

06/29/2021

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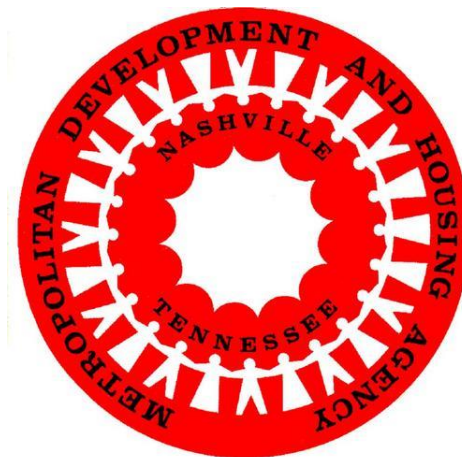
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## Nashville-Davidson County Homelessness *Continuum of Care (CoC)*

&

*Emergency Solutions Grants (ESG)*

## Standards of Care



## Table of Contents

INTRODUCTION.....	6
VISION, MISSION, AND VALUES OF THE HOMELESSNESS PLANNING COUNCIL STRATEGIC COMMUNITY PLAN.....	7
VISION .....	7
MISSION .....	7
VALUES.....	7
REGULATIONS FOR COC AND ESG PROGRAMS .....	8
SYSTEM-LEVEL STANDARDS FOR CoC AND ESG FUNDED PROGRAMS .....	9
HOUSING FIRST .....	9
COORDINATED ENTRY (CE) FOR CoC AND ESG FUNDED PROGRAMS .....	10
ADDRESSING THE SAFETY NEEDS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, AND STALKING SURVIVORS.....	11
WRITTEN PROCEDURES FOR CoC ANNUAL EVALUATION OF CE BY FUNDED PROJECTS, PARTICIPANTS .....	12
HMIS FOR CoC AND ESG FUNDED PROGRAMS.....	12
PROGRAM STANDARDS FOR CoC AND ESG FUNDED PROGRAMS.....	14
INCOME DETERMINATION FOR PARTICIPANTS OF CoC AND ESG FUNDED PROGRAMS .....	14
CONFLICTS OF INTEREST STANDARDS FOR ALL CoC and ESG FUNDED PROVIDERS.....	14
ORGANIZATIONAL CONFLICTS OF INTEREST.....	14
INDIVIDUAL CONFLICTS OF INTEREST.....	15
ALL TRANSACTIONS/ACTIVITIES.....	15
PARTICIPATION OF PEOPLE EXPERIENCING HOMELESSNESS FOR ALL CoC and ESG FUNDED PROVIDERS .....	16
FAITH-BASED ACTIVITIES FOR ALL CoC AND ESG FUNDED PROVIDERS.....	16
PROHIBITION AGAINST INVOLUNTARY FAMILY SEPARATION FOR ALL CoC AND ESG FUNDED PROGRAMS .....	17
NONDISCRIMINATION/EQUAL OPPORTUNITY/AFFIRMATIVE OUTREACH FOR ALL CoC AND ESG FUNDED PROGRAMS.....	17
PROGRAM INCOME FOR ALL CoC AND ESG FUNDED PROVIDERS.....	18
APPLICABILITY OF OTHER FEDERAL REQUIREMENTS FOR CoC AND ESG FUNDED PROVIDERS .....	19
RECOVERED MATERIALS .....	19

DISPLACEMENT .....	19
RECORDS & RECORDKEEPING REQUIREMENTS FOR THE NASHVILLE-DAVIDSON COUNTY CoC AND CoC AND ESG FUNDED PROVIDERS.....	20
COC RECORDS .....	20
RECORDS OF COC AND ESG FUNDING .....	21
PROGRAM COORDINATION FOR CoC AND ESG FUNDED PROGRAMS .....	23
CONNECTION OF OTHER RESOURCES FOR PARTICIPANTS OF CoC AND ESG FUNDED PROGRAMS .....	24
WRITTEN PROCEDURES FOR PROGRAM TERMINATION/GRIEVANCE/APPEALS PROCESS FOR ALL CoC- AND ESG-FUNDED HOUSING AND SERVICE DELIVERY PROGRAMS.....	25
PARTICIPANT ELIGIBILITY FOR CoC AND ESG FUNDED PROGRAMS .....	26
STREET OUTREACH.....	27
EMERGENCY SHELTER.....	28
RAPID RE-HOUSING (RRH) .....	28
TRANSITIONAL HOUSING .....	28
PERMANENT SUPPORTIVE HOUSING FOR PERSONS WITH DISABLING CONDITIONS (PSH) .....	29
HUD ELIGIBILITY REQUIREMENTS FOR ESG BY TYPE .....	30
HOMELESSNESS PREVENTION FOR ESG-FUNDED PROVIDERS .....	31
DESCRIPTION OF THE PROGRAM.....	31
PROGRAM STANDARDS .....	31
ELIGIBLE ACTIVITIES .....	31
CLIENT ELIGIBILITY REQUIREMENTS .....	32
PARTICIPANT CONTRIBUTIONS TO OCCUPANCY FOR HOMELESS PREVENTION PROGRAMS.....	32
RENTAL ASSISTANCE DURATION AND ADJUSTMENT: HOMELESS PREVENTION .....	33
LIMITATIONS ON FINANCIAL ASSISTANCE .....	33
HOUSING RELOCATION AND STABILIZATION SERVICES.....	35
RE-EVALUATIONS FOR CONTINUED ELIGIBILITY FOR HOMELESSNESS PREVENTION .....	36
PREVENTION TARGET PERFORMANCE BENCHMARKS .....	37
STREET OUTREACH STANDARDS .....	37
MINIMUM STANDARDS FOR CoC AND ESG FUNDED PROVIDERS.....	37
STREET OUTREACH TARGET PERFORMANCE BENCHMARKS.....	37
EMERGENCY SHELTER STANDARDS .....	37

ELIGIBILITY CRITERIA.....	38
PRIORITIZATION FOR SHELTER SERVICES.....	38
REASSESSMENT.....	38
DISCHARGE/LENGTH OF STAY.....	38
SAFETY AND SHELTER SAFEGUARDS FOR SPECIAL POPULATIONS .....	39
SAFETY, SANITATION & PRIVACY FOR SHELTERS HOUSING PARTICIPANTS OF CoC AND ESG FUNDED PROGRAMS .....	39
LEAD-BASED PAINT FOR EMERGENCY SHELTER PARTICIPANTS OF COC AND ESG FUNDED PROGRAMS .....	40
ADDITIONAL REQUIREMENTS FOR SHELTER & SERVICES FUNDED BY COC OR ESG .....	40
COC PERFORMANCE TARGET BENCHMARKS FOR SHELTERS.....	40
TRANSITIONAL HOUSING STANDARDS .....	40
RECOVERY HOUSING.....	41
PARTICIPANT CONTRIBUTION AND PROGRAM FEES.....	41
SAFETY, SANITATION & PRIVACY FOR UNITS HOUSING PARTICIPANTS OF CoC AND ESG FUNDED PROGRAMS .....	41
LEAD-BASED PAINT FOR UNITS HOUSING PARTICIPANTS OF CoC AND ESG FUNDED PROGRAMS ...	41
TRANSITIONAL HOUSING TARGET PERFORMANCE BENCHMARKS .....	42
HUD PERMANENT HOUSING.....	42
RAPID RE-HOUSING (RRH) STANDARDS.....	42
PARTICIPANT ELIGIBILITY FOR COC AND PRIORITIZATION .....	43
ELIGIBILITY .....	43
PRIORITIZATION .....	43
Coordinated Entry – RRH Referrals.....	44
Supportive Services.....	44
HOUSING LOCATION:.....	44
Housing Case Management and Supports.....	45
Required Documents & Timelines for Completion.....	47
Housing Service Plan.....	47
Monthly Participant Budget.....	47
Financial Assistance: .....	47

Eligible Expenses:.....	48
Other Financial Assistance.....	48
Determining the Amount of Financial Assistance.....	49
LIMITATIONS ON FINANCIAL ASSISTANCE .....	50
Income Documentation & Income Evaluation Form .....	51
Annual Assessment of Need .....	51
Coordination with Community Partners.....	52
RE-EVALUATIONS FOR CONTINUED ELIGIBILITY FOR RAPID REHOUSING.....	52
Exit from RRH Program: .....	52
RRH Program Termination.....	52
RRH TARGET PERFORMANCE BENCHMARKS.....	54
PERMANENT SUPPORTIVE HOUSING STANDARDS .....	54
PARTICIPANT ELIGIBILITY AND PRIORITIZATION.....	54
ELIGIBILITY .....	55
PRIORITIZATION .....	55
SAFETY, SANITATION, AND PRIVACY FOR SHELTER HOUSING PARTICIPANTS OF COC AND ESG FUNDED PROGRAMS.....	55
LEAD BASED PAINT FOR EMERGENCY SHELTER PARTICIPANTS OF COC AND ESG FUNDED PROGRAM .....	55
ADDITIONAL REQUIREMENTS FOR PSH PROJECTS WITH RENTAL ASSISTANCE .....	55
PARTICIPANT CONTRIBUTIONS TO OCCUPANCY FOR PSH PROJECTS .....	56
PSH TARGET PERFORMANCE BENCHMARKS .....	56
EVALUATION AND REVISION.....	56
GLOSSARY .....	57
Appendix:.....	63

## INTRODUCTION

The Nashville-Davidson County Continuum of Care (CoC), in consultation with the Metropolitan Development and Housing Agency (MDHA) as the administrator of the Consolidated Plan programs which include the Emergency Solutions Grant (ESG) for Nashville-Davidson County and ESG subrecipients, has developed the following standards for providing assistance with Emergency Solutions Grants (ESG) and CoC funds as required by HUD regulation 24 CFR 576.400 (e) and 24 CFR 578.7 (a) (8). The standards are in accordance with the interim rule for the Emergency Solutions Grants Program released by the U.S. Department of Housing and Urban Development on December 4, 2011, the Interim Rule for the Continuum of Care program which was effective on August 30, 2012, and the final rule for the definition of homelessness released by the U.S. Department of Housing and Urban Development on December 4, 2011.

It is important in the Introduction to the Written Standards that the process whereby this document was developed and enacted be briefly discussed as it provides context for both the work that has been done as well as work to be undertaken as Nashville continues to build a Housing Crisis Resolution System. In July of 2018, at the culmination of several years of work, the Nashville-Davidson County Homelessness Continuum of Care Planning Council was formally established. This event brought together two distinct homelessness governing bodies into one singular governing entity working together on a focused plan to end homelessness in Nashville-Davidson County. In its first year the Continuum of Care through its Planning Council and CoC Committees focused its efforts to ensure that through the transition and first year of operations the structures, processes, policies, and standards of the CoC met the core expectations of HUD rules and that strategic planning be undertaken to grow and improve the community response to those “at-risk of” and/or experiencing homelessness. In this process, the Coordinated Entry (CE) Standards and CoC Written Standards Committees began to meet jointly to review, revise, and update the community’s CoC Written Standards. This joint committee has determined that their efforts reflect a “Phased Approach”. This document represents the completion of the first phase of the process. The committee, after careful review of the HUD standards, has reviewed, revised, and updated the Nashville-Davidson County Written Standards to be in complete compliance with CoC/ESG regulation and rule. Based on the Homelessness Planning Council’s Strategic Community Plan, the CE/Written Standards committee’s discussion, and HUD Technical Assistance these are critical topics to be further discussed during Phase 2:

- Housing First policies, philosophy, and culture
- Coordinated Entry (CE) Evaluation
- COC/ESG Program Evaluation (including finalizing benchmarks)
- Prevention and Diversion Training
- After hours care
- Domestic Violence Planning
- Racial Equity

The goal of the second phase of work is a set of Written Standards that can be embraced and integrated universally throughout the community’s public and private sector’s health, education, and social services as the norm for work with those “at-risk of” or experiencing homelessness.

## VISION, MISSION, AND VALUES OF THE HOMELESSNESS PLANNING COUNCIL STRATEGIC COMMUNITY PLAN

### VISION

The Nashville-Davidson County Homelessness Continuum of Care creates a Housing Crisis Resolution System to prevent and end homelessness for all Nashvillians.

### MISSION

The Continuum of Care forms a collaborative, inclusive, community-based/inspired process and approach to planning and managing effective homelessness assistance resources and programs to end homelessness in our community. Federal, state and local funding resources are secured and utilized to adequately fund all homelessness assistance needs.

### VALUES

The underlying values of the Strategic Community Plan will be demonstrated as follows:

**Housing-focused** – Create a Housing Crisis Resolution System that helps stabilize housing situations and when necessary assists participants to obtain and move into permanent housing as quickly as possible and connect people to additional services and supports as needed to maintain housing stability without preconditions and barriers to entry. This plan endorses tailored housing interventions that align with our person-centered values taking into account best-practice approaches that address mental health, recovery and other needs. The Nashville system should be oriented toward a Housing First approach that includes all types of housing interventions (including emergency and temporary housing placements while working toward sustainable permanent housing options). Effective Housing First approaches, developed in response to strong evidence, include: expanding access to new and existing affordable housing for people experiencing homelessness; providing rapid re-housing to families and individuals; and providing supportive housing to people with the most intense needs<sup>1</sup>.

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<sup>1</sup> <https://www.usich.gov/home-together>

**Person-centered** – Treat individuals with dignity and respect by listening and working in partnership with people with lived experience of homelessness to support their personal perspectives, values, beliefs, preferences, and physical/mental health needs.

**Data-driven** – Use data to make strategic decisions regarding housing and supporting needs of individuals and families experiencing or at-risk of homelessness.

**Committed to the effective use of resources** - Create a system that is capable of non-duplicative service delivery, that evaluates effectiveness based on outcomes for the people served, and that utilizes financial resources and staff capacity in the community with the solution in mind.

**Race Equity focused** – The Continuum of Care (CoC) of Nashville/Davidson County is committed to building a more just and equitable homelessness response system. We recognize the history of oppression that has resulted in ongoing disparities for many communities, including people experiencing homelessness. Our CoC nevertheless consists of a powerful network of organizations and change agents with the opportunity to create positive systemic change. We believe that nonprofits and government entities that engage diverse perspectives and evolve to be inclusive behave equitably and have profound impacts on society. For these reasons, Nashville/Davidson County is committed to transforming each aspect of our CoC by confronting our own biases and operationalizing the values of equity, diversity and inclusion. We know that intention alone will not change things. To this work, we bring the successes and mistakes of our own continuing efforts to achieve equity for all people experiencing housing crises in our city and those who work with them.

## REGULATIONS FOR COC AND ESG PROGRAMS

Each Emergency Solutions Grant (ESG) and Continuum of Care (CoC) funded service provider will comply with the minimum written standards established by the Nashville-Davidson County CoC. Each provider may decide to set standards on their provision of ESG/CoC that exceed these minimum standards but will at the very least comply with what is in this guide, which details the baseline expectations all agencies must meet to receive funding.

The updated version of the CoC Program Interim Rule<sup>2</sup> which was originally published in the Federal Register on July 31, 2012, includes revisions to section 578.51(c) regarding mobility options for individual and families with tenant-based rental assistance; section 578.99(j) regarding protections for victims of domestic violence, dating violence, sexual assault, or stalking; and section 578.3 incorporating the final definition of chronically homeless. The

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<sup>2</sup> <https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml>



original CoC Program Interim Rule<sup>3</sup>, with the preamble, is also available on the HUD Exchange. Any citations in this document that start with “578” relate to this CoC Interim Rule.

The *Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act)*<sup>4</sup> amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The *Emergency Solutions Grants Program Interim Regulations*<sup>5</sup> took effect on January 4, 2012. The second allocation of FY 2011 ESG funding and future years are all subject to the ESG regulations. Any citations in this document that start with “576” relate to this ESG Interim Rule.

The first allocation of FY 2011 ESG funding and prior years were subject to the *Emergency Shelter Grants Program*<sup>6</sup> regulations.

## SYSTEM-LEVEL STANDARDS FOR CoC AND ESG FUNDED PROGRAMS

### HOUSING FIRST

Providers of CoC funded PSH projects will use the Housing First approach as outlined below. Any new CoC funded projects must use the Housing First approach as well. All agencies who identify their project to be adopting this approach should gauge how closely they are adhering to the recommended best practice standards of the Housing First Model using HUD’s Housing First Standards Assessment Tool<sup>7</sup>.

The Housing First approach toward housing assistance prioritizes rapid placement and stabilization in permanent housing. This approach does not have service participation requirements or preconditions for entry. This approach does not imply housing only, but implies a focus on housing, first, and then connection to services for stabilization post-housing. HUD encourages all providers of CoC funded PSH to follow a Housing First approach to the maximum extent possible.

Providers are encouraged to adopt Evidence-Based Practices (EBP) and Evidence Informed Practices that support the Housing First/Low Barrier approach. Some examples of EBP include Critical Time Intervention, Motivational Interviewing, Stages of Change, Trauma-Informed Care,

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<sup>3</sup> <https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>

<sup>4</sup> <https://www.hudexchange.info/homelessness-assistance/hearth-act/>

<sup>5</sup> [https://www.hudexchange.info/resources/documents/HEARTH\\_ESGInterimRule&ConPlanConformingAmendments.pdf](https://www.hudexchange.info/resources/documents/HEARTH_ESGInterimRule&ConPlanConformingAmendments.pdf)

<sup>6</sup> <https://www.hudexchange.info/programs/emergency-shelter-grants/>

<sup>7</sup> <https://www.hudexchange.info/resource/5294/housing-first-assessment-tool/>

Strengths-based Programming, and Harm Reduction.

Housing First projects must utilize the following criteria when leasing units:

- The housing is not contingent on the participant's compliance with services
- Participants are provided with a standard one-year lease agreement. The lease agreement can only be terminated in accordance with State of Tennessee statutes.
- Participants are offered services and supports to help maintain housing and prevent eviction. Participants are not required to participate in services, but providers are required to persistently and consistently seek to engage participants.
- There is no requirement for sobriety prior to being offered housing.
- Admission shall not be conditioned on credit or background checks. Serious criminal convictions may be considered only to the extent necessary for the safety of the applicant and others around them.
- Participants shall be given choice in their housing, subject to program limitations.

### **COORDINATED ENTRY (CE) FOR CoC AND ESG FUNDED PROGRAMS**

The Nashville-Davidson County CoC will develop and implement Coordinated Entry (CE) in accordance with HUD's requirements (24 CFR Part 578). The Nashville-Davidson County CES Policy and Procedures Manual may be found online at:

[http://www.nashville-mdha.org/wp-content/uploads/2016/07/CES-Policies-and-Procedures-Manua\\_Final-July-2018.pdf](http://www.nashville-mdha.org/wp-content/uploads/2016/07/CES-Policies-and-Procedures-Manua_Final-July-2018.pdf)

Nashville-Davidson County's CES Policies and Procedures includes the four primary components for a well-functioning CE: Access, Assessment, Prioritization, and Referral.

The following principles will guide the CE process in Nashville-Davidson County:

- All housing and services utilize a Housing First approach to serve all populations;
- Provide the right amount of support, at the right time, to the right person;
- Divert as many persons as possible who may be at risk of homelessness by connecting them to mainstream resources;
- Promote person-centered practices including but not limited to, Motivational Interviewing and Trauma Informed Care;
- Create an open, transparent system that allows for thoughtful decision making and open communication;
- Engage in continuous quality improvement efforts; and
- Consistently utilize a common database to evaluate and analyze needs and gaps in services

CoC and ESG funded providers must comply with the CE requirements established by the CoC. These requirements are documented in the CE Policies and Procedures Manual and included below:

- Supporting efforts to streamline housing and support services through CES
- Supporting the transition from first come-first served to a needs-based access to services and housing
- Supporting the transition to a Housing First approach and philosophy
- Complying with the CoC non-discrimination policies and provide equitable and fair access to all individuals and families who are experiencing a housing crisis
- Adhering to policies and procedures as detailed in the most recent CES Manual
- Understanding that participation is required by the CoC through the funding requirements established by HUD for the CoC/ESG competitive funds
- Using the designated Homeless Management Information System (HMIS) in regard to CES implementation.
- Collecting and entering all needed data into the designated HMIS, on persons experiencing a housing crisis (this includes entries into and exits from the system)
- If operating a bed program, reporting project vacancies to the CE Lead
- Accepting appropriate referrals from CE and accept participants based on need and vulnerability
- Working with CoC CE Lead to resolve project implementation challenges
- Participating in CE Care Coordination Meetings (CCMs)
- Participating and provide input on CES Policies and Procedures and other CE topics
- Participating in project and system evaluation activities.

This language is subject to change as CE is evaluated and needed improvements are made. Ongoing training and support will be provided by the CE Manager to all CoC and ESG funded providers in the access, assessment, prioritization, and referral process. If any of the training involves HMIS entry or processes, the HMIS Lead will be consulted.

## **ADDRESSING THE SAFETY NEEDS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, AND STALKING SURVIVORS**

Nashville providers should be able to provide individuals and families fleeing domestic violence access to housing and trauma-informed, services that prioritize the survivor's safety needs, accommodate their unique circumstances, and maximizes client choice. The CoC should have an emergency transfer plan that prioritizes safety and trauma-informed, survivor services to prioritize safety; and should maximize client choice for housing and services while ensuring safety and confidentiality.

Staff at shelters that are not DV-specific will be trained in safety planning at least annually, but

optimally once each quarter. The CoC will rely on agencies such as the YWCA and Mary Parrish Center for this training.

## **WRITTEN PROCEDURES FOR CoC ANNUAL EVALUATION OF CE BY FUNDED PROJECTS, PARTICIPANTS**

The CoC will be responsible for updating the CE Policies and Procedures Manual at least annually. The CoC CES/ Written Standards committee will allow the CoC General Body at least 30 calendar days for review and input before an updated draft of the CE Policies and Procedures Manual is presented to the Nashville-Davidson County CoC Homelessness Planning Council for approval. Evaluation will include, but not be limited to:

- Surveys designed to reach either the entire population or a representative sample of participating providers and households;
- Focus groups of five or more participants that approximate the diversity of the participating providers and households; and
- Individual interviews with participating providers and enough participants to approximate the diversity of participating households.

Feedback received using the processes selected from the above will be used to make necessary updates to the CES Policies and Procedures. The participants selected by the CoC to participate in the evaluation must include individuals and families currently engaged in the coordinated entry process and/or who have been referred to housing through the coordinated entry process in the last year.

## **HMIS FOR CoC AND ESG FUNDED PROGRAMS**

A CoC addresses the issue of homelessness by identifying local needs and designing a system of housing and services to meet those needs. Integral to its success is the development of complete and accurate data about the extent and nature of homelessness within its geography, which is why HUD requires recipients and subrecipients to participate in the Homeless Management Information System (HMIS).

The designated HMIS lead for Nashville-Davidson County is the Homeless Impact Division of Metropolitan Social Services. Designation of the HMIS lead will be reviewed not less than every three years or as required by law.

The Homelessness Planning Council will charge the HMIS Advisory Committee to assess the HMIS lead to ensure compliance HUD requirements and to ensure adequate support and training to the HMIS contributing agencies. They will also evaluate the cost-effectiveness of the HMIS lead.

In the event that the Homelessness Planning Council determines that the performance of the HMIS lead is not satisfactory or cost-effective, it will seek an alternative provider to be selected through an open and competitive process, and make a recommendation to the CoC General membership for final vote of the HMIS lead.

The HMIS lead will recommend to the CoC the HMIS software solution for the CoC.

The HMIS lead is responsible for:

- Maintaining and updating the HMIS data system
- Providing training and support to all HMIS users
- Generating regular reports based on HMIS data including counts of persons experiencing homelessness and performance reports on CoC and ESG funded providers.
- Providing reports to HUD as required including the Longitudinal Systems Analysis (LSA); and
- Ensuring that all ESG and CoC funded providers are able to access the system and have the training and support necessary to effectively use the system

Funded agencies will be required to use HMIS as a system planning and evaluation tool, and to review their data ongoing for performance issues, as well as data quality issues. The minimum HMIS standards for CoC and ESG funded program data is:

- Data completeness & quality-- HMIS Member Agencies will capture all necessary data.
  - HMIS Member Agencies will be expected to have no more than 5% of all client data “blank/not reported/null” value rate for all clients entered into HMIS (or 95% or above completeness).
  - “Blank/not reported/null” values include fields that are left blank or answered with a “don't know”, “refused”, or “unknown” value. While these options may accurately reflect what the client has self-reported, they are considered of low quality value
- Providers, except providers of survivors of domestic and interpersonal violence, shall actively utilize HMIS to enter HUD-required UDE’s (Universal Data Elements) and PSDE’s (Program-Specific Data Elements) on people served and assistance provided under the ESG and CoC Programs.
- Agencies should have program data entered within 24 hours of it being collected or when the client enters a program. Although, having client data entered within a week of intake or first service is acceptable as the minimum requirement according to HUD.

All programs and projects must comply with HMIS Policies and Procedures<sup>8</sup>, including all data

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<sup>8</sup> \*this document can be found along with other COC documents at the following link: <http://www.nashville-mdha.org/community-development/about-the-continuum-of-care/>

privacy/confidentiality requirements. A link to this document is provided in the appendix.

Providers of survivors of domestic and interpersonal violence shall actively utilize a comparable data system that meets HUD's standards (24 CFR 576.107 and 578.7(b)).

## PROGRAM STANDARDS FOR CoC AND ESG FUNDED PROGRAMS

### INCOME DETERMINATION FOR PARTICIPANTS OF CoC AND ESG FUNDED PROGRAMS

Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609. Annual income is defined as:

*Annual income* means all amounts, monetary or not, which:

- Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- Which are not specifically excluded in paragraph (c) of 24 CFR 5.609.
- Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

At annual reassessment, individuals and families assisted under ESG are required to have annual incomes at or below 30% of Area Median. There are no income limits for CoC assistance but in all instances in which participants are charged rent or occupancy charges, the amount charged must be based on participant's verified annual (gross) income from all sources.

In verifying income, ESG and CoC funded providers are required to obtain third party verification whenever possible. Self-certification or verification is to be accepted only when all efforts have been made to obtain third party verification have not produced results. Example of Self-certification can be found in the appendix.

### CONFLICTS OF INTEREST STANDARDS FOR ALL CoC and ESG FUNDED PROVIDERS

Minimum standards for conflicts of interest are located at 24 CFR 578.95 and 24 CFR 576.404:

#### ORGANIZATIONAL CONFLICTS OF INTEREST

An organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, the CoC or ESG funded provider is unable or potentially

unable to render impartial assistance in the provision of any type or amount of assistance. Such an organizational conflict would arise when a board member of a CoC or ESG applicant participates in a decision concerning the award of a grant, or provision of other financial benefits, to the organization that such member represents. It would also arise when an employee of a CoC or ESG funded provider participates in making rent reasonableness determinations under §578.49(b)(2) and § 578.51(g) and housing quality inspections of property under § 578.75(b) that the CoC or ESG funded agency, or related entity owns.

The provision of ESG and CoC assistance to a participant cannot be contingent on the individual's or family's acceptance or occupancy of emergency shelter or housing owned by the CoC or ESG provider or a related entity.

No CoC or ESG funded provider, with respect to individuals or families occupying housing owned by the provider or a provider's related entity, will carry out the initial evaluation under 24 CFR 576.401 or 578.75(b) or administer homelessness prevention assistance under 24 CFR 576.103.

#### INDIVIDUAL CONFLICTS OF INTEREST

When procuring goods and services, the CoC or ESG funded provider will comply with codes of conduct and conflict of interest requirements under 2 CFR 200.317 and 200.3.<sup>9</sup>

#### ALL TRANSACTIONS/ACTIVITIES

No board member of the CoC or ESG funded provider may participate in or influence discussions or resulting decisions concerning the award of a CoC or ESG grant or other financial benefits to the organization that the member represents. [578.95]

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

These conflict of interest provisions apply to any employee, agent, consultant, officer or elected

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<sup>9</sup> [https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=ea697ca94d390736cef1034389bcf0a4&h=L&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200\\_1330](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=ea697ca94d390736cef1034389bcf0a4&h=L&mc=true&n=pt2.1.200&r=PART&ty=HTML#se2.1.200_1330)

or appointed official of the CoC or ESG-funded provider.

A provider may request an exception to these provisions from HUD, only if he or she meets the threshold requirements identified in 24 CFR 576.404 and/or 578.95(d)(2).

## **PARTICIPATION OF PEOPLE EXPERIENCING HOMELESSNESS FOR ALL CoC and ESG FUNDED PROVIDERS**

Minimum standards for participation 24 CFR 578.75(g) and 576.405(a) are:

- Each provider of CoC or ESG assistance must provide for the participation of not less than one individual with lived experience on the board of directors or equivalent policymaking entity of the provider, such as an “advisory board” for a smaller program focused on homelessness within a larger social service agency.
- To the maximum extent possible, the provider shall involve individuals and families with lived experience of homelessness paid or volunteer work on the ESG or CoC funded facilities, in providing services under ESG or CoC and in providing services for occupants of ESG or CoC funded facilities (24 CFR 576.405 and 578.75).

## **FAITH-BASED ACTIVITIES FOR ALL CoC AND ESG FUNDED PROVIDERS**

Limitations on faith-based activities (24 CFR 576.406 and 578.87) are:

- Providers receiving ESG/CoC funding shall not engage in inherently religious activities as part of the ESG/CoC-funded programs or services. Such activities must be offered separately from ESG/CoC-funded programs and services and participation must be voluntary.
- A religious organization receiving ESG/CoC funding retains independence from government and may continue with its mission provided that ESG/CoC funds are not used to support inherently religious activities. An ESG/CoC-funded organization retains its authority over its internal governance.
- An organization receiving ESG/CoC funding shall not discriminate against a participant or prospective participant based on religion or religious beliefs, including providing different service to people based on actual or perceived impressions of gender identity, sexual identity, citizenship or immigration status.



- ESG/CoC funding shall not be used for the rehabilitation of structures used specifically for religious activities but may be used for rehabilitating structures that are used for ESG/CoC-eligible activities.

## PROHIBITION AGAINST INVOLUNTARY FAMILY SEPARATION FOR ALL CoC AND ESG FUNDED PROGRAMS

The age and gender, including gender identity, of a child under age 18 must not be used as a basis for denying any family's admission to any housing or shelter receiving funding from either ESG or CoC (24 CFR 576.102(b) and 578.93(e)).

## NONDISCRIMINATION/EQUAL OPPORTUNITY/AFFIRMATIVE OUTREACH FOR ALL CoC AND ESG FUNDED PROGRAMS

All CoC and ESG providers shall comply with the requirements for nondiscrimination, equal opportunity and affirmative outreach identified in §576.407 (ESG) and 578.93 (CoC), in addition to HUD's equal access policy, as established in HUD's 2012 Equal Access Rule<sup>10</sup>, and elaborated upon in the Equal Access in Accordance with Gender Identity Final Rule<sup>11</sup>.

Per the CoC Program interim rule at 24 CFR 578.93(c) & ESG requirements at 24 CFR § 576.407(a) and (b), recipients of CoC Program or ESG funds must affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, creed, age, familial status, or disability who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities. Housing assisted by CoC or ESG funding must also be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status in accordance with 24 CFR 5.105 (a)(2).

All CoC and ESG providers must provide appropriate auxiliary aids and services necessary to ensure effective communication, which includes ensuring that information is provided in appropriate accessible formats as needed, e.g., Braille, audio, large type, assistive listening devices, and sign language interpreters. Access points must be accessible to individuals with disabilities (physical, mental, developmental, behavioral impairments or substance use disorders), including accessible physical locations for individuals who use wheelchairs, as well as people in the CoC who are least likely to access homelessness services. Providers receiving CoC and/or ESG funds must also take reasonable steps to ensure housing and services can be accessed by persons with Limited English Proficiency (LEP).

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<sup>10</sup> [https://www.hudexchange.info/resources/documents/EqualAccess\\_FinalRule\\_2.3.12.pdf](https://www.hudexchange.info/resources/documents/EqualAccess_FinalRule_2.3.12.pdf)

<sup>11</sup> <https://www.hudexchange.info/resource/1991/equal-access-to-housing-final-rule/>

On September 21, 2016, HUD published a final rule in the *Federal Register*<sup>12</sup> entitled *Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs*<sup>13</sup>. Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity in programs and shelter funded under programs administered by HUD's Office of Community Planning and Development (CPD). This rule builds upon HUD's February 2012 final rule entitled *Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity*<sup>14</sup> (2012 Equal Access Rule), to ensure that HUD's housing programs would be open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.

The final rule requires recipients and subrecipients of HUD's Community Planning Department (CPD) funding, as well as owners, operators, and managers of shelters, and other buildings and facilities; and providers of services funded in whole or in part by any CPD program to grant equal access to such facilities, and other buildings and facilities, benefits, accommodations and services to individuals in accordance with the individual's gender identity, and in a manner, that affords equal access to the individual's family. The COC further expects these accommodations and services to be provided equitably.

MDHA will facilitate annual training opportunities on the above requirements for all CoC grantees and ESG sub-recipients.

## **PROGRAM INCOME FOR ALL CoC AND ESG FUNDED PROVIDERS**

Program income is defined as the income received by the CoC or ESG provider that is directly generated from a CoC or ESG grant-supported activity.

Program income earned during the grant term shall be retained by the provider and added to the CoC and ESG funds committed to the project by HUD and used by the provider to finance the non-Federal share of the project or program. Costs incidental to the generation of program income may be deducted from the income received to calculate program income, provided that the costs have not been charged to CoC or ESG grant funds. Records of the receipt and use of program income shall be retained. Program income may not be used to meet matching funding requirements.

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<sup>12</sup> <https://www.federalregister.gov/documents/2016/09/21/2016-22589/equal-access-in-accordance-with-an-individuals-gender-identity-in-community-planning-and-development>

<sup>13</sup> <https://www.hudexchange.info/resources/documents/Equal-Access-Final-Rule-2016.pdf>

<sup>14</sup> [https://www.hudexchange.info/resources/documents/EqualAccess\\_FinalRule\\_2.3.12.pdf](https://www.hudexchange.info/resources/documents/EqualAccess_FinalRule_2.3.12.pdf)

## APPLICABILITY OF OTHER FEDERAL REQUIREMENTS FOR CoC AND ESG FUNDED PROVIDERS

### RECOVERED MATERIALS

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

### DISPLACEMENT

Minimizing displacement is consistent with CoC and ESG goals and objectives. All CoC- and ESG-funded projects must ensure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations and farms) as a result of projects assisted with CoC or ESG funds. "Projects," as used in this section, means any activity or series of activities assisted with CoC or ESG funds received or anticipated to be received in any phase of the project.

It is the policy to the Nashville-Davidson County CoC and MDHA as the administrator of the Consolidated Plan for Nashville-Davidson County not to approve funding for any CoC or ESG projects that will involve displacement.

Temporary relocation not permitted. No tenant-occupant of housing (a dwelling unit) that is converted for a CoC or ESG funds project may be required to relocate. When a tenant-occupant moves from a project assisted with CoC or ESG funds under conditions described in 24 CFR 578.83 (b)(1) and 576.408 (b), the tenant shall be treated as permanently displaced and offered relocation assistance and payments consistent with 24 CFR 578.83 (c) and 576.408 (c).

There is assistance that is acceptable to help with relocation for displaced persons. In general, a displaced person (defined in 24 CFR 578.83 (c)(2) for CoC funds and 576.408(c)(2)for ESG funds shall be provided relocation in accordance with the requirements of the Uniform Relocation Act (URA) and implementing regulations at 49 CFR part 24.

A person does not qualify as a "displaced person" if the person meets the requirements

outlined in 24 CFR 578.83 (iii) (A)(B)(C)(D)(E) for CoC funds projects and 576.408 (ii)(A)(B)(C)(D) for ESG funds.

The provider may request that HUD determine whether or not a displacement would be covered by this rule as outlined in 24 CFR 578.83 (iv) for CoC funded projects and 576.408 (iii) for ESG funded projects.

The acquisition of real property for an CoC or ESG funded project is subject to the URA and Federal government wide regulations as outlined in 24 CFR 578.83 (d) for CoC funded projects and 576.408 (d) for ESG funded projects .

A person who disagrees with CoC or ESG providers determination concerning whether the person qualifies as a displaced person, or the amount of relocation assistance may file a written appeal using the procedures outlined in 24 CFR 578.83 (e) for CoC funded projects or 576.408 (e) for ESG funded projects. A low-income person who disagrees with the recipient's determination may submit a written request for review of that determination by HUD.

## RECORDS & RECORDKEEPING REQUIREMENTS FOR THE NASHVILLE-DAVIDSON COUNTY CoC AND CoC AND ESG FUNDED PROVIDERS

MDHA, the CoC, CoC and ESG funded providers must establish and maintain standard operating procedures to ensure that funds are used in accordance with the requirements of the respective programs and that records are maintained to enable HUD to determine compliance with the recordkeeping requirements listed at 24 CFR 578.103 for CoC funded programs and 576.500 for ESG funded programs.

### COC RECORDS

Each CoC Collaborative Applicant must keep the following documentation related to establishing and operating the Continuum of Care:

- Evidence that the Board selected meets the requirements of 578.5(b);
- Evidence that the CoC has been established and operated as set forth in subpart B of 24 CFR part 578 including published agendas and meeting minutes, an approved Governance Charter that is reviewed and updated annually, a written process for selecting a board that is reviewed and updated at least every five years, evidence required for designating a single HMIS for the CoC, and monitoring reports for CoC funded providers.
- Evidence that the CoC has prepared the HUD application for funds in accordance with 578.9, including the designation the eligible applicant to be the collaborative applicant.
- If applicable, must be able to provide Unified Funding Agency Records
  - Presently not applicable to the Nashville-Davidson County.

## RECORDS OF COC AND ESG FUNDING

Each CoC and ESG provider must maintain records for all program participants to include the following:

- Written verification that all program participants meet the following criteria:
  1. Homeless or At Risk of Homelessness and that an effort was made to obtain written third-party verification, when possible and applicable.
    - For CoC funded projects, acceptable evidence of homelessness status as set forth in 24 CFR 578.3.; and
    - For ESG funded projects, acceptable evidence of homelessness status as set forth in 24 CFR 576.2.<sup>15</sup>
  2. Documentation on why program participants were eligible or ineligible to receive particular services or financial assistance.
  3. Insufficient resources and support networks to obtain the assistance from other sources.
  4. Income requirements and that an effort was made to obtain written third-party verification, when possible and applicable. This includes annual documentation of income for each program participant who receives housing assistance where rent or an occupancy charge is paid by the program participant.
  5. Households served through permanent supportive housing must meet HUD's requirements of having a family member be a person with disabilities.
  6. Households served through PSH dedicated for chronically homeless individuals and families must meet the definition of chronically homeless.
    - Projects that prioritize units for the chronically homeless must maintain documentation that:
      - i. the participant in the unit met the definition of chronically homeless at program entry; OR
      - ii. prove there were no eligible chronically homeless participants waiting at time of vacancy. This should be documented by CE.
- Written verification in the participants individual chart (paper/electronic) may be in the form of, but not limited to, chart notes, copies, forms or other approved documentation of:
  - a. Specific services and financial assistance amounts that were provided to the program participant;
  - b. When applicable, services termination in compliance with 576.402 and/or 578.91.
  - c. CoC approved centralized or coordinated assessment of the program

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<sup>15</sup>[https://www.hudexchange.info/resources/documents/HomelessDefinition\\_RecordkeepingRequirementsandCriteria.pdf](https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf)

participant using the VI-SPDAT and recording that information in HMIS. This assessment must be periodically updated for all homeless participants.

- d. Consent and ROI for participation in HMIS
  - e. Leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with fair market rent, rent reasonableness and utility allowance requirements
  - f. Compliance with HUD's habitability and lead-based paint standards
  - g. Individualized housing stability plan
  - h. Case management services provided at least monthly, unless exempt from this requirement
  - i. Participant's eligibility re-evaluation at least every 3 months for homelessness prevention services or at least annually for rapid rehousing services
  - j. Assistance for participant to obtain necessary mainstream and other resources
  - k. Changes in participant income and/or household composition and assistance adjusted based on verified information.
- Program policies and procedures for all providers funded through ESG or CoC will indicate:
    - o Services are coordinated with Continuum(s) of Care, other homeless assistance/prevention programs and mainstream service and assistance programs
    - o Compliance with HUD's ESG and CoC regulations (24 CFR 576 and 578) requirements for:
      - Shelter and housing standards
      - Conflict of interest
      - Homeless participation
      - Faith-based activity
      - Nondiscrimination, equal opportunity and affirmative outreach
      - Uniform administrative rules (24 CFR part 84)
      - Environmental review
      - Lobbying and disclosure (24 CFR part 87)
      - Displacement, relocation and acquisition
      - Procurement (24 CFR 84.40-84.48)
    - o Program participant records are kept secure and confidential
    - o Participation in HMIS or comparable database
- Financial records shall include:
    - o Supporting documentation for all costs charged to ESG or CoC grant
    - o Documentation showing ESG or CoC funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles (2 CFR Part 200)
    - o Time sheets and time allocation for all personnel paid for with CoC and/or

ESG funding

- o Documentation of the receipt and use of program income
- o Documentation of the receipt and use of matching funds
- o Copies of procurement contracts

## PROGRAM COORDINATION FOR CoC AND ESG FUNDED PROGRAMS

The Nashville-Davidson County CoC will work together with ESG funded providers to ensure that the CoC's Coordinated Entry process allows for coordinated screening, assessment and referrals for ESG-funded projects consistent with the written standards for administering ESG assistance.

CoC and ESG projects will coordinate to the maximum extent possible with the following:

- Other homeless assistance providers, including:
  - o HUD-Veterans Affairs Supportive Housing (HUD-VASH);
  - o Education for Homeless Children and Youth Grants for State and Local Activities (McKinney-Vento Homeless Assistance Act);
  - o Grants for the Benefit of Homeless Individuals;
  - o Healthcare for the Homeless;
  - o Programs for Runaway and Homeless Youth;
  - o Projects for the Assistance in the Transition from Homelessness;
  - o Services in Supportive Housing Grants;
  - o Emergency Food and Shelter Program;
  - o Transitional Housing Assistance Grants for Victims of Sexual Abuse, Domestic Violence, and Stalking Program;
  - o Homeless Veterans Reintegration Program;
  - o Domiciliary Care for Homeless Veterans Program;
  - o VA Homeless Providers Grant and Per Diem Program;
  - o Health Care for Homeless Veterans Program;
  - o Homeless Veterans Dental Program;
  - o Supportive Services for Veterans Families Program; and
  - o Veterans Justice Outreach Initiative
  
- Mainstream service and housing providers:
  - o Public housing programs assisted under section 9 of the U.S. Housing Act of 1937;
  - o Housing programs receiving Section 8 tenant based or project based assistance;
  - o Supportive Housing for Persons with Disabilities;
  - o HOME Investment Partnerships Program;
  - o Temporary Assistance for Needy Families;
  - o Health Center Program;
  - o State Children's Health Insurance Program;

- Medicare
- Medicaid (TennCare)
- Insurance Coverage under the Affordable Care Act
- Head Start;
- Mental Health and Substance Abuse Block Grants;
- Services funded under the Workforce Investment Act; and
- State Housing Related Assistance Program for Adults with Serious Mental Illness

## CONNECTION OF OTHER RESOURCES FOR PARTICIPANTS OF CoC AND ESG FUNDED PROGRAMS

Minimum standards for connection with other resources consist of assisting each participant to obtain, if applicable:

Appropriate support services including:

- Permanent housing;
- Medical health treatment;
- Behavioral health services;
- Counseling;
- Health & Income Benefits;
- Supervision; and
- Other services needed for independent living.

Other governmental and private assistance available to help with housing stability including:

- Medicaid (TennCare);
- Medicare;
- Insurance Coverage under the Affordable Care Act
- Supplemental Nutrition Assistance Program;
- Women, Infants and Children (WIC);
- Federal-State Unemployment Insurance Program;
- Supplemental Security Income (SSI);
- Social Security Disability Insurance (SSDI);
- Veterans' Assistance
- Child and Adult Care Food Program; and
- Workers Compensation
- Other available assistance



## WRITTEN PROCEDURES FOR PROGRAM TERMINATION/GRIEVANCE/APPEALS PROCESS FOR ALL CoC- AND ESG-FUNDED HOUSING AND SERVICE DELIVERY PROGRAMS

All CoC and ESG funded providers must have written policies for program operations that include termination procedures and an appeals process. These written policies must be provided to program participants before any services are rendered.

Participants may appeal any decision made by the provider including but not limited to the following:

- Denial of services
- Determination of household income/calculated rent payment/occupancy charge
- Denial to add member to household
- Termination of services after acceptance in the program

In general, providers must afford program applicants or participants a formal process that is outlined in their program procedures that recognizes the rights of the individuals affected. The required formal appeal process, at a minimum, must consist of:

- A written notice to the participant containing a clear statement of the reason for decision;
- Information on the how the participant can ask for a review/appeal of the decision and present written or oral objections to a person or committee other than the person who made or approved the decision;
- A notice that they are allowed to have someone (i.e., legal aid, social worker, etc.) present or to represent them during the review/appeal at their own expense; and
- Prompt written notice of the final decision (typically no later than 30 days) after the appeal request is received.

Minimum standards for termination of assistance are:

- If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individual(s) affected.
- Termination shall only occur in the most severe cases after other remedies have been attempted.
- Termination of individuals and families in projects funded through the CoC program must be consistent with 578.91 and 576.402 for those projects funded through the ESG program.
- When an ESG or CoC funded homelessness assistance program seeks to terminate

- participation for any household, the required formal process shall minimally consist of:
- o Written notice clearly stating the reasons for termination;
  - o Review of the decision that gives the participant opportunity to present objections to the decision and to have representation.
    - Any appeal of a decision shall be heard by an individual different from and not subordinate to the initial decision-maker; and
    - Written notice of the final decision on the appeal should be received within 14 days.
- Termination will not bar the provider from providing later additional assistance to the same family or individual.

The initial appeal of any decision shall be made to the ESG or CoC funded provider pursuant to the process described above. Should the participant not be satisfied with the appeal decision, he/she has the right to appeal that decision to the board of the agency, and if not resolved to the participant's satisfaction, then appealed to the entity that awarded the funding.

## **PARTICIPANT ELIGIBILITY FOR CoC AND ESG FUNDED PROGRAMS**

HUD Homeless Definition - Four Categories (Effective January 4, 2012)

### **Category 1-- Literally homeless individuals/families**

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation, including

- A car
- A park
- An abandoned building
- A bus or train station
- An airport
- A camping ground
- Living in a shelter designated to provide temporary living arrangements, including
  - Congregate shelters
  - Transitional housing
  - Hotels and motels paid for by charitable organizations or federal/state/local government programs
- Exiting an institution (e.g., jail, hospital) - where they resided for 90 days or less; **AND**
- were residing in emergency shelter or place not meant for human habitation immediately before entering institution.

**Category 2 -- Individuals/families who will imminently (within 14 days) lose their primary nighttime residence with no subsequent residence, resources or support networks**

- Individuals/families who will imminently lose their primary nighttime residence within 14 days; **AND**
- have no subsequent residence identified; **AND**
- lack the resources or support networks needed to obtain other permanent housing

**Category 3 -- Unaccompanied youth or families with children/youth who meet the homeless definition under another federal statute and 3 additional criteria**

Unaccompanied youth under **age 25** or families with children and youth who do not otherwise qualify as homeless, but who

- meet homeless definition under another federal statute; **AND**
- have not had lease, ownership interest, or occupancy agreement in permanent housing at any time during last 60 days; **AND**
- have experienced two or more moves during last 60 days; **AND**
- Can be expected to continue in such status for an extended period of time because of: – chronic disabilities, OR – chronic physical health or mental health conditions, OR – substance addiction, OR – histories of domestic violence or childhood abuse (including neglect) OR – presence of a child or youth with a disability, OR – two or more barriers to employment

*NOTE: HUD must approve CoC Program funded projects to serve youth under Category 3. ESG funded projects do not require HUD approval.*

**Category 4 – Individuals/families fleeing or attempting to flee domestic violence with no subsequent residence, resources or support networks**

Individuals/families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life threatening conditions related to violence, who

- have no identified subsequent residence; **AND**
- lack the resources and support networks needed to obtain other permanent housing.

Minimum standards for evaluating individual and family eligibility for assistance under Emergency Solutions Grant (ESG) and Continuum of Care (CoC) are detailed below, and summarized in the chart that follows:

**STREET OUTREACH**

People are eligible for the following services if they are ‘unsheltered homeless,’ based on category (1)(i) of the “homeless” definition found at 24 CFR 576.2, in compliance with federal ESG rules (24 CFR 576.101):

- Engagement
- Case management
- emergency health
- Mental Health Services
- Transportation

## EMERGENCY SHELTER

People are eligible for the following services if they qualify as 'homeless,' based on categories (1, 2, or 4) of the "homeless" definition found at 24 CFR 576.2 Eligible activities, in compliance with federal ESG rules (24 CFR 576.102) in addition to the provision of decent, safe and sanitary emergency shelter accommodations are:

- case management;
- child care;
- education,
- employment
- life skills services;
- legal services;
- health
- mental health
- substance abuse services
- transportation

Any shelter that receives ESG funding cannot deny a family based on the gender, or gender identity of a child under age 18. Families with children under 18 cannot be required to separate in order to access emergency shelter.

## RAPID RE-HOUSING (RRH)

CoC and ESG funded RRH will follow the standards as set forth below:

- People must qualify as experiencing homelessness based on categories 1 or 4 of the homeless definition found at 24 CFR 576.2 and/or 578.3
  - Persons who meet the category 2 homeless definition are eligible for CoC funded RRH provided the project was not funded under special NOFA conditions that reallocated projects which limit eligibility to those living on the streets, in shelters, or places not meant for human habitation.
  - The housing unit a person is moving into must meet HUD's habitability and lead-based paint standards are eligible for the following activities, in compliance with federal ESG and CoC rules (24CFR 576.104, 576.105, 576.106, 578.37, 578.51 and 578.77).
  - Persons must be at or below 30% of the area median income (AMI) at annual recertification to continue to be eligible for ESG funded RRH
  - For COC funded agencies, there is no income requirement.

## TRANSITIONAL HOUSING

Transitional housing facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering the housing. Eligible persons for

transitional housing meet the homeless definition based on categories 1, 2 and 4.

### PERMANENT SUPPORTIVE HOUSING FOR PERSONS WITH DISABLING CONDITIONS (PSH)

Eligible households include any person with a verifiable disabling condition. To be eligible for PSH a household must meet the category 1 or 4 homelessness definition. Those that entered prior to this rule being in place will continue to be served.

Permanent supportive housing may be provided on a scattered-site or single-site basis using tenant-based rental assistance, sponsor- or project-based rental assistance, leasing (scattered-site individual apartment units or entire structures) or operating costs to support the operations of a supportive housing facility as well as supportive services to meet participants' needs. Supportive services must be designed to meet the needs of the participant and be readily available.

## HUD ELIGIBILITY REQUIREMENTS FOR ESG BY TYPE

<b>ELIGIBILITY BY COMPONENT</b> (Emergency Solutions Grants Program)	<b>Street Outreach</b>	Individuals defined as Homeless under the following categories are eligible for assistance in SO: <ul style="list-style-type: none"> <li><input type="checkbox"/> Category 1 – Literally Homeless</li> <li><input type="checkbox"/> Category 4 – Fleeing/Attempting to Flee Domestic Violence (where the individual or family also meets the criteria for Category 1)</li> </ul> SO projects have the following additional limitations on eligibility within Category 1: <ul style="list-style-type: none"> <li><input type="checkbox"/> Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter</li> </ul>
	<b>Emergency Shelter</b>	Individuals and Families defined as Homeless under the following categories are eligible for assistance in ES projects: <ul style="list-style-type: none"> <li><input type="checkbox"/> Category 1 – Literally Homeless</li> <li><input type="checkbox"/> Category 2 – Imminent Risk of Homeless</li> <li><input type="checkbox"/> Category 3 – Homeless Under Other Federal Statutes</li> <li><input type="checkbox"/> Category 4 – Fleeing/Attempting to Flee DV</li> </ul>
	<b>Rapid Re-housing</b>	Individuals defined as Homeless under the following categories are eligible for assistance in RRH Programs: <ul style="list-style-type: none"> <li><input type="checkbox"/> Category 1 – Literally Homeless</li> <li><input type="checkbox"/> Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)</li> </ul>
	<b>Homelessness Prevention</b>	Individuals and Families defined as Homeless under the following categories are eligible for assistance in HP projects: <ul style="list-style-type: none"> <li><input type="checkbox"/> Category 2 – Imminent Risk of Homeless</li> <li><input type="checkbox"/> Category 3 – Homeless Under Other Federal Statutes</li> <li><input type="checkbox"/> Category 4 – Fleeing/Attempting to Flee DV</li> </ul> Individuals and Families who are defined as At Risk of Homelessness are eligible for assistance in HP projects. <p>HP projects have the following additional limitations on eligibility with homeless and at risk of homeless:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Must only serve individuals and families that have an annual income <u>below</u> 30% of AMI</li> </ul>

## HOMELESSNESS PREVENTION FOR ESG-FUNDED PROVIDERS<sup>16</sup>

### DESCRIPTION OF THE PROGRAM

ESG funds may be used to provide housing relocation and stabilization services and short and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in § 576.2.

### PROGRAM STANDARDS

The cost of homelessness prevention is only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in § 576.105, the short-term and medium-term rental assistance requirements in § 576.106, and the written standards and procedures established under § 576.400.

CoC and ESG homeless prevention funded agencies must participate in CE as outlined above. This includes taking and accepting referrals from CE.

### ELIGIBLE ACTIVITIES

#### Housing Relocation and Stabilization Services

- moving costs
- rent application fees
- security deposits
- last month’s rent
- utility deposits
- utility payments
- housing search/placement
- housing stability case management
- mediation and legal services
- credit repair
- budgeting/money management

#### Rental Assistance:

- Short-Term (up to 3 months)
- Medium-Term Rental Assistance (4-24 months)

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<sup>16</sup> As CoC funds may be used for prevention only by recipients in CoCs that are designated high-performing communities (Nashville is not one of these; in fact, there are no communities in the country that have that designation by HUD), this section deals almost exclusively with the Prevention component funded only under ESG.

- Up to 24 months total during a 3- year period in tenant-based or project-based housing – meaning an agency could pay intermittent payments that totaled 24 months, but may not be consecutive

The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant’s portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord.

## CLIENT ELIGIBILITY REQUIREMENTS

In order for a person to qualify for prevention services in compliance with federal ESG rules (24 CFR 576.103, 576.105, 576.106) provided the household resides in Davidson County must meet the following conditions:

- Qualify as ‘at risk of homelessness,’ based on categories (2 or 4) of the “homeless” definition; OR
- based on the “At risk of homelessness” definition found at 24 CFR 576.2; AND
- who reside in a housing unit that meets HUD’s habitability and lead-based paint standards; AND?
- have an annual income below 30% of Area Median Income (AMI), are eligible for prevention services, in compliance with federal ESG rules (24 CFR 576.103, 576.105, 576.106), provided that the household resides in Davidson County.

The person(s) requesting homeless prevention assistance must meet the homeless definition as defined above. These definitions are also noted in 24 CFR 576.2. The person’s income must not exceed the 30% Annual Median Income (AMI).

## PARTICIPANT CONTRIBUTIONS TO OCCUPANCY FOR HOMELESS PREVENTION PROGRAMS

The Nashville-Davidson County CoC has established the following minimum standards for determining what percentage or amount of rent and utilities costs each program participant shall pay while receiving homelessness prevention or RRH assistance.

- Participant’s income will be verified prior to approval for initial and additional financial assistance.
  - Documentation of the participant’s income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in participant’s file. This file shall also contain a plan to sustain housing following the assistance, including either a plan to increase income, decrease expenses or both.



- Providers must establish policies concerning notification and verification of changes of participant income and/or family composition.
- Providers are expected to provide hardship exemptions to any rental charges if such charges could lead to the loss of housing for the household. Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider's policies and clearly communicated to program participants. The calculation of participant's income, the level of financial assistance provided, whether a hardship exemption is granted are all decisions that must be appealable to the provider and, if the participant is not satisfied with the response, to the funding entity.

#### RENTAL ASSISTANCE DURATION AND ADJUSTMENT: HOMELESS PREVENTION

The Nashville-Davidson County CoC has established the following minimum standards for determining how long a particular program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time.

- Providers will approve participants for the minimum amount of rental assistance necessary to prevent homelessness. Documentation of financial need shall be kept in the participant's file for each quarterly assessment. Participants shall not be approved for more rental assistance than can be justified given their income and expenses at a given time.
- For ESG Prevention:
  - Payment is not to exceed 24 months total during a 3 year period in tenant-based or for ESG funded project-based housing ( 24 CFR 576.103 and 576.104)
    - Short term not to exceed 3 months
    - Medium term not to exceed 24 months
    - Providers must re-assess the continuing need for rental assistance prior to approving a renewal increment
- Each provider can establish policies regarding any additional requirements pertaining to how long a participant can receive rental assistance and if and how the amount of that assistance will be adjusted over time. It is the responsibility of each provider to clearly communicate any additional requirements to participants.

#### LIMITATIONS ON FINANCIAL ASSISTANCE

Financial assistance provided to participants under CoC and ESG funded Prevention and RRH services may not exceed the limitations set forth below. It is the responsibility of all providers to comply with these requirements when providing services.

- Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is

receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources.

- Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA), during the period of time covered by the URA payments.
- Rental application fees – Payment shall only be made for fees charged by the owner to all applicants.
- Security deposits cannot exceed two months of rent
- Last month's rent cannot exceed one month's rent and needs to be included in calculating the total rental assistance amount.
- Utility deposits can only be made for gas, electric, water and sewage deposits.
- Utility payments under ESG can only be made for gas, electric, and sewer costs.
  - The utility account must be in the name of the participant or a member of the participant's household.
  - The participant cannot receive more than 24 months of utility assistance within a 3-year period.
- Reasonable on-time moving expenses are eligible.
- Rental Assistance:
  - Payment for rental arrears can only be paid for by ESG funds and cannot exceed 6 months and can only be a one-time payment, including any late fees
  - Payment must comply with HUD's standards of rent reasonableness that can be found in 24 CFR 982.507
  - Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet and late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.
  - Payment for rental assistance shall only be made when there is a rental assistance agreement between the provider and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the provider with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period and late payment penalty requirement as the participant's lease.
  - Late payment penalties incurred by the provider shall not be claimed for reimbursement.
  - Payment cannot be made without a written lease for the rental unit between the participant and the owner. The only exception for this is in regards to ESG funds paying rental arrears

- Payment can only be made for units that have been inspected for HUD’s Housing Quality Standards and inspected no less frequently than annually. Rental assistance cannot be provided if a unit does not meet Housing Quality Standards.
- The rental assistance agreement can be terminated without further payment if:
  - The participant moves out of the unit
  - The lease is terminated and is not renewed
  - The participant becomes ineligible to receive ESG/CoC rental assistance
- Payments can only be made for project-based rental assistance in regards to ESG funds if:
  - The lease has an initial term of one year
  - The rental assistance agreement covers one or more permanent housing units in the same building
  - Each unit covered by the agreement is only occupied by program participants
  - Payment will only be made for up to 100% of the first month’s rent, if the participant signs a lease and moves into the unit before the end of the month.

#### HOUSING RELOCATION AND STABILIZATION SERVICES

The Nashville-Davidson County CoC has established the following minimum standards for determining the type, amount, and duration of housing stabilization and/or relocation services that can be provided to a program participant. This includes the limits, if any, on the Homelessness Prevention or RRH assistance provided to each program participant. This includes the maximum amount of assistance, maximum number of months, or the maximum number of times they can receive assistance.

Housing search and placement services can only be made for assisting participants to locate, obtain and retain suitable permanent housing through provision of the following services:

- Assessment of housing barriers, needs and preferences
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with owners
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with ESG requirements for habitability, lead-based paint and rent reasonableness
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling

Payment for housing search and placement services shall not exceed 24 months during any 3-year period

Housing stability case management can only be made for assessing, arranging, coordinating and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing or to assist a participant in overcoming immediate barriers to obtaining housing through provision of the following services:

- Conducting the initial evaluation, including verifying and documenting participant eligibility
- Counseling
- Developing, securing and coordinating services and obtaining Federal, State and local benefits
- Monitoring and evaluating participant progress
- Providing information and referral to other providers
- Developing an individualized housing and service plan and supporting the participant in accomplishing the plan.
- Conducting re-evaluations

Payment for housing stability case management services provided while the participant is seeking permanent housing shall not exceed 30 days for ESG funded services.

Payment for housing stability case management services provided while the participant is living in permanent housing shall not exceed 24 months.

Housing stability case managers are expected to meet with participants in their homes, or another location if this is more convenient for the participant and must have a minimum of one contact per month with participants. All contact between case managers and program participants shall be documented in case notes.

For ESG Funded programs, mediation payment can only be made if the mediation is between the participant and the owner or person with whom the participant is living. If payment is necessary to prevent the participant from losing the permanent housing where they currently reside, payment for mediation services cannot exceed 24 months during any 3-year period.

Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

#### RE-EVALUATIONS FOR CONTINUED ELIGIBILITY FOR HOMELESSNESS PREVENTION

The Nashville-Davidson County CoC has established the following minimum standards for

providers to complete re-evaluations to determine on-going eligibility:

- Participants are to be re-evaluated at least once every three months
- The participant must have annual income that is 30% of AMI or less as determined by HUD at the time of annual reevaluation (ESG only); and
- Participant lacks sufficient resources and support networks necessary to retain housing without ESG/CoC assistance.

#### PREVENTION TARGET PERFORMANCE BENCHMARKS

- Exits from program to permanent housing – 90%

### STREET OUTREACH STANDARDS

#### MINIMUM STANDARDS FOR CoC AND ESG FUNDED PROVIDERS

Street outreach includes activities to engage persons experiencing homeless on the streets, in cars, parks or other areas not meant for human habitation, for the purpose of providing immediate support and intervention. This includes identifying potential program participants. These activities are designed to meet the immediate needs of those person(s) experiencing unsheltered homelessness and connecting them with emergency shelter, housing, and/or critical health services as outlined in 576.101.

A Street Outreach worker is to engage person(s) experiencing unsheltered homelessness and to complete an initial need and the CE Preliminary Assessment. When feasible a VI-SPDAT should be completed on the person if they identify housing as a goal. The following services can be offered to those person(s) experiencing unsheltered homelessness:

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

#### STREET OUTREACH TARGET PERFORMANCE BENCHMARKS

- Successful Exits from program -50%
  - any exit other than jail or the street and/or
  - exit with increased income

### EMERGENCY SHELTER STANDARDS

HUD defines Emergency shelter as any facility with the primary purpose of providing a temporary shelter for those experiencing homelessness, which does not require occupants to

sign leases or occupancy agreements. ESG activities for emergency shelters are designed to increase the quantity and quality of temporary shelters provided to those experiencing homelessness, through the renovation of existing shelters or conversion of buildings to shelters, paying for the operating costs of shelters, and providing essential services as outlined in 576.102.

For person(s) who enter into a CoC or ESG funded emergency shelter they will receive the adopted CE Preliminary Assessment. Once housing has been identified as a goal the VI-SPDAT will be completed to help identify a potential recommended housing intervention.

Based on the person(s) needs and wishes, referrals will be made to appropriate services and housing resources.

### ELIGIBILITY CRITERIA

Please see HUD ESG ELIGIBILITY chart on page 30 earlier in this document for eligibility for the ESG activities.

### PRIORITIZATION FOR SHELTER SERVICES

Emergency services, including all domestic violence services, emergency service hotlines, drop-in service programs, emergency shelter, domestic violence shelters, and other-short term crisis residential programs will be required to operate with as few barriers to entry as possible.

While these emergency interventions will not be prioritized based on severity of service need or vulnerability, particular attention will be given to:

- Single fathers with minor children in their care;
- Mothers who have newborns that are 0-14 days of age.

### REASSESSMENT

Person(s) in emergency shelters will need to be reassessed for case management progress at least every 30 days.

### DISCHARGE/LENGTH OF STAY

Program participants will be discharged from emergency shelter services when they choose to leave or when they have successfully obtained safe, permanent housing. Providers of shelter services are strongly encouraged not to discharge individuals and families who have not secured permanent housing and maintain those households in shelter until they can be placed in appropriate permanent housing.

Length of stay limitations are to be determined by the individual service provider's policies and

clearly communicated to program participants. It is the recommendation of the HEARTH Act for no household to experience homelessness more than 30 days.

#### SAFETY AND SHELTER SAFEGUARDS FOR SPECIAL POPULATIONS

Safety and Shelter Safeguards are to be determined by the funded service provider's policies and clearly communicated to program participants.

#### SAFETY, SANITATION & PRIVACY FOR SHELTERS HOUSING PARTICIPANTS OF CoC AND ESG FUNDED PROGRAMS

Any provider with CoC or ESG funds in which ESG funds are used for conversion, major rehabilitation, other renovations or for shelter operations must meet state and local government safety and sanitation standards. Minimum standards for all shelters and program participant-occupied housing must be in compliance with the safety, sanitation, and privacy requirements identified in 24 CFR 576.403 for ESG and 578.75 for CoC, including:

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

## LEAD-BASED PAINT FOR EMERGENCY SHELTER PARTICIPANTS OF COC AND ESG FUNDED PROGRAMS

Minimum standards for all shelters consist of compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR 576.403 and 578.99(f), including the Lead-Based Paint Poisoning Prevention Act, 42 USC 4821-4846, the Residential Lead-Based Paint Hazard Reduction Act of 1992 42 USC 4851-4856, and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R.

## ADDITIONAL REQUIREMENTS FOR SHELTER & SERVICES FUNDED BY COC OR ESG

The following are additional requirements in which shelter and services must follow:

- There can be no requirements related to identification, legal residency, income or employment in order to access and receive emergency shelter services; and
- Participants' placement is to be dependent on the participant's gender self-identification.

## COC PERFORMANCE TARGET BENCHMARKS FOR SHELTERS

- Average length of stay – 90 days
- Exits to permanent housing – 85%

## TRANSITIONAL HOUSING STANDARDS

Transitional housing (TH) is temporary housing with supportive services designed to facilitate the household's successful movement to permanent housing within 24 months. All program participants in TH funded by the CoC program must have a signed occupancy agreement, for the initial term of at least one month. This agreement must be automatically renewable upon expiration, except if prior notice by either party, up to a maximum term of 24 months. TH may be provided in scattered site or single site locations. Participants assisted in TH will be provided housing accommodations as well as services intended to address issues that may hinder the household from obtaining or maintaining stable long-term permanent housing.

To facilitate movement into permanent housing, participants in TH should have access to a wide range of supportive services the entire time they reside in housing. Providers of TH services will have availability throughout the time a participant is in the TH program to work with them on securing permanent housing within specified time periods. After participants choose a TH program, providers may require participants to take part in supportive services that are not disability-related services, provided through the project as a condition of continued participation in the program. If the purpose of the project is to provide substance abuse treatment services, providers may require participants to take part in substance abuse treatment services as a condition of continued participation in the program. Providers can provide services to former residents of TH for up to 6 months after leaving the program. The



extension of services is to assist in the household’s transition into independent living.

The Nashville-Davidson County CoC has established the following minimum standards for determining and prioritizing which eligible participants will receive TH. A participant must also be experiencing homelessness as defined by category 1, 2, or 4 of the homeless definitions in 24 CFR 576.2.

## RECOVERY HOUSING

HUD’s Recovery Housing Brief<sup>17</sup> notes that although the agency supports the *Housing First* approach, it also recognizes “the importance of providing individual choice to support various paths towards recovery. Some people pursuing recovery from addiction express a preference for an abstinence-focused residential or housing program where they can live among and be supported by a community of peers who are also focused on pursuing recovery from addiction—environments that are provided by *Recovery Housing* programs.”

However, HUD continues in its brief, “supporting individual choice must also mean that a community is ensuring that housing options are available for people at all stages of recovery, including people who continue to use drugs or alcohol.”

## PARTICIPANT CONTRIBUTION AND PROGRAM FEES

Participants residing in TH are not required to pay rent. Providers of TH may impose occupancy charges, but those charges may not exceed those specified in 578.77. No fee other than rent or occupancy as specified above may be charged to a participant. This includes meals, copayments for services, transportation and all other services rendered by participants.

## SAFETY, SANITATION & PRIVACY FOR UNITS HOUSING PARTICIPANTS OF CoC AND ESG FUNDED PROGRAMS

Minimum standards for all shelters and program participant-occupied housing on page 39.

## LEAD-BASED PAINT FOR UNITS HOUSING PARTICIPANTS OF CoC AND ESG FUNDED PROGRAMS

Minimum standards for all program participant-occupied housing consist of compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR 576.403 and 578.99(f), including the Lead-Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4856) and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R.

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<sup>17</sup> <https://www.hudexchange.info/resource/4852/recovery-housing-policy-brief/>

## TRANSITIONAL HOUSING TARGET PERFORMANCE BENCHMARKS

- Housing stability (stayed/exited to perm. housing) - 70%
- Average length of stay – 9 months
- Increased income - 40%

## HUD PERMANENT HOUSING

Per the CoC Interim Rule, the permanent housing component is community-based housing without a designated length of stay that permits formerly homeless participants to live as independently as possible. The interim rule clarifies that CoC funds may be spent on two types of permanent housing: permanent supportive housing for persons with disabilities (PSH) and rapid re-housing (RRH) that provides temporary housing assistance to participants in a unit that the participant retains after the assistance ends.

## RAPID RE-HOUSING (RRH) STANDARDS

Rapid Re-housing (RRH) is a model of permanent housing that is designed to quickly place participants experiencing homelessness directly from the streets and emergency shelters into permanent housing and to help them maintain that housing with temporary housing assistance and services for stabilization. This intervention is built on Housing First principles and a service approach that is tailored to the needs of each participant, while acknowledging the need to maximize resources and services. The core components of RRH include housing identification, move-in and rental assistance, case management and referrals to wrap around supports.

All RRH Programs in Nashville and Davidson County should incorporate elements of a Progressive Engagement approach as a means of empowering participants toward creating their own success and so that RRH can be available to more households in need. Progressive engagement does not dictate how long a participant can be in the project; it aims to provide the “lightest touch” intervention possible. This is a model of service delivery that intentionally provides the right amount of services to help someone maintain or return to permanent housing. For those who may require more resources, additional services can be added until the participant is able to stabilize. Housing Navigators/Case Managers must show due diligence in meeting with participants at least once per month. Staff and participants together create a Housing Service Plan (HSP) and RRH staff provide needed housing stabilization services and mainstream resources, as appropriate and with support from other community service providers.

## PARTICIPANT ELIGIBILITY FOR COC AND PRIORITIZATION

### ELIGIBILITY

- Participants in a COC funded RRH program must be experiencing literal homelessness as defined by HUD Category 1 or be experiencing homelessness as defined in category 4 and referred through DV CE
- All experiences of homelessness for eligibility must be verified within the 14 days prior to enrollment.
- For all ESG funded RRH programs, participants must be experiencing literal homelessness as defined by HUD Category 1 and that experience verified within the 7 days prior to enrollment. (See Category Definitions on page 25-27 of this document)
- Participants must be referred through Coordinated Entry (CE)
- Participants must lack sufficient resources or support networks to retain housing without CoC or ESG assistance.
- Participant's gross annual income at the annual review must be less than or equal to the 30% AMI for ESG funded programs

### PRIORITIZATION

Participants will be referred to RRH based on the prioritization protocol outlined in the CE Policies and Procedures Manual. The criteria are as follows:

- Prioritization for housing and support services in Nashville-Davidson County is dependent on the availability of each resource, and will be based on the following criteria:
  - 1<sup>st</sup> level Prioritization:
    - Score of the VISPDAT assessment, or DV-CE assessment
    - 1 point added for unsheltered homelessness,
    - 1 point added for age 55+
    - 1 point added for CDC identified underlying medical conditions which increase a person's risk for severe illness due to COVID-19
  - 2<sup>nd</sup> Level Prioritization (used as tiebreaker)
    - Length of time experiencing homelessness
- Prioritization ensures that those most vulnerable and most at risk for developing severe illness due to COVID-19 are served as quickly as possible. In line with HUD's suggested timeframe of 10 days to adjust CE prioritization, the CE team will work with the stakeholder group to determine and implement any necessary adjustments. All CE prioritization adjustments will be communicated with the Homelessness Planning Council immediately via e-mail and brought for questions and discussion to the next in-person or virtual meeting.

- It is important to note that some agencies participating in CE have population specific services (i.e. Families, Youth, Veterans, HIV, persons fleeing DV) that the person being referred must meet. Programs are not permitted to screen out households based on prioritization protocol or perceived vulnerabilities.

## Coordinated Entry – RRH Referrals

All referrals to RRH must come from the community’s By Name List (BNL). The BNL consists of households experiencing Category 1 or Category 4 homelessness and is ordered using the CE prioritization protocol. Priority pools are created by the number of program vacancies reported by RRH programs.

Referrals are made from the Priority pool during weekly Care Coordination meetings. Care Coordination meetings allow for case conferencing to refer prioritized households to the available RRH vacancies.

All programs that accept referrals through CE must abide by the following referral procedures:

- RRH program submits Vacancy Request Form prior to appropriate Care Coordination meeting
- CE team creates a Priority Pool based on number of program vacancies and prioritization protocol
- Referrals are discussed and made from Priority Pool at Care Coordination meeting

Once the RRH program receives the referral

- The program accepting the referral should contact the household referred within 2 business days
- The program accepting the referral should attempt contact at least 3 times
  - If the agency is unable to contact a referral after at least 3 attempts, the agency will request another referral using the Vacancy Request Form
- If a referred household contacts a program after the agency was unable to make contact, it is up to the program’s discretion whether they will accept the originally referred household.
  - If the agency no longer has capacity to work with the originally referred household, the agency should alert the CE team so that the household remains eligible for a future referral

## Supportive Services

### HOUSING LOCATION:

The Nashville-Davidson County CoC has established the following minimum standards for

determining the type, amount, and duration of housing stabilization and/or relocation services that can be provided to a program participant. This includes the limits, if any, on the RRH assistance provided to each program participant.

Housing Location should begin as soon as a participant has been determined eligible and has an intake into the RRH Program, regardless of participation in wrap around services such as financial counseling or employment navigation. Depending on the project staff, Housing Navigator/Case Managers will assist project participants in locating, obtaining, and retaining suitable permanent housing. These services include:

- Housing search and location
- Ongoing landlord engagement and outreach
- Assessment of housing barriers, needs, and preferences for the participants
- Educating participants on how to conduct housing search
- Assistance with submitting rental applications
- Assistance with understanding and completing leases
- Rehousing current participants
- Performing Housing Quality Standards (HQS) Inspections for CoC funded programs and habitability standard inspections for ESG funded programs
- Performing Lead Based Paint Assessments where appropriate
- Performing Rent Reasonability Comparisons
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling

Where appropriate, some housing search assistance may be delivered in group settings such as housing search and tenancy classes. All services, referrals, and assistance should be documented in case notes in the participant record.

### [Housing Case Management and Supports](#)

Housing supportive services help participants stabilize in permanent housing and access the services that they need in the community. Housing Navigators/Case Managers and other appropriate agency staff will assist participants to resolve crises that arise, intervene in conflicts between the landlord and connect participants to community and mainstream services for additional resources and supports as needed. Agencies will utilize a person-centered approach that draws on the strengths and assets of the participant and follow housing first methodologies.

#### ***Minimum Requirements:***

- Conducting the initial evaluation, including verifying and documenting participant eligibility
- Counseling (i.e. life-skills, tenant-readiness, goal-setting, providing or referring to

- appropriate behavioral health services as needed)
- Developing, securing and coordinating services and obtaining Federal, State and local benefits
- Monitoring and evaluating participant progress
- Providing information and referral to other providers
- Developing a participant lead, individualized, Housing Service Plan (HSP) and supporting the participant in accomplishing the plan.
- Conducting re-evaluations

***Expectations:***

- Participants will receive ongoing housing case management services to help meet employment, budgeting, financial, and overall life skills goals that are vital to their housing stabilization and self-sufficiency.
- Participants are not required to achieve the self-determined goals they have set in the Housing Service Plan in order to receive financial assistance through the RRH Program. It is the responsibility of the Housing Navigator/Case Manager to assertively engage participants in a meaningful way, making services attractive and individualized for all participant households. Services are voluntary for the participant; they are not voluntary for the RRH Program staff.
- During the time that the participant is searching for housing, the Housing Navigator/Case Manager is expected to attempt, at minimum, weekly contact with the participant or head of household by phone or in person. Identifying housing is the number one priority and the RRH Program as well as the referring shelter/outreach project should work together to assist the participant.
- Once the participant has obtained housing, Housing Navigators/Case Managers are expected to attempt contact, at minimum, once a month; best practice is weekly contact. Documentation of all contacts, or attempts to contact, is a requirement of funding and must be maintained in the participant file with the RRH Program.
- Housing Navigators/Case Managers should attend relevant trainings as offered by the community.

Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations shall be determined by the individual service provider's policies and clearly communicated to program participants. RRH program providers are encouraged to keep program requirements to a minimum and any additional requirements should be rooted in safety.

## Required Documents & Timelines for Completion

### Housing Service Plan

The Housing Service Plan (HSP) identifies the steps and goals that the participant will make towards sustaining permanent housing once financial assistance has ended. Goals should be participant defined with a focus on housing stability and the Housing Navigator/Case Manager is responsible for documenting the HSP. A copy of the HSP and each update must be provided to the participant as well and a copy must be maintained in the participant's file with the RRH agency.

- Initially completed at the time of project intake
- Updated at the time the participant moves into housing
- Updated as frequently as necessary to reflect changing situations
- HSP review required at least every three (3) months

### Monthly Participant Budget

A monthly budget is necessary to determine the potential amount of financial assistance and support needed. The amount of financial assistance is flexible and will be determined considering the individual needs of the participant household. However, all rental determinations must be documented in alignment with this CoC policy/process and available for review during a CoC monitoring. A copy of each budget must be provided to the participant as well and a copy must be maintained in the participant's file with the RRH agency.

- Initially completed at the time the participant moves into housing
- Completed monthly or as needed for documentation of rental determination

### Financial Assistance:

The RRH program has the ability to support participants with temporary financial assistance in the form of a rental subsidy/utility assistance, security or utility deposit assistance and/or relocation assistance on a short or medium-term basis. Financial assistance services are determined during monthly budget discussions and rental determinations are based on the needs of each participant.

All financial assistance must be paid to eligible third-party vendors, such as landlords, utility companies, moving companies, etc. ***Under no circumstances can financial assistance be provided directly to a participant or a member of a participant's household that is enrolled in the project, even as reimbursement for expenses undertaken by the participant to secure housing.***

## Eligible Expenses:

- **Security Deposits:** A maximum of two times the monthly rent for a unit is allowed. At times, a relocation may warrant additional security deposits for new location. This must be approved by the RRH Program Manager.
  - **Utility Deposits:** If a utility deposit is needed in order to begin utility service for a household, the RRH Program may assist with this deposit.
  - **Utility Assistance:** Participants that are responsible for the utilities associated with the lease held during participation in the RRH Program are entitled to utility assistance from the program. RRH Programs funded under COC are required to calculate a utility allowance included in the monthly rental assistance amount, to be paid out as a utility reimbursement in the following ways:
    - Directly to the utility company
    - Incorporated into tenant's rental calculation
      - The local utility allowance rates are found at [Metropolitan Development and Housing Agency | RENTAL ASSISTANCE VOUCHER PROGRAM \(nashville-mdha.org\)](https://www.metro.gov/development-and-housing/rental-assistance-voucher-program)
      - HUD Notice CPD-17-11 provides detailed guidance as to how this assistance must be calculated (<https://www.hud.gov/sites/dfiles/OCHCO/documents/17-11cpdn.pdf>)
      - For Purposes of the CoC Program, Utilities are defined as Gas, Oil, Electric, sewage, water and trash removal. Telephone, internet, cable/satellite for television are excluded as a covered utility.
- \*RRH Programs funded under ESG should either provide utility assistance payments as needed, or build in the utility allowance formula for rental assistance payments as outlined above. Housing Navigators/Case Managers are recommended to work closely with participants to discuss utility payments and what might be needed to best meet the needs outlined in the individualized plan.*
- **Rental Assistance payments:** The project may provide tenant-based rental assistance to a participant for up to 24 months. However, the amount of rental assistance paid must be determined by the participant and the RRH Housing Navigators/Case Managers each month.
    - RRH programs are required to follow the community's process for determining financial assistance as described in this document

## Other Financial Assistance

RRH funds may be used for other financial assistance that is directly related to helping participants to secure housing. Examples of additional financial assistance expenditures that may be permitted include:

- Rental application fees
- Cost of credit check
- Transportation assistance when directly connected to gaining housing, such as to attend a housing interview or attend a housing-related class or group



- Moving costs may be eligible and must be approved by the RRH Program manager

### Determining the Amount of Financial Assistance

The levels of financial assistance and supportive services offered by the RRH Program are based on the needs and goals of each individual participant. The participant's income and goals should be taken into account when identifying a housing unit. Housing Navigators/Case Managers should encourage participants to move into units that they will be able to financially maintain after RRH assistance has ended.

Housing Navigators/Case Managers are responsible for determining the level of need of each participant and RRH Program managers (or equivalent) are required to approve all rental expenses prior to payment. Some participants may need one-time assistance while others may need a deeper level of support and both levels are allowable in the RRH Program. RRH Programs should pay 100% of the initial move-in costs for the participant, including expenses listed in the eligible expenses above.

The goal is to provide an effective level of assistance for the duration necessary as based on the need of each participant, with the expectation that the participant takes over full contract rent when the rental assistance ends. Monthly budget discussions are required to be documented that include a list of all income sources and all expenses. While participants may be eligible for up to 24 months of support, the need for continued rental assistance and/or the amount of rental assistance provided must be evaluated monthly.

Many participants will leave a RRH Program paying more than 50% of their income towards housing expenses and the RRH Program should be preparing participants for that reality. The RRH Program is encouraged to work with participants to pay more towards their rent when possible. If a participant has no income, the RRH funds may subsidize the entire contracted rent amount on behalf of the participant. Rental assistance may not be conditioned on the participants fulfilling their agreements as part of the HSP. Rental assistance should not be paid more than one (1) month at a time. To continue rental assistance after three (3) months, the project must update the HSP as a means of recertifying the participant and this must be done at a minimum of every three (3) months.

All rental determination decisions must be provided to the participant and a copy must be maintained in the participant's file with the RRH agency.

## LIMITATIONS ON FINANCIAL ASSISTANCE

Financial assistance provided to participants under CoC and ESG funded RRH services may not exceed the limitations set forth below. It is the responsibility of all providers to comply with these requirements when providing services.

- Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources.
- Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA), during the period of time covered by the URA payments.
- Rental application fees – Payment shall only be made for fees charged by the owner to all applicants.
- Security deposits cannot exceed two months of rent
- Last month's rent cannot exceed one month's rent and needs to be included in calculating the total rental assistance amount.
- Utility deposits can only be made for gas, electric, water and sewage deposits.
- Utility payments under ESG can only be made for gas, electric, water, and sewer costs.
  - The utility account must be in the name of the participant or a member of the participant's household, or have proof of responsibility to make payments.
  - The participant cannot receive more than 24 months of utility assistance within a 3-year period.
- Reasonable one-time moving expenses are eligible.
- Rental Assistance:
  - Payment for rental arrears can only be paid for by ESG funds and cannot exceed 6 months and can only be a one-time payment, including any late fees
  - Payment must comply with HUD's standards of rent reasonableness that can be found in 24 CFR 982.507
  - Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet and late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.
  - Payment for rental assistance shall only be made when there is a rental assistance agreement between the provider and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the

provider with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period and late payment penalty requirement as the participant's lease.

- Late payment penalties incurred by the provider shall not be claimed for reimbursement.
- Payment cannot be made without a written lease for the rental unit between the participant and the owner. The only exception for this is in regards to ESG funds paying rental arrears
- Payment can only be made for units that have been inspected for HUD's Housing Quality Standards or habitability standards, as applicable, and inspected no less frequently than annually. Rental assistance cannot be provided if a unit does not meet the required housing standards.
- The rental assistance agreement can be terminated without further payment if:
  - The participant moves out of the unit
  - The lease is terminated and is not renewed
  - The participant becomes ineligible to receive ESG/CoC rental assistance
- Payments can only be made for project-based rental assistance in regards to ESG funds if:
  - The lease has an initial term of one year
  - The rental assistance agreement covers one or more permanent housing units in the same building
  - Each unit covered by the agreement is only occupied by program participants
  - Payment will only be made for up to 100% of the first month's rent, if the participant signs a lease and moves into the unit before the end of the month.

### Income Documentation & Income Evaluation Form

All participants are required to provide up-to-date income documentation. Documentation should include: a zero income self-identification form signed by the participant (example found in the appendix) or a rent calculation tool with applicable proof of income. A copy of all income documentation must be maintained in the participant's file with the RRH agency.

- Initially completed at the time the participant moves into housing
- Completed any time there is a change in income

### Annual Assessment of Need

Per the CoC Interim Rule, 578.37(a)2(E) any participant who remains in the RRH Program for 12 months must complete an annual assessment of need to determine if additional assistance is necessary to retain housing. RRH Programs will meet this requirement by documenting a monthly budget discussion and updating the HSP at least every three (3) months. RRH Program

representatives should be attending care coordination meetings as available to review resources and case conference in an effort to stabilize participants.

### Coordination with Community Partners

RRH Housing Navigators/Case Managers should be focused on housing and support services and are not expected to be experts in addressing all of the needs identified by project participants. However, participants should be referred to specific community-based services to address any additional needs identified while establishing the HSP. These connections are critical to implementing successful RRH and addressing the barriers that may have led to that episode of homelessness.

When partnering with community-based services, efforts to coordinate care and reduce duplication should be made to conserve project resources and to reduce burden for the participant and/or their household. Shared service plans, case conferences, and communication on participant status should occur on a regular basis in these situations, utilizing proper releases of information to maintain proper data sharing practices and to protect the confidentiality of participants.

### RE-EVALUATIONS FOR CONTINUED ELIGIBILITY FOR RAPID REHOUSING

The Nashville-Davidson County CoC has established the following minimum standards for providers to complete reevaluations to determine ongoing participant eligibility:

- RRH participants are to be reevaluated at least once every three months;
- The participant must have annual income that is 30% of AMI or less as determined by HUD at the time of annual reevaluation (ESG only); and
- Participant has to lack sufficient resources and support networks necessary to retain housing without CoC or ESG assistance.

### Exit from RRH Program:

All CoC and ESG funded providers must have written policies that include Exit Procedures at completion of program.

Minimum standards for exit procedures should include:

- Housing Navigators/Case Managers review progress of HSP with participant and develop plan for unresolved needs
- Make referrals to appropriate community partners
- Review with participants the process for accessing services at a later date if needed

### RRH Program Termination

All CoC and ESG funded providers must have written policies for termination procedures and

an appeals process. Termination is defined as exits due to participant no longer meeting eligibility, or due to a policy violation. These written policies must be provided to program participants before any services are rendered.

Minimum standards for termination of assistance should include:

- If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individual(s) affected.
- Termination shall only occur in the most severe cases after other possible remedies have been attempted.
- Termination of individuals and families in projects funded through the CoC program must be consistent with 578.91 and 576.402 for those projects funded through the ESG program.

Participants may appeal any decision made by the provider including but not limited to the following:

- Denial of services
- Determination of household income/calculated rent payment/occupancy charge
- Denial to add member to household
- Termination of services after acceptance in the program

In general, providers must afford program participants a formal process that is outlined in their program procedures that recognizes the rights of the individuals affected. The required formal appeal process, at a minimum, must consist of:

- A written notice to the participant containing a clear statement of the reason for decision.
- Information on how the participant can ask for a review/appeal of the decision and present written or oral objections to a person or committee other than the person who made or approved the decision.
- Any appeal of a decision shall be heard by an individual different from and not subordinate to the initial decision-maker.
- A notice that the participant is allowed to have someone (i.e., legal aid, social worker, etc.) present or to represent them during the review/appeal at their own expense.
- Prompt written notice of the final decision after the appeal request is received as documented in the providers grievance policy.
- Termination will not bar the provider from providing later additional assistance to the same family or individual.

The initial appeal of any decision shall be made to the ESG or CoC funded provider pursuant to

the process described above. Should the participant not be satisfied with the appeal decision, the participant has the right to appeal that decision to the board of the agency, and if not resolved to the participant's satisfaction, then appealed to the entity that awarded the funding.

#### RRH TARGET PERFORMANCE BENCHMARKS

- Median length from program entry to housing (45 days)
- Increased income from program entry to annual assessment or exit (40%)
- Exits to permanent housing (90%)

#### PERMANENT SUPPORTIVE HOUSING STANDARDS

Permanent Supportive Housing (PSH) is a model of permanent housing in which the housing assistance is long-term and supportive services are provided to assist persons experiencing homelessness, that are living with a verifiable disability, to live independently.

Eligible activities include tenant-based rental assistance, sponsor or project-based rental assistance, leasing (scattered-site), or operating costs to support the operations of a supportive housing facility. This includes the support services to meet a resident's needs. Using CoC program funds, providers can build or buy a new building to create PSH units. This includes, renovating existing buildings, renting or leasing an entire building, or utilizing individuals units in the community. Supportive services must be designed to meet the needs of the participants and must be provided for the entire duration that the participant is in PSH.

To be served, any newly admitted household must meet the definition of homelessness according to category 1 and 4. The participants who entered PSH before this rule was in effect can continue to be served.

Any PSH developed in the CoC from 2013 onwards is required to follow the Housing First approach described in these standards. Projects developed prior to 2013 are strongly encouraged to adopt the Housing First approach. All PSH projects are to receive and approve referrals via CE. There is a limited ability to decline referrals from CE. Reasons for denial must be outlined, however, even if a provider denies a referral, it will have to obtain an alternative referral from CE.

#### PARTICIPANT ELIGIBILITY AND PRIORITIZATION

Nashville-Davidson County CoC has established the following minimum standards for determining and prioritizing which participants will receive CoC funded PSH assistance.

## ELIGIBILITY

- Participants must be experiencing literal homeless as defined by category 1 or 4 of the homeless definition in 24 CFR 576.2.
- Participants or others in the participant's household must have a verifiable disability.
- Documentation must be maintained for all participants referred for PSH including documentation of homeless status, disabling conditions and chronic status, if applicable.

## PRIORITIZATION

The Nashville-Davidson County CoC will follow the order of priority for admission to CoC funded PSH outlined in HUD CPD Notice 16-11, "Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing".

Prioritization will follow what is outlined in the CES Policies and Procedures Manual

- Homeless Chronicity status
- Score of the VI-SPDAT, with consideration taken from care coordination meetings if a score is not representative of the person and their situation.
- Length of time homeless
- Date of identification, only to be used if there are two households tied for the resource.

## SAFETY, SANITATION, AND PRIVACY FOR SHELTER HOUSING PARTICIPANTS OF COC AND ESG FUNDED PROGRAMS

See page 38-39.

## LEAD BASED PAINT FOR EMERGENCY SHELTER PARTICIPANTS OF COC AND ESG FUNDED PROGRAM

Minimum standards for all shelters consist of compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR 576.403 and 578.99(f), including the Lead-Based Paint Poisoning Prevention Act, 42 USC 4821-4846, the Residential Lead-Based Paint Hazard Reduction Act of 1992 42 USC 4851-4856, and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R.

## ADDITIONAL REQUIREMENTS FOR PSH PROJECTS WITH RENTAL ASSISTANCE

Under the permanent housing program component of the CoC program, participants are required to enter into a lease or occupancy agreement. The participant must be a tenant on the lease for at least one year.

In regard to rental assistance and payment, the following are required:

- Calculation of the rental payment amount can only include monthly rent for the unit, any occupancy fees under the lease (except for pet and late fees) and if the participant pays separately for the utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.
- Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA), during the period of time covered by the URA payments.
- Payment for rental assistance can only be made where there is a rental assistance agreement between the provider and the owner, which sets forth the terms under which rental assistance will be provided. This includes the prior requirements that the owner is to provide the provider with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action. This includes the same payment due date, grace period, and late payment penalty requirement as established in the lease.
- Payment of any late payment penalties incurred by the agency shall not be claimed for reimbursement.
- Payment can only be made when there is a legally binding, written lease for the rental unit between the participant and the owner.

#### PARTICIPANT CONTRIBUTIONS TO OCCUPANCY FOR PSH PROJECTS

Participants residing in PSH are required to pay rent. Rent charges may not exceed those specified in 24 CFR 578.77. No other fee other than rent or occupancy charges as specified above may be charged to participants. This includes meals, copayments for services, transportation, and all other services that may be provided to program participants.

#### PSH TARGET PERFORMANCE BENCHMARKS

- Housing stability (stayed/exited to perm. housing) – 80%
- Increased income – 70%

#### EVALUATION AND REVISION

Evaluation and revisions will occur annually. Feedback will be shared in community meetings with providers operating projects using CoC or ESG funding, as well as other community partners. The CoC CE/Written Standards committee will ensure that the written standards are uniform and aligned with ESG and CES policies and procedures. There will be opportunity for public input when revisions and updates are made. There will be 30 calendar days allotted for review and input prior to a final draft being presented to the CoC Homelessness Planning Council for their final approval.

The CoC CE/Written Standards committee will be responsible for recommending to the CoC Homelessness Planning Council an oversight process that assures the standards are being



implemented across agencies in the CoC. This will include a process for monitoring of funded agencies.

## GLOSSARY

### **Area Median Income (AMI)**

The area median income (AMI) is the household income for the median, or middle, household in a region. Each year, the Department of Housing and Urban Development (HUD) calculate the median income for every metropolitan region in the county.

### **Chronically Homeless:**

A homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. In order to meet the “chronically homeless” definition, the individual also must have been living as described above continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven. ([24 CFR Parts 91 and 578](#))

### **Collaborative Applicant**

Eligible applicant designated by the CoC to: collect and submit the required CoC application information for all projects the CoC has selected for funding, and apply for CoC planning funds on behalf of the CoC. The CoC may assign additional responsibilities to the Collaborative Applicant so long as these responsibilities are documented in the CoC’s governance charter.

### **Continuum of Care (CoC)**

A regional or local planning body that coordinates housing and services funding for individuals, families, and unaccompanied youth experiencing homelessness. A CoC creates a collaborative community effort that provides a strategic systems approach that focuses on connecting people to housing and services to end their homelessness.

### **Continuum of Care General Membership**

Organizations and individuals (who do not belong to an organization) with the goal to collaborate on solutions to homelessness. Members are required to fill out a membership form

for the Continuum of Care.

### **Coordinated Entry (CE)**

A standardized access, assessment, and referral process for housing and other services across agencies in a community. Other frequently used terms include “centralized or coordinated assessment” (Department of Housing and Urban Development) and “coordinated entry and assessment” (National Alliance to End Homelessness).

### **Emergency Solution Grants (ESG)**

A program to assist individuals and families quickly regain stability in permanent housing after experiencing a housing crisis or homelessness.

### **Evidence-Based/Informed**

An approach to medicine, education, and other disciplines that emphasizes the practical application of the finds of the best available current research.

### **Fair Market Rent (FMR)**

Is a gross rent estimate that includes the base rent, as well as any essential utilities that the tenant would be responsible for paying, such as gas or electric. Every year, HUD compiles a list of the Fair Market Rents for over 2,500 metropolitan and non-metropolitan counties.

### **Fleeing/Attempting to Flee Domestic Violence by HUD [Category 4]**

Persons who are fleeing or attempting to flee domestic violence who have no other residence and lacks the resources or support networks to obtain other permanent housing.

### **Habitability Inspection**

Is an implied warranty that the unit will have hot water, a working electrical system, heat in the winter, lockable doors and windows, a working toilet and smoke detectors, and be free of pests like roaches and rats, among other conditions.

### **HMIS Lead –**

The HMIS Lead is the entity designated by the Continuum of Care in accordance with this== part to operate the Continuum's HMIS on its behalf.

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

A local information technology system used to collect client-level data and data on the provision

of housing and services to individuals and families experiencing or at-risk of homelessness. It is used as a tool to evaluate people's needs and assist them more effectively, avoiding duplication of services.

## **Homeless Population**

Nashville's goal is to end homelessness among the following population categories (which are listed in alignment with the federal strategic plan "Home, Together):

- Veterans
- People experiencing chronic homelessness who are disabled
- Families with children
- Unaccompanied youth
- All other individuals

## **Homelessness Providers**

Agencies serving people experiencing homelessness or at risk of homelessness. These agencies include organizations that are not traditionally viewed as homeless service providers because the populations they serve are generally at high risk of experiencing housing instability. They include, among others, people with need for Accessibility (mobility, intellectual, visual, hearing, etc.); people experiencing Sex/Human Trafficking; people who are immigrants/or have language barriers (ESL); the Recovery Community; LGBTQ+; Extreme Medically Vulnerable people; Domestic Violence survivors; people with pets; multi-generational families; single fathers who are the main caretakers of children; people struggling with re-entry after incarceration or other institutionalizations.

## **Homelessness Planning Council (HPC)**

The Nashville-Davidson County community board of 25 members that serves as the Continuum of Care Governance Board. The Homelessness Planning Council is a quasi-Metro body as described in BL2018-1199. It is empowered to act on behalf of the CoC as outlined in the CoC Governance Charter.

## **Housing Crisis Resolution System (HCRS)**

A community system that includes all types of programs from prevention/diversion, emergency and temporary interventions to permanent housing solutions. As a whole, an effective Housing Crisis Resolution System focuses on identifying people in a housing crisis as early as possible and connects them with housing and needed supports as quickly as possible. In Davidson County, the current goal is to house people in an average of 90 days or less.

## **Housing First**

A Housing First system orientation recognizes that people experiencing homelessness (like all people) need the safety and stability of a home in order to best address challenges and pursue opportunities. The Housing First approach connects people back to a home as quickly as possible, while making readily available the services that people may need to be stable and secure. While this plan adopts a Housing First systems approach, it recognizes that all types of interventions are necessary in an effective Housing Crisis Resolution System, as long as people have a choice, all exits of a program have the goal to lead to permanent housing (even if a person does not complete a program), and entry/access barriers are kept as low as possible.

## **Imminent Risk as defined by HUD [Category 2]**

Persons who will imminently lose their primary nighttime residence, provided that: i) residence will be lost within 14 days of the date of application for homeless assistance ii) no subsequent residence has been identified; and iii) the person lacks the resources or support networks needed to obtain other permanent housing.

## **Intersectionality**

Intersectionality describes the interconnected nature of social classifications such as race, gender, ethnicity, sexual orientation, etc. The term often describes the way different forms of discrimination can accumulate for individuals who belong to multiple minority groups.

LEA – Local Education Agency definition of homelessness – The school system’s definition of homelessness includes families in motels and in shared housing situations due to the loss of housing, economic hardship or a similar reason.

## **Lead Based Paint Inspection**

A risk assessment completed on-site to determine the presence, type, severity, and location of lead based paint hazards (including lead hazards in paint, dust, and soil) and provides suggested ways to control them.

## **Literal Homelessness**

Individuals or families who lack a fixed, regular, and adequate night-time residence. People experiencing literal homelessness sleep in shelters, on the streets, in encampments, in cars, and in other places not meant for human habitation.

### **Master List and By Name List**

Both are lists created through the coordinated entry process and are captured within HMIS. By Name Lists identify people in need by name to allow for a person-centered, coordinated approach to assist people. The Master List includes people at immediate risk of homelessness (example: people in the eviction process or households who have missed rent payments and do not know how to catch up). The By Name List, also referred to as BNL, is usually broken down by population and includes people experiencing homelessness. Thus, there are different By Name Lists such as Veteran By Name List, Family By Name List, Youth By Name List; etc. By Name Lists usually are established from the Master List. These lists are created and managed with people's consents and in accordance with HMIS security standards.

### **Motivational Interviewing:**

Motivational interviewing is a directive, client-centered counselling style for eliciting behavior change by helping clients to explore and resolve ambivalence. It is most centrally defined not by technique but by its spirit as a facilitative style for interpersonal relationship. It was developed by Stephen Rollnick and William R. Miller.

### **Point In Time (PIT) Count**

A one-night count conducted within the last 10 days of January of people meeting the Literal Homelessness definition

### **Project vs. Program**

Across the federal agencies the terms project and program are used differently. In this document, and for the purposes of data collection in HMIS, a program refers to the federal funding source (e.g., HUD CoC, HHS PATH, VA SSVF, etc.) whereas project refers to a distinct unit of an Organization as set up in the HMIS.

### **Rapid Re-housing**

In an intervention, informed by a Housing First approach that is critical part of a community's effective homeless crisis response system. Rapid re-housing rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services. Rapid re-housing programs help families and individuals living on the streets or in emergency shelters solve the practical and immediate challenges to obtaining permanent

housing while reducing the amount of time they experience homelessness, avoiding a near-term return to homelessness, and linking to community resources that enable them to achieve housing stability in the long-term.

### **Release of Information (ROI)**

A statement signed by the client authorizing a contact person to give another party information about the client's situation

### **Rent Reasonableness**

HUD sets a standard that is designed to ensure that rents being paid are reasonable in relation to rents being charged for comparable unassisted units in the same market.

### **Trauma Informed Care:**

Approaches delivered with an understanding of the vulnerabilities and experiences of trauma survivors, including the prevalence of physical, social, and emotional impact of trauma. Trauma-informed approaches place priority on restoring the survivor's feelings of safety, choice, and control.

### **Victim-Centered:**

This is an approach where the victim's priorities, needs, and interests are at the center of the work with the victim, including, providing non-judgmental assistance with emphasis on client self-determination.

### **VI-SPDAT**

The Vulnerability Index and Service Prioritization Decision Assistance Tool is developed and owned by OrgCode and Community Solutions. It is a tool that provides a recommendation on the type of housing intervention and support services needed for the individual to resolve his/her homelessness.

## Appendix:

CoC – Website that contains the authorizing laws, regulations, resources, eligibility requirements, and Notices for the Continuum of Care (CoC) Program:

<https://www.hudexchange.info/programs/coc/>

ESG – Website that contains the authorizing laws, regulations, and Federal Register Notices for the Emergency Solutions Grants (ESG) Program.

<https://www.hudexchange.info/programs/esg/esg-law-regulations-and-notices/>

2019 Homeless Definitions document

Zero Income Self-Certification Form

Zero Income Self-Certification Questionnaire

List of Committee Members document




# Homeless Definition

<b>CRITERIA FOR DEFINING HOMELESS</b>	<b>Category 1</b>	<b>Literally Homeless</b>	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> <li>(i) Has a primary nighttime residence that is a public or private place not meant for human habitation;</li> <li>(ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <b>or</b></li> <li>(iii) Is exiting an institution where (s)he has resided for 90 days or less <b>and</b> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution</li> </ul>
	<b>Category 2</b>	<b>Imminent Risk of Homelessness</b>	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> <li>(i) Residence will be lost within 14 days of the date of application for homeless assistance;</li> <li>(ii) No subsequent residence has been identified; <b>and</b></li> <li>(iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing</li> </ul>
	<b>Category 3</b>	<b>Homeless under other Federal statutes</b>	<p>(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> <li>(i) Are defined as homeless under the other listed federal statutes;</li> <li>(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;</li> <li>(iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <b>and</b></li> <li>(iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers</li> </ul>
	<b>Category 4</b>	<b>Fleeing/ Attempting to Flee DV</b>	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> <li>(i) Is fleeing, or is attempting to flee, domestic violence;</li> <li>(ii) Has no other residence; <b>and</b></li> <li>(iii) Lacks the resources or support networks to obtain other permanent housing</li> </ul>





# Homeless Definition

<b>RECORDKEEPING REQUIREMENTS</b>  	Category 1	Literally Homeless	<ul style="list-style-type: none"> <li>• Written observation by the outreach worker; <u>or</u></li> <li>• Written referral by another housing or service provider; <u>or</u></li> <li>• Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;</li> <li>• For individuals exiting an institution—one of the forms of evidence above <u>and</u>:             <ul style="list-style-type: none"> <li>○ discharge paperwork <u>or</u> written/oral referral, <u>or</u></li> <li>○ written record of intake worker's due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution</li> </ul> </li> </ul>
	Category 2	Imminent Risk of Homelessness	<ul style="list-style-type: none"> <li>• A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u></li> <li>• For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay; <u>or</u></li> <li>• A documented and verified oral statement; <u>and</u></li> <li>• Certification that no subsequent residence has been identified; <u>and</u></li> <li>• Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing</li> </ul>
	Category 3	Homeless under other Federal statutes	<ul style="list-style-type: none"> <li>• Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; <u>and</u></li> <li>• Certification of no PH in last 60 days; <u>and</u></li> <li>• Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; <u>and</u></li> <li>• Documentation of special needs <u>or</u> 2 or more barriers</li> </ul>
	Category 4	Fleeing/ Attempting to Flee DV	<ul style="list-style-type: none"> <li>• <i>For victim service providers:</i> <ul style="list-style-type: none"> <li>○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.</li> </ul> </li> <li>• <i>For non-victim service providers:</i> <ul style="list-style-type: none"> <li>○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; <u>and</u></li> <li>○ Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u></li> <li>○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.</li> </ul> </li> </ul>



**Metropolitan Development and Housing Agency  
Rental Assistance Department**

620 Dew Street • Nashville, Tennessee 37206  
Mailing Address: P O Box 846 Nashville, Tennessee 37202  
Telephone (615) 252-6500 • TDD (615) 252-8599 • FAX (615) 252-6614  
www.nashville-mdha.org

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**Zero Income Certification**

Re: Tenant

You have reported there is no income in your household. Please sign this certification and return in the enclosed envelope within 10 days of the date on this letter. All adult members of the household must sign the form.

\_\_\_\_\_  
MDHA Representative                      Date Mailed

As an adult member of the above referenced household, I certify that I am not employed and have no source of income, earned or unearned. I understand that should my income status change, I am obligated to report it to the Section 8 Office within 15 days. I further understand that failure to report any income that I receive may result in my family being charged retroactive rent and/or being discontinued from the Section 8 Program.

**CERTIFICATION**

I/We certify that the information provided on this document is true and complete to the best of my knowledge. I/We understand that false statements or information are punishable under Tennessee Code Annotated and Section 1001 of Title 18 of the U.S. Code which provides penalties up to \$10,000 or imprisonment up to five (5) years or both. I/we also understand that false statements or information are grounds for me being charged retroactive rent and my housing assistance being terminated.

“Any person who makes a false statement in writing, knowing it is false, for the purpose of obtaining or maintaining occupancy or for a reduction in rent or rent subsidy shall be guilty of a Felony”.

\_\_\_\_\_  
Head of Household

\_\_\_\_\_  
Other Family member 18 years old or older

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

\_\_\_\_\_  
Other Family member 18 years old or older

\_\_\_\_\_  
Date



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**ZERO INCOME QUESTIONNAIRE**

Name: \_\_\_\_\_ Social Security Number: \_\_\_\_\_

Address: \_\_\_\_\_

Please complete the questions below, sign, date and return to our office if you are claiming zero income as an applicant/participant of the Section 8 Housing Choice Voucher Program.

**1) Do you or any household member:**

- |  |                          |     |                          |    |
|--|--------------------------|-----|--------------------------|----|
| Own a business?  | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Own any real estate property?  | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Work full-time?  | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Work part-time?  | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Work Seasonal, Temporary or PRN?   | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive wages, tips, bonuses or commissions for any type of work?                  | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Work for someone who pays you in cash?   | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive payments from rental property?   | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive worker's compensation?   | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive severance pay?   | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive child support through a child support recovery unit or agency such as DHS? | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive child support from an absent parent?                                       | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive alimony payments?  | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive public assistance under TANF (formerly AFDC)?                              | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive social security payments?  | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive SSI payments?  | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive payments from a pension?   | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive payments from an annuity?  | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive payments from an insurance policy?   | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive regular contributions from persons or organizations outside of the home?   | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive military pay or allotment?   | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive any other type of payments not mentioned here?                             | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive financial aid? (students)  | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive disability or death benefits?  | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive income from babysitting?   | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| Receive winnings paid in periodic payments?  | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |

If you answered yes to any of the above items please provide a detailed explanation below.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

2) Please provide information of your current monthly household expenses as listed below.

Monthly Food Stamp Allotment	\$ _____
Monthly Phone Bill	\$ _____
Monthly Electric Bill	\$ _____
Monthly Gas Bill	\$ _____
Monthly Water Bill	\$ _____
Monthly Cell Phone Bill	\$ _____
Monthly Cable Bill	\$ _____
Monthly Credit Card Bill	\$ _____
Monthly Car Payment	\$ _____
Monthly Car Insurance Payment	\$ _____
Monthly Life Insurance Payment	\$ _____
Monthly Furniture Payments	\$ _____

3) Do you or anyone in your household have a bank account?  YES  NO  
 If answered yes, where? \_\_\_\_\_

4) Will you be applying for any of the following:

TANF (AFDC)	<input type="checkbox"/> YES	<input type="checkbox"/> NO	if yes, when? _____
Unemployment Compensation	<input type="checkbox"/> YES	<input type="checkbox"/> NO	if yes, when? _____
Disability	<input type="checkbox"/> YES	<input type="checkbox"/> NO	if yes, when? _____
Workman's Compensation	<input type="checkbox"/> YES	<input type="checkbox"/> NO	if yes, when? _____

5) In the past months how did or do you pay for the following and what is the amount of the monthly expense?

Rent	_____	\$ _____
Electric	_____	\$ _____
Gas	_____	\$ _____
Water	_____	\$ _____
Food	_____	\$ _____
Clothing	_____	\$ _____
Cleaning Supplies (dish soap, laundry soap, etc.)	_____	\$ _____
Paper Supplies (toilet paper, paper towels, etc.)	_____	\$ _____
Personal Hygiene Items (shampoo, deodorant, diapers, etc.)	_____	\$ _____
Medical Expenses (medications, co-pays, etc.)	_____	\$ _____
Transportation (bus pass, gas for car, etc.)	_____	\$ _____
Laundromat expenses	_____	\$ _____
Cigarettes	_____	\$ _____

**PLEASE READ:**

I have stated during this verification process that I have no income at this time. I understand that I must complete this form every 90 days.

By my signature I certify that the information I have provided above is true and complete to the best of my knowledge and belief. I understand that if I provide false or incomplete information, I can be fined up to \$10,000, imprisoned up to five years, lose the subsidy MDHA pays on my behalf, and/or have my rent portion increased.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

**Written Standards – Committee Members**

Nashville-Davidson County Homelessness

Continuum of Care (CoC)

& Emergency Solutions Grants (ESG)

**2017 – CoC Written Standards Ad-Hoc Committee Members**

- Mary Katherine Rand – The Mary Parrish Center
- Bill Friskies-Warren – Neighborhood Health
- Sam Forcum – The Salvation Army
- Trish Davis – YWCA Nashville
- Sean Muldoon – Operation Stand Down, TN
- Suzie Tolmie – MDHA

**2019 – CoC CE/Written Standards Committee Members:**

- Sean Muldoon – Operation Stand Down
- Traci Pekovitch - Mental Health Coop
- Grant Winter - Nashville Cares
- Michael Centi - Oasis Center
- Amanda Wood - MDHA
- Tina Sivley – Safe Haven Family Shelter
- Kristy Pomeroy - The Next Door
- Michelle Southard - Vanderbilt
- Cathy Buckner - lived experience
- Carrie Siqueiros - Nashville Rescue Mission
- Martina Condron – Room in the Inn
- Mary Katherine Rand - Mary Parrish Center
- Jessica Ivey – Homeless Impact Division
- Suzie Tolmie – MDHA
- Matt Preston – United Way (Chair)