any identified education programs including General Education Development programs, colleges, technical colleges, or training/certification programs.
- Projects must have a formal procedure for terminating assistance to a participant that abides all project funding, state and federal regulations.
- Projects must participate in the annual PIT Count, including participation in unsheltered count if needed

Project Requirements Specific to CoC- and ESG-funded Projects

- Projects must participate in HMIS
- Projects must participate in the development and refining of the KS-505's Coordinated Entry System
- Eligibility requirements as defined by CoC and ESG funding are the standard for receiving assistance. Additional project requirements for eligibility are not the standard and cannot be grounds for rejection. Project participants can only be rejected because the eligibility criteria as defined by CoC and ESG funding as noted in the written standards is not met.
- Projects must maintain and follow written intake procedures to ensure compliance with the allowable HUD homeless definitions. The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records

contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

- Record retention and access: All projects must retain all program participant records, including documentation of each program participant's qualification as homeless or at risk of homelessness or as homeless, for 5 years after the expenditure of all funds from the grant under which the program participant was served. With the exception of family violence projects, authorized government representatives of HUD and the Comptroller General of the United States must have the right of access to all participant records pertinent to the grant, in order to make audits, examinations, excerpts, and transcripts.
- Projects must develop and implement written procedures to ensure all records containing protected identifying information of any individual or family who applies for and/or receives Continuum of Care assistance will be kept secure and confidential.
- Reporting requirements: All projects must collect and report data on their use of CoC/ESG funds in an Annual Performance Report (APR), as well as in any additional reports as and when required by HUD.
- Homeless Status Documentation: See the full instructions and examples of homeless certification forms in the ESG Handbook and the HUD Exchange.
    A. Category 1: Literally Homeless
        a. Written observation by an outreach worker; or
        b. Written referral by another housing or service provider; or
        c. Certification by the individual or head of household seeking assistance stating that they were living no the streets or in a shelter;
        d. For individuals exiting an institution – one of the forms of evidence above and:
            i. Discharge paperwork or written/oral referral or
            ii. Written record of intake worker's due diligence to obtain the above evidence and certification by the individual that they exited institution
    B. Category 2: Imminent Risk of Homelessness
        a. A court order resulting from an eviction action notifying the individual or family that they must leave; or
        b. For individuals or families leaving a hotel or motel, evidence that they lack financial resources to stay; or
        c. A documented and verified oral statement; and
            i. Certification that no subsequent residence has been verified; and
            ii. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing
    C. Category 4: Fleeing or attempting to flee domestic violence
        a. For victim service providers: An oral statement by the individual or head of household seeking assistance which states: they are fleeing, they have no subsequent residence, and they lack resources. Statement must be documented by a self-certification by the intake worker
        b. For non-victim service providers: An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where safety of the individual or family is not jeopardized, the oral statement must be verified; and certification by the individual or head of household that no subsequent residence has been identified; and self-certification, or written documentation, that the individual or family lacks financial resources and support networks to obtain other permanent housing
- CoC funded projects must have documented procedures on how they gather client feedback and the process for a client to submit a grievance.

- Projects are prohibited from operating drug injection sites or "safe consumption sites," knowingly distributing drug paraphernalia on or off property under their control, knowingly permitting the use or distribution of illicit drugs on property under their control. If a CoC-funded housing project is determined to be in violation of this policy, the CoC Lead Agency and at least two representatives of the CoC Performance Committee will develop a Corrective Action Plan with the project. If the activities in violation of this policy are not corrected, the CoC-funded project will be at risk of involuntary reallocation of funding during the next CoC grant competition.
    - Note: Naloxone is not considered drug paraphernalia and is allowed on-site at CoC funded projects.
- The CoC recognizes that substance use recovery is individualized and that some participants require more intensive support and a higher level of care. CoC programs are expected to ask about substance use and educate participants about the full range of available options for treatment and support including (but not limited to): referral to Regional Alcohol and Drug Assessment Center, detox centers and sobering units, inpatient treatment programs, Intensive Outpatient treatment programs, 12-step and other recovery support groups, and sober living programs.
- CoC programs should be as flexible as possible in supporting the treatment needs of participants and should work to remove barriers that impede treatment and recovery. For example, connecting a client with additional rent/utility assistance so that they can complete a 28-day inpatient treatment program without fear of losing their housing.

ESG Funded Projects

Projects funded with ESG funds will be expected to adhere to the following to be considered in good project standing and align with the standards:

- Project will be familiar with and adhere to all project requirements of ESG as stated in Title 24 of the Code of Federal Regulations, Part 576 and applicable policies listed in 2 CFR part 200
- Project will work with KS-505 CoC lead agency staff in developing and implementing the Johnson County Continuum of Care Plan
- Collaborate with other homeless providers in the operation of the project
- Participate in trainings and coordination meetings
- Cooperate with related research and evaluation activities
- Prioritize referrals from homeless service providers within KS-505's Continuum of Care as it relates to the Coordinated Entry System
- Meet high standards of professionalism in implementing the project

CoC Funded Projects

Recordkeeping Requirements:

Participant Annual Income**:** For each program participant who receives housing assistance where rent or an occupancy charge is paid by the program participant, the recipient or subrecipient must keep the following documentation of annual income:

- Income evaluation form specified by HUD and completed by the recipient or subrecipient; and
- Source documents (e.g., most recent wage statement, unemployment compensation statement, public benefits statement, bank statement) for the assets held by the program participant and income received before the date of the evaluation;
    - To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period; or
    - To the extent that source documents and third-party verification are unobtainable, the written certification by the program participant of the amount of income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

Services and Assistance Provided: The recipient or subrecipient must keep records for each program participant that documents:

- Case management services provided for each program participant;
- Types of supportive services provided under the recipient's program and the amounts spent on those services;
- For participants that remain in the program for more than one year, an annual assessment of services and documentation of any adjusted service; and
- Where applicable, compliance with the termination of assistance requirement in § 578.91.

Housing standards: The recipient or subrecipient must retain documentation of compliance with the housing standards in § 578.75(b), including inspection reports before any assistance is provided and at least annually during the grant period.

Objectives and Outcomes Specific to ESG Funded Projects

- Engage homeless individuals and families living on the street
- Improve the number and quality of emergency shelters for homeless individuals and families
- Help operate these shelters
- Provide essential services to shelter residents
- Rapidly re-house homeless individuals and families, and
- Prevent families and individuals from becoming homeless.
- Reduce the number of unsheltered individuals and families
- Reduce length of stay for clients in emergency shelters. Length of stay should generally be no longer than 90 days for shelters.
- Increase placements into permanent housing for homeless individuals and families from Emergency Shelter.
- Prevent individuals and families from becoming homeless – either unsheltered or sheltered
- Increase the percentage of individuals and families remaining in permanent housing. Increase income or access to mainstream benefits for program participants while in the ESG program

Strategic Planning Objectives Specific to CoC Funded Projects

- Increase the number of beds prioritized to serve chronically homeless and unsheltered households
- Increase housing stability
- Increase project participant income
- Increase the number of participants obtaining mainstream benefits
- Increase the number of individuals and households with children served by Rapid Rehousing

Written Standards by Project Type

The project types directly providing homeless housing and services included within the written standards and their location within the document are listed below.

- Homelessness Prevention (HP) p.6
- Outreach p.7
- Emergency Shelter (ES) p.8
- Transitional Housing (TH) p.9
- Rapid Re-housing (RRH) p.10
- Permanent Supportive Housing (PSH) p.12

- For standards related to HMIS, see the KS-505 HMIS Governance Charter
- For information on Coordinated Entry, see the KS-505 Coordinated Entry Policies & Procedures

HOMELESSNESS PREVENTION (ESG)

Homeless prevention assistance can be used to prevent an eligible individual or family from becoming homeless or to help to regain stability in their current housing or other permanent housing. Eligible activities include housing relocation and stabilization services as well as short and medium-term rental assistance.

Eligibility Criteria (ESG)

- Participants must meet the HUD definition of homelessness or at risk of becoming homeless.
  - Category 2: Imminent Risk of Homelessness
  - Category 4: Fleeing/Attempting to Flee Domestic Violence
- Participants must have combined income below 30% Area Median Income (AMI).
- Participant must be a Johnson County resident.
- Participant lacks identifiable financial resources and/or support networks.

Accessing Assistance

- May accept participant referrals from CE, other agencies, or from the participants themselves

Prioritization

- The CoC does not currently have prioritization standards for homeless prevention projects

Minimum Standard of Assistance (ESG)

- Up to three months in arrear payments
- Up to three months of utility payments (arrears, deposit, and/or current utility bill)
- Rental assistance is provided up to a maximum of 3 months (not including arrear payments)
- Policies and procedures for determining and prioritizing homelessness prevention, must include the emergency transfer plan priority required under 24 CFR 576.409.
- Standards for determining what percentage or amount of rent and utilities costs, if any, each program participant must pay while receiving homelessness prevention
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time,
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide, including the limits, if any, on the homelessness prevention that each program participant may receive, such as the maximum amount of assistance, maximum number of months in the program; or the maximum number of times the program participant may receive assistance

Performance Standard: Expected Outcomes

- Reduce the Number of Homeless Households Seeking Emergency Shelter
  - 75% of clients will access permanent housing
  - 75% of clients will maintain Permanent Housing for six (6) months.

STREET OUTREACH

Street Outreach serves unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Essential services of street outreach include: engagement, case management, emergency health and mental health services, and transportation, and services for special populations.

Eligibility Criteria

- Participants must meet a HUD definition of unsheltered homelessness.
  - Category 1: Literally Homeless (ESG & HHS SOP)
  - Category 2: Imminent Risk of Homelessness (HHS SOP)
  - Category 4: Fleeing or attempting to flee domestic violence – must also meet Category 1 (ESG)
- Participants must be living on the streets or other places not meant for human habitation and be unwilling and unable to access services in emergency shelter (ESG)

Accessing Assistance

- Outreach workers engage unsheltered households throughout Johnson County, outside office walls, engaging with participants early and often. Outreach workers look for people staying outdoors and in places not meant for habitation. Street outreach programs take referrals from community partners and Coordinated Entry; participants can also seek assistance by calling the programs.

Prioritization

- Street outreach programs attempt to serve all unsheltered households in Johnson County unless their grant specifies a special/target population. If prioritization is necessary due to staff capacity, participants with the highest needs are prioritized.
- Some projects may have a specific target population such as veterans or transition aged youth (age ranges defined by grants).

Minimum Standard of Assistance

- Assist unsheltered households with accessing basic needs including food, clothing, hygiene items, and transportation.
- Assist unsheltered households with accessing shelters, medical and psychiatric care, substance use treatment, and housing. Assist households with obtaining and maintaining identity documents and other documentation needed to qualify for housing assistance.
- Participate in the CoC's Coordinated Entry System.
- Agency must have standards for targeting and providing essential services related to street outreach.
- Assist unsheltered households in resolving legal obligations and encourage compliance with laws to reduce barriers to housing stability, preserve individual rights, and maximize public health and safety.
- Collaborate with First Responders and other public health and safety partners when necessary to address immediate or significant public safety concerns.

Performance Standards: Expected Outcomes

- Reduce Lengths of Time Homeless
  - 50% of clients will exit to positive housing destinations (ES, TH, SH, PH or PSH) (HMIS APR Q23c)
  - 75% of clients will access Essential Services (ESG)

EMERGENCY SHELTERS

Shelters provide a safe, accessible place to stay for those experiencing homelessness and to move them towards and into appropriate and stable permanent housing. Shelters achieve this ultimate goal by connecting

households with appropriate housing options as well as other services that will help them obtain or maintain housing including building income and addressing a variety of physical, mental, emotional, and other needs.

ESG: Emergency Shelter activities are designed to increase the quantity and quality of temporary shelters provided to homeless individuals, through renovation of existing shelters or conversion of buildings to shelters, paying for the operating costs of shelters, and providing essential services. §576.102

Eligibility Criteria

- Participants must meet the HUD definition of homelessness
  - Category 1: Literally Homeless
  - Category 2: Imminent Risk of Homelessness (if not funded by ESG)
  - Category 4: Fleeing/Attempting to Flee Domestic Violence

Accessing Assistance

- There must be clear, public descriptions of eligibility criteria and how households self-refer or are referred by other agencies and/or the Coordinated Entry System.
- May accept participant referrals from CE, other agencies, or from the participants themselves
- Diversion: Shelter staff should explore all options prior to enrolling a household in ES
- DV: To the extent possible, households fleeing DV will be referred to the local domestic violence agency for safe shelter

Prioritization

- Category 1 households are prioritized over households from other categories. DV shelters only accept Category 4 households.

Minimum Standard of Assistance

- Provision of shelter, food, and personal care items.
- Case management and assistance in transitioning to permanent housing.
- Policies and procedures for admission, diversion, referral, and discharge by emergency shelters, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, [e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest]. (ESG)
- Policies and procedures for assessing, prioritizing, and reassessing needs for essential services related to emergency shelter (ESG)
- ESG funded projects also have specific Habitability Standards, see ESG Handbook

Additional Assistance and Referrals

- Referrals to childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

Performance Standards: Expected Outcomes

- Reduce Rates of Homelessness
  - Average length of stay is less than 90 days (HMIS APR Q22b)
  - 50% of households exit to a permanent destination (HMIS APR Q23c)
  - 75% of clients with more than 90 days in shelter exit to permanent destinations. (ESG)

    - 75% of clients with 90 days or less in shelter, exit to destination other than homelessness. (ESG)
- These performance standards do not apply to extreme-weather or overnight-only emergency shelters

TRANSITIONAL HOUSING PROGRAMS

Transitional Housing (TH) is designed to provide individuals and families experiencing homelessness with interim stability and support to successfully move to and maintain permanent housing.

Accessing Assistance

- There must be clear, public descriptions of eligibility criteria and how households self-refer or are referred by other agencies and/or the Coordinated Entry System.
- May accept participant referrals from CE, other agencies, or from the participants themselves
- Diversion: TH staff should explore all options prior to enrolling a household in TH

Eligibility Criteria

- Participants must meet the HUD definition of homelessness
    - Category 1: Literally Homeless
    - Category 2: Imminent Risk of Homelessness (if not funded by CoC)
    - Category 4: Fleeing/Attempting to Flee Domestic Violence

Prioritization

- In CoC-funded projects, participants are prioritized for Transitional Housing to Rapid Rehousing projects based on their scores on the CoC's Coordinated Entry Screening tool.
- Privately funded projects differ based on unit size and household need.

Minimum Standards of Assistance

- Maximum length of stay cannot exceed 24 months
- Assistance in transitioning to permanent housing must be provided
- Support services must be provided throughout the duration of stay in transitional housing
- Project participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months
- All households are screened for eligibility for mainstream benefits

Performance Standards: Strategic Planning Objectives

- At least 80% of persons will exit to permanent housing destinations (HMIS APR Q23c)
- At least 54% of adults will increase total income prior to exit (HMIS APR Q19a2)
- At least 20% of adults will have income from employment (HMIS APR Q19a2)

RAPID RE-HOUSING PROJECTS (RRH)

Rapid Rehousing is available to quickly and permanently house those who are literally homeless. Rapid Rehousing Projects (RRH) provide housing relocation and stabilization services and short- or medium-term rental assistance as needed to help a homeless individual or family move as quickly as possible to permanent housing

and achieve stability in that housing. Please note, Rapid Rehousing funds are available through both CoC and ESG.

Accessing Assistance

- The Coordinated Entry System screens potential participants for permanent housing assistance eligibility. Households must be referred to Rapid Rehousing programs from the Coordinated Entry List.

Prioritization

- Participants are prioritized for Permanent Supportive Housing and then Rapid Rehousing based on their scores on the CoC's Coordinated Entry Screening tool.

Eligibility Criteria (ESG)

- Participants must meet a HUD definition of homelessness
  - Category 1: Literally Homeless
  - Category 4: Fleeing/Attempting to Flee Domestic Violence - must also meet Category 1 (ESG)
- Participants must have combined income below 30% Area Median Income (AMI).
- Participant must be a Johnson County resident.
- Participant lacks identifiable financial resources and/or support networks.

Minimum Standards of Assistance (ESG)

- A set rental stipend of up to three months with the possibility of a one-time three month extension with written approval from organizational staff administering RRH programming.
- Up to three months for utility payments (arrears, deposit, or first month's rent)
- Rental assistance is provided for a maximum of 3 months (not including arrear payments)
- Assistance will not be adjusted over time
- Case management will occur at minimum monthly while participants are receiving assistance
- Follow-up will occur at six months after discharge
- Policies and procedures for determining and prioritizing rapid re-housing assistance (these policies must include the emergency transfer plan priority required under 24 CFR 576.409.
- Standards for determining what percentage or amount of rent and utilities costs, if any, each program participant must pay while receiving rapid re-housing assistance;
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time,
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide, including the limits, if any, on the rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months in the program; or the maximum number of times the program participant may receive assistance

Eligibility Criteria (CoC)

- Participants must meet a HUD definition of homelessness
  - Category 1: Literally Homeless
  - Category 4: Fleeing/Attempting to Flee Domestic Violence
- Participants lack identifiable financial resources and/or support networks

Minimum Standards of Assistance (CoC)

- Projects should enroll the household in the program in HMIS once the project and client have agreed to work together

- Projects should add a move-in date once participant moves into unit
- Exit planning should start upon enrollment
- Income is reassessed at least quarterly for the purposes of adjusting rental payments
- A rental subsidy based on income with the possibility to extend assistance up to a maximum of 24 months (no arrears)
- The rental subsidy amount will account for participants paying no more than 30% of their adjusted income
- Supportive services designed to meet the needs of the project participants must be made available to the project participants throughout the duration of RRH assistance
- Case management will occur at minimum monthly while participants are receiving assistance
- All households are screened for eligibility for mainstream benefits
- Follow-up will occur at six months after discharge

Performance Standards: Expected Outcomes

Reduce numbers of households experiencing homelessness and length of homelessness

- At least 75% of households will move into housing within 60 days (HMIS APR Q22c)
- At least 75% of Households will access permanent housing (ESG)
- At least 75% of households served will maintain permanent housing for 6 months. (ESG)
- At least 80% of persons will exit to permanent housing destinations (HMIS APR Q23c)
- At least 20% of adults will gain or increase earned income from entry to exit (HMIS APR Q19a2)
- At least 54% of adults will gain or increase total income from entry to exit (HMIS APR Q19a2)

PERMANENT SUPPORTIVE HOUSING

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.

Accessing Assistance

- The Coordinated Entry System screens potential participants for permanent supportive housing assistance eligibility. Households must be referred to Permanent Supportive Housing programs from the Coordinated Entry List.

Eligibility Criteria

- Participants must meet the HUD definition of homelessness
  - Category 1: Literally Homeless
  - Category 4: Fleeing/Attempting to Flee Domestic Violence

AND

- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability.

Prioritization

- Participants are prioritized for Permanent Supportive Housing and then Rapid Rehousing based on their scores on the CoC's Coordinated Entry Screening tool.

Minimum Standards of Assistance

- Projects should enroll the household in the program in HMIS once the project and client have agreed to work together
- Projects should add a move-in date once participant moves into unit
- There can be no predetermined length of stay for a PSH project
- Supportive services designed to meet the needs of the project participants must be made available to the project participants throughout the duration of stay in PSH
- Project participants in PSH must enter into a lease (or sublease) agreement for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month.
- Case management will occur at minimum monthly while participants are receiving assistance
- All households are screened for eligibility for mainstream benefits

Performance Standards: Expected Outcomes

Reduce numbers of households experiencing homelessness and length of homelessness

- At least 80% of households will move into housing within 60 days (HMIS APR Q22c)

Households exit to permanent housing and maintain permanent housing

- At least 75% of households will maintain housing for 180 days after discharge. Measured by no returns to homelessness in HMIS
- At least 80% of persons will maintain permanent housing or exit to permanent housing destinations (HMIS APR number of Stayers plus Q23c number of exits to permanent destinations)
- At least 54% of adults will gain or increase total income from entry to exit (HMIS APR Q19a2)

CoC POLICIES

Anti-Discrimination Policy

Policy Overview

The KS-505 Johnson County Continuum of Care (CoC) does not tolerate discrimination on the basis of actual or perceived: race, color, national origin, immigration status, ancestry, ethnicity, religion, primary language, age, familial status, veteran status, disability, sex, sexual orientation, gender identity or expression, marital status, experiences of violence (including but not limited to domestic, dating, sexual, or hate violence), source of income, justice system involvement, or any other discrimination prohibited by law, regulation, executive or court order.

The CoC and CoC Housing Providers shall comply with this policy and all applicable equal access, fair housing, and nondiscrimination provisions of federal, state, and local civil rights laws to maintain compliance. This policy provides guidance to all individuals involved within the CoC to prevent discrimination in Housing Provider policies and during any interactions with the individuals served throughout the CoC.

Federal Regulations Applicable to CoC and ESG Programs

The Fair Housing Act: prohibits discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin.

- https://www.justice.gov/crt/fair-housing-act-1

Affirmatively Furthering Fair Housing Rule: provides an approach to aid housing providers in taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

- https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing

Equal Access in Accordance with an Individual's Gender Identity: regulation ensures that HUD's housing and shelter programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.

- https://www.federalregister.gov/documents/2012/02/03/2012-2343/equal-access-to-housing-in-hud-programs-regardless-of-sexual-orientation-or-gender-identity

Civil Rights Act of 1964: Title VI prohibits all recipients of federal financial assistance from discrimination based on race, color, or national origin.

- https://www.justice.gov/crt/fcs/TitleVI

Americans with Disabilities Act: prohibits discrimination against persons with disabilities in all programs, activities, and services of a public entity (i.e., state or local government; or department, HP, special purpose district, or other instrumentality of a state, or local government).

- https://www.ada.gov/law-and-regs/title-ii-2010-regulations/

Age Discrimination Act of 1975: prohibits discrimination based upon age in federally assisted and funded programs or activities, except in limited circumstances.

- https://www.dol.gov/agencies/oasam/regulatory/statutes/age-discrimination-act

Dissemination and Evaluation

All agencies that have programs and services funded by CoC and ESG must manage a responsible and sound operation in accordance with federal and local nondiscrimination and equal opportunity provisions, as codified in the federal regulations listed in the section above. This includes establishing agency anti-discrimination policies and grievance procedures and sharing all policy and procedures with clients, staff, volunteers, and contractors. Agencies must make these policies and procedures publicly available on their websites and through other commonly used public notification processes. Agencies must ensure staff, volunteers and contractors are regularly trained to comply with all anti-discrimination policies and procedures.

The CoC Board or a CoC Committee will annually review data from the system to determine if any race or gender or other types of disparities exist. Analysis is aimed to understand where gaps in services may exist and will be disseminated to CoC Housing Providers to allow for input.

The CoC Lead Agency will host a Fair Housing training annually for CoC members. All agencies that receive CoC and/or ESG funds must participate annually in trainings that cover both the (1) Fair Housing Act and (2) the Equal Access Final Rule. Agencies may participate in a training provided by the CoC or an alternate provider. One training may be able to cover both topics.

Reporting Violations of Anti-Discrimination

KS-505 CoC's Anti-Discrimination Policy is intended to encourage and enable individuals being served by Housing Providers and other agencies operating within Johnson County to raise serious concerns internally, and/or externally, so the Housing Provider, KS-505 CoC, HUD, and/or other appropriate entities can address and correct discriminatory conduct and actions.

Any individual who believes they have been discriminated against by the CoC and/or Housing Providers has the right to make an official report of such events. Additionally, any individual who believes they have witnessed discrimination by the CoC and/or Housing Providers has the right to report such events as well.

Individuals reporting can do so by following the determined reporting process outlined in each entities Grievance Policy:

- Housing Providers Grievance Reporting
    - Each Housing Provider is required to have their own internal grievance reporting process that is readily available to anyone who may need to officially report a violation.
    - Each Housing Provider is responsible for notifying the CoC Lead Agency of its grievance reporting process so that proper referrals can be made.
- KS-505 CoC Reporting
    - Anyone who would like to report discrimination within the CoC or a Housing Provider can do so by emailing cocgrievance@ucsjoco.org . CoC grievances are received by the CoC Lead Agency, the CoC Board Co-Chairs, and the CoC Board Secretary.
- HUD Discrimination Reporting: instructions on how to report discrimination online, by phone, or by email can be found at https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint

Resources

The Department of Housing and Urban Development and the National Alliance to End Homelessness offer many trainings and resources for agencies to develop their anti-discrimination policies, procedures, and staff trainings. Contact the CoC Lead Agency for recommendations on trainings and resources. This checklist can be used by agencies to develop anti-discrimination policies that align with the CoC's anti-discrimination policies.

YES	NO	Checklist Questions	Notes
		Does your agency have an anti-discrimination policy?	
		Are anti-discrimination policies and procedures publicly available on the agency's website? Are the policies provided to people presenting for services and/or posted in a common area?	
		Is there a stated plan to train new staff and clearly communicate this policy during the onboarding process? Is annual training provided for staff, volunteers, and contractors?	
		Is there a clear statement about non-discrimination because of race, ethnicity, color, national origin, language, ancestry, religion, sex, familial status, age, gender identity, LGBTQ+ status, marital status, domestic or sexual violence victim status, or sensory, mental, or physical disability?	
		Is there an equal access policy? If so, does it include specific procedures for working with transgender persons?	
		Are procedures spelled out that demonstrate how the clients, agency, staff, volunteers, and contractors will carry out the agency's anti-discrimination policies?	
		Are there grievance and anti-retaliation policies and procedures? If so, are they shared with each person presenting for services?	

VAWA Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking – Rapid Rehousing and Permanent Supportive Housing Projects

Emergency Transfers

The Johnson County Continuum of Care on Homelessness (KS-505) 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), KS-505 allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of KS-505's CoC funded agencies 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.

This plan applies to CoC grant funded housing projects. The plan for ESG funded housing projects can be found in the ESG Handbook at https://kshousingcorp.org/homeless-services/emergency-solutions-grant/. 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 the following regulations:
HUD 24 CFR, Part 5, Subpart L: https://www.ecfr.gov/current/title-24/subtitle-A/part-5/subpart-L
VAWA 2022: https://www.justice.gov/crt/violence-against-women-act-reauthorization-act-2022-vawa-2022-housing-rights-subpart
Kansas Law: http://kslegislature.org/li_2020/b2019_20/measures/documents/sb150_00_0000.pdf

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, is eligible for an emergency transfer, if

1. The tenant expressly requests the transfer, and
2. Either:
    a. The tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying; or
    b. In the case of a tenant who is a victim of sexual assault, either the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying, or the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for transfer

Tenants who are not in compliance with the project's rules may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation and Recordkeeping

CoC-funded projects must notify tenant of the Emergency Transfer Request procedure at intake.

To request an emergency transfer, the tenant shall notify the landlord and the KS-505 CoC funded agency and submit the KS-505 VAWA Emergency Transfer Form to the Agency. The landlord and funded agency will provide reasonable accommodations to this policy for individuals with disabilities. The VAWA Emergency Transfer Form will be accepted in written or electronic form. 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 unit assisted under KS-505'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.

For each program participant who moved to a different Continuum of Care due to imminent threat of further domestic violence, dating violence, sexual assault, or stalking, each recipient or subrecipient of assistance under this part must retain the following:

- Documentation of the original incidence of domestic violence, dating violence, sexual assault, or stalking, only if the original violence is not already documented in the program participant's case file. This may be written observation of the housing or service provider, letter or other documentation from a victim service provider or other professional from whom the victim has sought assistance, medical records, court records or law enforcement records; or written certification by the program participant.
- Documentation of the reasonable belief of imminent threat of further domestic violence, dating violence, or sexual assault or stalking, which would include threats from a third-party, such as a friend or family member of the perpetrator of the violence. This may be written observation by the housing or service provider; a letter or other documentation from a victim service provider or other professional from whom the victim has sought assistance; current restraining order; recent court order or law enforcement report; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence; or a written certification by the program participant.
- Data on emergency transfers requested under 24 CFR 5.2005(e) and § 578.99, pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.

Agencies must document each transfer request and the outcome of the request. Records must be retained for at least 3 years. Outcomes of Emergency Transfer Requests must be reported to HUD annually. Agencies must report deidentified Emergency Transfer Request results to the CoC Lead Agency annually including the number of transfers requested, the number of transfers granted, and the length of time needed to process each transfer.

<u>Confidentiality</u>

KS-505 CoC, its funded agencies, and the landlord will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives KS-505 CoC, its funded agencies, and landlord 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 regulation links above

for more information about KS-505 CoC'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

KS-505 cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request form. KS-505 CoC funded agencies and their landlords 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. KS-505 CoC funded agencies may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

In addition, if KS-505 CoC funded agency has no safe and available units for which a tenant who needs an emergency transfer is eligible, KS-505 CoC funded agency 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, KS-505 CoC funded agencies will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are listed below.

Emergency Transfer Process Assistance

Any KS-505 CoC funded agency needing assistance with VAWA Emergency Transfer Requests, process and placement, safety planning concerns, or confidentiality concerns, should contact the CoC Lead Agency or the Kansas City HUD Field Office immediately.

Safety and Security of Tenants

During the processing of the transfer and the actual transfer, the tenant is urged to take all reasonable precautions to be safe.

Tenants who have been victims of domestic violence are encouraged to contact local and national resources for assistance in creating a safety plan, finding a local shelter, and/or getting legal assistance.

- Safehome: domestic violence shelter and supportive services in Johnson County, 913-262-2868
- Kansas City Metro Domestic Violence hotline to find other domestic violence shelters in the KC metro: 816-HOTLINE (816-468-5463)
- Kansas Legal Services
- National Domestic Violence Hotline: 800-799-7233. For persons with hearing impairments, the hotline can be accessed by calling 800-787-3224 (TTY).

Tenants who have been victims of sexual assault are encouraged to contact:

- MOCSA: supportive services for victims of sexual assault in Kansas City metro area, 913-642-0233
- The National Sexual Assault Hotline is 800-656-HOPE, or visit the online hotline at https://ohl.rainn.org/online/

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's

Stalking Resource Center at https://www.victimsofcrime.org/our-programs/stalking-resource- center.

Tenants with safety issues may also seek help through the Safe At Home program administered by the Kansas Attorney General's Office. Safe At Home administers an address confidentiality program for victims of domestic violence, sexual assault, stalking, and human trafficking. Safehome administers the Safe At Home Program in Johnson County, contact 913-262-2868.

Implementation

It shall be the responsibility of KS-505 CoC funded agencies to ensure that any landlord receiving funds from a KS-505 CoC grant is informed and adhering to these policies and procedures.