

WRITTEN SERVICE STANDARDS FOR PROVIDING ASSISTANCE UNDER THE CONTINUUM OF CARE AND THE EMERGENCY SOLUTIONS GRANT PROGRAMS

CALHOUN COUNTY CONTINUUM OF CARE MI-514

June 2022

TABLE OF CONTENTS

INTRODUCTION	4
PROGRAMS OVERVIEW	4
EMERGENCY SOLUTIONS GRANT PROGRAM.....	4
CONTINUUM OF CARE PROGRAM.....	5
POLICY ON PROJECT SELECTION	5
STANDARDS FOR ALL PROJECT TYPES.....	5
FAIR HOUSING, EQUAL OPPORTUNITY, AND NON-DISCRIMINATION	5
CONTACTS REGARDING DISCRIMINATION GRIEVANCES.....	6
RACIAL EQUITY.....	6
INTEGRATION AND ACCESSIBILITY.....	6
REASONABLE ACCOMMODATIONS AND MODIFICATIONS FOR PERSONS WITH DISABILITIES	7
DISCRIMINATION BASED ON ACTUAL OR PERCEIVED GENDER.....	7
DISCRIMINATION BASED ON HOUSEHOLD COMPOSITION	7
PREVENTING FAMILY SEPARATION	7
GUIDANCE FOR PLACEMENT FOR TRANSGENDER PERSONS IN SINGLE-SEX EMERGENCY SHELTERS AND OTHER FACILITIES	8
PRIORITIZED SUBPOPULATIONS AND FAIR HOUSING IMPLICATIONS	8
COORDINATED ENTRY SYSTEM PARTICIPATION	9
HMIS PARTICIPATION	9
PARTICIPANT INCLUSION.....	9
ACCESS TO MAINSTREAM RESOURCES.....	9
EDUCATION LIAISON.....	9
TERMINATION AND GRIEVANCE PROCEDURES	10
GUIDING PRINCIPLES	10
HOUSING FIRST.....	10
HOUSING FOCUSED	11
PRIORITIZATION.....	11
PERSON-CENTERED.....	11
STRENGTH-BASED.....	11
HOMELESS ASSISTANCE SERVICES AVAILABLE	12
ESG STREET OUTREACH	12
MINIMUM SERVICE STANDARDS FOR STREET OUTREACH.....	12
TYPES OF ASSISTANCE ALLOWABLE THROUGH ESG.....	13

ESG EMERGENCY SHELTER.....	13
MINIMUM SERVICE STANDARDS FOR EMERGENCY SHELTER ASSISTANCE.....	13
ESG HOMELESSNESS PREVENTION	14
ELIGIBILITY	14
MINIMUM STANDARDS FOR HOMELESSNESS PREVENTION ASSISTANCE	15
TYPES OF ASSISTANCE ALLOWABLE THROUGH ESG	15
COC TRANSITIONAL HOUSING	16
ELIGIBILITY	16
MINIMUM SERVICE STANDARDS FOR TRANSITIONAL HOUSING ASSISTANCE.....	16
ESG RAPID RE-HOUSING	16
ELIGIBILITY	16
MINIMUM SERVICE STANDARDS FOR RAPID RE-HOUSING ASSISTANCE	16
DETERMINING RENTAL ASSISTANCE LIMITS.....	17
COC PERMANENT SUPPORTIVE HOUSING.....	17
ORDER OF PRIORITY FOR PERMANENT SUPPORTIVE HOUSING ASSISTANCE	17
MINIMUM SERVICE STANDARDS FOR PERMANENT SUPPORTIVE HOUSING ASSISTANCE.....	18
APPROVALS.....	18
APPENDIX A: HUD HOMELESS DEFINITIONS.....	19
APPENDIX B: AT RISK OF HOMELESSNESS DEFINITIONS.....	19
APPENDIX C: COMMON TERMS, ACRONYMS, AND DEFINITIONS	20

INTRODUCTION

The Coordinating Council of Calhoun County (TCC) is the Collaborative Applicant (CA) for the Calhoun County Continuum of Care (CoC). A Continuum of Care works to coordinate a community-based process of identifying needs relating to the experience of homelessness and of building a system of housing and services to address those needs. The Calhoun County CoC works to establish local priorities for system planning and to evaluate system-wide performance toward making homelessness rare, brief, and non-recurring.

Membership in the Calhoun County CoC is open to all stakeholders interested in its purposes, including nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and individuals currently or formerly experiencing homelessness.

The CoC must prepare and submit a collaborative application to the US Department of Housing & Urban Development (HUD) for Federal CoC Program funding to support the operation of homeless assistance projects comprising of Permanent Supportive Housing (PSH) for persons with disabilities, Transitional Housing programs, Homeless Management Information System (HMIS) operation, and CoC Planning activities. This requires designing a local funding competition and a local project ranking strategy. The CoC also must engage in Consolidated Planning as it relates to homelessness and Emergency Solutions Grant (ESG) spending, which includes Emergency Shelter, Street Outreach, Homelessness Prevention, Rapid Re-housing, and HMIS.

The Calhoun County CoC Housing Solutions Board (HSB) is the primary governing body of the CoC, responsible for approval of all CoC policies, procedures, and CoC program funding decisions. The Board's decisions are made with input from the Homeless Coalition, direct service agencies, and advocates in the community. The HSB currently has 16 Members (12 voting and 2 non-voting) along with fiduciary and TCC participation. The HSB actively recruits participants that represent diversity, equity and inclusion.

All projects funded under the CoC program, Emergency Solutions Grant (ESG) Program, shall apply the following standards consistently for the benefit of all program participants. The CoC strongly encourages projects that do not receive the above-mentioned funds to accept and utilize these standards to guide their provision of services.

PROGRAMS OVERVIEW

EMERGENCY SOLUTIONS GRANT PROGRAM

The Emergency Solutions Grant Program (ESG) has broadened existing emergency shelter and homelessness prevention activities over the years, placing an emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. ESG funds are authorized and intended for rapid re-housing, homelessness prevention, street outreach, and emergency shelter. Written Service Standards are required as part of the ESG deliverables for each CoC.

ESG funds may be used for a variety of services, including: Emergency Shelter, Street Outreach, short- or medium-term Rental Assistance, Housing Search and Placement, and Housing Stability Case Management. The Homelessness Prevention component includes various housing relocation and stabilization services as well as short- and medium-term rental assistance. The Battle Creek Community Foundation is currently the fiduciary for all ESG grants through the Michigan State Housing Development Authority (MSHDA) and is the recipient of ESG

Program funds. Eligible organizations executing approved services (prioritized through the HSB) are referred to as Subrecipients.

CONTINUUM OF CARE PROGRAM

The Continuum of Care (CoC) Program funds projects that provide housing and supportive services to households with and without children who are experiencing homelessness. Households with and without services may seek assistance starting at age 11 for The Ark of Kalamazoo youth shelter and at 18 for all other services. Projects funded under the CoC Program seek to assist households with attaining and sustaining permanent housing as quickly as possible. In Calhoun County, CoC Program funds are currently used to support CoC Planning activities, Permanent Supportive Housing, HMIS, Coordinated Entry Supportive Services, and Transitional Housing projects. The Coordinating Council is the Collaborative Applicant (CA) for Calhoun County, acts as the CoC Planning Body, and oversees the performance of projects awarded through the CoC Program. All awarded projects have direct contracts/ grant agreements with HUD.

POLICY ON PROJECT SELECTION

The CoC Housing Solutions Board (HSB) evaluates projects funded with HUD CoC Program dollars annually, in preparation for HUD's CoC Program Funding Competition. Locally-developed objective criteria incorporate priorities established by HUD in its Notice of Funding Opportunity (NOFO) and local priorities established by the Calhoun County CoC. The local evaluations inform project selection and ranking for the HUD Competition, and also help the CoC to identify any performance issues that may need to be addressed. Persistent performance issues, including issues related to compliance with Calhoun County CoC Written Service Standards, and chronic underspending, may negatively impact the CoC's willingness to continue to include a project in its consolidated application for CoC Program funding. The CoC Director shall notify project applicants in a timely manner, per the decision by the HSB and NOFO guidelines, whether the project will be recommended for funding.

STANDARDS FOR ALL PROJECT TYPES

The Calhoun County CoC practices a person-centered, housing-first model that strongly incorporates participant choice and inclusion of subpopulations present in Calhoun County including, but not limited to persons experiencing chronic homelessness, veterans, youth ages 18-24, households with children, and victims of domestic violence or other life-threatening interpersonal violence.

FAIR HOUSING, EQUAL OPPORTUNITY, AND NON-DISCRIMINATION

All participating projects in the Calhoun County/Greater Battle Creek CoC (514) comply with applicable civil rights and fair housing laws and requirements. All recipients and sub-recipients of CoC Program and ESG Program-funded projects are required to comply with the nondiscrimination and equal opportunity provisions of Federal Civil Rights laws, including, but not limited to the following:

- Fair Housing Act
- Section 504 of the Rehabilitation Act
- Title VI of the Civil Rights Act
- Title II of the Americans with Disabilities Act
- Violence Against Women Act (VAWA)
- And HUD's Final Rule on Equal Access

The coordinated entry process is used universally in our community to all those eligible. Using the VI-SPDAT assessment, organizations are able to uniformly prioritize participants on the wait list, make referrals for housing and/or supportive services, and ensure that needs are met regardless of race, color, national origin, religion, actual or perceived sexual orientation, gender identity, age, familial/marital status, disability, or those who are least likely to apply in the absence of special outreach. Persons with Limited English Proficiency (LEP) are offered translators through community partnerships. Providers shall provide program applicants and participants with information, in writing, on their rights and remedies under applicable federal, state, and local fair housing and civil rights laws.

CONTACTS REGARDING DISCRIMINATION GRIEVANCES

Persons who believe they've been a victim of housing discrimination may contact the:

- Fair Housing Center of Southwest Michigan Center (FHCSWM)
 - 405 West Michigan Avenue, Kalamazoo, M 49007, Toll free (866) 637-0733
 - The Center also provides fair housing training; email info@fhcswm.org for more information.
- Legal Services of South Central Michigan
 - 123 W. Territorial Road Battle Creek, MI 49015
 - Office Phone (Receptionist): (269) 965-3951
- HUD.GOV
 - https://www.hud.gov/program_offices/fair_housing_equal_opp

If an individual believes that they have been excluded from participation in, denied the benefits of, or subjected to discrimination on the basis of race, color, national origin including individuals with limited English proficiency (LEP), sex, religion, age, and disability, the individual may file a program discrimination complaint by contacting:

- Calhoun County Office of Prosecuting Attorney, Civil Rights Complaint Coordinator (CRCC)
 - 161 E Michigan Ave, Battle Creek, MI 49014, phone 269-969-6980

RACIAL EQUITY

People of color experience homelessness at disproportionately high rates due to historic and ongoing systemic racism. Calhoun County CoC organizations have a significant and direct responsibility to ensure we are not contributing to or supporting a disparate housing and service impact on Black, indigenous, and any people of color experiencing homelessness.

Additionally, all partners must proactively and intentionally engage to implement organizational, structural, policy-focused, and service-driven changes informed by data and – most importantly – lived experience. As evidenced in the HUD Continuum of Care Notice of Funding Opportunity, understanding racial disparities data within homeless service delivery is a critical step towards establishing improved racial equity in service outcomes.

INTEGRATION AND ACCESSIBILITY

Housing and supportive services must be offered in an integrated manner, such that persons with disabilities may enjoy a meaningful life within the community. Organizations shall offer housing and supportive services to enable individuals with disabilities to interact with nondisabled persons to the fullest extent possible.

REASONABLE ACCOMMODATIONS AND MODIFICATIONS FOR PERSONS WITH DISABILITIES

Organizations are required to provide reasonable accommodations and modifications for persons with disabilities. For federally-funded housing, the recipient is responsible for paying for the modification. Organizations must inform applicants during the intake process of their right to request a reasonable accommodation or modification. A reasonable modification is a structural change, and a reasonable accommodation is change to rules, policies, or services so that a person with a disability has equal opportunity to use and enjoy a dwelling unit or common space. An example of a reasonable modification is installing a grab bar in the bathroom of a person with a disability, while an example of reasonable accommodations includes permitting a person with a disability to have a service animal.

DISCRIMINATION BASED ON ACTUAL OR PERCEIVED GENDER

HUD's Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule (Equal Access Rule) requires that HUD's housing projects be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status. The rule defines "gender identity" to mean "actual or perceived gender-related characteristics." The final rule also prohibits owners and administrators of HUD-assisted or HUD-insured housing, approved lenders in an FHA mortgage insurance program, and any other recipients or subrecipients of HUD funds from inquiring about sexual orientation or gender identity to determine eligibility for HUD-assisted or HUD-insured housing.

There is a limited exception to this rule: Temporary, emergency shelters and other buildings and facilities that are not covered by the Fair Housing Act because they provide short-term, temporary accommodations may provide sex-segregated accommodations, which they sometimes do to protect the privacy and security of individuals when the buildings and facilities have physical limitations or configurations that require shared sleeping quarters or shared bathing facilities. For purposes of this rule, shared sleeping quarters or shared bathing facilities are those that are designed for simultaneous accommodation of multiple individuals in the same space. For example, a single-user bathing facility with a lock on the door is not designated for simultaneous occupancy by multiple individuals, so it is not a "shared bathing facility" for purposes of the Equal Access Rule or this rule.

Organizations should ensure that its services do not isolate or segregate victims of domestic violence based upon actual or perceived gender identity.

DISCRIMINATION BASED ON HOUSEHOLD COMPOSITION

Organizations cannot discriminate against a group of persons presenting as a family based on the composition of the family, the age of any member of the family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. The people who present together for assistance, regardless of age or relationship, are considered a household and are eligible for assistance as a household.

Projects that serve families with children must serve all types of families with children; if a project targets a specific population, (e.g., homeless veterans), these projects must serve all families with children that are otherwise eligible for assistance, including families with children that are headed by a single adult or consist of multiple adults who reside together.

PREVENTING FAMILY SEPARATION

In an effort to maintain family unity, for housing projects serving households with children, the age and gender of a child under age 18 shall not be used as a basis for denying any family's admission, nor may a recipient deny

admission to any member of the family (e.g., 15-year-old son). Projects will make every attempt possible to avoid family separation, unless absolutely necessary for the safety and well-being of the family.

GUIDANCE FOR PLACEMENT FOR TRANSGENDER PERSONS IN SINGLE-SEX EMERGENCY SHELTERS AND OTHER FACILITIES

Organizations operating ESG-single-sex emergency shelters (or other ESG- and/or CoC facilities) may not make a determination about services for one participant based on the complaints of another participant when those complaints are based on a participant's gender identity or non-conformity with gender stereotypes. For the purpose of assigning a participant to sex-segregated or sex-specific services, it is a requirement that intake staff and emergency housing providers ask a transgender participant which group or service the participant wishes to join. The organizations must take reasonable steps to address safety and privacy concerns; the organization should provide for privacy in bathrooms and dressing areas. For instance, organizations may install privacy curtains or partitions. When deciding how to house a victim of domestic violence, an organization that provides sex-segregated housing may consider on a case-by-case basis whether a particular housing assignment would ensure the victim's health and safety. A victim's own views with respect to personal safety deserve serious consideration. The organizations should ensure that its services do not isolate or segregate victims of domestic violence based upon actual or perceived gender identity.

PRIORITIZED SUBPOPULATIONS AND FAIR HOUSING IMPLICATIONS

Organizations shall comply with applicable civil rights laws, including the Fair Housing Act. Within this framework, these standards establish subpopulations to be prioritized for housing and services that align with the identified needs of the local community and the goals of the Federal Strategic Plan to End Homelessness. Subpopulations may be prioritized as long as doing so does not discriminate against any protected class under federal nondiscrimination laws (e.g., the housing may be limited to homeless veterans, victims of domestic violence and their children, or chronically homeless households); subpopulations may also be prioritized according to who needs the specialized supportive services that are offered by the project (e.g., substance use disorder treatment, domestic violence services, or a high intensity package of services designed to meet the needs of hard-to-reach homeless persons).

- *Dedicated versus Prioritized:* Projects and/or beds that are dedicated to serving a specific subpopulation must continue serving only this subpopulation. (For instance, a Permanent Supportive Housing project that is dedicated to serving households experiencing chronic homelessness must continue serving those households). This means that if two otherwise eligible households are seeking admission into the program, one who falls within the designated prioritized subpopulation and one who does not, the household who is in the designated prioritized subpopulation must be given priority for admission.
- *Fair Housing Implications:* The Local Standards establish priority subpopulations by project type (i.e., Permanent Supportive Housing); organizations may not set more restrictive priorities. For instance, while a Permanent Supportive Housing project may prioritize households experiencing chronic homelessness with a qualifying disability per the Local Standards, beds may not be reserved to persons with a specific disability (e.g., physical disability). If an individual, who is otherwise qualified, but who does not have a physical disability, seeks admission and would benefit from the services offered, this person may not be excluded from the project. Organizations may reserve beds for persons with HIV/AIDS if the housing also receives funding from the Housing Opportunities for People with AIDS program (HOPWA).

COORDINATED ENTRY SYSTEM PARTICIPATION

- Calhoun County’s Coordinated Entry System is a process designed to coordinate program participant access, assessment, and referral to homeless prevention assistance, homeless dedicated emergency shelter and services, and homeless-dedicated rapid re-housing. The written service standards for providing assistance under ESG and CoC Programs will be integrated into the CoC’s Coordinated Entry policies and procedures and the intake and assessment procedures of individual housing projects.
 - All CoC-funded and ESG-funded projects are required to participate in the Calhoun County CoC's Coordinated Entry System.
 - Participation requires following all established policies and procedures outlined in the Calhoun County Coordinated Entry Policy.

HMIS PARTICIPATION

- All CoC-funded and ESG-funded projects are required to participate in the Calhoun County CoC's Homeless Management Information System (HMIS), as specified in the HMIS Governance Charter and HMIS Policies and Procedures.
- The CoC strongly encourages non-CoC/ESG funded organizations to participate in HMIS.

PARTICIPANT INCLUSION

- Each CoC-funded project is expected to engage participants in ongoing program evaluation and quality improvement processes. Toward that end, at a minimum, each project is required to survey or interview participants at least annually to obtain feedback on program service quality, the housing and service environment, and opportunities for improvement.
- Each CoC-funded organization must have participant representation on the Housing Solutions Board (HSB), which is the governing and decision-making body for the CoC.
- The CoC Equity Results Team (CERT) is a collaborative, advisory body to the CoC, working with CoC partners and the State of Michigan. CERT membership represents our communities of color and is dedicated to diversity, equity, inclusion, and justice.

ACCESS TO MAINSTREAM RESOURCES

- The Calhoun County CoC expects that every organization that is funded through the CoC or ESG programs will coordinate with and access mainstream and other targeted homeless resources.
- Organizations should assess and assist participants with obtaining any mainstream resource for which they may be eligible for including: TANF, Veterans Health Care, Supplemental Nutrition Assistance Program (SNAP), Medicaid, Federally Qualified Health Plan (Affordable Care ACT), CHIP, SSI/SSDI, Workforce Investment funds, and Welfare-to-Work.
- Where possible, organizations should streamline processes for applying for mainstream benefits.
- Our CoC utilizes our partnership with Integrated Services of Kalamazoo (ISK) who has a regional approach to the SOAR program and street outreach. SOAR certification with agencies local to Calhoun County.

EDUCATION LIAISON

- For projects that serve households with children, an educational liaison or housing case manager may be available to ensure children are:
 - Enrolled in school

- Connected to appropriate services in the community, including early childhood projects such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney Vento education services
- A McKinney-Vento representative must serve at the HSB level

TERMINATION AND GRIEVANCE PROCEDURES

- Organizations with projects must have a written grievance procedure, including a formal process for participants to provide feedback.
- Organizations must have a written termination policy outlining project rules and termination processes, including a formal due process.
- Terminations may only occur in the most severe circumstances, which include, but are not limited to: consistent failure to adhere to emergency shelter procedures and policies, make rental payments, consistent violation of the lease, or destruction of property, or threat/violence to staff.
- Termination from a project should not prohibit the household from being readmitted into the program at a future date.
- The termination process, at a minimum, must consist of:
 - Providing the participant with a written copy of the rules and the termination process before the participant begins to receive assistance
 - Written notice to the program participant containing a clear statement of the reasons for termination
 - A review of the decision, in which the program participant is given the opportunity to present written or oral objections/appeal before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
 - Prompt written notice of the final decision to the program participant.

GUIDING PRINCIPLES

HOUSING FIRST

- Housing First is a programmatic and systems approach that prioritizes providing permanent housing to people experiencing homelessness quickly without preconditions or service participation requirements, thus ending their homelessness and serving as a platform from which they can pursue personal goals and improve their quality of life.
- This approach is guided by the belief that people need basic necessities, like food and a place to live, before attending to anything less critical, such as getting a job, budgeting properly, or attending to substance use issues.
- Access to projects is not contingent on sobriety, minimum income requirements, lack of a criminal record, completion of treatment, participation in services, status or other unnecessary conditions.
- Projects do everything possible not to reject a household on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”
- People with disabilities are offered clear opportunities to request reasonable accommodations within application and screening processes and during tenancy, and building and apartment units include special physical features that accommodate disabilities.
- Housing and service goals and plans are highly tenant-driven.

- Participation in services is voluntary and not a condition of tenancy, but can and should be used to persistently engage participants to ensure housing stability.
- Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are a part of some tenants' lives. Tenants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices.
- Substance use in and of itself, without other lease violations, is not considered a reason for eviction.
- Tenants in supportive housing are given reasonable flexibility in paying their share of rent on time and offered special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.
- Every effort is made to provide a tenant the opportunity to transfer from one housing situation or project to another if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.
- Projects that cannot serve a household work through the coordinated entry process to ensure that the household has access, as much as possible, to other housing and services such as: prevention assistance, homeless dedicated housing and services, and community-based affordable housing.

HOUSING FOCUSED

- Assistance provided to households at-risk of or experiencing homelessness is focused on moving to and maintaining permanent housing.

PRIORITIZATION

- Assistance is prioritized based on vulnerability and severity of service needs to ensure households needing help the most receive it in a timely manner.

PERSON-CENTERED

- A trauma-informed approach that is dignified, safe, and incorporates participant choice is utilized.
 - Assistance is allocated effectively and households are linked to the most appropriate intervention strategy
 - Reduction in number of households experiencing homelessness
 - Reduced length of time a households experiences homelessness
 - Reduced returns to homelessness (recidivism)

STRENGTH-BASED

- An asset-based approach that focuses on the inherent strengths of participants, and deploys these personal strengths to aid in the achievements of the participants' goals. Specifically:
 - Every individual, group, family, and community have strengths.
 - Trauma, illness, and struggle may be injurious but they may also be sources of challenge and opportunity.
 - There is no limit to a person's growth, achievement, or success.
 - Participants are best served by collaborating with them.
 - Every environment is full of resources.

HOMELESS ASSISTANCE SERVICES AVAILABLE

ELIGIBILITY BY PROGRAM				
Program**	Funding	Homeless Status Category*	Target Population	Income
Street Outreach	ESG	Homeless: 1,2,4	N/A	N/A
Emergency Shelter	ESG	Homeless: 1,2,4	N/A	N/A
Homelessness Prevention	ESG	At-Risk: 1,2,3 Homeless: 2,4	See "ESG Homeless Prevention" Section for further eligibility criteria	At or below 30% AMI
Transitional Housing	HUD	Homeless: 1,4	Households fleeing Domestic Violence and Individuals in recovery from substance use disorder	N/A
Rapid Re-Housing	ESG	Homeless: 1,4	1. VI-SPDAT Score 4-7 2. Households with the longest history of homelessness 3. People with VISPDAT score 9+, who do not qualify for PSH	No income requirement at entry****
Permanent Supportive Housing***	HUD	Homeless: 1,4	Dedicated or Prioritized to households experiencing chronic homelessness, as defined by HUD.	At or below 50% AMI
<p>* All definitions and categories of "Homeless" and "At Risk of Homelessness" can be found in Appendix A and Appendix B ** All programs: Eligible households must have a Head of household that is 18 years of age or older *** PSH programs: Eligible households must have one household member (adult OR child) with a disability; See Appendix F ****RRH Income: Participant income must be at or below 30% AMI at annual evaluation</p>				

ESG STREET OUTREACH

Street Outreach services shall target unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, such as a car, park, abandoned building, bus or train station, airport, or camping ground.

MINIMUM SERVICE STANDARDS FOR STREET OUTREACH

Street outreach programs should operate with a Housing First approach. Housing First programs believe that anyone can and should be housed and the barriers to permanent housing should be minimized. Housing First

allows street outreach programs to move unsheltered individuals more quickly from places not meant for human habitation into permanent housing.

The Calhoun County Street Outreach team participates in the local community's coordinated entry system (CES). Street Outreach is led by one of the CoC's emergency shelters, providing strong linkages back to emergency housing, as needed, to help divert people from homelessness and assess their needs for emergency services. The Individual and Family VI-SPDAT Prescreen Tools are utilized to assess client service needs and set priorities for permanent housing. This effort is coordinated with a regional street outreach team under the PATH program managed through Integrated Services of Kalamazoo (the CMH).

TYPES OF ASSISTANCE ALLOWABLE THROUGH ESG

ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care. Street Outreach advocates:

- Proactively reach out to unsheltered homeless; whenever possible, provide resources to address immediate needs such as placement in emergency shelter, food, personal hygiene items, etc.
- Provide Engagement services – assessing housing and service needs, completion of VI-SPDAT and other assessment tools based on need
- Provide short term case management - provide linkages to emergency health and behavioral health services, mainstream resources, etc.

ESG EMERGENCY SHELTER

An emergency shelter is any facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for households experiencing homelessness.

MINIMUM SERVICE STANDARDS FOR EMERGENCY SHELTER ASSISTANCE

The Michigan State Housing Development Authority (MSHDA) Emergency Solutions Grants (ESG) Program establishes minimum standards for safety, sanitation, and privacy in emergency shelters funded with ESG, and minimum habitability standards for permanent housing funded under the Rapid Re-housing and Homelessness Prevention components of ESG. These may be found at: <https://www.michigan.gov/mshda/-/media/Project/Websites/mshda/homeless/esg/policy-and-procedures/ESG-Minimum-Standards-for-Emergency-Shelter.pdf?rev=d8bbef8c7f7e498794c8598c15725da3&hash=4653F042AA3002BEB769D345450B0890>

Emergency housing organizations provide the following services to facilitate self-sufficiency and independence:

- Safe, temporary emergency shelter;
- Housing-focused, person-centered, strengths-based case management services;
- Assistance with obtaining housing;
- And Referrals to supportive services for special populations such as children, clients with disabilities, clients with behavioral health needs, veterans, etc.

Emergency housing organizations, including those receiving ESG funds, comply with the Calhoun County CoC Coordinated Entry Policy and Calhoun County Plan to End Homelessness. Each organization has clearly identified

policies and procedures that comply with MSHDA requirements. The guiding principles ensure individuals and families living in emergency housing have:

1. a safe environment
2. treatment with dignity and respect; and
3. provision of housing and related services without regard to race, ethnicity, age, gender identity, actual or perceived sexual orientation, familial/marital status, or disability.

ESG HOMELESSNESS PREVENTION

ESG homelessness prevention is housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the household from moving to an emergency shelter, a place not meant for human habitation, or another location described in paragraph (1) of HUD's homeless definition. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

ELIGIBILITY

The following households may be eligible for homelessness prevention assistance through ESG:

1. An individual or family who will imminently lose their primary nighttime residence, provided that:
 - a. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - b. No subsequent residence has been identified; and
 - c. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
2. Any individual or family who:
 - a. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - b. Has no other residence; and
 - c. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

In addition, the following individuals may be available for Homeless Prevention assistance.

1. Do not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; AND
2. Meets ONE of the following conditions:
 - a. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance;
 - b. Is doubled up, and not listed on the lease because of economic hardship;
 - c. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

- d. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals;
- e. Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room;
- f. Is exiting a publicly funded institution or system of care;
- g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in this Consolidated Plan.
- h. A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute;
- i. An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

MINIMUM STANDARDS FOR HOMELESSNESS PREVENTION ASSISTANCE

- Participants are eligible to receive rental assistance up to 6 months.
- Participants receiving more than one-month rental assistance are required to meet with their housing stabilization specialist/social worker at least once per month.
- Participants are required to cover utilities and other living expenses while the HARA covers rental assistance
- Participant household incomes are recertified every 6 months; monthly household income at or below 30% AMI.
- Participants must have a written lease in order to receive rental assistance.
- Rental assistance will only be provided if the total rent for the unit does not exceed the fair market rent established by HUD, and complies with HUD's standard of rent reasonableness

TYPES OF ASSISTANCE ALLOWABLE THROUGH ESG

- Rental Assistance
 - Short-term rental assistance (up to 3 months)
 - Medium-term rental assistance (4 to 6 months)
 - Rental arrears (one time, to cover up to 6 months of arrears, including late fees)
- Housing Relocation and Stabilization Services
 - Financial assistance
 - Rental application fees
 - Security and Utility Deposits (up to 2 equivalent of 2 months' rent)
 - Utility Payments (up to 12 months, including up to 6 months of arrears)
 - Last Month's Rent
 - Moving Costs
- Services
 - Housing Search and Placement
 - Housing Stability Case Management
 - Landlord-Tenant Mediation
 - Tenant Legal Services through Legal Services of South Central Michigan

COC TRANSITIONAL HOUSING

Transitional housing is temporary supportive housing used to facilitate the movement of households experiencing homelessness to permanent housing.

ELIGIBILITY

Transitional housing projects must follow eligibility criteria set forth in the HUD CoC NOFO through which a project was funded and the HUD grant agreement. Calhoun County currently includes two transitional housing programs: one for individuals participating in a substance use treatment program and one for survivors of domestic violence and their minor children.

MINIMUM SERVICE STANDARDS FOR TRANSITIONAL HOUSING ASSISTANCE

All referrals to transitional housing and assessment for type and level of services must come through the Coordinated Entry System or comparable Victim Services system for domestic violence survivors. The following minimum standards will be applied to all transitional housing programs:

- Assistance in transitioning to permanent housing must be made available/provided as early as possible.
- Supportive services must be offered throughout the duration of the stay in transitional housing.
- Participants in transitional housing must enter into a lease, sublease or occupancy agreement for a term of at least one month. The lease, sublease or occupancy agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 12 months depending on program.

Unless otherwise prohibited by other project funding sources, transitional housing projects are required to use a low barrier Housing First Approach (i.e., not have services participation requirements or preconditions to entry, such as sobriety or minimum income threshold, and must prioritize rapid placement and stabilization in permanent housing.

ESG RAPID RE-HOUSING

Rapid Re-Housing (RRH) is available to help those who are experiencing homelessness be quickly and permanently housed. Rapid Re-Housing Projects (RRH) provides housing relocation and stabilization services and short- or medium-term rental assistance as needed to help households experiencing homelessness move as quickly as possible to permanent housing and achieve stability in that housing.

ELIGIBILITY

Rapid Re-housing projects must follow eligibility criteria set forth in the MSHDA NOFA through which a project was funded and the grant agreement.

MINIMUM SERVICE STANDARDS FOR RAPID RE-HOUSING ASSISTANCE

The following minimum standards will be applied to all rapid re-housing projects:

- Maximum participation in a rapid re-housing program cannot exceed 18 months in any three-year period
- Supportive services must be offered throughout the duration of stay in housing

- Participants are required to meet with a Housing Stabilization Specialist not less than once per month to assist the participant in ensuring long-term housing stability
- Participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party
- Must re-evaluate quarterly that the participant lacks sufficient resources and support networks necessary to retain housing without assistance.
- Rental assistance will only be provided if the total rent for the unit does not exceed the fair market rent established by HUD, and complies with HUD's standard of rent reasonableness

DETERMINING RENTAL ASSISTANCE LIMITS

- Each household may receive up to 6 months of assistance. When households need assistance beyond 6 months, state approval is required.
- Participants will be evaluated every 6 months to determine if further assistance is needed. All documents required at entry will be required at evaluation.

COC PERMANENT SUPPORTIVE HOUSING

Permanent supportive housing (PSH) for persons experiencing chronic homelessness and disabilities is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist chronically homeless persons with a disability or families with an adult or children member with a disability achieve housing stability.

ORDER OF PRIORITY FOR PERMANENT SUPPORTIVE HOUSING ASSISTANCE

The Calhoun County CoC has adopted the orders of priority for PSH:

1. First Priority – Individuals and families who meet HUD's definition of chronic homelessness, have the longest length of time homeless, and has been identified as having severe service needs.
2. Second Priority – Individuals and families who meet HUD's definition of chronic homelessness without severe service needs.

Organizations must exercise due diligence when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs.

HUD and the Calhoun County CoC recognize that some persons - particularly those living on the streets or in places not meant for human habitation - might require significant engagement and contacts prior to their entering housing. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and these chronically homeless persons must continue to be prioritized for PSH until they are housed.

CoC Program-funded PSH organizations are required by grant agreement to follow a Housing First approach to the maximum extent practicable. A household experiencing chronic homelessness should not be forced to refuse an offer of PSH if the household does not want to participate in the project's services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs.

MINIMUM SERVICE STANDARDS FOR PERMANENT SUPPORTIVE HOUSING ASSISTANCE

- There can be no predetermined length of stay for a PSH project.
- Supportive services designed to meet the needs of the participants must be made available to the participants throughout the duration of stay in PSH.
- Participants in PSH must enter into a lease (or sublease) agreement for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month.
- Organizations that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that participant assistance is terminated only in the most severe cases.

APPROVALS

The Calhoun County CoC Written Service Standards for Providing Assistance under the Continuum of Care and Emergency Solutions Grant Programs were approved by the Calhoun County Housing Solutions Board on June 14, 2022.

Lee Talmage
Chair, Housing Solutions Board

Date

Jamie Schook
Co-Chair, Housing Solutions Board

Date

APPENDIX A: HUD HOMELESS DEFINITIONS

Category 1: Literally Homeless

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

- Has a primary nighttime residence that is a public or private place not meant for human habitation; or
 - 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); or
 - Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 2: Imminent Risk of Homelessness

- Individual or family who will imminently lose their primary nighttime residence, provided that:
 - Residence will be lost within 14 days of the date of application for homeless assistance;
 - No subsequent residence has been identified; and
 - The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 4: Fleeing/Attempting to Flee DV

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

APPENDIX B: AT RISK OF HOMELESSNESS DEFINITIONS

Category 1: Individuals and Families

- An individual or family who:
 - Has an annual income below 30% of the median family income for the area; and
 - Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place described in Category 1 of the “homeless” definition; and
 - Meets one or more of the following conditions (risk factors):
 - Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; or
 - Is living in the home of another because of economic hardship; or
 - Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; or
 - Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; or

- Lives in severely overcrowded (SRO) housing or efficiency apartment unit in which more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; or
- Is exiting a publicly funded institution or system of care; or
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness (use the characteristics described in your jurisdiction’s Consolidated Plan)

Category 2: Unaccompanied Children and Youth

- A child or youth who does not qualify as homeless under the “homeless” definition but qualifies as “homeless” under another Federal Statute.

Category 3: Families with Children and Youth

- An unaccompanied youth who does not qualify as “homeless” under the homeless definition but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardians(s) or that child or youth if living with him or her.

APPENDIX C: COMMON TERMS, ACRONYMS, AND DEFINITIONS

Chronically Homeless (HUD definition):

1. A “homeless individual with a disability,” as defined in the Act, who:
 - a. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - b. Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months
2. An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph (1) of this definition before entering that facility; or
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Continuum of Care (CoC) – A collaborative planning body designed to address homelessness through a coordinated community-based process of identifying needs and building a system of housing and services to address those needs. It is the body responsible for meeting the goals of HUD’s Continuum of Care Program.

Homeless Management Information System (HMIS) – A computerized data collection system that tracks services received by homeless people, helps identify gaps in services within the continuum, and allows for greater collaboration among service providers as the system provides a “history” of a homeless person’s involvement in the system of care making it easier for caseworkers to evaluate the situation and provide services in the most efficient manner. In addition, the HMIS system can help accurately describe a community’s homeless population including unduplicated census counts, need for increased capacity to fill service gaps. This system is required by HUD for all continuums of care.

Emergency Shelter (ES) – A facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for persons experiencing homelessness.

Transitional Housing (TH) – Supportive housing used to facilitate the movement of individuals and families experiencing homelessness to permanent housing within 24 months.

Permanent Supportive Housing (PSH) – Permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

Rapid Re-Housing (RRH) – An intervention that rapidly connects families and individuals experiencing homelessness to permanent housing through housing identification, rent and move-in assistance, and case management and services.

Project – A project refers to a distinct unit of an organization, which may or may not be funded by HUD or the federal partners, that provides services and/or housing and is identified by the CoC as part of its service system.

Program – Program refers to the federal or state funding source (e.g., ESG, CoC, etc.).

Organization – Organization refers to the entity that is the recipient of program funding for a specific project.

MINIMUM SERVICE STANDARDS FOR PERMANENT SUPPORTIVE HOUSING ASSISTANCE

- There can be no predetermined length of stay for a PSH project.
- Supportive services designed to meet the needs of the participants must be made available to the participants throughout the duration of stay in PSH.
- Participants in PSH must enter into a lease (or sublease) agreement for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month.
- Organizations that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that participant assistance is terminated only in the most severe cases.

APPROVALS

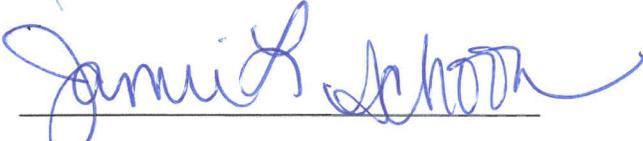
The Calhoun County CoC Written Service Standards for Providing Assistance under the Continuum of Care and Emergency Solutions Grant Programs were approved by the Calhoun County Housing Solutions Board on June 14, 2022.



Lee Talmage
Chair, Housing Solutions Board



Date



Jamie Schook
Co-Chair, Housing Solutions Board



Date