



Agenda: Interagency Council on Homelessness

Meeting date, time, and place Date: **March 22, 2017**
Time: **9:00 am – 11:00 am**
Place: **County of San Bernardino Health Services (CSBHS) Building**
850 E. Foothill Blvd., CSBHS Auditorium
Rialto, CA 92376

Note: Please remember to silence your cell phones.

		Time
Call to Order	Chair or Designee will call the meeting to order	
Invocation	Chair or Designee will lead the Invocation	9:00 – 9:05 am
Pledge of Allegiance	Chair or Designee will lead the Pledge of Allegiance	
Introductions	Chair or Designee will lead the Introductions of the ICH Members and Staff	9:05 – 9:10 am
Reports	<ol style="list-style-type: none">1. Homeless Provider Network – Sharon Green, Chair (5 min)2. Office of Homeless Services – Tom Hernandez (5 min)3. Subcommittee Reports – Chairs (15 min)<ul style="list-style-type: none">Bylaws and Membership Committee – Chris RymerHousing Committee – Ray OsborneHomeless Youth Task Force- Supervisor Ramos/Brenda DowdyHealth Committee – Roger Uminski4. Legislative Report – Chekesha Gilliam (5 min)5. Probation Report – Laura Davis (5 min)6. Reentry Collaborative Report – Jose Marin (5 min)7. Housing Authority of the County of San Bernardino – Maria Razo – (5 min)8. Coordinated Entry System Report – Gary Madden (5 min)	9:10 – 10:00 am



Agenda Items: The following items are presented for informational, consent, and discussion purposes.

Item No.	Consent Items	
1	Approve minutes of the February 22, 2017, ICH meeting	
2	Ratification of ICH Chair's approval and execution of Letter of Support for Lighthouse Social Services for Grant Per Diem grant application	10:00 – 10:05 am
Discussion		
3	Approve Letters of Support for the Grant Per Diem grant applications for Frazee Community Center and Life Community Development – Tom Hernandez, Office of Homeless Services	10:05 – 10:10 am
4	Approve Letter of Support for Time for Change Foundation's application for the Substance Abuse and Mental Health Services Administration's Grants for the Benefit of Homeless Individuals-Services in Supportive Housing – Tom Hernandez, Office of Homeless Services	10:10 – 10:15 am
5	Approve the amended changes to the Written Standards, originally adopted June 24, 2015 by the ICH, to include recommended U.S. Department of Housing and Urban Development Community Planning Development Notice 16-11 changes – Tom Hernandez, Office of Homeless Services	10:15-10:25 am
6	Approve the Letter of Coordinated Entry System (CES) participation with ICH recommended changes – Gary Madden, Director 211 and CES, and Tom Hernandez, Office of Homeless Services	10:25– 10:35 am
7	Accept the Point-In-Time Count Preliminary Report submitted by Urban Initiatives – Kent Paxton, Homeless Policy Advisor 5 th District and deTom Hernandez, Office of Homeless Services	10:35 – 10:45 am
Closing		10:45 – 11:00 am

Public Comment Open to the public for comments limited to three minutes

Council Roundtable Open to comments by the Council

Next ICH Meeting The next Interagency Council on Homelessness meeting is scheduled for:

THE INTERAGENCY COUNCIL ON HOMELESSNESS MEETING FACILITY IS ACCESSIBLE TO PERSONS WITH DISABILITIES. IF ASSISTIVE LISTENING DEVICES OR OTHER AUXILIARY AIDS OR SERVICES ARE NEEDED IN ORDER TO PARTICIPATE IN THE PUBLIC MEETING, REQUESTS SHOULD BE MADE THROUGH THE OFFICE OF HOMELESS SERVICES AT LEAST THREE (3) BUSINESS DAYS PRIOR TO THE PARTNERSHIP MEETING. THE OFFICE OF HOMELESS SERVICES TELEPHONE NUMBER IS (909) 386-8297 AND THE OFFICE IS LOCATED AT 303 E. VANDERBILT WAY, SAN BERNARDINO, CA 92415. <http://www.sbcounty.gov/dbh/sbchp/>



Office of Homeless Services
303 E. Vanderbilt Way • San Bernardino, CA 92415
Phone: (909)386-8297 • Fax: (909)890-0868
mail: homelessrfrp@hss.sbcounty.gov • Website: <http://www.sbcounty.gov/dbh/sbchp/>

April 26, 2017
9:00 am – 11:00 am
County of San Bernardino Health Services (CSBHS) Building
850 E. Foothill Blvd., CSBHS Auditorium
Rialto, CA 92376

Mission Statement

The mission of the San Bernardino County Homeless Partnership is to provide a system of care that is inclusive, well planned, coordinated and evaluated and is accessible to all who are homeless and those at-risk of becoming homeless.



County of San Bernardino Office of Homeless Services

303 E. Vanderbilt Way, First Floor • San Bernardino, CA 92415-0026

Phone: (909) 386-8297 • Fax: (909) 890-0868

Email: homelessrpf@hss.sbcounty.gov • Website: <http://www.sbcounty.gov/sbchp>

Office of Homeless Services Report Prepared for the Interagency Council on Homelessness

Report purpose	The purpose of this document is to present the Office of Homeless Services (OHS) report and to record action items from prior Interagency Council on Homelessness (ICH) meetings.
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Date	March 22, 2017
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Presenter	Tom Hernandez, Homeless Services Officer
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Announcements	The table below lists the announcements for today's meeting.
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Announcements
HUD Homelessness Data Exchange <ul style="list-style-type: none">• Office of Homeless Services is currently entering data in the HUD Homelessness Data Exchange. The HDX website opened for data entry on Wednesday, March 1, 2017.• The HDX provides all Continuums of Care (CoCs) the opportunity to update the CoC Housing Inventory Chart (or HIC) and report the results of the local Point-In-Time (PIT) Count to HUD.• The data provided by the CoC during this annual update provides valuable information to HUD which is included in the Annual Homeless Assessment Report to the U.S. Congress on the nature of homelessness in America. The deadline for final submission of the HIC and PIT via HDX is Monday, May 1, 2017 at 7:59:59 p.m. EST.• The System Performance measures will be released on April 3, 2017 and due May 31, 2017 at 7:59:59 p.m. EST. CoCs will be expected to submit their System Performance Measures data to HUD via HUD's HDX.• The purpose of the System Performance Measures is to help communities gauge their progress in preventing and ending homelessness and provide a more complete picture of how well a community is achieving this goal.• The number of homeless persons measure directly assesses a CoC's progress toward eliminating homelessness by counting the number of people experiencing homelessness both at a point in time and over the course of a year.



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National Alliance to End Homelessness (NAEH) Conference

- This year the NAEH Conference will be held on July 17 through 19, 2016 at the Renaissance Hotel in Washington, D.C. Registration will be available on the NAEH website at: <http://www.endhomelessness.org/news/calendar/national-conference-on-ending-homelessness2>

Point-In-Time Count (PITC) Report Update

- The PITC Final Report is estimated to be available by the end of this month. The preliminary PITC report will be released and discussed on today's agenda.

Homeless Management Information System Update

- The Office of Homeless Services (OHS), HMIS section routinely monitors agencies data quality to ensure accuracy and meet HUD standards for data quality maintenance. Attached you will find a copy of the latest HMIS Data Quality Report for the month of February, 2017 (see attached, Report 2A).
- Agency report cards are posted for review on individual agencies participating in HMIS at the following website: <http://www.sbcounty.gov/dbh/sbchp/HMIS.aspx>

Continuum of Care Written Standards

- The Office of Homeless Services in conjunction with Urban Initiatives has recently amended the Written Standards adopted in 2015 by ICH. The changes to be discussed later in the agenda will highlight the changes in the chronic definition of homelessness and refer the new standards in relation to bed prioritization for beds not dedicated to the chronically homeless.
- These updates concur with the HUD Community Planning and Development (CPD) Notice CPD-16-11 that was released last year (see attached, Report 2B).

Attachments

HMIS Data Quality Monthly Report January 2017 – Report 2A-Attached

Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing – Report 2B-Attached

Org ID	Organization / Program	Total Active Enrollments	Data Totals for the Month of February 2017						
			Total New Enrollments	Total Applicable Records	# of Missing Data Elements	% of Missing	# of Don't Know	# of Refused	% of DK/ Refused
CC1	Catholic Charities	3	3	30	0	0.00%	0	0	0.00%
CAP	Community Action Partnership	24	7	76	0	0.00%	0	0	0.00%
DMM	Desert Manna Ministries	33	12	180	0	0.00%	1	0	0.56%
FA2	Family Assistance Program	6	13	185	5	2.70%	15	0	8.11%
FSA	Family Services Association of Redlands	17	17	177	1	0.56%	0	0	0.00%
FAI	Foothill AIDS Project	26	0	0	0	0.00%	0	0	0.00%
FFS	Foothill Family Shelter	74	18	200	0	0.00%	6	0	3.00%
FCC	Frazee Community Center	10	5	72	0	0.00%	0	0	0.00%
GDC	Global One Development Center	7	0	0	0	0.00%	0	0	0.00%
HDH	High Desert Homeless Services	67	20	290	5	1.72%	0	0	0.00%
LTH	Inland Temporary Homes	66	0	0	0	0.00%	0	0	0.00%
IHP	Inland Valley Hope Partners	241	0	0	0	0.00%	0	0	0.00%
KEY	Knowledge & Education For Your Success	1,397	157	1668	0	0.00%	1	0	0.06%
LCD	Life Community Development	31	2	28	0	0.00%	0	0	0.00%
LSS	Lighthouse Social Services	174	50	554	0	0.00%	1	0	0.18%
CCL	Lutheran Social Services of Southern California	106	32	471	0	0.00%	1	0	0.21%
MMC	Mary's Mercy Center	37	3	48	0	0.00%	0	2	4.17%
MH1	Mercy House	1,186	52	652	0	0.00%	6	0	0.92%
NHV	New Hope Village, Inc.	27	2	28	0	0.00%	0	0	0.00%
OG1	Operation Grace	9	0	0	0	0.00%	0	0	0.00%

Org ID	Organization / Program	Total Active Enrollments	Data Totals for the Month of February 2017						
			Total New Enrollments	Total Applicable Records	# of Missing Data Elements	% of Missing	# of Don't Know	# of Refused	% of DK/ Refused
HOA	Restoration House of Angels	15	4	59	0	0.00%	0	0	0.00%
SA1	Salvation Army	93	43	470	0	0.00%	1	0	0.21%
DBA	SB DBH Adult & Older System of Care	49	11	163	0	0.00%	0	0	0.00%
DBH	SB DBH/HA	445	0	0	0	0.00%	0	0	0.00%
HA1	SB Housing Authority	706	16	202	3	1.49%	0	0	0.00%
SUS	Step Up on Second Street, Inc	30	16	212	7	3.30%	0	0	0.00%
TFC	Time For Change Foundation	51	8	98	0	0.00%	0	0	0.00%
USV	US Veterans Inc	241	37	455	0	0.00%	3	0	0.66%
VVF	Victor Valley Family Resource Center	28	13	194	0	0.00%	1	0	0.52%
WOL	Water Of Life Community Church	33	3	43	0	0.00%	0	0	0.00%
		5,232	544	6555	21	0.33%	36	2	0.64%



U.S. Department of Housing and Urban Development
Office of Community Planning and Development

Special Attention of:

All Secretary's
Representatives

Notice: CPD-16-11

Issued: July 25, 2016

Expires: This Notice is effective until it is
amended, superseded, or rescinded

Issued:

All Regional Directors for
CPD

Cross Reference: 24 CFR Parts 578 and
42 U.S.C. 11381, *et seq.*

Expires:

All CPD Division Directors
Continuums of Care (CoC)
Recipients of the Continuum of Care (CoC)
Program

**Subject: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other
Vulnerable Homeless Persons in Permanent Supportive Housing**

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I. Purpose

This Notice supersedes Notice CPD-14-012 and provides guidance to Continuums of Care (CoC) and recipients of Continuum of Care (CoC) Program (24 CFR part 578) funding for permanent supportive housing (PSH) regarding the order in which eligible households should be served in **all** CoC Program-funded PSH. This Notice reflects the new definition of chronically homeless as defined in CoC Program interim rule as amended by the Final Rule on Defining “Chronically Homeless” (herein referred to as the Definition of Chronically Homeless final rule) and updates the orders of priority that were established under the prior Notice. CoCs that previously adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the FY2015 CoC Program Competition are encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. CoCs that have not previously adopted the orders of priority established in Notice CPD-14-012 are also encouraged to incorporate the orders of priority included in this Notice into their written standards

A. Background

In June 2010, the Obama Administration released *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (Opening Doors)*, in which HUD and its federal partners set goals to end Veteran and chronic homelessness by 2015, and end family and youth homelessness by 2020. Although progress has been made there is still a long way to go. In 2015, the United States Interagency Council on Homelessness extended the goal timeline for achieving the goal of ending chronic homelessness nationally from 2015 to 2017. In 2015, there were still 83,170 individuals and 13,105 persons in families with children that were identified as chronically homeless in the United States. To end chronic homelessness, it is critical that CoCs ensure that limited resources awarded through the CoC Program Competition are being used in the most effective manner and that households that are most in need of assistance are being prioritized.

Since 2005, HUD has encouraged CoCs to create new PSH dedicated for use by persons experiencing chronic homelessness (herein referred to as dedicated PSH). As a result, the number of dedicated PSH beds funded through the CoC Program for persons experiencing chronic homelessness has increased from 24,760 in 2007 to 59,329 in 2015. This increase has contributed to a 30.6 percent decrease in the number of chronically homeless persons reported in the Point-in-Time Count between 2007 and 2015. Despite the overall increase in the number of dedicated PSH beds, this only represents 31.6 percent of all CoC Program-funded PSH beds.

To ensure that all PSH beds funded through the CoC Program are used as strategically and effectively as possible, PSH needs to be targeted to serve persons with the highest needs and greatest barriers towards obtaining and maintaining housing on their own—persons experiencing chronic homelessness. HUD’s experience has shown that many communities and recipients of CoC Program-funded PSH continue to serve persons on a “first-come, first-serve” basis or based on tenant selection processes that screen-in those who are most likely to succeed while screening out those with the highest level of need. These approaches to tenant

selection have not been effective in reducing chronic homelessness, despite the increase in the number of PSH beds nationally.

B. Goals of this Notice

The overarching goal of this Notice is to ensure that those individuals and families who have spent the longest time in places not meant for human habitation, in emergency shelters, or in safe havens and who have the most severe service needs within a community are prioritized for PSH. By ensuring that persons with the longest histories of homelessness and most severe service needs are prioritized for PSH, progress towards the Obama Administration's goal of ending chronic homelessness will increase. In order to guide CoCs in ensuring that all CoC Program-funded PSH beds are used most effectively, this Notice revises the orders of priority related to how persons should be selected for PSH as previously established in Notice CPD-14-012 to reflect the changes to the definition of chronically homeless as defined in the Definition of Chronically Homeless final rule. CoCs are strongly encouraged to adopt and incorporate them into the CoC's written standards and coordinated entry process.

HUD seeks to achieve two goals through this Notice:

1. Establish a recommended order of priority for dedicated and prioritized PSH which CoCs are encouraged to adopt in order to ensure that those persons with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens and with the most severe service needs are given first priority.
2. Establish a recommended order of priority for PSH that is not dedicated or prioritized for chronic homelessness in order to ensure that those persons who do not yet meet the definition of chronic homelessness but have the longest histories of homelessness and the most severe service needs, and are therefore the most at risk of becoming chronically homeless, are prioritized.

C. Applicability

The guidance in this Notice is provided to all CoCs and all recipients and subrecipients of CoC Program funds—the latter two groups referred to collectively as recipients of CoC Program-funded PSH. CoCs are strongly encouraged to incorporate the order of priority described in this Notice into their written standards, which CoCs are required to develop per 24 CFR 578.7(a)(9), for their CoC Program-funded PSH. Recipients of CoC Program funds are required to follow the written standards for prioritizing assistance established by the CoC (see 24 CFR 578.23(c)(10)); therefore, if the CoC adopts these recommended orders of priority for their PSH, all recipients of CoC Program-funded PSH will be required to follow them as required by their grant agreement. CoCs that adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Lastly, where a CoC has chosen to not adopt HUD's recommended orders of priority into their written standards, recipients of CoC Program-funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC's written standards.

D. Key Terms

1. **Housing First.** A model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions for entry (such as sobriety or a minimum income threshold). HUD encourages all recipients of CoC Program-funded PSH to follow a Housing First approach to the maximum extent practicable.
2. **Chronically Homeless.** The definition of “chronically homeless”, as stated in Definition of Chronically Homeless final rule is:
 - (a) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - i. lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - ii. Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;
 - (b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering the facility;
 - (c) 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 paragraph (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.
3. **Severity of Service Needs.** This Notice refers to persons who have been identified as having the most severe service needs.
 - (a) For the purposes of this Notice, this means an individual for whom at least one of the following is true:
 - i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or

- ii. Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
- iii. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
- iv. When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high-need, high cost beneficiaries.

(b) Severe service needs as defined in paragraphs i.-iv. above should be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool and process and should be documented in a program participant's case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see 24 C.F.R. § 5.105(a).

II. Dedication and Prioritization of Permanent Supportive Housing Strategies to Increase Number of PSH Beds Available for Chronically Homeless Persons

A. Increase the number of CoC Program-funded PSH beds that are dedicated to persons experiencing chronic homelessness.

Dedicated PSH beds are those which are required through the project's grant agreement to only be used to house persons experiencing chronic homelessness unless there are no persons within the CoC that meet that criteria. If there are no persons within the CoC's geographic area that meet the definition of chronically homeless at a point in which a dedicated PSH bed is vacant, the recipient may then follow the order of priority for non-dedicated PSH established in this Notice, if it has been adopted into the CoC's written standards. The bed will continue to be a dedicated bed, however, so when that bed becomes vacant again it must be used to house a chronically homeless person unless there are still no persons who meet that criterion within the CoC's geographic area at that time. These PSH beds are also reported as "CH Beds" on a CoC's Housing Inventory Count (HIC).

B. Prioritize non-dedicated PSH beds for use by persons experiencing chronic homelessness.

Prioritization means implementing an admissions preference for chronically homeless persons for CoC Program-funded PSH beds. During the CoC Program competition project applicants for CoC Program-funded PSH indicate the number of non-dedicated beds that will be prioritized for use by persons experiencing chronic homelessness during the operating year of that grant, when awarded. These projects are then required to prioritize chronically homeless persons in their non-dedicated CoC Program-funded PSH beds for the applicable operating year as the project application is incorporated into the

grant agreement. All recipients of non-dedicated CoC Program-funded PSH are encouraged to change the designation of their PSH to dedicated, however, at a minimum are encouraged to prioritize the chronically homeless as beds become vacant to the maximum extent practicable, until there are no persons within the CoC's geographic area who meet that criteria. Projects located in CoCs where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified area. For example, if a Balance of State CoC has chosen to divide the CoC into six distinct regions for purposes of planning and housing and service delivery, each region would only be expected to prioritize assistance within its specified geographic area.¹

The number of non-dedicated beds designated as being prioritized for the chronically homeless may be increased at any time during the operating year and may occur without an amendment to the grant agreement.

III. Order of Priority in CoC Program-funded Permanent Supportive Housing

The definition of chronically homeless included in the final rule on “Defining Chronically Homeless”, which was published on December 4, 2015 and went into effect on January 15, 2016, requires an individual or head of household to have a disability and to have been living in a place not meant for human habitation, in an emergency shelter, or in a safe haven for at least 12 months either continuously or cumulatively over a period of at least 4 occasions in the last 3 years. HUD encourages all CoCs adopt into their written standards the following orders of priority for all CoC Program-funded PSH. CoCs that adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Where a CoC has chosen to not incorporate HUD's recommended orders of priority into their written standards, recipients of CoC Program-funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC's written standards.

As a reminder, recipients of CoC Program-funded PSH are required to prioritize otherwise eligible households in a nondiscriminatory manner. Program implementation, including any prioritization policies, must be implemented consistent with the nondiscrimination provisions of the Federal civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II or III of the Americans with Disabilities Act, as applicable. For example, while it is acceptable to prioritize based on level of need for the type of assistance being offered, prioritizing based on specific disabilities would not be consistent with fair housing requirements or program regulations.

¹ For the State of Louisiana grant originally awarded pursuant to “Department of Housing and Urban Development—Permanent Supportive Housing” in chapter 6 of title III of the Supplemental Appropriations Act, 2008 (Public Law 110–252; 122 Stat. 2351), projects located within the geographic area of a CoC that is not the CoC through which the State is awarded the grant may prioritize assistance within that geographic area instead of within the geographic area of the CoC through which the State is awarded the grant.

A. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Dedicated or Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

1. CoCs are strongly encouraged to revise their written standards to include an order of priority, determined by the CoC, for CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness that is based on the length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the individual's or family's service needs. Recipients of CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness would be required to follow that order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.
2. Where there are no chronically homeless individuals and families within the CoC's geographic area, CoCs and recipients of CoC Program-funded PSH are encouraged to follow the order of priority in Section III.B. of this Notice. For projects located in CoC's where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified sub-CoC area.²
3. Recipients of CoC Program-funded PSH should follow the order of priority above while also considering the goals and any identified target populations served by the project. For example, a CoC Program-funded PSH project that is permitted to target homeless persons with a serious mental illness should follow the order of priority under Section III.A.1. of this Notice to the extent in which persons with serious mental illness meet the criteria. In this example, if there were no persons with a serious mental illness that also met the criteria of chronically homeless within the CoC's geographic area, the recipient should follow the order of priority under Section III.B for persons with a serious mental illness.
4. Recipients 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 recognizes 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 and recipients of CoC Program-funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. CoC Program-funded PSH providers are encouraged to follow a Housing First approach to the maximum extent practicable. Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH

² For the State of Louisiana grant originally awarded pursuant to "Department of Housing and Urban Development—Permanent Supportive Housing" in chapter 6 of title III of the Supplemental Appropriations Act, 2008 (Public Law 110–252; 122 Stat. 2351), projects located within the geographic area of a CoC that is not the CoC through which the State is awarded the grant may prioritize assistance within that geographic area instead of within the geographic area of the CoC through which the State is awarded the grant.

project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

B. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Not Dedicated or Not Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

1. CoCs are strongly encouraged to revise their written standards to include the following order of priority for non-dedicated and non-prioritized PSH beds. If adopted into the CoCs written standards, recipients of CoC Program-funded PSH that is not dedicated or prioritized for the chronically homeless would be required to follow this order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.

(a) First Priority—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.

(b) Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

(c) Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

(d) Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing.

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

2. Recipients of CoC Program-funded PSH should follow the order of priority above, as adopted by the CoC, while also considering the goals and any identified target populations served by the project. For example, non-dedicated or non-prioritized CoC Program-funded PSH that is permitted to target youth experiencing homelessness should follow the order of priority under Section III.B.1. of this Notice, as adopted by the CoC, to the extent in which youth meet the stated criteria.
3. Recipients must exercise due diligence when conducting outreach and assessment to ensure that persons are prioritized for assistance based on their length of time homeless and the severity of their needs following the order of priority described in this Notice, and as adopted by the CoC. HUD recognizes 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 and recipients are not required to keep units vacant indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH (see [FAQ 1895](#)). Recipients of CoC Program-funded PSH are encouraged to follow a Housing First approach to the maximum extent practicable. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these individuals and families must continue to be prioritized until they are housed.

IV. Using Coordinated Entry and a Standardized Assessment Process to Determine Eligibility and Establish a Prioritized Waiting List

A. Coordinated Entry Requirement

Provisions at 24 CFR 578.7(a)(8) requires that each CoC, in consultation with recipients of Emergency Solutions Grants (ESG) program funds within the CoC's geographic area, establish and operate either a centralized or coordinated assessment system (referred to in this Notice as coordinated entry or coordinated entry process) that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. CoCs that adopt the order of priority in Section III of this Notice into the CoC's written standards are strongly encouraged to use a coordinated entry process to ensure that there is a single prioritized list for all CoC Program-funded PSH within the CoC. The [Coordinated Entry Policy Brief](#), provides recommended criteria for a quality coordinated entry process and standardized assessment tool and process. Under no circumstances shall the order of priority be based upon diagnosis or disability type,

but instead on the length of time an individual or family has been experiencing homelessness and the severity of needs of an individual or family.

B. Written Standards for Creation of a Single Prioritized List for PSH

CoCs are also encouraged to include in their policies and procedures governing their coordinated entry system a requirement that all CoC Program-funded PSH accept referrals only through a single prioritized list that is created through the CoCs coordinated entry process, which should also be informed by the CoCs street outreach. Adopting this into the CoC's policies and procedures for coordinated entry would further ensure that CoC Program-funded PSH is being used most effectively, which is one of the goals in this Notice. The single prioritized list should be updated frequently to reflect the most up-to-date and real-time data as possible.

C. Standardized Assessment Tool Requirement

CoCs must utilize a standardized assessment tool, in accordance with 24 CFR 578.3, or process. The [Coordinated Entry Policy Brief](#), provides recommended criteria for a quality coordinated entry process and standardized assessment tool.

D. Nondiscrimination Requirements

CoCs and recipients of CoC Program-funded PSH must continue to comply with the nondiscrimination provisions of Federal civil rights laws, including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II or III of the Americans with Disabilities Act, as applicable. See 24 C.F.R. § 5.105(a).

V. Recordkeeping Recommendations for CoCs that have Adopted the Orders of Priority in this Notice

24 CFR 578.103(a)(4) outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, HUD expects that where CoCs have adopted the orders of priority in Section III. of this Notice into their written standards. The CoC, as well as recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

- A. Evidence of Severe Service Needs.** Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in Section I.D.3. of this Notice using data-driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.
- B. Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance.** Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of

written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new program participants into the project.

C. Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.

- (a) When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area – or for those CoCs that implement a sub-CoC³ planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area – at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.
- (b) When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area - or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area - that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.

VI. Questions Regarding this Notice

Questions regarding this notice should be submitted to HUD Exchange Ask A Question (AAQ) Portal at: <https://www.hudexchange.info/get-assistance/my-question/>.

³ For the State of Louisiana grant originally awarded pursuant to “Department of Housing and Urban Development—Permanent Supportive Housing” in chapter 6 of title III of the Supplemental Appropriations Act, 2008 (Public Law 110–252; 122 Stat. 2351), projects located within the geographic area of a CoC that is not the CoC through which the State is awarded the grant may prioritize assistance within that geographic area instead of within the geographic area of the CoC through which the State is awarded the grant.



County of San Bernardino Office of Homeless Services

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Membership and Bylaws Report Prepared for the Interagency Council On Homelessness

Date March 22, 2017

Presenter Christopher M. Rymer, Bylaws and Membership Committee Chair

Announcements The table below lists the announcements for today's meeting.

Announcements
<ul style="list-style-type: none">○ Welcome to the three new Cities; Upland, Montclair, and Hesperia○ The application for the ICH Member position from the field of Education/Universities has been delayed, and should be re-flown before the month's end. If all goes well, the Committee will be recommending an organization to the Board at the April ICH meeting○ We have one open seat for a Member At Large. The Call for Applications will go out within the next week.



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Housing Committee Report Prepared for the Interagency Council On Homelessness

Date March 22, 2017

Presenter Ray Osborne

Announcements The table below lists the announcements for today's meeting.

Announcements	
1)	Housing sub-committee goals and objectives for 2017: 2017 goal will be to try to help develop at least 400 beds/units A. Obtain and review CoC Housing Inventory Chart (HIC) report B. Compile a list of multi-family housing developments (new and rehab) currently in the pipeline throughout San Bernardino County C. Compile a list of affordable and permanent supportive housing funding resources D. Work with Supervisor Gonzales and the Building Industry Association (BIA) to development and stage a county-wide Affordable/Permanent Supportive Housing Summit for local jurisdictions, affordable housing developers, homeless service providers and funding resources.
2)	Discussed continuing to reach out to various SB County cities to get them involved with the ICH Housing sub-committee. Lois Leavitt now represents Fontana on the Housing sub-committee. San Bernardino, Upland, Colton, Montclair, Ontario and Victorville were among the other cities mentioned to be contacted.
3)	Discussed the idea of continuing to build a list of affordable housing developers like National Community Renaissance (CORE), Wakeland Housing Group, Jamboree Housing, American Family Housing, Corporation For Better Housing (CFBH), Palm Communities, Affirmed Housing and others to get them more involved with developing new affordable and permanent supportive housing inventory in San Bernardino County. The committee decided that getting the various affordable housing developers more involved with the process should come after the committee has a better understanding of the need and current development pipeline for the county.



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- 4) Discussed creating and updating a list of new San Bernardino County RRH and PSH projects in development that could be under construction or completed in 2017
 - A. HACSB Golden Apartments in San Bernardino (14 PSH units)
 - B. U.S. VETS two apartment buildings in San Bernardino (29 and 30 units respectively for a total of 59 PSH units)
 - C. Liberty Lane in Redlands (80 PSH apartment units, 15 designated for veterans)
 - D. Mary's Village in San Bernardino (84 transitional units to serve homeless men)
 - E. HACSB motel conversion in Victorville (60 RRH and/or PSH units)
 - F. Horizon apartments for seniors in Yucaipa (10 units)
- 5) Discussed how the sub-committee should proceed with developing and staging an Affordable/Permanent Supportive Housing Summit in 2017.

The sub-committee will work with Supervisor Gonzales and the BIA to see how and when a Summit can be presented this year.

Next ICH Housing sub-committee meeting: Mon. 4/3 from 10-11:30 am
at the HACSB office.



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**Health Committee Report
Prepared for the Interagency Council On Homelessness**

Date March 22, 2017

Presenter Roger Uminski, IEHP Director of Health Administration

Announcements The table below lists the announcements for today's meeting.

Announcements	
	<ul style="list-style-type: none">○ ICH Homeless Committee met March 9, 2017.<ul style="list-style-type: none">▪ New members added: Kimberlee Alders from Step Up on Second; Deputy Mike Jones, HOPE Team▪ Asset/Resource process mapping is still underway▪ Housing organizations continue to educate health care organizations▪ Gary Madden provided a Coordinated Entry System presentation▪ Discussions reveal resource gaps, ideas to improve system and leverage resources
	<p>Next meeting will be:</p> <p>April 13, 2017 DBH Administration 303 E. Vanderbilt Way San Bernardino, CA 92415</p>



**Interagency Council on Homelessness
Legislation of Interest**

To date, more than 2,670 bills have been introduced. The Legislature is actively engaged in committee hearings and will begin Spring Recess on April 6, 2017. The report below includes legislation related to housing and homelessness tracked through March 15, 2017.

AB 30

Caballero D (Dist. 30)

Location: ASSEMBLY L. GOV.

Planning and zoning: specific plan: housing. Would authorize a legislative body of a city or county to identify an area of underperforming infill and direct the planning agency to prepare a specific plan, in accordance with specified described provisions and specified additional procedures, to provide for immediate development within that area. The bill would require the specific plan make certain findings relating to the need for affordable housing and to designate the specific plan area as an overlay zone in which development is permitted by right. The bill would require the legislative body conduct at least one public hearing before approving a specific plan pursuant to these provisions to provide for community participation.

AB 53

Steinorth R (Dist. 40)

Location: ASSEMBLY H. & C.D.

Personal income taxes: deduction: homeownership savings accounts. Would provide that a qualified taxpayer may withdraw amounts from a homeownership savings account to pay for qualified homeownership savings expenses, defined as expenses paid or incurred in connection with the purchase of a principal residence in this state. The bill would provide that any amount withdrawn from that account that is not used for these expenses would be included as income for that taxpayer. The bill would define various terms for its purposes. This bill contains other related provisions.

Position: San Bernardino County Support

AB 56

Holden D (Dist. 41)

Location: ASSEMBLY PRINT

Affordable housing: San Gabriel Valley: San Bernardino-Riverside metropolitan area. Under current law, there are programs providing assistance for, among other things, emergency housing, multifamily housing, farmworker housing, homeownership for very low and low-income households, and downpayment assistance for first-time home buyers. This bill would state the intent of the Legislature to enact legislation that would provide for the redevelopment of impoverished areas in the San Gabriel Valley and the San Bernardino-Riverside metropolitan area, by creating affordable housing opportunities, and establish a novel source of revenue to offset the costs of this program.

AB 59

Thurmond D (Dist. 15)

Location: ASSEMBLY H. & C.D.

Local Housing Trust Fund Matching Grant Program. Under the Local Housing Trust Fund Matching Grant Program, the department is authorized to make matching grants available to cities, counties, cities and counties, and existing charitable nonprofit organizations that have created, funded, and operated housing trust funds. This bill would recast these provisions to instead authorize the department to make grants to eligible recipients, defined as cities that meet specified criteria and charitable nonprofit organizations organized under certain provisions of the Internal Revenue Code that apply jointly with a qualifying city, that have created or are operating or will operate housing trust funds.

AB 62

Wood D (Dist. 2)

Location: ASSEMBLY H. & C.D.

Public housing: smoke-free policy. Would require all public housing agencies, as defined, to implement a policy prohibiting the smoking of tobacco products, as defined, in all public housing living units, interior areas, and outdoor areas within 25 feet of public housing and administrative buildings,



except in designated smoking areas, by July 30, 2018. The bill would exempt dwelling units in a mixed-finance project from these provisions. By increasing the duties of local public housing agencies, this bill would impose a state-mandated local program.

[AB 71](#)

[Chiu](#) D (Dist. 17)

Location: ASSEMBLY REV. & TAX

Income taxes: credits: low-income housing: farmworker housing. Would, under the law governing the taxation of insurers, the Personal Income Tax Law, and the Corporation Tax Law, for calendar years beginning in 2018, increase the aggregate housing credit dollar amount that may be allocated among low-income housing projects to \$300,000,000, as specified, and would allocate to farmworker housing projects \$25,000,000 per year of that amount. The bill would delete that special needs exception and authorization to request state credits provided the applicant is not requesting a 130% basis adjustment for purposes of the federal credit amount.

[AB 72](#)

[Santiago](#) D (Dist. 53)

Location: ASSEMBLY PRINT

Attorney General: enforcement: housing laws. Current law provides that the Attorney General has charge of all legal matters in which the state is interested, except as specified. This bill would appropriate \$_____ from the General Fund to the Attorney General to fund the Attorney General's duties in enforcing specified laws relating to housing. The bill would require the Attorney General to report to the Assembly Committee on Housing and Community Development and the Senate Committee on Transportation and Housing on or before December 31, 2018, and each year thereafter on the expenditure of the funds.

[AB 73](#)

[Chiu](#) D (Dist. 17)

Location: ASSEMBLY L. GOV.

Planning and zoning: housing sustainability districts. Would authorize a city, county, or city and county, including a charter city, charter county, or charter city and county, to establish by ordinance a housing sustainability district that meets specified requirements, including authorizing residential use within the district through the ministerial issuance of a permit. The bill would authorize the city, county, or city and county to apply to the Office of Planning and Research for approval for a zoning incentive payment and require the city, county, or city and county to provide specified information about the proposed housing sustainability district ordinance.

[AB 74](#)

[Chiu](#) D (Dist. 17)

Location: ASSEMBLY HEALTH

Housing. Would require Department of Housing and Community Development to, on or before October 1, 2018, establish the Housing for a Healthy California Program and on or before April 1, 2019, and every year thereafter, subject to on appropriation by the Legislature, award grants on a competitive basis to eligible grant applicants based on guidelines that HCD would draft, as prescribed, and other requirements. The bill would provide that an applicant is eligible for a grant under the program if the applicant meets specified requirements. This bill contains other related provisions.

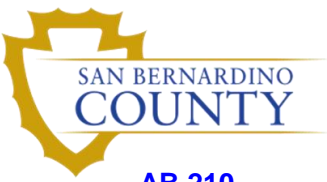
Position: San Bernardino County Support

[AB 202](#)

[Steinorth](#) R (Dist. 40)

Location: ASSEMBLY PRINT

Planning and zoning: density bonuses. The Planning and Zoning Law requires, when an applicant proposes a housing development within the jurisdiction of a local government, that the city, county, or city and county provide the developer with a density bonus and other incentives or concessions for the production of lower income housing units or for the donation of land within the development if the developer, among other things, agrees to construct a specified percentage of units for very low, low-, or moderate-income households or qualifying residents. This bill would make nonsubstantive changes to these provisions.



AB 210

Santiago D (Dist. 53)

Location: ASSEMBLY HUM. S.

Homeless multidisciplinary personnel team. Current law authorizes counties to establish a child abuse multidisciplinary personnel team, as defined, to allow provider agencies to share confidential information in order to investigate reports of suspected child abuse or neglect or for the purpose of child welfare agencies making detention determinations, as specified. This bill would authorize counties to also establish a homeless adult, child, and family multidisciplinary personnel team, as defined, with the goal of facilitating the expedited identification, assessment, and linkage of homeless individuals to housing and supportive services within that county to allow provider agencies to share confidential information, as specified, for the purpose of coordinating housing and supportive services to ensure continuity of care.

AB 220

Ridley-Thomas D (Dist. 54)

Location: ASSEMBLY PRINT

The California Emergency Services Act. Would state the intent of the Legislature to enact legislation clarifying that the definition of "state of emergency" includes emergencies related to homelessness.

AB 256

Steinorth R (Dist. 40)

Location: ASSEMBLY PRINT

Land use: housing. Current law declares the importance of, and general responsibility for, making housing available and affordable for all Californians. This bill would make nonsubstantive changes to this provision.

AB 257

Steinorth R (Dist. 40)

Location: ASSEMBLY PRINT

Housing: building standards: violations. The State Housing Law requires the housing or building department or, if there is no building department, the health department, of every city or county or a specified environmental agency to enforce within its jurisdiction all of the State Housing Law, the building standards published in the California Building Standards Code, and other specified rules and regulations. If there is a violation of these provisions or any order or notice that gives a reasonable time to correct that violation, or if a nuisance exists, an enforcement agency is required, after 30 days' notice to abate the nuisance, to institute appropriate action or proceeding to prevent, restrain, correct, or abate the violation or nuisance. This bill would make nonsubstantive changes to these provisions.

AB 346

Daly D (Dist. 69)

Location: ASSEMBLY H. & C.D.

Redevelopment: housing successor: Low and Moderate Income Housing Asset Fund. Would authorize a housing successor to also use funds remaining in the Low and Moderate Income Housing Asset Fund for homelessness services, transitional housing, or emergency housing services, as well as for the development of affordable housing. This bill contains other related provisions and other existing laws.

AB 571

Garcia, Eduardo D (Dist. 56)

Location: ASSEMBLY H. & C.D.

Income taxes: insurance tax: credits: low-income housing: farmworker housing assistance. Would authorize the California Tax Credit Allocation Committee to allocate the farmworker housing credit even if the taxpayer receives federal credits for buildings located in designated difficult development areas or qualified census tracts. The bill would also redefine farmworker housing to mean housing in which at least 50% of the units are available to, and occupied by, farmworkers and their households. This bill contains other related provisions.

AB 682

Caballero D (Dist. 30)

Location: ASSEMBLY PRINT

Multifamily housing program. Current law establishes the Multifamily Housing Program under the administration of the Department of Housing and Community Development to provide a standardized



set of program rules and features applicable to all housing types based on the department's California Housing Rehabilitation Program. Current law requires the criteria established by the department for selecting supportive housing projects funded under the Multifamily Housing Program to give priority to supportive housing projects that include a focus on measurable outcomes and a plan for evaluation. This bill would make nonsubstantive changes to this provision.

[AB 686](#)

[Santiago D \(Dist. 53\)](#)

Location: ASSEMBLY H. & C.D.

Housing discrimination: affirmatively further fair housing. Would require a public agency to administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing, and to not take any action that is materially inconsistent with this obligation. The bill would provide that if a public agency fails to meet its obligation to affirmatively further fair housing, then that failure would constitute housing discrimination under the California Fair Employment and Housing Act.

[AB 727](#)

[Nazarian D \(Dist. 46\)](#)

Location: ASSEMBLY HEALTH

Mental Health Services Act: housing assistance. Current law specifies the manner in which counties are to use the funds distributed from the Mental Health Services Fund, including using the majority of the funds for services provided by county mental health programs. Existing law specifies a target population for these programs, including seriously emotionally disturbed children or adolescents and adults or older adults who have a serious mental disorder. This bill would clarify that counties may spend MHSA moneys on housing assistance, as defined, for people in the target population.

[AB 824](#)

[Lackey R \(Dist. 36\)](#)

Location: ASSEMBLY HUM. S.

Transitional Housing for Homeless Youth Grant Program. Would establish the Transitional Housing for Homeless Youth Grant Program to be administered by the Office of Emergency Services to award grants to qualified nonprofit entities to provide transitional living services, such as long-term residential services, access to resources, and counseling services, to homeless youth ages 18 to 24 years of age, inclusive, for a period of up to 36 months. The bill would require the office, in consultation with specified stakeholders, to establish minimum standards and procedures for awarding the grant moneys.

[AB 829](#)

[Chiu D \(Dist. 17\)](#)

Location: ASSEMBLY PRINT

Planning and zoning: regional housing needs allocation. Current law requires each council of governments or delegate subregion, as applicable, to develop a proposed methodology for distributing the existing and projected regional housing need to cities, counties, and cities and counties within the region or within the subregion, as provided. This bill would make nonsubstantive changes to the latter provision.

[AB 915](#)

[Ting D \(Dist. 19\)](#)

Location: ASSEMBLY H. & C.D.

Planning and zoning: housing. Would state the intent of the Legislature to enact legislation that would authorize local governments to require an applicant for a permit for a housing development to include affordable housing units in that development without receiving a density bonus or other incentives or concessions provided pursuant to the above-described provisions.

[AB 932](#)

[Ting D \(Dist. 19\)](#)

Location: ASSEMBLY PRINT

Housing: affordable housing. Would state the intent of the Legislature to enact legislation that would increase the supply of affordable housing by changing existing laws to address key issues that have prevented the growth of housing, to ensure that fewer people are displaced or end up homeless.



[AB 1086](#)

[Daly D \(Dist. 69\)](#)

Location: ASSEMBLY PRINT

Local government: housing. Would express the intent of the Legislature to enact legislation that would provide additional funding for parks or other financial incentives to local agencies that meet their share of the regional housing need.

[AB 1122](#)

[Limón D \(Dist. 37\)](#)

Location: ASSEMBLY PRINT

Affordable housing. Current law states legislative findings and declarations regarding the need for affordable housing in connection with local authority to approve housing developments. This bill would express the intent of the Legislature to enact legislation relating to housing.

[AB 1203](#)

[Gloria D \(Dist. 78\)](#)

Location: ASSEMBLY H. & C.D.

Housing: discrimination. Current law prohibits a city, county, city and county, and other local governmental agency from imposing different requirements on a residential development or an emergency shelter that is subsidized, financed, insured, or otherwise assisted by the federal or state government or by a local public entity than those imposed on nonassisted developments, except as specified. Current law specifies that a city, county, or city and county is not prohibited from extending preferential treatment to residential developments or emergency shelters, as specified. This bill would additionally apply these provisions to transitional housing.

[AB 1328](#)

[Limón D \(Dist. 37\)](#)

Location: ASSEMBLY PRINT

Sustainable communities: affordable housing. Current law requires the Strategic Growth Council to develop and administer the Affordable Housing and Sustainable Communities Program to reduce greenhouse gas emissions through projects that implement land use, housing, transportation, and agricultural land preservation practices to support infill and compact development, and that support related and coordinated public policy objectives. Current law encourages projects eligible for funding under the program to promote certain objectives. This bill would make a nonsubstantive change to the provision regarding the eligible projects.

[AB 1423](#)

[Chiu D \(Dist. 17\)](#)

Location: ASSEMBLY PRINT

Housing: data. The Planning and Zoning Law requires a city or county to adopt a general plan for land use development within its boundaries that includes, among other things, a housing element. Current law provides for various reforms and incentives intended to facilitate and expedite the construction of affordable housing. This bill would declare the intent of the Legislature to enact legislation that would fund measures to provide for accessible housing-related data and would make legislative findings and declarations in support of that intent.

[AB 1445](#)

[Reyes D \(Dist. 47\)](#)

Location: ASSEMBLY PRINT

Housing needs. The Planning and Zoning Law requires the Department of Housing and Community Development, for cities and counties without a council of governments, to determine and distribute the existing and projected housing need, in accordance with specified requirements. This bill would make nonsubstantive changes to that provision relating to housing for cities and counties without a council of governments

[AB 1585](#)

[Bloom D \(Dist. 50\)](#)

Location: ASSEMBLY PRINT

Planning and zoning: affordable housing: single application. Would establish in each city, county, and city and county in the state an affordable housing zoning board and procedures by which a public agency or nonprofit organization proposing to build affordable housing units, as defined, or a



developer proposing to build a housing project that meets specified affordability criteria, could submit to that board a single application for a comprehensive conditional use or other discretionary permit.

[AB 1670](#)

[Gomez D \(Dist. 51\)](#)

Location: ASSEMBLY PRINT

Income taxes: credits: qualified developer: affordable housing. The Personal Income Tax Law and the Corporation Tax Law allow various credits against the taxes imposed by those laws. This bill would state the intent of the Legislature to enact legislation that would allow a credit against those taxes for amounts paid by a taxpayer to an eligible developer for the purpose of supplying affordable housing for low and very low income residents through new construction and home rehabilitation.

[AB 1714](#)

Committee on Housing and Community Development

Location: ASSEMBLY PRINT

Income taxes: credits: low-income housing: farmworker housing. This bill, under the law governing the taxation of insurers, the Personal Income Tax Law, and the Corporation Tax Law, would modify specified criteria necessary for an existing property to qualify as being "at risk of conversion" by expanding the eligible government assistance programs to include an additional federal program and also receiving state loans or grants through programs administered by the Department of Housing and Community Development.

[SB 2](#)

[Atkins D \(Dist. 39\)](#)

Location: SENATE GOV. & F.

Building Homes and Jobs Act. Would enact the Building Homes and Jobs Act. The bill would make legislative findings and declarations relating to the need for establishing permanent, ongoing sources of funding dedicated to affordable housing development. The bill would impose a fee, except as provided, of \$75 to be paid at the time of the recording of every real estate instrument, paper, or notice required or permitted by law to be recorded, per each single transaction per single parcel of real property, not to exceed \$225.

[SB 3](#)

[Beall D \(Dist. 15\)](#)

Location: SENATE GOV. & F.

Affordable Housing Bond Act of 2018. Would enact the Affordable Housing Bond Act of 2018, which, if adopted, would authorize the issuance of bonds in the amount of \$3,000,000,000 pursuant to the State General Obligation Bond Law. Proceeds from the sale of these bonds would be used to finance various existing housing programs, as well as infill infrastructure financing and affordable housing matching grant programs, as provided. This bill contains other related provisions.

[SB 35](#)

[Wiener D \(Dist. 11\)](#)

Location: SENATE GOV. & F.

Planning and zoning: affordable housing: streamlined approval process. The Planning and Zoning Law requires a planning agency, after a legislative body has adopted all or part of a general plan, to provide an annual report to the legislative body, the Office of Planning and Research, and the Department of Housing and Community Development on the status of the general plan and progress in meeting the community's share of regional housing needs. This bill would require the planning agency to include in its annual report specified information regarding units of housing that have completed construction. The bill would also require the Department of Housing and Community Development to post an annual report submitted pursuant to the requirement described above on its Internet Web site, as provided.

[SB 136](#)

[Leyva D \(Dist. 20\)](#)

Location: SENATE T. & H.

Mobilehome parks: mobilehome park program funding. Would authorize the Department of Housing and Community Development to contract directly with nonprofit corporations that have significant experience representing or working with mobilehome park residents, or acquiring, rehabilitating, and preserving affordable housing, and have statewide or regional capacity to deliver technical assistance to mobilehome park residents or community-based nonprofit corporations in order



to assist them in acquiring, financing, operating, and improving mobilehome parks occupied by low- and moderate-income households. The bill would rename the Mobilehome Park Rehabilitation and Purchase Fund as the Mobilehome Park Rehabilitation and Resident Ownership Program Fund.

[SB 253](#)

[Nielsen R](#) (Dist. 4)

Location: SENATE RLS.

Veterans: homelessness. The Veterans Housing and Homeless Prevention Bond Act of 2014 authorizes the issuance of bonds in the amount of \$600,000,000, as specified, for expenditure by the California Housing Finance Agency, the Department of Housing and Community Development, and the Department of Veterans Affairs to provide multifamily housing to veterans pursuant to the Veterans Housing and Homeless Prevention Act of 2014 (VHHPA). Current law requires the departments to establish and implement programs that focus on veterans at risk for homelessness or experiencing temporary or chronic homelessness, as specified. This bill would make technical, nonsubstantive changes to these provisions.

[SB 540](#)

[Roth D](#) (Dist. 31)

Location: SENATE T. & H.

Workforce Housing Opportunity Zone. Would authorize a local government, as defined, to establish a Workforce Housing Opportunity Zone by preparing an EIR pursuant to CEQA and adopting a specific plan that is required to include text and a diagram or diagrams containing specified information. The bill would require a local government that proposes to adopt a Workforce Housing Opportunity Zone to hold public hearings on the specific plan. The bill would authorize a local government, after a specific plan is adopted and the zone is formed, to impose a specific plan fee upon all persons seeking governmental approvals within the zone.

[SB 542](#)

[Leyva D](#) (Dist. 20)

Location: SENATE T. & H.

Manufactured Housing Act of 1980: notice of transfer and release of liability. Would provide that an owner of a new or used manufactured home or mobilehome subject to registration pursuant to the Manufactured Housing Act of 1980 who sells or transfers ownership of the manufactured home or mobilehome would not be subject to civil or criminal liability for a violation of the act after the delivery of possession of the manufactured home or mobilehome, the compliance with specified requirements in existing law regarding transfer of title, and the delivery to the department of either a notice of transfer and release of liability, as specified, or the appropriate documents and fees for registration of the manufactured home or mobilehome to the new owner pursuant to the sale or transfer.



**County of San Bernardino
Office of Homeless Services**

303 E. Vanderbilt Way, First Floor • San Bernardino, CA 92415-0026

Phone: (909) 386-8297 • Fax: (909) 890-0868

Email: homelessrfp@hss.sbcounty.gov • Website: <http://www.sbcounty.gov/sbchp>

**Probation Report
Prepared for the Interagency Council On Homelessness**

Date March 22, 2017

Presenter Laura Davis, Division Director II

Announcements The table below lists the announcements for today's meeting.

Announcements
<ul style="list-style-type: none">○ The Housing RFP evaluation process is completed. Selection of providers should go to the Board the first week in April.

Report	The purpose of this document is to present the Office of Homeless Services on activities from the San Bernardino County Reentry Collaborative (SBCRC).
Date	March 22, 2017
Presenter	Jose Marin, Special Projects Coordinator, Department of Public Health
Announcements	The table below listthe announcements for today's meeting.

Proposition 47 funding

- Proposition funds are being released to provide recidivism reduction services. Our County plans to apply for the large scope that makes our County eligible for the \$6 million project. We will be using the Peer Mentoring approach that was used for the BRIDGES grant. We will be providing pre- and post-release services and working with various County Departments' (Probation, DBH, Public Defender, and Sheriff's Dept.). Per grant requirements, a minimum of 50% must be subcontracted to our community- and faith-based organizations. Our project will actually subcontract 70% of the funds to community- and faith-based organizations.

February 2017 Reentry Meeting

- San Bernardino Community College District Educational Opportunity – Presentation was provided on their workforce readiness credential programs which include the Workforce Literacy Skills Certificate of Completion, and the Job Readiness Certificate of Completion. Their programs are catered towards individuals recently released from incarceration and at risk community members, however all community members are welcome. The mission of the work readiness program is to provide marketable and positive employment opportunities as well as to prevent recidivism. After completion of the certificate program, students are encouraged to continue with their education and transfer to a community college and four-year university. Students can also enroll in one of their many vocational courses to obtain Industrial Maintenance, Welding, or Forklift training and certification.

Next Reentry Meeting

- The next Reentry meeting will be held on April 26, 2017 from 1:30 pm – 3:00 pm. The meeting for March 22, has been cancelled.

Workgroup meetings

- A workgroup meeting was held on March 10, 2017. Topics discussed were what services are needed to provide to inmates prior to their release for successful reentry into our communities.

Community Recidivism Reduction Program (CRRP)

- Public Health is overseeing a Recidivism Reduction Program funded by the California's Bureau of State & Community Corrections (BSCC). Public Health finished its RFA process and was able to contract with 10 community- and faith-based organizations to provide recidivism reduction services that include:
 - Self-help groups
 - Anger management
 - Employment and Education Services
 - Referral Services
 - Juvenile/mentoring Services, and
 - Basic life skills services
- 8 of the 9 selected providers are new vendors to the county.
- Goal of the program is to reduce recidivism rates in our community by using local community- and faith-based organizations that have been providing services to the population for at least 5 years.
- Services have begun as of November 2015

For more information, please contact Jose Marin at jose.marin@dph.sbcounty.gov.

Please visit our website at www.sbcounty.gov/sbcrc



Housing Authority of the County of San Bernardino

672 South Waterman Avenue • San Bernardino, CA 92408

Phone: (909) 890-9533 • Fax: (909) 890-5333

Website: www.hacsb.com

Housing Authority of the County of San Bernardino Report Prepared for the Interagency Council on Homelessness

Report purpose The purpose of this document is to present the Housing Authority of the County of San Bernardino (HACSB) updates and to record action items from prior Interagency Council on Homelessness (ICH) meetings if applicable.

Date Wednesday, March 22, 2017

Presenter Maria Razo, Executive Director

Announcements

Current Housing Authority Efforts to Expand Homeless Housing Opportunities and Partnerships

Current Programs

*See 'Easy Access to Homeless Programs' for more information.

Rental Assistance Vouchers (774)

- Shelter Plus Care (tenant based and project based vouchers, 325)
- Veterans Affairs Supportive Housing (VASH) (tenant based vouchers, 407)
- Housing Opportunities for Persons with AIDS (HOPWA) (tenant based vouchers, 42)

Rapid Rehousing

- CalWORKs Housing Support Program (rapid rehousing, 385 households annually)
- Supportive Services for Veteran Families (SSVF) (rapid rehousing, 135 households annually)
- COC- Keys for Life (rapid rehousing, 30 households annually)

Project Based Rental Assistance

- No Child Left Unsheltered (50 units for unsheltered homeless families with children)
- Loma Linda Prospect Place (7 safe haven units, serving up to 14 high need, homeless veterans)
- CORE Victorville development (12 units Homeless Veterans)



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Near Term (6-12 months)

- Golden Apartments, being rehabilitated and remodeled to provide permanent housing for eligible chronically homeless individuals/ families (up to 40 units). In design phase - initial units projected to come on-line between July and October 2017
- Queens Motel, being rehabilitated and remodeled to provide permanent housing for eligible chronically homeless individuals/ families and potentially 6-7 short term 'bridge' housing beds for individuals transitioning from homelessness to permanent housing (up to 30 units). In design phase - initial units projected to come on-line between July and October 2017
- Horizons at Yucaipa senior community for 55+, (40 senior units, and 10 MHSA 'homeless' units, already 100% pre-leased)
- Loma Linda Veterans Village, project based (META Housing), 88 units. Projected completion date: January 2018

Long Term (2 years +)

- VASH - Project Based, Notice of Funding Availability (NOFA): the Housing Authority will continue to partner with the Veterans Administration-Loma Linda, and other agencies to apply for funding through the Project Based VASH Voucher program. The next NOFA is expected to come out in the next several months.
- Liberty Lane (A Community of Friends), 79 units (59 VASH PBV, 9 veterans set aside PBV) for homeless veteran households. Projected completion date: September, 2019

Reminder: Easy Access to Homeless Programs

CalWORKs Housing Support Program

HACSB and KEYS partner with the San Bernardino County Transitional Assistance Department (TAD) to administer the new CalWORKs Housing Support Program which promotes housing stability for homeless families.

- ✓ Who Qualifies: Homeless families with children who are receiving CalWORKs.
- ✓ How to Apply: If a family is receiving CalWORKs or thinks they may be eligible for CalWORKs they should visit their local TAD office and meet with an eligibility worker. If they qualify they will be referred to KEYS for intake and housing search and stabilization assistance.

Continuum of Care

HACSB receives HUD Continuum of Care HUD funding to serve approximately 325 chronically homeless persons in the county through permanent supportive housing assistance and case management.

- ✓ Who Qualifies: Low-income, homeless, disabled persons with mental health concerns and their families.
- ✓ How to Apply: You must have an open case with the local DBH office or DBH project HOST team staff. Please use HACSB's Homeless line as the referral number: (909)890-5314.

KEYS also receives HUD Continuum of Care HUD funding to serve approximately 25 homeless persons in the county through rapid rehousing assistance and short-term case management.

- ✓ Who Qualifies: Low-income, homeless families with children.
- ✓ How to Apply: Please use KEYS' intake line for an eligibility screening: (909) 332-6388.



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Veterans Affairs Supportive Housing Program (VASH)

The Housing Authority receives HUD VASH funding to permanently house a total of 407 homeless veterans who also qualify for clinical support services from the Veterans Administration Medical Clinics (VAMC) across the county.

- ✓ Who Qualifies: Low-income homeless veterans with need for medical/mental health (psychiatric or substance abuse) service needs.
- ✓ How to Apply: The veteran would need to call (909)-825-7084 extension 6085 for a VASH screening. VAMC will provide supportive services and refer the veteran to HACSB if appropriate.

Supportive Services for Veterans Families (SSVF)

Since 2013 KEYS has been a recipient of the Department of Veterans Affairs' SSVF grant. This funding pays for case managers and housing outreach specialists that assist veterans and their families with case management, financial assistance for rent and utility payments, security deposits and moving expenses.

- ✓ Who Qualifies: Veterans with a verified Veteran status (with exception of dishonorable discharge) that meet income guidelines and homelessness status. There is more than one category of assistance and eligibility will be determined based on the intake assessment criteria.
- ✓ How to Apply: Any veteran can apply via telephone, walk-in, email, or referral from other providers. Please utilize KEYS' intake line for an eligibility screening: (909) 332-6388.

Housing Opportunities for People with AIDS (HOPWA)

HACSB partners with Foothill AIDS Project to offer rental assistance and supportive services for up to 40 homeless individuals with HIV/AIDS.

- ✓ Who Qualifies: Low-income persons medically diagnosed with HIV/AIDS and their families.
- ✓ How to Apply: Applications from low-income residents of San Bernardino County are processed through the Foothill AIDS Project to the Housing Authority. The individual must have been receiving HIV case management services for a minimum of 6 months. The contact phone number is: (909)-884-2722.

Contacts to Assist a Homeless Family

Reminder: Calling the 2-1-1 Coordinated Entry program should always be the first contact made to assist a homeless individual/ family.

- ✓ HACSB Homeless Hotline: (909) 890-5314
- ✓ KEYS Intake Line: (909) 332-6388



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Open Waiting Lists

Bloomington, Colton, Fontana, Loma Linda, Rancho Cucamonga, Redlands, Yucaipa – 1, 2, 4 and 5 bedroom

Barstow – 2, 3, 4, and 5 bedroom

Chino – 5 bedroom

Joshua Tree, Twentynine Palms, Yucca Valley – 3 bedroom

San Bernardino – 4 and 5 bedroom

Senior Housing

Barstow – 1 bedroom

Bloomington – 2 bedroom

Victorville – 2 bedroom

Twin Peaks – 2 bedroom

Fontana – 2 bedroom

Redlands – 2 bedroom

Yucaipa – 2 bedroom

Interested households can apply in person at any HACSB office or can print an application from our website by going to www.hacsb.com, and going to the residents/ future residents section.

*Please note: All waiting lists have an ultimate preference for veterans.

Housing Authority of the County of San Bernardino

Continuum of Care Grants - Monthly Utilization Reports

As of: February 28, 2017

Original Grant Effective Date	Grant Name	Type	Grant Effective Date	Grant Expiration Date	Remaining Months	Units Authorized	Units Leased	Total PUC	Current Month Housing Assistance & Expenses	Total Grant	Remaining Funding	Projected Monthly Housing Assistance & Expenses	Projected Over/Under -spend at Current Lease Rate	Next Year Funding Amount
10/1/2007	Stepping Stones	TRA	1/1/2017	12/31/2017	10	28	35	762.73	26,695.43	331,739	277,384.07	26,695.43	10,429.77	331,739
9/1/2008	New Horizons	TRA	11/1/2016	10/31/2017	8	154	183	771.89	141,254.98	1,865,076	1,268,446.14	152,056.53	51,993.90	1,865,076
10/1/2012	Cornerstone	TRA	10/1/2012	9/30/2017	7	33	25	813.37	20,334.24	1,928,520	116,178.48	20,334.24	(26,161.20)	400,415
10/1/2012	Whispering Pines	TRA	10/1/2012	9/30/2017	7	16	10	738.61	7,386.12	935,040	44,045.40	7,386.12	(7,657.44)	194,141
2/1/2011	Laurelbrook Estates	PRA	2/1/2017	1/31/2018	11	27	25	954.91	23,872.77	357,984	334,111.23	24,867.50	60,568.73	357,984
2/1/2011	Project Gateway	PRA	2/1/2017	1/31/2018	11	12	12	1,050.74	12,608.88	182,550	169,941.12	12,608.88	31,243.44	182,550
12/1/2011	Lantern Woods	PRA	12/1/2011	11/30/2017	9	16	15	755.14	11,327.04	1,025,160	568,931.28	12,136.05	459,706.83	n/a
								Average PUC:	835.34					

Definitions:

PUC- Average dollar amount to support each unit on a monthly basis.

PRA - Project-Based Rental Assistance, funds are tied to the unit and cannot 'over-lease' to utilize excess grant funds.

TRA- Tenant-Based Rental Assistance, and can over-lease to expend funds, if renewal grant funds are available to support the unit on an ongoing annual cycle.

VS- Voucher committed, voucher holder searching for a unit.

PL- Pending lease-up.

Notes:

***New Horizons:** We are currently projected to have \$51,000 in funds remaining. However, we are pending launch of a new pilot for NH to accept persons with physical rather than mental health disabilities. It is projected that 5 to 6 persons, over 6 months would equate to an additional \$35,000 in expenditure. The remaining \$15,000 would give room for adjustments in PUC from month to month.

***Cornerstone and Whispering Pines:** Note the significant increase in PUC for this month, this now shows a grant term deficit of \$33,000 cumulatively, rather than last months data which showed a deficit of \$15,000 cumulatively. This is due to the calculation of current PUC multiplied by number of units and months remaining. The PUC could significantly change next month and the deficit will likely diminish significantly. PUC can fluctuate greatly from month to month. Authority staff will continue to monitor these grants closely as they near their term dates.

***Laurelbrook and Gateway:** Both of these grants are PRA types, and excess funding cannot be utilized by over-leasing. Gateway is currently 100% leased and Laurelbrook has 2 pending lease-ups expected to be effective between the 1st and 15th of March, which would bring LB to 100% lease rate, and projected underspend closer to \$11,185. The Housing Authority is looking into the possibility seeking approval for a budget modification to utilize the excess Housing Assistance funds and provide additional services (under allowable CoC PRA guidelines) to current participants.

***Lanternwoods-** Current projections show that there will be unexpended funds at the end of the grant term (11/30/17). This is PRA so there is no ability to 'over-lease' additional units in order to expend grant funds. However, HACSB is in conversation with HUD staff to determine other ways that the funding can potentially be extended or re-allocated with regulatory waivers to ensure funding stays within the county.

Reallocation- In the 2015 grant cycle, HACSB worked with OHS and ICH to identify funds that could be carved out of 3 current grants in order to be utilized for re-allocation. This was done with no impact to currently housed families or in a way that would cause a reduction in current housing resources. This funding helped support the funding that was dedicated to the implementation and ongoing funding of the new Coordinated Entry System. The grants utilized were New Horizons, Stepping Stones and Laurelbrook.

PUC Fluctuations- It is worth note that small changes in household income or changes in contract rent can have significant effect on the average Per Unit Cost and monthly expenditure projections. It is expected to see some fluctuation on a monthly basis and the HACSB staff watches this carefully in order to adjust leasing utilization when funding is available. However, it is also important to note that even if there may be small amounts of unutilized funding projected at the end of a grant term, it is vital to consider that if we lease more households to utilize that funding, that there is enough funding in the *next grant cycle* to be able to support those additional households. As part of our monthly analysis, we not only look at the current grant year and funding availability, but the next grant year and funding cycle.

Board of Supervisors
County of San Bernardino

JOSIE GONZALES
SUPERVISOR, FIFTH DISTRICT



March 10, 2017

VA Homeless Providers GPD Program Office
10770 N. 46th Street, Suite C-200
Tampa, FL 33617

Re: USVA Grant and Per Diem Program Notice of Funding Availability

To the Application Review Committee:

As Chair of the governing body for San Bernardino County's Continuum of Care (CoC), CA-609, I am pleased to write this letter of support for LightHouse Treatment Center's (dba, LightHouse Social Service Center) Grant & Per Diem (GPD) application for funding to provide transition support services for homeless male veterans with our County. Through its many programs, LightHouse consistently addresses the critical needs of our veteran community. The agency has also helped play a crucial role in the County's mission to eliminate homelessness amongst our veteran population.

The current LightHouse GPD program serves homeless male veterans who are living with a mental health diagnosis. Services include outreach, intensive case management, assistance with obtaining VA and other mainstream benefits, as well as educational and employment support services. LightHouse is an active participant in the County's CoC, as well as the Coordinated Entry System.

I support LightHouse's application for bridge housing and believe that these services will provide much-needed support for our veterans. It is our goal as a County to ensure a successful transition to permanent housing and self-sufficiency for all of those who have served our country proudly in the military. We continue to make significant strides towards our goal of housing all homeless veterans. LightHouse has been an invaluable partner in that goal, and I wholeheartedly support their grant application.

If I can provide any further assistance, do not hesitate to contact me at (909) 387-4565.

Respectfully,

A handwritten signature in blue ink, appearing to read "Josie Gonzales", is written over a blue circular stamp.

JOSIE GONZALES
Chair, Interagency Council on Homelessness
County Supervisor, County of San Bernardino – 5th District
JG/df/kp

San Bernardino County Homeless Partnership

Interagency Council on Homelessness
 Administrative Office
 303 E. Vanderbilt Way, San Bernardino, CA 92415-0026
 Office: (909) 386-8297



March 22, 2017

VA Homeless Providers GPO Program Office
 10770 N. 46th Street, Suite C-200
 Tampa, FL 33617

Re: USVA Grant and Per Diem Program Notice of Funding Availability

To the Application Review Committee:

The San Bernardino County Interagency Council on Homelessness (ICH) as the governing body of the San Bernardino County's Continuum of Care (CoC), CA-609, is pleased to write this letter of support for Frazee Community Center's Grant & Per Diem (GPD) application for funding to provide bridge housing and low barrier support services for homeless veterans within our County. Frazee Community Center has a long history of providing much needed services to our veteran community and actively participates in the Homeless Management Information System and Coordinated Entry System.

The ICH supports the application for bridge housing and believes that these services will provide much needed support for our veterans. It is our goal as a County to ensure the successful transition to permanent housing and self-sufficiency for all of those who have served our country proudly in the armed forces. We continue to make significant strides towards our goal of housing all homeless veterans that reside in our County. Frazee Community Center has been a substantial partner in meeting that goal, and we wholeheartedly support the submission for this grant application.

Please contact the Office of Homeless Services, the administrative arm of the ICH, for further assistance or additional comments at (909) 386-8297.

Respectfully,

JOSIE GONZALES

Chair, Interagency Council on Homelessness

Fifth District Supervisor, County of San Bernardino Board of Supervisors

Members of the Interagency Council on Homelessness

Members of the Board of Supervisors
 City of Ontario
 City of San Bernardino
 San Bernardino County Human Services
 Community Action Partnership of San Bernardino County
 Housing Authority of the County of San Bernardino
 San Bernardino County Superintendent of Schools
 Department of Community Development and Housing

City of Barstow
 City of Redlands
 Town of Yucca Valley
 Department of Probation
 Veteran Administration Loma Linda
 Workforce Development Department
 Members of the Homeless Provider Network
 HMIS Lead Agency

City of Colton
 City of Rancho Cucamonga
 Department of Behavioral Health
 Department of Rehabilitation
 211 United Way
 Sheriff's Department
 General Members-At-Large
 Kaiser Permanente

San Bernardino County Homeless Partnership

Interagency Council on Homelessness

Administrative Office

303 E. Vanderbilt Way, San Bernardino, CA 92415-0026

Office: (909) 386-8297



March 22, 2017

VA Homeless Providers GPO Program Office
10770 N. 46th Street, Suite C-200
Tampa, FL 33617

Re: USVA Grant and Per Diem Program Notice of Funding Availability

To the Application Review Committee:

The San Bernardino County Interagency Council on Homelessness (ICH) as the governing body of the San Bernardino County's Continuum of Care (CoC), CA-609, is pleased to write this letter of support for Life Community Development's Grant & Per Diem (GPD) application for funding to provide bridge housing and low barrier support services for homeless veterans within our County. Life Community Development has a long history of providing much needed services to our veteran community and actively participates in the Homeless Management Information System and Coordinated Entry System.

The ICH supports the application for bridge housing and believes that these services will provide much needed support for our veterans. It is our goal as a County to ensure the successful transition to permanent housing and self-sufficiency for all of those who have served our country proudly in the armed forces. We continue to make significant strides towards our goal of housing all homeless veterans that reside in our County. Life Community Development has been a substantial partner in meeting that goal, and we wholeheartedly support the submission for this grant application.

Please contact the Office of Homeless Services, the administrative arm of the ICH, for further assistance or additional comments at (909) 386-8297.

Respectfully,

JOSIE GONZALES

Chair, Interagency Council on Homelessness

Fifth District Supervisor, County of San Bernardino Board of Supervisors

Members of the Interagency Council on Homelessness

Members of the Board of Supervisors

City of Ontario

City of San Bernardino

San Bernardino County Human Services

Community Action Partnership of San Bernardino County

Housing Authority of the County of San Bernardino

San Bernardino County Superintendent of Schools

Department of Community Development and Housing

City of Barstow

City of Redlands

Town of Yucca Valley

Department of Probation

Veteran Administration Loma Linda

Workforce Development Department

Members of the Homeless Provider Network

HMIS Lead Agency

City of Colton

City of Rancho Cucamonga

Department of Behavioral Health

Department of Rehabilitation

211 United Way

Sheriff's Department

General Members-At-Large

Kaiser Permanente

San Bernardino County Homeless Partnership

Interagency Council on Homelessness

Administrative Office
303 E. Vanderbilt Way, San Bernardino, CA 92415-0026
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March 22, 2017

Time for Change Foundation
P O BOX 25040
San Bernardino CA 92406

Re: GBHI-SSH (Grants for the Benefit of Homeless Individuals-Services in Supportive Housing)

Dear Ms. Carter;

On behalf of San Bernardino County Interagency Council on Homelessness we are pleased to support Time for Change Foundation's application for the **Grants for the Benefit of Homeless Individuals-Services in Supportive Housing** under the SAMHSA umbrella. Time for Change Foundation has been a stellar partner and community stakeholder on the front lines addressing homelessness in the County of San Bernardino. The need to expand supportive services for chronically homeless individuals with substance use disorders and mental illness is paramount and the collaboration of all our community partners is critical to addressing these disorders. The need to continue and expand these services throughout our county is essential.

The Interagency Council on Homelessness is a major stakeholder in the effort to reduce homelessness, coordinate access to behavioral health services, social services and linkages to entitlement benefits in the County of San Bernardino. We are a central linkage to the Homeless Provider Network as well as the Office of Homeless Services.

Specifically, our area of expertise is to coordinate housing and supportive services through our Continuum of Care and Coordinated Entry System using a Housing First Approach that enables clients to fully engage in treatment services. We are fully committed to collaborating and/or serving in an advisory capacity in the effort to expand behavioral health services to our populations suffering from Substance Use Disorder and Mental Illness.

We are excited to partner with Time for Change Foundation, and the many other agencies and individuals in our County to work together to help end chronic homelessness for veterans and non-veterans alike in our County.

Please contact the Office of Homeless Services, the administrative arm of the ICH, for further assistance at (909) 386-8297.

Respectfully,

JOSIE GONZALES

Chair, Interagency Council on Homelessness
Fifth District Supervisor, County of San Bernardino Board of Supervisors

Members of the Interagency Council on Homelessness

Members of the Board of Supervisors
City of Ontario
City of San Bernardino
San Bernardino County Human Services
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City of Barstow
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City of Colton
City of Rancho Cucamonga
Department of Behavioral Health
Department of Rehabilitation
211 United Way
Sheriff's Department
General Members-At-Large
Kaiser Permanente

San Bernardino County Homeless Partnership

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Office: (909) 386-8297



March 22, 2017

San Bernardino County Homeless Service Providers:

The Continuum of Care (CoC) Program interim rule under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 requires that all CoCs implement a Coordinated Entry (CE) system. The CE is defined to mean a centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals. In the County of San Bernardino the CE is administered by the Inland Empire United Way (IEUW) 2-1-1.

Agencies receiving CoC and Emergency Solutions Grant (ESG) funds are mandated to participate in the San Bernardino CoC CE. Agencies that do not receive CoC or ESG funds are strongly encouraged to participate in the CE to facilitate client access to all homeless service providers.

Participation in the CE includes but is not limited to the following: accepting referrals from the IEUW 2-1-1; communicating project vacancies (bed and/or unit) to the IEUW in real time; practicing housing first principles; limiting project eligibility requirements to those that are required by funders; and only enrolling clients referred by IEUW 2-1-1. Please be reminded that projects shall not maintain their own client wait lists.

Due to the critical nature of the roles of homeless service providers, inputting data into HMIS will be measured with system-wide metrics, and will directly impact the scoring and competitiveness of the San Bernardino County CoC application. This letter serves as notification to all CoC funded agencies that lack of compliance in CES participation will be weighed in future competition consideration for funding by the Interagency Council on Homelessness (ICH).

Beginning in February 2017, the San Bernardino County ICH will be provided with data from IEUW 2-1-1 which will report on the following information:

- Households housed
- Households assessed
- IEUW referrals to housing agencies
- IEUW referrals not accepted by housing agencies
- Housing agencies that maintain a client waiting list
- Housing agency that have imposed eligibility requirements outside of the funders requirements

An effective CE requires the participation from all homeless service providers and will ensure that all people experiencing a housing crisis have fair and equal access to appropriate services.

Respectfully,

Gary Madden
Director, 211 San Bernardino County
Inland Empire United Way
on behalf of United Ways Serving San Bernardino County

Josie Gonzales
Chair, Interagency Council on Homelessness
Fifth District Supervisor, San Bernardino County
Board of Supervisors

Members of the Interagency Council on Homelessness

Members of the Board of Supervisors
City of Ontario
City of San Bernardino
San Bernardino County Human Services
Community Action Partnership of San Bernardino County
Housing Authority of the County of San Bernardino
San Bernardino County Superintendent of Schools
Department of Community Development and Housing

City of Barstow
City of Redlands
Town of Yucca Valley
Department of Probation
Veteran Administration Loma Linda
Workforce Development Department
Members of the Homeless Provider Network
HMIS Lead Agency

City of Colton
City of Rancho Cucamonga
Department of Behavioral Health
Department of Rehabilitation
211 United Way
Sheriff's Department
General Members-At-Large
Kaiser Permanente

San Bernardino Continuum of Care (CoC):
Written Standards for Providing Continuum of Care Assistance
Amended March 22, 2017 by the Interagency Council on Homelessness

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The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH Act): Continuum of Care Program (24 CFR Part 578) describes in § 578.7 Responsibilities of the Continuum of Care,

subsection (a) Operate the Continuum of Care (9), the Continuum of Care must

“In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance.”¹

This subsection also states that at a minimum, written standards must include “policies and procedures for evaluating individuals’ and families’ eligibility for assistance” for

1. permanent supportive housing;
2. rapid rehousing; and
3. transitional housing.

However, written standards for the San Bernardino CoC will also include:

4. coordinated assessment;
5. seasonal shelter;
6. year-round shelter;
7. bridge housing; and
8. homeless prevention.

These written standards will be developed as HUD provides more guidance.

This subsection also states that written standards must also include

“~~policies~~policies and procedures for determining and prioritizing which eligible individuals and families will receive” transitional housing, rapid rehousing, and permanent supportive housing assistance.

¹ The Interim Rule for the Emergency Solutions Grant Program does not provide information concerning transitional housing beyond the Interim Rule for the HEARTH Act Continuum of Care program because in order for a transitional facility to receive ESG funds, the facility cannot require occupants to sign leases or occupancy agreements whereas CoC funded transitional housing programs must require occupants to sign leases or occupancy agreements.

I. Written Standards for Permanent Supportive Housing

A. Background information

In regards to rapid rehousing, § 578.7 Responsibilities of the Continuum of Care (a) (9) of the HEARTH Act Interim Rule notes that

In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance.

Permanent supportive housing is considered permanent housing. HUD's regulatory definition of "permanent housing" states:

"The term 'permanent housing' means community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid re-housing."

HUD also states

"Additionally, in the regulatory definition of "permanent housing," HUD clarifies that to be permanent housing, "the program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long. HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause, assists program participants in obtaining stability in housing, even when the rental assistance is temporary. These requirements are consistent with Section 8 requirements."

B. Eligible clients

As stated in the 2014 CoC NOFA under Beds Dedicated to the Chronically Homeless

"The total number of permanent supportive housing beds in the CoC's geographic area that are dedicated specifically for use by the chronically homeless, per 24 CFR 578.3, as reported in the CoC's Housing Inventory Count (HIC). For permanent supportive housing beds, when a participant exits the program, the bed must be filled by another chronically homeless participant unless there are no chronically homeless persons located within the CoC's geographic area. This concept only applies to permanent supportive housing projects. (see p. 18)"

~~Also stated in the 2014 CoC NOFA under *Non-Dedicated Permanent Supportive Housing Beds*~~

~~“Permanent supportive housing beds within a CoC’s geographic area that are not currently dedicated specifically for use by the chronically homeless. CoCs and projects are strongly encouraged to prioritize the chronically homeless in non-dedicated permanent supportive housing beds as they become available through turnover. This concept only pertains to permanent supportive housing projects (see p. 19).”~~

~~Eligible clients must also meet eligibility criteria as defined in the NOFA under which the program was funded.~~

On July 25, 2016, HUD published CPD-16-11 “Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing. HUD stated on page 3 that

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“This Notice supersedes Notice CPD-14-012 and provides guidance to Continuums of Care (CoC) and recipients of Continuum of Care (CoC) Program (24 CFR part 578) funding for permanent supportive housing (PSH) regarding the order in which eligible households should be served in **all** CoC Program-funded PSH. This Notice reflects the new definition of chronically homeless as defined in CoC Program interim rule as amended by the Final Rule on Defining “Chronically Homeless” (herein referred to as the Definition of Chronically Homeless final rule) and updates the orders of priority that were established under the prior Notice. CoCs that previously adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the FY2015 CoC Program Competition are encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice.

HUD strongly encouraged chronically homeless households as prioritized eligible clients for permanent supportive housing and within Section D Key Terms of the notice, HUD stated that

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The definition of “chronically homeless”, as stated in Definition of Chronically Homeless final rule is:

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“(a) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

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i. lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

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ii. Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of

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not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;

(b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering the facility;

(c) 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 paragraph (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.”

Also, HUD encouraged eligible clients to be chronically homeless persons with with the most severe service needs. Severity of Service Needs, as defined within Section D Key Terms

“refers to persons who have been identified as having the most severe service needs.

(a) For the purposes of this Notice, this means an individual for whom at least one of the following is true:

i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or

ii. Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.

iii. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.

iv. When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high-need, high cost beneficiaries.

(b) Severe service needs as defined in paragraphs i.-iv. above should be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool and process and should be documented in a program participant’s case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see 24 C.F.R. § 5.105(a).”

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C. Prioritizing Permanent Supportive Housing

~~On July 28, 2014, HUD published Notice: CPD-14-012 “Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status.”~~

~~HUD stated that to “ensure that all PSH beds funded through the CoC Program are used as strategically and effectively as possible, PSH needs to be targeted to serve persons with the highest needs and greatest barriers towards obtaining and maintaining housing on their own—persons experiencing chronic homelessness (see p. 2).”~~

~~HUD also stated that “CoCs are strongly encouraged to adopt and incorporate into the CoC’s written standards and coordinated assessment system” that are consistent with the order of priority established by HUD in the notice concerning CoC Program-funded Permanent Supportive Housing and Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness (see pages 2 and 3).~~

~~Thus, with “adoption by CoCs and incorporation into the CoC’s written standards, all recipients of CoC Program-funded PSH must then follow this order of priority, consistent with their current grant agreement, which will result in this intervention being targeted to the persons who need it the most (see p. 3).~~

~~HUD’s “Order of Priority in CoC Program-funded Permanent Supportive Housing” is as follows:~~

- ~~● First Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.~~
- ~~● Second Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness.~~
- ~~● Third Priority—Chronically Homeless Individuals and Families with the Most Severe Service Needs.~~
- ~~● Fourth Priority—All Other Chronically Homeless Individuals and Families.~~

~~HUD’s “Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness” is as follows:~~

- ~~● First Priority—Homeless Individuals and Families with a Disability with the Most Severe Service Needs.~~
- ~~● Second Priority—Homeless Individuals and Families with a Disability with a Long Period of Continuous or Episodic Homelessness.~~

- ~~Third Priority Homeless Individuals and Families with Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters.~~
- ~~Fourth Priority Homeless Individuals and Families with a Disability Coming from Transitional Housing.~~

~~Details of both sets of order of priority can be found on pages 6 – 10 of the notice.~~

~~A glossary of key terms for this notice can be found on pages 3 – 5.~~

The notice also requires “Recordkeeping Requirements for Documenting Chronic Homeless Status.” HUD stated that this notice “establishes recordkeeping requirements for all recipients of CoC Program-funded PSH that are required to document a program participant’s status as chronically homeless as defined in 24 CFR 578.3 and in accordance with 24 CFR 578.103. Further, HUD expects that where CoCs have adopted the orders of priority in Section III. of this Notice into their written standards, the CoC as well as recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities.”

A. CoC Records

In addition to the records required in 24 CFR 578.103, it is recommended that the CoC should supplement such records with the following:

1. Evidence of written standards that incorporate the priorities in Section III. of this Notice, as adopted by the CoC;
2. Evidence of a standardized assessment tool;
3. Evidence that the written standards were incorporated into the coordinated assessment policies and procedures.

Details for 1 -3 can be found on pages 11 – 12 of the notice.

B. Recipient Recordkeeping Requirements

In addition to the records required in 24 CFR 578.103, recipients of CoC Program-funded PSH that is required by grant agreement to document chronically homeless status of program participants in some or all of its PSH beds must maintain the following records:

1. Written Intake Procedures;
2. Evidence of Chronically Homeless Status
 - a. Evidence of homeless status
 - b. Evidence of the duration of the homelessness:

- Evidence that the homeless occasion was continuous, for at least one year;
- Evidence that the household experienced at least four separate homeless occasions over 3 years;
- Evidence of diagnosis with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

Details for 1 -2 can be found on pages 11 – 12 of the notice.

D. Written Standards

Written Standard #1: No Designated Length of Stay

- **Program participants are provided housing without a designated length of stay that permits them to live as independently as possible.**

In Program Components and Eligible Costs (Subpart D) of the Preamble of the HEARTH Act (see p. 25) the following is noted:

“Consistent with the definition of permanent housing in section 401 of the McKinney-Vento Act and § 578.3 of this interim rule, the permanent housing component is community-based housing without a designated length of stay that permits formerly homeless individuals and families to live as independently as possible. The interim rule clarifies that Continuum of Care funds may be spent on two types of permanent housing: permanent supportive housing for persons with disabilities (PSH) and rapid rehousing that provides temporary assistance (i.e., rental assistance and/or supportive services) to program participants in a unit that the program participant retains after the assistance ends.”

Written Standard #2: Lease Agreement

- **The program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long.**

On page 12 of the Preamble of the HEARTH Act Interim Rule,

“HUD clarifies that to be permanent housing, “the program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long. HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause, assists program participants in obtaining stability in housing,

even when the rental assistance is temporary. These requirements are consistent with Section 8 requirements.”

Also, § 578.77 Calculating occupancy charges and rent (a) states the following about occupancy agreements:

“(a) Occupancy agreements and leases. Recipients and subrecipients must have signed occupancy agreements or leases (or subleases) with program participants residing in housing.”

Written Standard #3: Restricted Assistance and Disabilities

- **Permanent supportive housing can only provide assistance to individuals with disabilities and families in which one adult or child has a disability.**

§ 578.37 Program components and uses of assistance (a) (1) (i) states that

“Permanent supportive housing for persons with disabilities (PSH). *PSH can only provide assistance to individuals with disabilities and families in which one adult or child has a disability.* Supportive services designed to meet the needs of the program participants must be made available to the program participants.”

Written Standard #4: Supportive Services

- **Supportive services designed to meet the needs of program participants must be made available to the program participants.**

§ 578.37 Program components and uses of assistance (a) (1) (i) states that

“Permanent supportive housing for persons with disabilities (PSH). PSH can only provide assistance to individuals with disabilities and families in which one adult or child has a disability. *Supportive services designed to meet the needs of the program participants must be made available to the program participants.*”

Written Standard #5: Duration of Supportive Services Assistance

- **Supportive services to enable program participants to live as independently as possible must be provided throughout the duration of their residence**

§ 578.53 Supportive services (b) (2) states that

“Permanent supportive housing projects must provide supportive services for the residents to enable them to live as independently as is practicable throughout the duration of their residence in the project.”

Written Standard #6: One Person per Bedroom

- **Two individuals in a shared housing situation must have their own lease and their own bedroom unless the two individuals are presented together as a household**

Information received from HUD Exchange on February 9, 2015 is as follows:

“Under the CoC Program, all housing that is leased with Continuum of Care program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the applicable Housing Quality Standards (HQS) under 24 CFR 982.401 of this title, except that 24 CFR 982.401(j) applies only to housing occupied by program participants receiving tenant-based rental assistance.

HQS dictates that, at a minimum, the unit must have a living room, a kitchen, and a bathroom. HQS requirements also dictate that the bathroom must be contained within the unit, afford privacy (usually meaning a door, although no lock is required), and be for the exclusive use of the occupants. Additionally, the unit must have suitable space and equipment to store, prepare, and serve food in a sanitary manner. This includes a requirement for an oven and stove or range, a refrigerator of appropriate size for the family, and a kitchen sink with hot and cold running water. Hot plates are not acceptable substitutes for stoves or ranges. However, a microwave oven may be used in place of a conventional oven, stove, or range if the oven/stove/range are tenant supplied or if microwaves are furnished in both subsidized and unsubsidized units in the building or premises.

The CoC Program also allows for shared housing/roommate situations in projects with leasing or rental assistance funds. **Each household must have the bedroom size that fits their household size. In other words, 2 individuals in a shared housing situation must have their own lease, and their own bedroom. The only situation where 2 people would be sharing one bedroom would be if they presented together as a household.**

For more information about Housing Quality Standards, please refer to Chapter 10 of the HCVP

Guidebook: www.hud.gov/offices/adm/hudclips/guidebooks/7420.10G/7420g10GUID.pdf.

Written Standard #7: Program Income

- **Program income generated from rent and occupancy charges may be collected from program participants and added to funds committed to the project by HUD and used for eligible program activities**

§ 578.97 Program income includes the following:

“(a) Defined. Program income is the income received by the recipient or subrecipient directly generated by a grant-supported activity.

(b) Use. Program income earned during the grant term shall be retained by the recipient, and added to funds committed to the project by HUD and the recipient, used for eligible activities in accordance with the requirements of this part. Costs incident to the generation of program income may be deducted from gross income to calculate program income, provided that the costs have not been charged to grant funds.

(c) Rent and occupancy charges. Rents and occupancy charges collected from program participants are program income. In addition, rents and occupancy charges collected from residents of transitional housing may be reserved, in whole or in part, to assist the residents from whom they are collected to move to permanent housing.”

Also, § 578.49 Leasing (b) (7) states the following about program income

“Program income. Occupancy charges and rent collected from program participants are program income and may be used as provided under § 578.97.”

Written Standard #8: Calculating Occupancy Charges and Rent

- **if occupancy charges are imposed, they may not exceed the highest of: 1) 30 percent of the family’s monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses); 2) 10 percent of the family’s monthly income; or 3) If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family’s actual housing costs) is specifically designated by the agency to meet the family’s housing costs, the portion of the payments that is designated for housing costs.**

§ 578.77 Calculating occupancy charges and rent (b) (1) (2) (3) notes the following about occupancy agreements

“(b) Calculation of occupancy charges. Recipients and subrecipients are not required to impose occupancy charges on program participants as a condition of residing in the housing. However, if occupancy charges are imposed, they may not exceed the highest of:

(1) 30 percent of the family’s monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses);

(2) 10 percent of the family’s monthly income; or

(3) If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family’s actual housing costs) is specifically designated by the agency to meet the family’s housing costs, the portion of the payments that is designated for housing costs.”

Written Standard #9: Examining Program Participant's Initial Income

- **a program participant's initial income must be examined at least annually to determine the amount of the contribution toward rent payable by the program participant and adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified.**

§578.77 Calculating occupancy charges and rent (c)(2) states that

"Recipients or subrecipients must examine a program participant's income initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant. Adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified."

§578.103 Recordkeeping requirements (7) (i) (ii) states that the recipient or subrecipient must keep records for each program participant that document:

"(i) The services and assistance provided to that program participant, including evidence that the recipient or subrecipient has conducted an annual assessment of services for those program participants that remain in the program for more than a year and adjusted the service package accordingly, and including case management services as provided in § 578.37(a)(1)(ii)(F); and

(ii) Where applicable, compliance with the termination of assistance requirement in § 578.91."

Written Standard #10: Verifying Program Participant's Initial Income

- **each program participant must agree to supply the information or documentation necessary to verify the program participant's income.**

§578.77 Calculating occupancy charges and rent (c)(3) states that

"As a condition of participation in the program, each program participant must agree to supply the information or documentation necessary to verify the program participant's income. Program participants must provide the recipient or subrecipient with information at any time regarding changes in income or other circumstances that may result in changes to a program participant's contribution toward the rental payment."

§578.103 Recordkeeping requirements (6) (i) (ii) (iii) and (iv) states that the following documentation of annual income must be kept by recipient or subrecipient:

“(i) Income evaluation form specified by HUD and completed by the recipient or subrecipient; and

(ii) Source documents (e.g., most recent wage statement, unemployment compensation statement, public benefits statement, bank statement) for the assets held by the program participant and income received before the date of the evaluation;

(iii) To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient’s or subrecipient’s intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period; or

(iv) To the extent that source documents and third-party verification are unobtainable, the written certification by the program participant of the amount of income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.”

Written Standard #11: Recalculating Occupancy Charges and Rent

- **if there is a change in family composition (e.g., birth of a child) or a decrease in the resident’s income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly.**

§ 578.77 Calculating occupancy charges and rent (b) (4) notes the following about recalculating occupancy charges and rent

“(4) Income. Income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Recipients and subrecipients must examine a program participant’s income initially, and if there is a change in family composition (e.g., birth of a child) or a decrease in the resident’s income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly.”

Written Standard #12: Supportive Services Agreement

- **program participants may be required to take part in supportive services that are not disability-related services (including substance abuse treatment services) provided through the project as a condition of continued participation in the program. However, HUD tends to believe that these kind of requirements can be barriers and should be rare and minimal if used at all.**

§ 578.75 General operations (h) states that

“Recipients and subrecipients may require the program 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. Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by the disability. Notwithstanding this provision, if the purpose of the project is to provide substance abuse treatment services, recipients and subrecipients may require program participants to take part in such services as a condition of continued participation in the program.”

From “HOUSING FIRST IN PERMANENT SUPPORTIVE HOUSING” (see www.hudexchange.info/resources/documents/Housing-First-Permanent-Supportive-Housing-Brief.pdf)

“Supportive services are voluntary, but can and should be used to persistently engage tenants to ensure housing stability - Supportive services are proactively offered to help tenants achieve and maintain housing stability, but tenants are not required to participate in services as a condition of tenancy. Techniques such as harm reduction and motivational interviewing may be useful. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-judgmental communication while motivational interviewing may be useful in helping households acquire and utilize new skills and information.”

Written Standard #13: Termination of Assistance

- **Assistance may be terminated to a program participant who violates program requirements or conditions of occupancy by providing a formal process that recognizes the due process of law.**

On page 37 of the Preamble of the HEARTH Act, the following is stated concerning termination of assistance:

“The interim rule provides that a recipient may terminate assistance to a participant who violates program requirements or conditions of occupancy. The recipient must provide a formal process that recognizes the due process of law. Recipients may resume assistance to a participant whose assistance has been terminated.

Recipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all circumstances in determining whether termination is appropriate. Under this interim rule, HUD has determined that a participant’s assistance should be terminated only in the most severe cases. HUD is carrying over this requirement from the Shelter Plus Care program.”

II. Written Standards for Rapid Rehousing

A. Background information

In regards to rapid rehousing, § 578.7 Responsibilities of the Continuum of Care (a) (9) of the HEARTH Act Interim Rule notes that

In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;
- Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;

Rapid rehousing is considered permanent housing. HUD's regulatory definition of "permanent housing" states:

"The term 'permanent housing' means community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid re-housing."

HUD also states

"Additionally, in the regulatory definition of "permanent housing," HUD clarifies that to be permanent housing, "the program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long. HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause, assists program participants in obtaining stability in housing, even when the rental assistance is temporary. These requirements are consistent with Section 8 requirements."

Types of rapid rehousing assistance include:

- Rental assistance;
- Case management;
- Supportive services;
- security deposits.

B. Eligible Clients

Eligible clients must meet HUD's Category 1 definition of homelessness which is:

Individuals and families who lack a fixed, regular, and adequate nighttime residence:

- An individual or family 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, including a car, park, abandoned building, bus or train station, etc.
- An individual or family living in a supervised 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, or local government programs for low income individuals); or
- An individual who is exiting an institution where he or she 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.

For information on HUD's other homeless categories, eligible for other CoC funds, visit: www.onecpd.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf

Eligible clients must also meet eligibility criteria as defined in the NOFA under which the program was funded.

C. Prioritizing Rapid Rehousing

Recently, HUD provided guidance for rapid rehousing in terms of prioritizing subpopulations. HUD noted in a SNAPS In Focus: Rapid Re-Housing As a Model and Best Practice, August 6, 2014, that

“Rapid re-housing can be effective for many populations, such as families with children, youth aging out of foster care, domestic violence survivors, single adults, and veterans, but should be targeted to those households that would not be able to get out of homelessness without the assistance. It is particularly a key strategy for achieving the Opening Doors goal of ending family, youth, and child homelessness by 2020.

Rapid re-housing should prioritize people with more challenges, including those with no income, poor employment prospects, troubled rental histories, and criminal records. Providers should link participants with community resources that will help them achieve longer-term stability and well-being. Now is the time for communities to be working together to establish written standards for administering rapid re-housing and thinking strategically about how this type of assistance will be used most effectively within the CoC.”

Recently, HUD also noted on www.hudexchange.info/resources/documents/Rapid-Re-Housing-Brief.pdf that

“Rapid re-housing is an effective intervention for many different types of households experiencing homelessness, including those with no income, with disabilities, and with

poor rental history. The majority of households experiencing homelessness are good candidates for rapid re-housing. The only exceptions are households that can exit homelessness with little or no assistance, those who experience chronic homelessness and who need permanent supportive housing, and households who are seeking a therapeutic residential environment, including those recovering from addiction.”

Thus, the San Bernardino CoC will prioritize the following subpopulations:

- families with children;
- youth aging out of foster care;
- domestic violence survivors;
- single adults;
- and veterans

that can exit homelessness with little or no assistance, those who experience chronic homelessness and who need permanent supportive housing, and households who are seeking a therapeutic residential environment, including those recovering from addiction.

D. Written Standards

Written Standard #1: Lease Agreement

- **The program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long.**

On page 12 of the Preamble of the HEARTH Act Interim Rule,

“HUD clarifies that to be permanent housing, “the program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long. HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause, assists program participants in obtaining stability in housing, even when the rental assistance is temporary. These requirements are consistent with Section 8 requirements.”

Written Standard #2: Rental Assistance

- **Program participants may receive short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance**

§ 578.37 Program components and uses of assistance (a) (1) (ii) states that

“Continuum of Care funds may provide supportive services, as set forth in § 578.53, and/or **short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance**, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing.”

Written Standard #3: Amount of Rental Assistance

- **Standards for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following guidelines:**
 - The maximum amount of rent that a participant will pay can be up to 100% of the rental amount;
 - The maximum percentage of income paid by participants towards rent at program completion shall be no more than 50%. However, in certain circumstances, on a case-by-case basis, there may be participants whose rental share may exceed 50% of the rent based on their financial circumstances. In general, the goal will be that participants pay generally no more than 50% of their income in rent;
 - 100% of the cost of rent in rental assistance may be provided to program participants. However to maximize the number of households that can be served with rapid re-housing resources, it is expected that the level of need will be based on the goal of providing only what is necessary for each household to be stably housed for the long term;
 - Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the Fair Market Rent limit, established by HUD;
 - The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

§ 578.37 Program components and uses of assistance (a) (1) (ii) (F) states that a Continuum of Care

“May set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, and/or a maximum number of times that a program participant may receive rental assistance. The recipient or subrecipient may also require program participants to share in the costs of rent. For the purposes of calculating rent for rapid rehousing, the rent shall equal the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.”

Written Standard #4: Duration of Assistance

- **Program participants may receive up to 24 months of rental assistance. However, it is expected that program participants will only receive the level of assistance necessary to be stably housed for the long-term.**

§ 578.37 Program components and uses of assistance (a) (1) (ii) states that

“Continuum of Care funds may provide supportive services, as set forth in § 578.53, and/or short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing.”

Written Standard #5: Security Deposits including Last Month’s Rent

- **Program participants may receive funds for security deposits in an amount not to exceed 2 months of rent.**

§ 578.51 Rental assistance (a) (2) states that

“Grant funds may be used for security deposits in an amount not to exceed 2 months of rent. An advance payment of the last month’s rent may be provided to the landlord, in addition to the security deposit and payment of first month’s rent.”

Written Standard #6: Receiving Rental Assistance through Other Sources

- **Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.**

§ 578.51 Rental assistance (a) Use states that

“Grant funds may be used for rental assistance for homeless individuals and families. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.”

Written Standard #7: Case Management

- **Program participants must meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability.**

§ 578.37 Program components and uses of assistance (a) (1) (ii) (F) states the following requirement

“Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. The project is exempt from this requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 *et seq.*) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 *et seq.*) prohibits the recipient carrying out the project from making its housing conditional on the participant’s acceptance of services.”

Written Standard #8: Supportive Services

- **Program participants may receive supportive services as set forth in § 578.53 (see Appendix A)**

§ 578.37 Program components and uses of assistance (a) (1) (ii) states that

“Continuum of Care funds may provide **supportive services**, as set forth in § 578.53, and/or short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing.”

Written Standard #9: Duration of Supportive Services

- **Program participants may receive supportive services for no longer than 6 months after rental assistance stops**

§ 578.37 Program components and uses of assistance (a) (1) (ii) (F) states that the Continuum of Care “May provide supportive services for no longer than 6 months after rental assistance stops.”

Written Standard #10: Re-evaluation

- **Program participants must be re-evaluated, not less than once annually, in order to determine whether program participants lack sufficient resources and support networks necessary to retain housing without Continuum of Care assistance and the types and amounts of assistance that the program participant needs to retain housing.**

§ 578.37 Program components and uses of assistance (a) (1) (ii) (E) states that the Continuum of Care

“Must re-evaluate, not less than once annually, that the program participant lacks sufficient resources and support networks necessary to retain housing without Continuum of Care assistance and the types and amounts of assistance that the program participant needs to retain housing. The recipient or subrecipient may require each program participant receiving assistance to notify the recipient or subrecipient of changes in the program participant’s income or other circumstances (e.g., changes in household composition) that affect the

program participant's need for assistance. When notified of a relevant change, the recipient or subrecipient must reevaluate the program participant's eligibility and the amount and types of assistance that the program participant needs."

III. Written Standards for Transitional Housing

A. Background Information

This section proposes written standards for transitional housing based upon information provided in the HEARTH Act.

Under § 578.3 Definitions of the HEARTH Act, the following is stated:

"Transitional housing means housing, where all program participants have signed a lease or occupancy agreement, the purpose of which is to facilitate the movement of homeless individuals and families into permanent housing within 24 months or such longer period as HUD determines necessary. The program participant must have a lease or occupancy agreement for a term of at least one month that ends in 24 months and cannot be extended."

B. Eligible Clients

Eligible clients must meet HUD's Category 1 definition of homelessness which is:

Individuals and families who lack a fixed, regular, and adequate nighttime residence:

- An individual or family 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, including a car, park, abandoned building, bus or train station, etc.
- An individual or family living in a supervised 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, or local government programs for low income individuals); or
- An individual who is exiting an institution where he or she 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.

For information on HUD's other homeless categories, eligible for other CoC funds, visit: www.onecpd.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf

Eligible clients must also meet eligibility criteria as defined in the NOFA under which the program was funded.

C. Prioritizing Transitional Housing

Domestic violence survivors and youth ages 18 – 24 will be prioritized for transitional housing if they are not assessed as chronically homeless.² All chronically homeless individuals and families will not be served through transitional housing.³ Such households will be served by permanent supportive housing through a Housing First approach. Also, eligible single veterans and veterans with families, will be served by permanent supportive housing through the HUD VASH voucher program or the Supportive Services for Veteran Families program.

D. Written Standards

Written Standard #1:

The program participant must have a lease or occupancy agreement for a term of at least one month that ends in 24 months and cannot be extended” unless a “homeless individual or family may remain in transitional housing for a period longer than 24 months, if permanent housing for the individual or family has not been located or if the individual or family requires additional time to prepare for independent living” as noted in § 578.79 Limitation on transitional housing.

Under § 578.51 Rental assistance, (l) Leases (2) Initial lease for transitional housing, the following is required:

“Program participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.”

Written Standard #2:

² In the HEARTH Act, chronically homeless is defined as (1) An individual who: (i) Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and (ii) Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and (iii) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; (2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar 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 paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

³ Chronically homeless households are no longer considered chronically homeless once they become residents of transitional housing programs. As a result, such households are no longer eligible for permanent supportive housing programs that are restricted to serve only chronically homeless households. In addition, HUD strongly encourages permanent supportive housing providers to fill vacant beds with chronically homeless households.

The lease with program participant “must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.”

Under § 578.37 Program components and uses of assistance, subsection (2), transitional housing is further described in the HEARTH Act as follows:

“Transitional housing facilitates the movement of homeless individuals and families to PH within 24 months of entering TH. Grant funds may be used for acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services.”

Written Standard #3:

In order to facilitate the movement of program participants to PH within 24 months of entering TH, grant funds may be used for all of the following activities: acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services.

Under § 578.53 Supportive services (b) Duration, the following is also noted:

- (1) “For a transitional housing project, supportive services must be made available to residents throughout the duration of their residence in the project.”
- (3) “Services may also be provided to former residents of transitional housing and current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living.”

Written Standard #4:

Supportive services must be made available to program participants “throughout the duration of their residence” and such services “may also be provided to former residents of transitional housing and current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living.”

Under § 578.77 Calculating occupancy charges and rent, the following guidelines are provided:

- “(a) Occupancy agreements and leases. Recipients and subrecipients must have signed occupancy agreements or leases (or subleases) with program participants residing in housing.
- (b) Calculation of occupancy charges. Recipients and subrecipients are not required to impose occupancy charges on program participants as a condition of residing in the

housing. However, if occupancy charges are imposed, they may not exceed the highest of:

- (1) 30 percent of the family's monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses);
- (2) 10 percent of the family's monthly income; or
- (3) If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family's actual housing costs) is specifically designated by the agency to meet the family's housing costs, the portion of the payments that is designated for housing costs.
- (4) Income. Income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Recipients and subrecipients must examine a program participant's income initially, and if there is a change in family composition (e.g., birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly."

Written Standard #5:

Recipients and subrecipients of funding for transitional housing "are not required to impose occupancy charges on program participants as a condition of residing" in transitional housing. "However, if occupancy charges are imposed, they may not exceed the highest of:

- (1) 30 percent of the family's monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses);**
- (2) 10 percent of the family's monthly income; or**
- (3) If the family is receiving payments for welfare assistance from a public agency and a part of the payments (adjusted in accordance with the family's actual housing costs) is specifically designated by the agency to meet the family's housing costs, the portion of the payments that is designated for housing costs.**
- (4) Income. Income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Recipients and subrecipients must examine a program participant's income initially, and if there is a change in family composition (e.g., birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly.**

Under § 578.79 Limitation on transitional housing, the following is stated:

“A homeless individual or family may remain in transitional housing for a period longer than 24 months, if permanent housing for the individual or family has not been located or if the individual or family requires additional time to prepare for independent living. However, HUD may discontinue assistance for a transitional housing project if more than half of the homeless individuals or families remain in that project longer than 24 months.”

Written Standard #6:

Assistance for a transitional housing project may be discontinued “if more than half of the homeless individuals or families remain in that project longer than 24 months.”

As noted on page 1, § 578.7 Responsibilities of the Continuum of Care, subsection (a) Operate the Continuum of Care (9), states that written standards must also include

“[policies](#) and procedures for determining and prioritizing which eligible individuals and families will receive” transitional housing, rapid rehousing, and permanent supportive housing assistance.

Prioritizing which eligible individuals and families will receive transitional housing has been the focus of a few HUD publications during the past few years. On September 18, 2013, “What about Transitional Housing” was the emphasis of SNAPS Weekly Focus.

“It is time for CoCs to look at transitional housing programs with a critical eye – look at recent research, review each program’s eligibility criteria, analyze outcomes and occupancy rates, and make sure the services offered (and paid for) actually match the needs of people experiencing homelessness within the CoC. Many transitional housing programs may need to change their program design or serve a different population. For example, some may need to remove strict eligibility criteria that result in those families that really need intensive services being screened out (often resulting in low occupancy). In other cases, the best course of action is to reallocate the transitional housing program in favor of a more promising model.

For many years, using HUD funds for transitional housing was the only funding alternative for serving families and individuals that did not need permanent supportive housing. With rapid re-housing now eligible under both the CoC Program and the Emergency Solutions Grants (ESG) program, there is an alternative and promising option for families with low-barriers that need shorter interventions. Rapid re-housing can be done with a lower cost per household – increasing the total number of households that can be served with the same amount of funding. If the majority of households served in your CoC’s transitional housing are families with lower barriers, you should consider reallocating those projects into new rapid re-housing projects for families.

Similarly, as CoCs move to a more direct Housing First approach, eligible households with disabilities that will need long-term assistance likely do not need an interim stay in

transitional housing. For example, a CoC that has a high number of people in transitional housing **waiting** for placement into permanent supportive housing should consider reallocating those transitional housing units into new permanent supportive housing.

We know that there are families and individuals who need more assistance than rapid re-housing offers but who do not qualify for permanent supportive housing. Transitional housing should be reserved for those populations that most need that type of intervention – programs that serve domestic violence survivors and youth and those that provide substance abuse treatment come to mind first – rather than being used either as a holding pattern for those that really need permanent supportive housing or those that need less intensive interventions.”

Appendix A: Supportive Services

§ 578.53 Supportive services.

(a) In general. Grant funds may be used to pay the eligible costs of supportive services that address the special needs of the program participants. If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility, including maintenance, repair, building security, furniture, utilities, and equipment are eligible as a supportive service.

(1) Supportive services must be necessary to assist program participants obtain and maintain housing.

(2) Recipients and subrecipients shall conduct an annual assessment of the service needs of the program participants and should adjust services accordingly.

(b) Duration.

(1) For a transitional housing project, supportive services must be made available to residents throughout the duration of their residence in the project.

(2) Permanent supportive housing projects must provide supportive services for the residents to enable them to live as independently as is practicable throughout the duration of their residence in the project.

(3) Services may also be provided to former residents of transitional housing and current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living.

(4) Rapid rehousing projects must require the program participant to meet with a case manager not less than once per month as set forth in § 578.37(a)(1)(ii)(F), to assist the program participant in maintaining long-term housing stability.

(c) Special populations. All eligible costs are eligible to the same extent for program participants who are unaccompanied homeless youth; persons living with HIV/AIDS; and victims of domestic violence, dating violence, sexual assault, or stalking.

(d) Ineligible costs. Any cost that is not described as an eligible cost under this section is not an eligible cost of providing supportive services using Continuum of Care program funds. Staff training and the costs of obtaining professional licenses or certifications needed to provide supportive services are not eligible costs.

(e) Eligible costs.

(1) Annual Assessment of Service Needs. The costs of the assessment required by § 578.53(a)(2) are eligible costs.

(2) Assistance with moving costs. Reasonable one-time moving costs are eligible and include truck rental and hiring a moving company.

(3) Case management. The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Component services and activities consist of:

- (i) Counseling;
- (ii) Developing, securing, and coordinating services;
- (iii) Using the centralized or coordinated assessment system as required under § 578.23(c)(9).
- (iv) Obtaining federal, State, and local benefits;
- (v) Monitoring and evaluating program participant progress;
- (vi) Providing information and referrals to other providers;
- (vii) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- (viii) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(4) Child care. The costs of establishing and operating child care, and providing child-care vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible.

- (i) The children must be under the age of 13, unless they are disabled children.
- (ii) Disabled children must be under the age of 18.
- (iii) The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

(5) Education services. The costs of improving knowledge and basic educational skills are eligible.

- (i) Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
- (ii) Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.

(6) Employment assistance and job training. The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.

(i) Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.

(ii) Services that assist individuals in securing employment consist of:

(A) Employment screening, assessment, or testing;

(B) Structured job skills and job-seeking skills;

(C) Special training and tutoring, including literacy training and pre-vocational training;

(D) Books and instructional material;

(E) Counseling or job coaching; and

(F) Referral to community resources.

(7) Food. The cost of providing meals or groceries to program participants is eligible.

(8) Housing search and counseling services. Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible.

(i) Component services or activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements.

(ii) Other eligible costs are:

(A) Mediation with property owners and landlords on behalf of eligible program participants;

(B) Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and

(C) The payment of rental application fees.

(9) Legal services. Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing.

(i) Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants.

(ii) Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.

(iii) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

(iv) Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.

(10) Life skills training. The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.

(11) Mental health services. Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

(12) Outpatient health services. Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:

(i) Providing an analysis or assessment of an individual's health problems and the development of a treatment plan;

(ii) Assisting individuals to understand their health needs;

(iii) Providing directly or assisting individuals to obtain and utilize appropriate medical treatment;

(iv) Preventive medical care and health maintenance services, including in-home health services and emergency medical services;

(v) Provision of appropriate medication;

(vi) Providing follow-up services; and

(vii) Preventive and non-cosmetic dental care.

(13) Outreach services. The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.

(i) Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach.

(ii) Component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care.

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(14) Substance abuse treatment services. The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.

(15) Transportation. Eligible costs are:

(i) the costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other services eligible under this section.

(ii) Mileage allowance for service workers to visit program participants and to carry out housing quality inspections;

(iii) The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants;

(iv) The cost of gas, insurance, taxes, and maintenance for the vehicle;

(v) The costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and

(vi) If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:

(A) Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);

(B) Payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car; and

(C) The recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.

(16) Utility deposits. This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies.

(17) Direct provision of services. If the a service described in paragraphs (e)(1) through (e)(16) of this section is being directly delivered by the recipient or subrecipient, eligible costs for those services also include:

(i) The costs of labor or supplies, and materials incurred by the recipient or subrecipient in directly providing supportive services to program participants; and

(ii) The salary and benefit packages of the recipient and subrecipient staff who directly deliver the services.