



Yolo County Homeless and Poverty Action Coalition (HPAC)

Policies and Procedures Manual

Davis/Woodland/Yolo County Continuum of Care (CA-521)

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Overview

Pursuant to 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule¹, this document shall serve as the policies and procedures manual for the Davis/Woodland/Yolo County Continuum of Care (CA-521), hereafter known as the Homeless and Poverty Action Coalition (HPAC). As a counterpart to HPAC's Governance Charter, this manual shall be reviewed, revised, and re-ratified with the Governance Charter every October upon a majority vote of all voting members present during the scheduled meeting.

This manual shall contain most relevant information required by 24 CFR Part 578 Subpart B that is not included in HPAC's Governance Charter. The only exception is information pertinent to the region's local Homeless Management Information System (HMIS). HPAC's HMIS Policies and Procedures Manual shall contain this information, which includes a privacy, security, and data quality plan.

About HPAC

HPAC is a local planning body that provides leadership and coordination on the issues of homelessness and poverty in Yolo County. HPAC serves numerous roles and responsibilities, many of which fulfill federal, state and local government mandates. Such activities include, but are not limited to:

- Implementing the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act
- Implementing the region's Homeless Management Information System (HMIS)
- Maintaining a coordinated response among service providers to ensure continuity of services
- Assessing needs and identifying gaps in services for persons facing homelessness in Yolo County on an ongoing basis
- Supporting the planning, funding, and development of services to meet prioritized needs within Yolo County
- Planning, developing, and sustaining options to meet the housing needs of people facing homelessness
- Promoting access to and effective utilization of mainstream human services programs

¹ 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578_165

Coordinated Entry

HPAC is currently in the process of conducting a comprehensive community engagement process to design its permanent coordinated entry system. In the meantime, HPAC has implemented an interim coordinated entry system that is intended to quickly connect households with the most appropriate type of housing and services. The interim system will serve as a pilot, with successful components of the interim solution being integrated into the permanent coordinated entry system.

Points of Entry

HPAC has selected a “no wrong door” approach to its interim coordinated entry system. All local providers of homeless services are eligible to participate as a point of entry to the system, as long as they meet the following minimum requirements:

- Have access to HMIS or a comparable database as permitted by the United States Department of Housing and Urban and Development (HUD) for domestic violence, dating violence, human trafficking, sexual assault, and stalking victim service providers
- Opt-in to the HPAC Data Sharing Agreement
- Receive training on use of the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT)

Assessment, Referral and Placement Process

Each point of entry to the interim system uses the following three steps to assist homeless individuals and families in connecting with appropriate services based on their unique needs and vulnerability.

1. **Assessment:** Each homeless individual and family is assessed using the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT). The VI-SPDAT is used to (1) determine the chronicity and vulnerability of homeless individuals (including critical health and safety needs), and (2) identify which type of permanent housing solution (permanent supportive housing, rapid re-housing or affordable housing) is most appropriate. Each individual receives a score based on the assessment, with a higher VI-SPDAT score indicating that the individual or family is more vulnerable. For individuals who receive a lower VI-SPDAT score and indicate that they have other safe and appropriate housing options or resources, HPAC shall link them to homeless prevention assistance as needed and available. This may also include linkage to other appropriate services from various providers based on individual need.
2. **Referral:** HPAC uses the results from the VI-SPDAT to refer the individual or family to the most appropriate type of housing and services. In the permanent coordinated entry system, it is HPAC’s hope to establish a community queue, where HPAC maintains and prioritizes all referrals on one list.
3. **Placement:** Those individuals or families who have the highest VI-SPDAT scores (meaning they are the most vulnerable) are prioritized first for housing and services as slots become available. Individuals or families who cannot immediately be placed in permanent housing continue to receive services from outreach workers or other providers while they wait for a bed.

Process for Victims of Domestic Violence, Dating Violence, Human Trafficking, Sexual Assault, and Staking

Pursuant to 24 CFR Subpart B Section 578.7², HPAC shall implement a separate coordinated entry process for victims of domestic violence, dating violence, human trafficking, sexual assault, staking, and any other dangerous or life-threatening conditions that relate to violence against a homeless individual or family.

To protect the safety and maintain the confidentiality of such survivors, HPAC prohibits victim service providers from using HMIS. Rather, HPAC requires that victim service providers use a comparable database as permitted by HUD.

To ensure that homeless survivors receive the same opportunities afforded by the region's coordinated entry system as all others, HPAC implements the following process:

1. If an individual or family experiencing homelessness presents to a non-victim service provider and either self-identifies herself, himself or a family member as a victim or reveals any information that implies dangerous or life-threatening conditions that relate to violence, the provider must refer the individual or family to a victim service provider.
2. Upon connecting, the victim service provider shall perform an intake assessment of the individual or family to determine if the survivor is eligible for shelter entry based on lethality as well as bed availability.
3. If the victim service provider deems that the individual or family does not have adequate resources to exit homelessness on her, his or their own, the provider shall conduct a VI-SPDAT.
4. Once complete, the provider shall send an anonymous VI-SPDAT to the County Homeless Program Coordinator. The only personal identifying information shall be the unique identification number indicating the appropriate record within the victim service provider's comparable database.
5. HPAC will then integrate the anonymous victim service referrals into its community queue. In addition, HPAC shall require training specifically related to this process. In particular, HPAC shall train coordinated entry staff on the confidentiality and privacy rights of survivors protected by the Health Insurance Portability and Accountability Act (HIPAA) as well as the Violence Against Women Act (VAWA).

² 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578_165

HPAC Election Procedure

Pursuant to its Governance Charter, HPAC shall hold an election each year in October with newly elected officers serving a one (1) year term from November 1 through October 31. The election shall include HPAC's three officer positions of Chair, Vice-Chair, and Secretary. HPAC shall use the following election process:

Election Process

1. At the August or September meeting, convene a Nominating Subcommittee consisting of volunteer members who do not wish to seek an elected position.
 - a. The Subcommittee shall be composed of a minimum of three (3) volunteers from three (3) different member organizations. The Homeless Coordinator shall also participate as a non-voting member.
 - b. The role of Nominating Subcommittee members will be to assist the Homeless Coordinator in accepting nominations and answering candidate questions .
 - c. If the Nominating Subcommittee does not receive at least one (1) nomination for each position, it is also the role of Nominating Subcommittee members to recruit candidates.
2. Establish, announce, and publicize a process and timeline for how and when the Nominating Subcommittee will accept nominations.
 - a. Nominations shall be accepted for at least a minimum of seven (7) days.
 - b. Both self-nominations and nominations of others shall be accepted.
 - c. Nominations shall be accepted in both a public and private setting. Nomination period will open during the September HPAC meeting, where nominations will be accepted publicly. Following the meeting, nominations will be accepted privately via email, phone, or in-person.
 - d. Individuals may choose to run for more than one (1) position
 - e. Nominees must be affiliated with an active HPAC member. If the individual is not designated on the HPAC member application as the primary or secondary voting representative for their organization, the individual must seek approval from their organization's leadership prior to nomination.
3. Following the nomination period, the Nominations Subcommittee shall create and disseminate an online poll for any positions with more than one (1) nominee.
 - a. The poll shall be made available for at least a minimum of seven (7) days.
 - b. Pursuant to its Governance Charter, member agencies have voting status if they have a representative present during at least six (6) full HPAC meetings in the current year (November through October) and had a representative participate in at least one HPAC subcommittee.
 - c. Each member agency with voting status may cast one (1) vote for their preferred candidate in each position. Votes must be cast by one of the two voting representatives designated on the agency's HPAC membership application.
 - d. The candidate with the highest number of votes in each position shall be recommended for the position.
 - i. In the event of a tie, voting shall be opened to HPAC member agencies that do not have voting status, so long as they sent a representative to at least two (2) general HPAC meeting in the previous year.
 - e. Each member agency with voting status shall be asked to identify themselves during the poll to ensure that all votes come from eligible member agencies.
 - f. However, the poll shall remain confidential and no information regarding individual votes shall be shared outside of the Nominating Subcommittee.

4. Once the poll is complete, the Nominating Subcommittee shall determine the recommended officer slate (based on the results of the poll) and seek a simple majority approval from member agencies with voting status who are present during the October meeting.

Early Vacation of Term Procedure

Pursuant to its Governance Charter, if an elected officer needs to vacate the position prior to the expiration of his or her term, the officer shall submit a written resignation to the Homeless Coordinator and other HPAC Officers.

Upon receiving the written resignation, the Coordinator shall inform the full HPAC body. HPAC shall then convene a special election at the next regularly scheduled general meeting. HPAC shall use the election process established in the previous section for the special election.

Prior to the special election, any vacant positions shall be filled as follows:

- Chair: The Vice Chair shall assume the duties of Chair until after the special election.
- Vice-Chair: The Secretary shall assume the responsibilities of Vice Chair until after the special election.
- Secretary: The Homeless Coordinator shall assume the responsibilities of Secretary until after the special election.

Election Grievance Policy

HPAC encourages candidates and/or member agencies to report grievances using the following procedure without fear of reprisal.

1. Submit a written grievance to the Homeless Coordinator and Nominating Subcommittee.
 - a. The Nominating Subcommittee shall respond within seven (7) days of receiving the written grievance.
2. If the Nominating Subcommittee is unable to resolve the grievance, the candidates and/or member agencies shall submit a written grievance to the full HPAC body.
 - a. The full HPAC body shall consider the matter at the next meeting of the full membership, and determine any necessary actions through a simple majority vote of all member agencies with voting status who are present during the meeting.

Service Standards

This section of the manual shall define HPAC's expected service standards for local projects receiving funding from HUD, including projects funded by the Continuum of Care (CoC) and/or Emergency Solutions Grant (ESG) programs. This section shall define the different categories of homelessness as well as define the recordkeeping and reporting requirements and shall provide written standards for applicable projects providing services in any of the following areas:

- Prevention
- Street Outreach
- Emergency Shelter
- Rapid Re-Housing
- Transitional Housing
- Permanent Supportive Housing

Definitions of Homelessness

HPAC shall expect all CoC and/or ESG funded programs to use the following definitions of homelessness, as determined by 24 CFR Parts 91, 578, 582, and 583³ and ⁴. The definitions are also pursuant to federal ESG regulations 24 CFR Subpart A Section 576.2⁵.

<p><i>Literally Homeless</i></p>	<p>An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> • Unsheltered Homelessness: The individual or family has a primary nighttime residence that is a public or private place not meant for human habitation; • Sheltered Homelessness: The individual or family is living in a publicly or privately operated shelter designated to provide temporary living arrangements—including congregate shelters and hotels and motels paid for by charitable organizations or by federal, state, and local government programs; or • Institutional Homelessness: The individual is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
<p><i>Imminent Risk of Homelessness</i></p>	<p>An individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> • The individual or family has an annual income below 30 percent of the median family income for the geographic area; and • The individual or family has insufficient resources or support networks immediately available to attain housing stability <p>In addition, the individual or family must also meet one of the following risk factors:</p> <ul style="list-style-type: none"> • Has moved two or more times during the 60 days immediately preceding the application for homelessness prevention assistance because of economic reasons; • Is living in the home of another because of economic hardship; • Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; • Lives in a hotel or motel not paid for by federal, state, or local

³ 24 CFR Parts 91, 582, and 583 Final Rule on Homeless Definitions:

https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf

⁴ 24 CFR Parts 91 and 578 Final Rule on Chronically Homeless Definition:

<https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf>

⁵ 24 CFR Parts 91 and 576 Homeless Emergency Assistance and Rapid Transition to Housing: Emergency Solutions Grants Program and Consolidation Plan Conforming Amendments:

https://www.hudexchange.info/resources/documents/HEARTH_ESGInterimRule&ConPlanConformingAmendments.pdf

	<p>government programs for low-income individuals or charitable organizations;</p> <ul style="list-style-type: none"> • Lives in a single-room occupancy or efficiency apartment unit in which more than two persons, on average, reside or another type of housing in which there reside more than 1.5 persons per room as defined by the U.S. Census Bureau; • Is exiting a publicly funded institution or system of care, such as a healthcare facility, mental health facility, foster care, or other you facility, or correction program or institution; or • Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness
<p><i>Homeless under other Federal Statutes</i></p>	<p>Unaccompanied youth under 25 years of age or families with children and youth, who do not otherwise qualify as homeless under the definition stated above, but who:</p> <ul style="list-style-type: none"> • Are defined as homeless under the other listed federal statutes; • Have not signed a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; • Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and • Can be expected to continue in such status for an extended period of time due to special needs or barriers
<p><i>Fleeing/Attempting to Flee Domestic Violence</i></p>	<p>An individual or family who:</p> <ul style="list-style-type: none"> • 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
<p><i>Chronically Homeless</i></p>	<p>An individual or family who:</p> <ul style="list-style-type: none"> • Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and • Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least one year or on at least four separate occasions in the last three years, where the cumulative total of the four occasions is at least one year. Stays in institutions of 90 days or less will not constitute as a break in homelessness, but rather such stays are included in the cumulative total; and • Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance

	<p>Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; or</p> <ul style="list-style-type: none"> • An individual who has been residing in an institutional care facility, including a jail, substance use or mental health treatment facility, hospital, or other similar facility for fewer than 90 days and met all of the criteria listed in paragraph 1 before entering the facility; or <p>A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria listed in paragraph 1 including a family whose composition has fluctuated while the head of household has been homeless</p>
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Recordkeeping and Reporting Requirements

Pursuant to 24 CFR Parts 91 and 576 Section 576.500 (b-e) ⁶, HPAC shall expect that all CoC and/or ESG funded projects comply with federal recordkeeping and reporting requirements.

HPAC shall require that agencies upload the documentation specified in 24 CFR Parts 91 and 576, Section 576.500 (b-e) ⁷ into the region’s HMIS. Described in more detail within HPAC’s HMIS Policies and Procedures Manual, the HMIS Daily Operator shall monitor and ensure compliance with such requirements on a quarterly basis.

Prevention

HPAC defines prevention as services that are necessary to prevent an individual or family from becoming homeless. These services include various housing relocation and stabilization services as well as short to medium term rental assistance.

At present, HPAC does not permit prevention using ESG funds as a stand-alone activity. Rather, prevention must be provided in conjunction with rapid re-housing and/or emergency shelter. For rapid re-housing, HPAC’s intention is to facilitate preventing homelessness of a previously assisted individual or family who is experiencing instability after rapid re-housing assistance has ended. For emergency shelter, HPAC’s intention is to facilitate shelter diversion.

Prevention Eligibility

In order to be eligible for prevention services, an individual or at least one family member must:

- Meet the definition for imminent risk of homelessness

Prevention Prioritization

⁶ 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578_165

⁷ 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578_165

Of the eligible individuals and families, HPAC designates the following as priority populations pursuant to 25 California Code of Regulations 8409 Core Practices⁸:

- Individuals or families who are at the greatest risk of becoming literally homeless without an intervention and are at greatest risk of experiencing a longer time in shelter or on the street should they become homeless

Prevention Minimum Service Standards

HPAC designates the following as minimum service standards for programs offering prevention services:

- Must either assist the individual or family to regain stability in their current housing or move into other permanent housing and achieve stability in that housing
- For project participants who receive prevention assistance in conjunction with rapid re-housing, providers must conduct a 3-month evaluation
- Services may include, but are not limited to:
 - Rental assistance (such as paying all or a portion of the client's rent)
 - Other financial assistance (such as rental application fees, security and utility deposits, utility payments, last month's rent, rent in arrears, and moving costs)
 - Housing placement and retention assistance (such as search and placement, case management, landlord mediation, tenant legal services, credit repair, financial coaching, bills, and arrears)
- Meet the minimum services standards for all project types, as described at the end of this chapter

Street Outreach (SO)

HPAC defines street outreach (SO) as services that engage individuals or families experiencing unsheltered homelessness and assist in improving the health and well-being of the individual or family.

SO Eligibility

In order to be eligible for SO services, an individual or at least one family member must:

- Meet the definition for literally homeless
- Live in unsheltered homelessness at the time of first contact

SO Prioritization

Pursuant to 25 California Code of Regulations 8409 Core Practices⁹, SO projects shall use the VI-SPDAT as an assessment tool to prioritize the individuals and families with the most urgent and severe needs. This includes:

- Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings

⁸ California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:
[https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)&bhcp=1](https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1)

⁹ California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:
[https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)&bhcp=1](https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1)

- Have experienced the longest amount of time homeless
- Have multiple and severe service needs that inhibit their ability to quickly identify and secure housing on their own

This practice aligns with HPAC’s envisioned permanent coordinated entry system and shall ensure access to assistance regardless of where an individual or family is located within HPAC’s service region.

In general, HPAC expects that using the VI-SPDAT will concurrently prioritize the target subpopulations identified in the Yolo County 10-Year Plan to End Homelessness and the United States Interagency Council on Homelessness’ (USICH) Opening Doors: A Federal Strategic Plan to Prevent and End Homelessness. These target subpopulations include:

- Individuals or families with a history of chronic homelessness
- Families with a history of homelessness
- Transition age youth with a history of homelessness (age 18 to 24)
- Unaccompanied youth with a history homelessness (meaning an individual under the age of 18 with no family member over the age of 18 in the household)
- Veterans with a history of homelessness (meaning an individual or family member who has served in active United States military duty)

SO Minimum Service Standards

HPAC designates the following as minimum services standards for projects offering street outreach services:

- Participants and staff understand that the primary goals of street outreach are to:
 - Provide access to emergency shelter and services
 - Re-house participants in permanent housing as quickly as possible, regardless of other personal issues or concerns
- Conduct outreach to engage unsheltered homeless individual or families
- Link unsheltered homeless individual or families to the region’s coordinated entry system
- Accept triage referrals through HPAC’s coordinated entry system
- Meet the minimum services standards for all project types, as described at the end of this chapter

Emergency Shelter (ES)

HPAC defines emergency shelter (ES) as a living arrangement that provides temporary shelter and supportive services, without a standard lease agreement.

ES Eligibility

In order to be eligible for ES projects, individuals or at least one family member must meet the definition for one of the following categories:

- Literally homeless
- Fleeing/attempting to flee domestic violence, dating violence, human trafficking, sexual assault, staking, and any other dangerous or life-threatening conditions that relate to violence against a homeless individual or family

HPAC allows shelters to serve a specific sub-population (such as persons with mental illness or victims of domestic violence, dating violence, human trafficking, sexual assault and/or stalking) within the definitions above, depending on organizational missions and goals.

ES Prioritization

Of the eligible individuals and families, HPAC shall prioritize those with the most urgent and severe needs. Pursuant to 25 California Code of Regulations 8409 Core Practices¹⁰, this includes but is not limited to those who:

- Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings
- Have experienced the longest amount of time homeless
- Have multiple and severe service needs that inhibit their ability to quickly identify and secure housing on their own

HPAC expects that doing so will concurrently prioritize the target subpopulations identified in the Yolo County 10-Year Plan to End Homelessness and the United States Interagency Council on Homelessness' (USICH) Opening Doors: A Federal Strategic Plan to Prevent and End Homelessness. These target subpopulations include:

- Individuals or families with a history of chronic homelessness
- Families with a history of homelessness
- Transition age youth with a history of homelessness (meaning an individual or family member age 18 to 24)
- Unaccompanied youth with a history homelessness (meaning an individual under the age of 18 with no family member over the age of 18 in the household)
- Veterans with a history of homelessness (meaning an individual or family member who has served in active United States military duty)

ES Minimum Standards

HPAC designates the following as minimum service standards for projects providing emergency shelter services:

- Participants and staff must understand that the primary goals of the emergency shelter are to:
 - Provide temporary accommodation that is safe, respectful, and responsive to individual needs
 - Re-house participants in permanent housing as quickly as possible, regardless of other personal issues or concerns
- No minimum or maximum length of stay for project participants; however, providers may determine a target length of stay for participants (such as 90 days), at which point the participant's case may be re-assessed to determine whether a longer stay is appropriate.
- No leases or occupancy agreements

¹⁰ California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:
[https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)&bhcp=1](https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1)

- Meet the minimum services standards for all project types, as described at the end of this chapter

Rapid Re-Housing (RRH)

HPAC defines rapid re-housing (RRH) as housing that provides short to medium term move-in and rental assistance, as well as assistance with housing identification and supportive services.

RRH Eligibility

In order to be eligible for RRH projects, individuals or at least one family member must meet the definition for one of the following categories:

- Literally homeless
- Imminent risk of homelessness (only if the individual or at least one family member qualifies for prevention per HPAC's standards)
- Fleeing/attempting to flee domestic violence, dating violence, human trafficking, sexual assault, stalking, and any other dangerous or life-threatening conditions that relate to violence against a homeless individual or family

In addition, individuals or at least one member of the family must:

- Earn enough income to pay at least 30% of their monthly rent or at least 30% of their monthly income, whichever is lower
 - HPAC considers monthly income to consist of:
 - Earned income
 - Self-employment/business income
 - Interest and dividend income
 - Pension/retirement income
 - Unemployment and disability income
 - Temporary Assistance for Needy Families (TANF)/public assistance
 - Alimony, child support, and foster care income
 - Armed forces income
 - While generally expecting households to pay at least 30% of their monthly rent or monthly income, HPAC permits RRH project managers to authorize lesser contributions under extraordinary circumstances
 - At times, this may include paying the entire rent on behalf of households that have no current income
- Meet any funder-specific eligibility requirements

RRH Prioritization

Of the eligible individuals and families, HPAC shall prioritize those with the most urgent and severe needs. Pursuant to 25 California Code of Regulations 8409 Core Practices¹¹, this includes but is not limited to those who:

¹¹ California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

- Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings
- Have experienced the longest amount of time homeless
- Have multiple and severe service needs that inhibit their ability to quickly identify and secure housing on their own

In general, HPAC expects that doing so will concurrently prioritize the target subpopulations identified in the Yolo County 10-Year Plan to End Homelessness and the United States Interagency Council on Homelessness' (USICH) Opening Doors: A Federal Strategic Plan to Prevent and End Homelessness. These target subpopulations include:

- Individuals or families with a history of chronic homelessness
- Families with a history of homelessness
- Transition age youth with a history of homelessness (age 18 to 24)
- Unaccompanied youth with a history homelessness (meaning an individual under the age of 18 with no family member over the age of 18 in the household)
- Veterans with a history of homelessness (meaning an individual or family member who has served in active United States military duty)

For projects using the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) as an assessment tool, HPAC designates the following as priority populations:

- Individuals who receive a VI-SPDAT-Single score of 4 to 7; or
- Families who receive a VI-SPDAT-Family score of 4 to 8

RRH Minimum Service Standards

HPAC designates the following as minimum service standards:

- Participants and staff must understand that the primary goals of RRH are to:
 - End homelessness
 - Move participants to permanent housing as quickly as possible, regardless of personal issues
- No maximum monetary amount for rental assistance; however, individual assistance may not exceed 24 months during a 3-year period
- For project participants who receive rental assistance, providers must conduct an annual evaluation to determine continued eligibility
 - At the time of evaluation, if a participant's income has changed, the amount of rental assistance will be adjusted to meet the 30% threshold
- For participants who receive prevention assistance, providers must conduct a 3-month evaluation
- For project-based assistance, providers must ensure a one-year lease

- All individuals or families that are literally homeless who cannot quickly secure housing on their own or with another form of assistance are screened for and offered rapid re-housing assistance, to the extent they are eligible and assistance is available
- Housing identification efforts must consider, within the limits of the participant's income, where the individual or family wants to live and if the individual or family feels safe
- Project providers must use a fair, yet flexible approach when determining the duration of assistance
- Project providers must use a fair, yet flexible approach when determining what qualifies as an extraordinary circumstance (whereas project participants do not need to meet the 30% threshold)
- Supportive services must be provided throughout the entire time that rental assistance is provided
- Must ensure that data on all persons served and all activities provided are entered into HMIS (or a comparable database if the agency is a domestic violence, dating violence, human trafficking, sexual assault, and stalking victims service provider) pursuant to HUD and local standards.
- Meet the minimum services standards for all project types, as described at the end of this chapter

Transitional Housing (TH)

HPAC defines transitional housing (TH) as housing that provides temporary housing and supportive services, as an interim solution toward securing permanent housing. Unlike emergency shelter, transitional housing participants must enter into a lease agreement.

TH Eligibility

In order to be eligible for TH projects, individuals or at least one family member must meet the definition for one of the following categories:

- Literally homeless
- Imminent risk of homelessness
- Homeless under other Federal Statutes (if the project(s) received approval from HUD to serve this category)
- Fleeing/attempting to flee domestic violence

In addition, individuals or at least one member of the family must:

- Meet any funder-specific eligibility requirements

TH Prioritization

Of the eligible households, HPAC shall prioritize those with the most urgent and severe needs. Pursuant to 25 California Code of Regulations 8409 Core Practices¹², this includes but is not limited to those who:

- Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings

¹² California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:
[https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)&bhcp=1](https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1)

- Have experienced the longest amount of time homeless
- Have multiple service needs that inhibit their ability to identify and secure housing independently

HPAC expects that doing so will concurrently prioritize the target subpopulations identified in the Yolo County 10-Year Plan to End Homelessness and the United States Interagency Council on Homelessness' (USICH) Opening Doors: A Federal Strategic Plan to Prevent and End Homelessness. These target subpopulations include:

- Individuals or families with a history of chronic homelessness
- Families with a history of homelessness
- Transition age youth with a history of homelessness (age 18 to 24)
- Unaccompanied youth with a history homelessness (meaning an individual under the age of 18 with no family member over the age of 18 in the household)
- Veterans with a history of homelessness (meaning an individual or family member who has served in active United States military duty)

TH Minimum Service Standards

HPAC designates the following as minimum service standards:

- Project participation cannot exceed 24 months
- Supportive services must be provided throughout the entire length of stay
- Supportive services may be provided to former residents of transitional housing and current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living
- Project providers must offer assistance in transitioning toward securing permanent housing
- Project participants must enter into a lease agreement for a term of at least one month
- The lease agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months
- Meet the minimum services standards for all project types, as described at the end of this chapter

Permanent Supportive Housing (PSH)

HPAC defines permanent supportive housing (PSH) as housing that provides indefinite leasing or rental assistance and supportive services.

PSH Eligibility

In order to be eligible for PSH projects, individuals or at least one family member must meet the definition for one of the following categories:

- Literally homeless
- Fleeing/attempting to flee domestic violence

In addition, individuals or at least one member of the family must:

- Have a disability
 - Evidence of diagnosis with one or more of the following conditions:

- Substance use disorder
 - Serious mental illness
 - Developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Acts of 2000 (42 U.S.C. 15002))
 - Post-traumatic stress disorder
 - Cognitive impairments resulting from brain injury
 - Chronic physical illness or disability
- Meet any funder-specific eligibility requirements

PSH Prioritization

For CoC-funded PSH beds dedicated or prioritized for occupancy by persons experiencing chronic homelessness, HPAC requires the projects use the following order of priority, pursuant to Notice CPD-16-11¹³, which supersedes Notice CPD-14-012¹⁴:

- Persons experiencing chronic homeless with the longest length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter
- Persons with the most severe service needs

For projects using the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) as an assessment tool, HPAC designates the following as priority populations:

- Individuals who receive a VI-SPDAT-Single score of 8 or greater; or
- Families who receive a VI-SPDAT-Family score of 9 or greater

In addition, consistent with Notice CPD 16-11, HPAC shall only allow PSH dedicated projects to serve other homeless individuals and families, when no persons within the designated service area meet the specified criteria listed above. If this occurs and there is a vacant dedicated PSH bed available, the provider may then follow the order of priority for non-dedicated PSH beds listed below. The bed will continue to be a dedicated bed, however, so when that bed becomes vacant again it must be used to house a chronically homeless person unless there are still no persons who meet that criterion within the designated service area. Regardless of if this occurs or not, the provider must continue to report the dedicated PSH beds as “Chronically Homeless” beds on HPAC’s Housing Inventory Count (HIC).

For CoC-funded PSH beds not dedicated or not prioritized for persons experiencing chronic homeless, HPAC designates the following as priority populations pursuant to Notice CPD-16-11¹⁵, which supersedes Notice CPD-14-012¹⁶:

¹³ HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: <https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf>

¹⁴ HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: <http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf>

¹⁵ HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: <https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf>

¹⁶ HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: <http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf>

- **First priority:** Homeless individuals and families with a disability with long periods of episodic homelessness and severe service needs
 - An individual or family that is eligible for CoC Program-funded PSH who has experienced at least four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months and has been identified as having severe service needs
- **Second priority:** Homeless individuals and families with a disability with severe service needs
 - An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing persons that meet this order of priority, but there is not a minimum length of time required
- **Third priority:** Homeless individuals and families with a disability coming from places not meant for human habitation, a safe haven, or an emergency shelter without severe service needs
 - An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing persons that meet this order of priority, but there is not a minimum length of time required
- **Fourth priority:** Homeless individuals and families with a disability coming from transitional housing
 - An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in a safe haven, or in an emergency shelter. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, a safe haven, or an emergency shelter prior to entry in the transitional housing

Also pursuant to Notice CPD-16-11, HPAC requires that all CoC-funded PSH projects accept referrals only through a single prioritized waiting list, created through the coordinated entry process.

PSH Minimum Service Standards

HPAC designates the following as minimum service standards:

- No designated length of stay
- Supportive services must be provided throughout the entire length of stay
- Project participants must enter into a lease, sublease, or occupancy agreement for a term of at least one year, with the agreement automatically renewing upon expiration for a term of at least one month
 - While generally expecting compliance with the terms stated above, HPAC permits PSH project managers to exercise discretion when executing lease, sublease, or occupancy agreements, particularly regarding terminable causes
- Meet the minimum services standards for all project types, as described at the end of this chapter

Minimum Services Standards for all Project Types

Domestic Violence, Dating Violence, Human Trafficking, Sexual Assault, and Stalking Victims

HPAC prohibits all victim service providers from using HMIS. HPAC hopes that these provisions shall protect the safety and maintain the confidentiality of victims.

Housing First

All CoC and ESG-funded projects must use a Housing First approach, which focuses on assisting people experiencing homelessness by securing housing as quickly as possible, and then providing supportive services as needed to promote housing stability and individual well-being. Pursuant to 25 California Code of Regulations 8409 Core Practices,¹⁷ this includes:

- Ensuring low-barrier, easily accessible assistance to all people, including but not limited to people with no income or income history, and people with active substance use or mental health issues
- Helping participants quickly identify and resolve barriers to obtaining and maintaining housing
- Providing linkage to financial assistance for move-in and stabilization costs as well as housing case management
- Seeking to quickly resolve the housing crisis before focusing on other non-housing related services
- Allowing participants to choose the services and housing that meets their needs, within practical limitations, understanding that housing may cost greater than 30% of income and be precarious
- Preventing exits into homelessness whenever possible, even when program rules are violated:
 - People who pose an imminent risk of harm to themselves or others may be exited to more appropriate assistance, such as a more intensive program or hospital
- Allowing participants currently in emergency shelter or transitional housing to only move to other emergency shelter or transitional housing when:
 - They desire and choose
 - It is more appropriate to meet their health and safety needs (e.g., persons in early recovery; domestic violence survivors; those who need special accommodations)
 - No permanent housing solution (with or without supportive services) is currently available that is a similar or better match for their preferences and needs
- Connecting participants to appropriate support and services available in the community that foster long-term housing stability
- Assisting participants create and update individualized Housing Plans designed to re-house and stabilize participants as quickly as possible
- Ensuring all staff helping to house participants know how to access an array of housing options directly or through HPAC's coordinated entry system to help participants achieve their Housing Plan goals

¹⁷ California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:
[https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)&bhcp=1](https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1)

- Ensuring all staff are aware of and know how to access other community resources that can help participants achieve their Housing Plan goals
- Ensuring all participants and staff are aware that participation in services unrelated to obtaining permanent housing is voluntary

HMIS

All CoC and ESG-funded projects must ensure that data on all persons served and all activities provided are entered into HMIS (or a comparable database if the agency is a domestic violence, dating violence, human trafficking, sexual assault, and stalking victims service provider) pursuant to HUD and local standards.

Preventing Involuntary Family Separation

HPAC prohibits all CoC and ESG-funded projects from denying admission or involuntarily separating a family unless the health and/or well-being of a family member is at immediate risk. Pursuant to HUD, HPAC's defines a family as any group of persons who presents for assistance together and identifies themselves as a family.

Progressive Engagement and Assistance

Another local priority is implementing progressive engagement and assistance practices. Pursuant to 25 California Code of Regulations 8409 Core Practices,¹⁸ this includes:

- Offering financial assistance and services in a way that offers a minimum amount of assistance initially
- Adding more assistance over time if needed to quickly resolve a housing crisis by either ending homelessness or avoiding an immediate return to literal homelessness
 - The type, duration, and amount of assistance offered shall be based on an individual assessment of the household, and the availability of other resources or support systems to resolve their housing crisis and stabilize them in housing

Nondiscrimination Provisions

Pursuant to civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II and III of the Americans with Disabilities Act, all CoC and ESG-funded projects must comply with federal nondiscrimination provisions.

This includes Attorney General Order No. 2353-2001, 66 Fed. Reg. 3616¹⁹, which states that agencies should not withhold certain services based on immigration status when the services are necessary to protect life and/or safety.

This also includes HUD's final rule, "Equal Access in Accordance with an Individual's Gender Identity,"²⁰ which states that agencies must ensure equal access to HUD programs regardless of gender identity. The rule is

¹⁸ California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

[https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)&bhcp=1](https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1)

¹⁹ U.S. Department of Justice, U.S. Department of Health and Human Services, and U.S. Department of Housing and Urban Development Joint Letter Regarding Immigration Access to Housing and Services: <https://www.hudexchange.info/resources/documents/HUD-HHS-DOJ-Letter-Regarding-Immigrant-Access-to-Housing-and-Services.pdf>

particularly pertinent to projects serving one sex or projects separating dormitories by sex, whereby agencies must provide all individuals, including transgender and other individuals who do not identify with the sex they were assigned at birth, with access to projects, benefits, services, and accommodations in accordance with their gender identity without being subject to intrusive questioning or being asked to provide documentation.

Equal Access: Gender Identity

Pursuant to 24 CFR Part 5: Equal Access in Accordance with an Individual's Gender Identify in Community Planning and Development Programs²¹, HPAC ensures equal access to individuals in accordance with their gender identity. More specifically, HPAC shall strive to uphold the following general provisions stated within the Final Rule:

- All CoC and ESG funded projects must recognize that a difference may exist between an individual's gender identity and their sex assigned at birth
- All CoC and ESG funded projects must recognize that a difference may exist between an individual's actual gender identify and perceived gender identity
- All CoC and ESG funded projects may not deny access to a single-sex emergency shelter or facility because the provider possesses identity documents indicating a sex different from the gender with which the resident or potential client identifies
- All CoC and ESG funded projects may not consider the resident or potential resident ineligible for an emergency shelter or other facility because their appearance or behavior does not conform to gender stereotypes
- All CoC and ESG funded projects may not ask questions or otherwise seek information or documentation concerning a person's anatomy or medical history related to their gender identity or expression

In addition, HPAC shall expect that all CoC and ESG funded agencies complete the following in order to ensure compliance with the Final Rule:

- Develop written policies and procedures ensuring compliance with the rule
- Update staff, volunteer, and contractor trainings to comply with the written policies and procedures
- Educate clients on the agency's/project's commitment to comply with the Equal Access Final Rule
- Make the agency's/project's policies and procedures readily available to the clients

²⁰ HUD Final Rule "Equal Access in Accordance with an Individual's Gender Identity": <https://www.hudexchange.info/resources/documents/Equal-Access-Final-Rule-2016.pdf>

²¹ 24 CFR Part 5: Equal Access in Accordance with an Individual's Gender Identify in Community Planning and Development Programs: <https://www.hudexchange.info/resources/documents/Equal-Access-Final-Rule-2016.pdf>