

Standards for Providing Assistance under  
the  
Continuum of Care and  
Emergency Solutions Grant Programs

Philadelphia Continuum of Care  
PA-500

August 2018

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## INTRODUCTION

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

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

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

The Philadelphia CoC Board is the primary decision-making body of the CoC, responsible for approval of all CoC policies, procedures, and CoC program funding decisions. The Board's decisions are made with input from CoC Committees, workgroups, and the Office of Homeless Services. The Board has 18 Members (15 voting and 3 non-voting):

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

## BACKGROUND AND PURPOSE

The U.S. Department of Housing and Urban Development (HUD) Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) was signed into law on May 20, 2009. The HEARTH Act reauthorizes the McKinney-Vento Homeless Assistance Act of 1987, but with some important changes.

The overall goal of the HEARTH Act is to make homelessness rare, brief, and non-recurring by reducing the duration of time people spend homeless and reducing recidivism back into homelessness. Currently, Philadelphia has funding through the Emergency Solutions Grants (ESG) Program and the Continuum of Care (CoC) Program to undertake projects that work toward this goal.

The [Continuum of Care \(CoC\) Interim Rule](#) was published on July 31, 2012 and took effect on August 30, 2012. The purpose of the regulation is to:

- Return households who experience homelessness to permanent housing in less than 30 days;
- Consolidate the Supportive Housing Program (SHP), Shelter Plus Care Program (SPC) and the Section 8 Moderate Rehabilitation Program;
- Promote a community wide commitment to the goal of ending homelessness;
- Provide funding to quickly rehouse homeless individuals and families while minimizing trauma and dislocation;
- Promote access to mainstream benefits;
- Optimize self-sufficiency;
- Provide funding to support the CoC structure & process; and
- Codify the CoC structure & process

The Interim Rule requires CoCs to establish and consistently follow written standards for providing CoC assistance, in consultation with recipients of the [Emergency Solutions Grant \(ESG\) Program](#), which in Philadelphia, is the City's Division of Housing and Community Development (DHCD). At a minimum, these written standards must include:

- Policies and procedures for evaluating households' eligibility for assistance in the CoC Program
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance, rapid re-housing assistance, and transitional housing assistance
- Standards for determining what percentage or amount of rent each participant must pay while receiving rapid re-housing assistance

**The goals of the written standards are to:**

- Establish community-wide expectations on the operations of projects within the community to create consistency and coordination among recipients' and sub-recipients' projects
- Establish a minimum set of standards and expectations in terms of the quality expected of projects<sup>1</sup>
- Make the local priorities transparent to recipients and sub-recipients of the funds

Under the purview of HUD regulations and guidelines, the Continuum of Care, in consultation with DHCD, the recipient of ESG program funds in Philadelphia, has the discretion to set local standards regarding rental assistance amounts, length of assistance available for participants, and other project components as necessary. All projects receiving CoC Program and/or ESG Program funds must comply in full with the applicable standards described in this manual. Additionally, all recipients and subrecipients of this funding must meet all minimum requirements in the CoC interim rule. The Philadelphia CoC strongly encourages projects that do not receive CoC program funds to accept and utilize these written standards. Recipients and sub-recipients of CoC Program and local funds may develop additional standards for administering program assistance, ***but these additional standards cannot be in conflict with those established by the CoC Program Interim Rule and by the Philadelphia CoC in this document. In addition, projects may not establish additional eligibility requirements beyond those specified here and those required by other funders, including but not limited to: DHS, PHA, AACO, and DBHIDS.***

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<sup>1</sup> All performance indicators for CoC projects included in these written standards will be changed annually per available APR data.

## PROGRAMS OVERVIEW

### EMERGENCY SOLUTIONS GRANT PROGRAM

The [Emergency Solutions Grant Interim Rule](#) broadened existing emergency shelter and homelessness prevention activities, placing greater emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness by expanding prevention as an eligible use and adding a rapid rehousing component. ESG funds are authorized and intended for rapid rehousing, homelessness prevention, and emergency shelter. The interim rule updated the annual action plan requirements to include written standards for the provision of ESG assistance and performance standards for evaluating ESG activities.

ESG funds can be used for a variety of services, including: Emergency Shelter, short- or medium-term Rental Assistance, Housing Search and Placement, Utility Arrears, and Housing Stability Case Management. The Homelessness Prevention component includes various housing relocation and stabilization services and short- and medium-term rental assistance. The City’s Division of Housing and Community Development is a recipient of HUD ESG Program funds and administers this award via the Office of Homeless Services to eligible organizations referred to as Subrecipients.

ESG Eligible Components				
Street Outreach	Homeless Prevention	Emergency Shelter	Rapid Rehousing	HMIS

### CONTINUUM OF CARE PROGRAM

The Continuum of Care (CoC) Program funds projects that provide housing and supportive services to households with and without children experiencing homelessness. Projects funded under the CoC Program seek to assist households with attaining and sustaining permanent housing as quickly as possible. In Philadelphia, CoC Program funds are currently used to support 105+ Permanent Supportive Housing, Rapid Rehousing, Safe Haven, Transitional Housing, HMIS, and Supportive Services Only for Coordinated Entry projects. Homeless Services is the direct recipient for roughly 40% of the awarded projects under the CoC Program, for which it contracts with various non-profit organizations to operate these projects. These organizations are referred to as Subrecipients. Within the Philadelphia CoC, roughly 60% of the projects are funded through have direct grant agreements between HUD and the recipient/ non-profit organization.

### POLICY ON PROJECT SELECTION

The CoC evaluates projects funded with HUD CoC Program dollars annually, in preparation for HUD’s CoC Program Funding Competition. Locally-developed objective criteria incorporate priorities established by HUD in its Notice of Funding Availability (NOFA) and CoC Program Interim Rule, and local priorities established by the Philadelphia CoC. The local evaluations inform project selection and ranking for the HUD Competition, and also help the CoC to identify any performance issues that may need to be addressed. Persistent performance issues, including issues related to compliance with Philadelphia CoC Written Standards, chronic under spending, and cost effectiveness may negatively impact the CoC’s willingness to continue to recommend a project for HUD CoC Program funding in its annual consolidated

application to HUD. Homeless Services shall notify project applicants in a timely manner, per the NOFA guidelines, whether the project will be recommended for funding.

CoC Eligible Components					
Transitional Housing	Rapid Re-Housing	Joint TH-RRH	Supportive Services Only for Coordinated Entry	HMIS	Permanent Supportive Housing

## STANDARDS FOR ALL PROJECT TYPES

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

### FAIR HOUSING AND EQUAL OPPORTUNITY

All recipients and sub-recipients of CoC Program and ESG Program funding must comply with the [Philadelphia CoC's Nondiscrimination Policy](#). Additional compliance is required with the non-discrimination and equal opportunity provisions of Federal civil rights laws as specified at 24 C.F.R. 5.105(a), including, but not limited to the following:

- [Fair Housing Act](#)
  - Section 504 of the Rehabilitation Act
  - Title VI of the Civil Rights Act
  - Title II of the Americans with Disabilities Act
  - HUD's Equal Access Rule
  - Local law including Philadelphia's Fair Practices Ordinance
- **[Affirmatively Furthering Fair Housing](#)**  
Providers must have non-discrimination policies in place and conduct assertive outreach to people least likely to engage with the homeless system. Organizations receiving CoC Program and ESG Program funding shall market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability; and, shall provide program applicants and participants with information, in writing, on their rights and remedies under applicable federal, state, and local fair housing and civil rights laws.
  - **Integration and Accessibility ([Fair Housing and Equal Opportunity](#))**  
Housing and supportive services must be offered in an integrated manner, such that persons with disabilities may enjoy a meaningful life within the community. Organizations shall offer housing and supportive services to enable individuals with disabilities to interact with nondisabled persons to the fullest extent possible.
  - **Reasonable Accommodations and Modifications for Persons with Disabilities**  
Organizations are required to provide reasonable accommodations and modifications for persons with disabilities. For federally-funded housing, the recipient is responsible for paying for the modification. Organizations must inform applicants during the intake process of their right to

request a reasonable accommodation or modification. A reasonable modification is a structural change, and a reasonable accommodation is change to rules, policies, or services so that a person with a disability has equal opportunity to use and enjoy a dwelling unit or common space. An example of a reasonable modification is installing a grab bar in the bathroom of a person with a disability, while examples of reasonable accommodations include, permitting a person with a disability to have a service animal.

- **Discrimination Based on Actual or Perceived Gender**

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

There is a limited exception to this rule: Temporary, emergency shelters and other buildings and facilities that are not covered by the Fair Housing Act because they provide short-term, temporary accommodations to adults without children may provide sex-segregated accommodations, which they sometimes do to protect the privacy and security of individuals when the buildings and facilities have physical limitations or configurations that require shared sleeping quarters or shared bathing facilities. For purposes of this rule, shared sleeping quarters or shared bathing facilities are those that are designed for simultaneous accommodation of multiple individuals in the same space. For example, a single-user bathing facility with a lock on the door is not designated for simultaneous occupancy by multiple individuals, so it is not a "shared bathing facility" for purposes of the Equal Access Rule or this rule.

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

- [Discrimination Based on Household Composition](#)

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

Projects that serve households with children must serve **all types of households with children**, including households with children that are headed by a single adult or consist of multiple adults who reside together. Additionally, projects that serve households without children must serve **all types of households without children**, including households with multiple adults who reside together.

- [Preventing Family Separation](#)

In an effort to maintain family unity, for housing projects serving households with children, the age and gender of a child under age 21 shall not be used as a basis for denying any family's admission, nor may a recipient deny admission to any member of the family (e.g., 17-year old son). Projects will

make every attempt possible to avoid family separation, unless absolutely necessary for the safety and well-being of the family.

- [Guidance for Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities](#)

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

- **Prioritized Subpopulations and Fair Housing Implications**

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

- *Dedicated versus Prioritized*

Projects and/or beds that are dedicated to serving a specific subpopulation must continue serving only this subpopulation. (For instance, a Permanent Supportive Housing project that is dedicated to serving households experiencing chronic homelessness must continue serving those households). This means that if two otherwise eligible households are seeking admission into the program, one who falls within the designated prioritized subpopulation and one who does not, the household who is in the designated prioritized subpopulation must be given priority for admission.

If there are no persons on a waiting list or applying for entrance to the program who fall within the dedicated or first priority subpopulation, organizations should not hold the unit vacant, but instead should serve the next prioritized subpopulation who may benefit from the services being provided.

- *Fair Housing Implications*

The Local Standards establish priority subpopulations by project type (i.e., Permanent Supportive Housing); organizations may not set more restrictive priorities. For instance, while a Permanent Supportive Housing project may prioritize households experiencing chronic

homelessness with a qualifying disability per the Local Standards, beds may not be reserved to persons with a specific disability (i.e. physical disability). If an individual, who is otherwise qualified, but who does not have a physical disability, seeks admission and would benefit from the services offered, this person may not be excluded from the project. Organizations may reserve beds for persons with HIV/AIDS if the housing also receives funding from the Housing Opportunities for People with AIDS program (HOPWA).

Per the federal Fair Housing Act and the Philadelphia Fair Practices Ordinances, households with children may not be categorically screened out from housing. This means that a housing project may prioritize households without children, but may not limit eligibility for the project to households without children. If a household with children is otherwise eligible for a project, the household must be offered housing in the project.

## VIOLENCE AGAINST WOMEN ACT (VAWA)

ESG and CoC-funded homeless assistance programs providing housing or rental assistance must comply with the [Violence Against Women Act](#) (VAWA)<sup>2</sup> regulations.

VAWA protections mean that survivors of domestic violence, dating violence, sexual assault, or stalking:

- Cannot be denied admission to emergency housing, safe havens, transitional housing, or permanent housing programs because they are or have been victims or threatened victims;
- Cannot be evicted, lose federal rental assistance, or have emergency housing assistance terminated because they are or have been victims or threatened victims;
- Cannot be denied admission or rental assistance, evicted, terminated, or lose a rental subsidy for reasons related to the abuse, such as bad credit history and criminal history;
- May remain in housing, at least temporarily, if their abuser is evicted; and
- Must be able to move or “transfer” to another subsidized unit to protect their safety and keep their affordable housing.

VAWA housing protections are intended to encourage survivors of domestic violence, sexual assault, dating violence, and stalking who are receiving housing subsidies to report and seek help for the abuse committed against them, without being afraid of being evicted. HUD’s final VAWA rule “reflects the federal government’s recognition that all people have a right to live their lives safely.” The protections reduce the risk of homelessness for individuals who might otherwise be evicted, be denied housing assistance, or flee their homes.

HUD’s regulations implementing the law include a number of requirements:

- Notifying all program participants (current and future) of their rights under VAWA;
  - Providing all participants (current and future) with a self-certification form, to have in case needed;
  - Including a lease provision/addendum with all VAWA requirements in all leases with participants;
- and

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<sup>2</sup> Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

- Establishing Rental Assistance Agreements or Contracts with all third-party housing owners, or revising current agreements or contracts, to ensure compliance with VAWA obligations.

A person’s ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.<sup>3</sup> Housing providers will work with the Office of Homeless Services’ Supportive Housing Clearinghouse (Clearinghouse), which serves as the CEA-BHRS Centralized Referral Entity, to enact external emergency transfers. The ability of the Clearinghouse to honor requests for participants currently receiving assistance may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, human trafficking, or stalking, and on whether another dwelling unit is available and is safe to offer the tenant for temporary or more permanent occupancy. A draft emergency transfer plan, which includes more information on this process and definitions of key concepts, is currently available for view and comment on the Office of Homeless Services website.

#### COORDINATED ENTRY AND ASSESSMENT-BASED HOUSING REFERRAL SYSTEM (CEA-BHRS) PARTICIPATION

- Philadelphia’s Coordinated Entry and Assessment-Based Housing Referral System (CEA-BHRS) is a *process* designed to coordinate program participant access, assessment, and referral to homeless-dedicated prevention assistance, homeless-dedicated housing and services, and community-based affordable housing. These written standards for providing assistance under ESG and CoC Programs will be integrated into the CoC’s Coordinated Entry and Assessment Based Housing Referral System (CEA-BHRS) policies and procedures and the intake and assessment procedures of individual housing projects.
- All CoC-funded and ESG-funded projects are required to participate in the Philadelphia CoC’s Coordinated Entry and Assessment Based Housing Referral System (CEA-BHRS).
- Participation requires following all established policies and procedures outlined in the [CEA-BHRS Policies and Procedure Manual](#)

#### HMIS PARTICIPATION

- All CoC-funded and ESG-funded projects are required to participate in ClientTrack<sup>4</sup>, the Philadelphia CoC’s Homeless Management Information System (HMIS), as specified in the [HMIS Governance Charter](#) and [HMIS Policies and Procedures](#).

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<sup>3</sup> Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

<sup>4</sup> Victim service providers are prohibited from entering participant information into HMIS under federal guidelines, and therefore will use a comparable database in order to report data as necessary.

- The CoC strongly encourages non-CoC/ESG funded organizations to participate in ClientTrack.

## PARTICIPANT INCLUSION

- Each CoC-funded project is expected to engage participants in ongoing program evaluation and quality improvement processes. Toward that end, at a minimum, each project is required to survey or interview participants at least annually to obtain feedback on program service quality, the housing and service environment, and opportunities for improvement.
- Per the CoC Interim rule, all recipients and sub-recipients of CoC Program funding are required to provide for the participation of at least one homeless or formerly homeless individual on the board of directors of other equivalent policymaking entity. An advisory or tenant committee that makes recommendations to the recipient's or subrecipient's board, but itself does not make decisions, is not considered an equivalent policymaking entity.

## ACCESS TO MAINSTREAM RESOURCES

- The Philadelphia CoC expects that every organization that is funded through the CoC or ESG Programs will coordinate with and access mainstream and other targeted homeless resources.
- Organizations should assess and assist participants with obtaining any mainstream resource for which they may be eligible for, including: TANF, Veterans Health Care, Supplemental Nutrition Assistance Program (SNAP), Medicaid, Federally Qualified Healthplan (Affordable Care ACT), CHIP, SSI/SSDI, Workforce Investment funds, and Welfare-to-Work.
- Where possible, organizations should streamline processes for applying for mainstream benefits such as the use of a singular form to apply for benefits or collecting necessary information in one step.

## EDUCATION LIAISON

- For projects that serve households with children, a staff person must be designated as the educational liaison that will ensure children are:
  - Enrolled in school
  - Connected to appropriate services in the community, including early childhood projects such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney Vento education services

## TERMINATION AND GRIEVANCE PROCEDURES

- Organizations must have a written grievance procedure, including a formal process for participants to provide feedback.
  - Organizations should make available information about the **Office of Homeless Services Comment Line** to all participants.
  - In the case of denying a match from CEA-BHRS, organizations must follow the procedure described in the CEA-BHRS Policies and Procedures manual
- Organizations must have a written termination policy outlining project rules and termination processes, including a formal due process.

- Terminations may only occur in the most severe circumstances, which include, but are not limited to: consistent failure to make rental payments or adhere to a repayment schedule, consistent violation of the lease, or destruction of property.
- Termination from a project should not prohibit the household from being readmitted into the program at a future date.
- The termination process, at a minimum, must consist of:
  - Providing the participant with a written copy of the rules and the termination process before the participant begins to receive assistance;
  - Written notice to the program participant containing a clear statement of the reasons for termination: e.g. lease obligations, tenant payments, damage to the property;
  - A review of the decision, in which the program participant is given the opportunity to present written or oral objections/ appeal before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
  - Prompt written notice of the final decision to the program participant.

## GUIDING PRINCIPLES

### HOUSING FIRST <sup>5</sup>

- *Housing First* is a programmatic and systems approach that prioritizes providing permanent housing to people experiencing homelessness quickly without preconditions or service participation requirements, thus ending their homelessness and serving as a platform from which they can pursue personal goals and improve their quality of life.
- This approach is guided by the belief that people need basic necessities like food and a place to live, before attending to anything less critical, such as getting a job, budgeting properly, or attending to substance use issues.

#### Core Elements of Housing First at the Project Level <sup>6</sup>

- Access to projects is not contingent on sobriety<sup>7</sup>, minimum income requirements, lack of a criminal record (including status on the sex offender registry)<sup>8</sup>, completion of treatment, participation in services, status, or other unnecessary conditions.
- Projects do everything possible not to reject a household on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that are interpreted as indicating a lack of “housing readiness.”<sup>9</sup>

<sup>5</sup> National Alliance to End Homelessness (2016). *Housing First Fact Sheet*. Retrieved from [http://www.endhomelessness.org/page/-/files/07-14-2016\\_FS\\_HousingFirst.pdf](http://www.endhomelessness.org/page/-/files/07-14-2016_FS_HousingFirst.pdf)

<sup>6</sup> United States Interagency Council on Homelessness (2016). *Housing First Checklist: Assessing Projects and Systems for a Housing First Orientation*. Retrieved from [https://www.usich.gov/resources/uploads/asset\\_library/Housing\\_First\\_Checklist\\_FINAL.pdf](https://www.usich.gov/resources/uploads/asset_library/Housing_First_Checklist_FINAL.pdf)

<sup>7</sup> Per HUD guidance, Recovery programs at a project level can limit entry to persons who are not currently using drugs or alcohol and are committed to living in a sober environment. The key component to staying aligned with Housing First, as a systems approach, is that the participant has sought out this type of program versus it being the only option presented to them. Additionally, Recovery programs should accept participants at any stage of their recovery and have minimal barriers to entry so that income requirements, criminal records, or eviction histories are not required for program entry

<sup>8</sup> Active status on the PA sex offender registry is not an eligible criterion to deny someone from entering a project

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

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#### HOUSING-FOCUSED

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

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#### PRIORITIZATION

- Prioritization Factors for Transitional Housing, Rapid Re-Housing, and Permanent Supportive Housing are the following:
  - Severity of service needs (VI-SPDAT score)
  - Verified chronic homeless status
  - Length of time homeless
  - Currently living in an unsheltered situation
- Housing prioritization is implemented using a “Banding Order”:

CEA-BHRS Band	Family VI-SPDAT Score	Singles VI-SPDAT Score	Youth VI-SPDAT Score	Housing Resource
<b>High</b>	9-22	8-17	8-17	Permanent Supportive Housing
				Rapid Re-Housing (for households that are not eligible for PSH and are not part of a TH target population)
				Transitional Housing (for households

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<sup>9</sup> “Housing readiness” is when a project subordinates access to permanent housing with other requirements: <http://www.csh.org/toolkit/public-housing-agencies-toolkit/primer-on-homelessness-and-supportive-housing/supportive-housing-key-terms/>

				that are not eligible for PSH and are part of a TH target population)
<b>Medium</b>	4-8	4-7	4-7	Rapid Re-Housing (for households not part of a TH target population)
				Transitional Housing (for households that are part of a TH target population)
<b>Low</b>	0-3	0-3	0-3	Not prioritized for a housing resource through CEA-BHRS

### PERSON-CENTERED

- A trauma-informed approach that is dignified, safe, and incorporates participant choice is utilized.
  - Assistance is allocated effectively and efficiently, linking households as quickly as possible to the most appropriate intervention to achieve:
    - a. A reduction in the number of households experiencing homelessness
    - b. A Reduction in the length of time households experience homelessness
    - c. A Reduction in returns to homelessness (recidivism)

### STRENGTHS-BASED

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

### HOMELESS ASSISTANCE SERVICES AVAILABLE

ELIGIBILITY BY COMPONENT				
Component**	Funding	Homeless Status Category *	Target Population	Income
<b>Homelessness Prevention</b>	ESG	At-risk: 1,2,3 Homeless: 2,4	See "ESG Homeless Prevention" Section for further eligibility criteria	At or below 30% AMI
<b>Emergency Shelter</b>	ESG	1,2,4	N/A	N/A
<b>Transitional Housing</b>	CoC	1,4	Youth ages 18-24 People fleeing Domestic Violence People in recovery from substance use disorder	N/A

<b>Rapid Re-Housing</b>	ESG CoC	1,4	People with VI-SPDAT Scores 4-7 People with the longest history of homelessness People with VI-SPDAT scores 9+ who do not qualify for PSH	No income requirement at entry****
<b>Joint TH-RRH</b>	CoC	1,4	Youth ages 18-24 People fleeing Domestic Violence	No income requirement at entry
<b>Permanent Supportive Housing ***</b>	CoC	1,4	Dedicated to households experiencing chronic homelessness, as defined by HUD, or meeting the eligibility criteria for DedicatedPLUS	At or below 50% AMI

**\* All definitions and categories of "Homeless" and "At Risk of Homelessness" can be found in Appendix A and Appendix B.**

**\*\* All components:** Eligible households must have a head of household that is 18 years of age or older; if not 18 years old, must provide documentation of legal emancipation.

**\*\*\* PSH component:** Eligible households must have one household member (adult OR child) with a disability; income limits apply to OHS-contracted PSH only; see Appendix F.

**\*\*\*\*RRH Income:** Participant income must be at or below 30% AMI at annual evaluation, see Appendix F

## ESG HOMELESSNESS PREVENTION

ESG homelessness prevention is housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the household from moving to an emergency shelter, a place not meant for human habitation, or another location described in [paragraph \(1\)](#) of HUD’s homeless definition.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

### ELIGIBILITY<sup>10</sup>

Households who:

1. Do not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND
2. Meet ONE of the following conditions:
  - a. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance;

<sup>10</sup>Other eligibility criteria may apply with additional funding streams and can be found in Appendix E.

- b. Is doubled up, and not listed on the lease because of economic hardship;
- c. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- d. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals;
- e. Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room;
- f. Is exiting a publicly funded institution or system of care;
- g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in this Consolidated Plan.
- h. A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute, such as
- i. section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with him or her.

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#### MINIMUM STANDARDS FOR HOMELESSNESS PREVENTION ASSISTANCE

- Participants are eligible to receive rental assistance up to 12 months.<sup>11</sup>
- Participants receiving more than one month of rental assistance are required to meet with their housing stabilization specialist/social worker at least once per month.
- Participants are required to contribute 30% of their monthly adjusted income or 10% of their monthly income (higher of the two amounts) towards rent, and participant household incomes are recertified every 3 months: monthly household income at or below 30% AMI. Participants must make payments directly to the housing owner (or their agent, such as a property manager).
- Participants must have a written lease in order to receive rental assistance.
- Rental assistance will only be provided if the total rent for the unit does not exceed the fair market rent established by HUD, and complies with HUD’s standard of rent reasonableness.
- When providing rental assistance under the homelessness prevention component of the ESG program, assistance may only be provided in cases where a rental assistance agreement is in place between the provider and owner that sets forth the terms under which the rental assistance is being provided. It must *at least* include the following:
  - A provision requiring the owner to give the provider a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant, as indicated in §576.106(e).
  - The same payment due date, grace period, and late payment penalty requirements as the program participant’s lease, as indicated in §576.106(f).
  - For project-based rental assistance, the initial term of the rental assistance agreement must be 1 year. For tenant-based rental assistance, recipients/subrecipients should establish the term of the rental assistance agreement for the period of time they anticipate providing assistance.
  - All protections for victims of domestic violence, dating violence, sexual assault, or stalking that apply to tenants and applicants under [24 CFR part 5](#), subpart L, as supplemented by § 576.409.

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<sup>11</sup> Up to 12 months of rental assistance is a Philadelphia CoC Local Standard.

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## TYPES OF ASSISTANCE

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

## ESG EMERGENCY SHELTER

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

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## MINIMUM STANDARDS FOR EMERGENCY SHELTER ASSISTANCE

The Emergency Solutions Grants (ESG) Program interim rule establishes minimum standards for safety, sanitation, and privacy in emergency shelters funded with ESG, and minimum habitability standards for permanent housing funded under the Rapid Re-housing and Homelessness Prevention components of ESG.

The Office of Homeless Services and its contracted emergency housing organizations provide the following services to facilitate self-sufficiency and independence:

- Safe, temporary emergency shelter;
- Housing-focused, person-centered, strengths-based case management services;
- Assistance with obtaining housing;
- Referrals to supportive services for special subpopulations such as children, people with disabilities such as serious mental illness or substance use disorder, veterans, etc.; and
- A savings program to enable clients to save income toward housing.

The Office of Homeless Services requires all contracted emergency housing organizations, including those receiving ESG funds, to comply with its [Emergency Housing Standards](#) and [Emergency Housing Case Management Standards](#) created to provide City contracted organizations with a clear set of guidelines and requirements for the operation of their emergency housing facilities.

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<sup>12</sup> Time frame for medium term rental assistance and utility assistance are Philadelphia CoC local standards

The guiding principles of the City’s Emergency Housing Standards ensure individuals and families living in emergency housing:

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

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#### CURRENT PERFORMANCE INDICATORS FOR ESG EMERGENCY SHELTER <sup>13</sup>

- Timeliness of HMIS Data Entry
  - All project entry and exit assessments are entered in HMIS within 3 days (72 hours)
  - All annual assessments entered within 30 days before or after the anniversary of the head of household’s project start date
- HMIS Data Quality
  - The “percent of Error Rate” is 10% or less for all categories: personally identifiable information, Universal Data Elements, and income and Housing Data Quality
- The “Percent of Records Unable to Calculate” is 10% or less for chronic homelessness
- Reduction in length of time homeless
  - Average length of stay is 120 days or less
- Exits to permanent housing
  - 40% or more of participants (adults + children) will exit to permanent housing destination

#### COC TRANSITIONAL HOUSING

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

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#### ELIGIBILITY

- Transitional housing projects must follow any additional eligibility criteria set forth in the HUD CoC Program NOFA through which a project was funded and the project’s grant agreement.
- Households must represent 1 of the 3 target populations the Philadelphia CoC has dedicated its transitional housing inventory to serve.

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#### MINIMUM STANDARDS FOR TRANSITIONAL HOUSING ASSISTANCE

All referrals to transitional housing and assessment for type and level of services must come through the Coordinated Entry and Assessment Based Housing Referral System (CEA-BHRS). The following minimum standards will be applied to all transitional housing programs:

- The primary objective of transitional housing is to move a household from homelessness to permanent housing as quickly as possible; assistance in transitioning to permanent housing must be made available/provided as quickly as possible from transitional housing program entry.
- Supportive services must be offered throughout the duration of the stay in transitional housing.

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<sup>13</sup> Performance Indicators represent 2017-2018 APR data. The Philadelphia CoC updates performance indicators annually.

- Participants in transitional housing must enter into a lease, sublease or occupancy agreement for a term of at least one month. The lease, sublease or occupancy agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 12 months.
- Maximum length of stay cannot exceed 12 months.<sup>14</sup> When households need assistance beyond 12 months, OHS approval is required. This standard applies to all households who enter a TH project on or after October 1, 2018.

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

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#### CURRENT PERFORMANCE INDICATORS FOR COC TRANSITIONAL HOUSING <sup>15</sup>

- Timeliness of HMIS Data Entry
  - All project entry and exit assessments are entered in HMIS within 3 days (72 hours)
  - All annual assessments entered within 30 days before or after the anniversary of the head of household's project start date
- HMIS Data Quality
  - The "percent of Error Rate" is 10% or less for all categories: personally identifiable information, Universal Data Elements, and income and Housing Data Quality
  - The "Percent of Records Unable to Calculate" is 10% or less for chronic homelessness
- Housing Stability
  - 80% or more of all participants that exit the program will exit to other permanent housing destinations
- Connection to non-cash mainstream benefits
  - 93% or more of adult participants will have mainstream (non-cash) benefits at project exit or annual assessment
- Connection to health insurance
  - 100% of all participants will be connected to health insurance at project exit or annual assessment
- Increase in income from sources other than employment
  - 26% or more of adult participants will increase income from sources other than employment
- Increase in income from employment
  - 38% or more of adult participants will increase income from employment
- Reduction in length of time homeless
  - Average length of stay for programs serving households with children is 300 days or less
  - Average length of stay for programs serving households without children is 200 days or less.

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<sup>14</sup> All TH projects must request an extension from OHS to serve a household for more than 12 months. All TH project receiving HAP funding must abide by HAP regulations which require that an extension after 12 months be approved by OHS, and an extension after 18 months be approved by the state.

<sup>15</sup> Performance Indicators represent 2017-2018 APR data. The Philadelphia CoC updates performance indicators annually.

## ESG AND COC RAPID RE-HOUSING

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

### ELIGIBILITY

- Must follow any additional eligibility criteria set forth in the NOFA through which a project was funded and the grant agreement (e.g. in the FY13/14 NOFA, new RRH projects could only serve families with children coming directly from streets or shelter)

### ELIGIBLE ACTIVITIES

<b>Rapid Re-Housing – Eligible Activities/ Costs<sup>16</sup></b>		
	<b>ESG RRH</b>	<b>CoC RRH</b>
Rental Assistance	<ul style="list-style-type: none"> <li>• Short Term (up to 3 months)</li> <li>• Medium Term (4 to 24 months)</li> <li>• Rent Arrears (one time, to cover up to 6 months of arrears, including late fees)</li> </ul>	<ul style="list-style-type: none"> <li>• Short Term (up to 3 months)</li> <li>• Medium Term (4 to 24 months)</li> </ul>
Type of Rental Assistance	<ul style="list-style-type: none"> <li>• Tenant based</li> <li>• Project based</li> </ul>	<ul style="list-style-type: none"> <li>• Tenant based only</li> </ul>
Housing Relocation and Stabilization Services	<p><b>Financial Assistance</b></p> <ul style="list-style-type: none"> <li>• Rental application fees</li> <li>• Security deposits (up to 2 equivalent of 2 months' rent)</li> <li>• Last month's rent</li> <li>• Utility Deposits and payments (up to 24 months, including up to 6 months of arrears)</li> <li>• Moving costs</li> </ul> <p><b>Supportive Service</b></p> <ul style="list-style-type: none"> <li>• Housing Search and Placement</li> <li>• Housing Stability Case Management</li> <li>• Mediation</li> <li>• Legal services</li> <li>• Credit repair</li> </ul>	<p><b>Financial Assistance</b></p> <ul style="list-style-type: none"> <li>• Security deposits (up to 2 equivalent of 2 months' rent)</li> </ul> <p>First and last month's rent</p> <p><b>Supportive Service</b></p> <ul style="list-style-type: none"> <li>• Case management</li> <li>• Child care</li> <li>• Educational services</li> <li>• Employment assistance and job training</li> <li>• Food</li> <li>• Housing search and counseling services, including mediation, credit repair, and payment of rental application fees</li> <li>• Legal services</li> </ul>

<sup>16</sup> These are eligible activities and costs established by HUD. Recipients are given the discretion to set local standards for determining rental assistance amounts, maximum number of times eligible for services, and maximum number of months a participant may receive assistance.

	<ul style="list-style-type: none"> <li>• Budgeting</li> <li>• Money Management</li> </ul>	<ul style="list-style-type: none"> <li>• Life skills training</li> <li>• Mental health services</li> <li>• Moving costs</li> <li>• Outpatient health services</li> <li>• Outreach services</li> <li>• Substance abuse treatment</li> <li>• Transportation</li> <li>• Utility deposits</li> </ul>
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## MINIMUM STANDARDS FOR RAPID RE-HOUSING ASSISTANCE

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

- All projects must document eligibility according to [HUD recordkeeping requirements](#) for the CoC Program.
- Maximum participation in a rapid re-housing program cannot exceed 24 months in any three-year period.
- Supportive services must be offered throughout the duration of stay in the program.
- Housing Stabilization Specialists are required to make appointments with participants not less than once per month to assist the participant in ensuring long-term housing stability.
  - Though appointments are required to be set by program staff, the participant reserves the right to not attend the appointment or to be consistently engaged in services
- Participants must enter into a lease agreement for a term of at least 366 days, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.
- Any lease, sublease, and occupancy agreement with a program participant must include a provision that includes all requirements that apply to tenants, the owner, or the lease under Federal protections for victims of domestic violence, dating violence, sexual assault, or stalking, including the prohibited bases for eviction and restrictions on construing a lease. The lease, sublease, and occupancy agreement may specify that the protections apply only during the period of assistance.
- When CoC Program grant funds are used for assistance that is not tenant-based, any lease, sublease, or occupancy agreement with a [program participant](#) must permit the program participant to terminate the lease, sublease, or occupancy agreement without penalty if the program participant qualifies for an emergency transfer under the Philadelphia CoC Emergency Transfer Plan.
- Must re-evaluate quarterly that the participant lacks sufficient resources and support networks necessary to retain housing without assistance.
- Rental assistance will only be provided if the total rent for the unit does not exceed the fair market rent established by HUD, and complies with HUD’s standard of rent reasonableness.
- When providing rental assistance under the rapid re-housing component of the ESG program, assistance may only be provided in cases where a rental assistance agreement is in place between the provider and owner that sets forth the terms under which the rental assistance is being provided. It must *at least* include the following:
  - A provision requiring the owner to give the provider a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.
  - The same payment due date, grace period, and late payment penalty requirements as the program participant’s lease.

- For project-based rental assistance, the initial term of the rental assistance agreement must be 1 year. For tenant-based rental assistance, recipients/subrecipients should establish the term of the rental assistance agreement for the period of time they anticipate providing assistance.
- All requirements that apply to tenants, the owner, or the lease under Federal protections for protections for victims of domestic violence, dating violence, sexual assault, or stalking.
- When CoC Program grant funds are used for tenant-based rental assistance, the provider must enter into a contract with the owner or landlord of the housing that:
  - Requires the owner or landlord of the housing to comply with Federal protections for protections for victims of domestic violence, dating violence, sexual assault, or stalking;
  - Requires the owner or landlord of the housing to include a lease provision that includes all requirements that apply to tenants, the owner, or the lease under Federal protections for victims of domestic violence, dating violence, sexual assault, or stalking, including the prohibited bases for eviction and restrictions on construing lease.

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#### DETERMINING RENTAL ASSISTANCE LIMITS

- Each household may receive up to 12 months of assistance. When households need assistance beyond 12 months, OHS approval is required.<sup>17</sup>
- Participants are to pay rent. It is required that the tenant’s share of rent not exceed 30% of the household’s adjusted monthly gross income.\*<sup>18</sup>
- Participants will be evaluated every 3 months to determine if further assistance is needed. All documents required at entry will be required at evaluation.<sup>19</sup>

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#### CURRENT PERFORMANCE INDICATORS FOR COC RAPID RE-HOUSING <sup>20</sup>

- Timeliness of HMIS Data Entry
  - All project entry and exit assessments are entered in HMIS within 3 days (72 hours)
  - All annual assessments entered within 30 days before or after the anniversary of the head of household’s project start date
- HMIS Data Quality
  - The “percent of Error Rate” is 10% or less for all categories: personally identifiable information, Universal Data Elements, and income and Housing Data Quality
  - The “Percent of Records Unable to Calculate” is 10% or less for chronic homelessness
- Housing Stability
  - 80% or more of all participants that exit the program will exit to other permanent housing destinations
- Reduce Length of time homeless
  - Time from program entry date to move-in is 45 days or less
- Connection to non-cash mainstream benefits
  - 72% or more of adult participants will have mainstream (non-cash) benefits

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<sup>17</sup> Up to 12 months of rental assistance is a Philadelphia CoC local standard

<sup>18</sup> Annual income inclusions and exclusions can be found in Appendix D

<sup>19</sup> Quarterly re-evaluations is a Philadelphia CoC local standard

<sup>20</sup> Performance Indicators represent 2017-2018 APR data. The Philadelphia CoC updates performance indicators annually.

- Connection to health insurance
  - 100% of all participants will be connected to health insurance at project exit or annual assessment
- Increase in income from sources other than employment
  - 20% (26%) or more of adult participants will increase income from sources other than employment
- Increase in income from employment
  - 20% (38%) or more of adult participants will increase income from employment

## COC PERMANENT SUPPORTIVE HOUSING

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

PSH projects have the following additional NOFA limitations on eligibility within Category 1:

- Individuals and Families coming from TH must have originally come from the streets, emergency shelter, or safe haven
- Projects that are dedicated to serving households experiencing chronic homelessness, including those that were originally funded as Samaritan Bonus Initiative Projects, must continue to serve chronically homeless persons exclusively
- Projects funded under the Permanent Supportive Housing Bonus must continue to serve the homeless population outlined in the NOFA under which the project was originally awarded.
- Projects that are DedicatedPLUS must serve households who meet HUD’s eligibility criteria for DedicatedPLUS, prioritizing those households experiencing chronic homelessness, as defined by HUD

## ORDER OF PRIORITY FOR PERMANENT SUPPORTIVE HOUSING ASSISTANCE

The Philadelphia CoC and CEA-BHRS Order of Priority is based on the Order of Priority for PSH as established in Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing.<sup>21</sup> Individuals and families are prioritized for housing resources within the associated “band” based on their VI-SPDAT score. Then there are multiple individuals and families with the same VI-SPDAT score, housing units will be prioritized in the following order:

1. Chronic Status, then
2. Length of time homeless, then
3. Current living situation (unsheltered prioritized above sheltered), then
4. Housing Assessment Date (oldenst assessment date prioritized first)

<sup>21</sup> <https://www.hudexchange.info/resource/3897/notice-cpd-14-012-prioritizing-persons-experiencing-chronic-homelessness-in-psh-and-recordkeeping-requirements/>

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#### ORDER OF PRIORITY FOR DEDICATEDPLUS PSH BEDS

1. First Priority — Individuals and families with a disability who meet HUD’s definition of chronic homelessness
2. Second Priority – Individuals and families with a disability residing in a place meant for human habitation, emergency shelter, or safe haven who experienced chronic homelessness as defined by HUD, had been admitted and enrolled in a permanent housing project within the last year but were unable to maintain the housing placement
3. Third Priority – Individuals and families with a disability residing in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last 3 years, but has not done so on four separate occasions.
4. Fourth Priority –Individuals and families with a disability residing in a transitional housing project that will be eliminated and meet the definition of chronically homeless at the time the individual or family entered the transitional housing project
5. Fifth Priority – Individuals and families with a disability receiving assistance through a Department of Veterans Affairs (VA) – funded homeless assistance program and met one of the above criteria at initial intake to the VA’s homeless assistance system.

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#### ORDER OF PRIORITY FOR PSH BEDS NOT DEDICATED NOR DEDICATEDPLUS

1. First Priority – Individuals and families with a disability who has experiences fewer than four occasions of homelessness but where the cumulative time homeless is at least 12 months and has been identified as having severe service needs.
2. Second Priority – Individuals and families with a disability experiencing homelessness and has been identified as having severe service needs
3. 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
4. Fourth Priority – Homeless individuals and families with a disability coming from transitional housing

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

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

CoC Program-funded PSH organizations are required by grant agreement to follow a Housing First approach to the maximum extent practicable. A household experiencing chronic homelessness should not be forced to refuse an offer of PSH if the household does not want to participate in the project's

services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs.

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#### MINIMUM STANDARDS FOR PERMANENT SUPPORTIVE HOUSING ASSISTANCE

- There can be no predetermined length of stay for a PSH project.
- Supportive services designed to meet the needs of the participants must be made available to the participants throughout the duration of stay in PSH.
- Participants in PSH must enter into a lease (or sublease) agreement for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month.
- Any lease, sublease, and occupancy agreement with a program participant must include a provision that includes all requirements that apply to tenants, the owner, or the lease under Federal protections for victims of domestic violence, dating violence, sexual assault, or stalking, including the prohibited bases for eviction and restrictions on construing lease. The lease, sublease, and occupancy agreement may specify that the protections apply only during the period of assistance.
- When CoC Program grant funds are used for assistance that is not tenant-based, any lease, sublease, or occupancy agreement with a [program participant](#) must permit the program participant to terminate the lease, sublease, or occupancy agreement without penalty if the program participant qualifies for an emergency transfer under the Philadelphia CoC Emergency Transfer Plan.
- Providers must enter into a contract with the owner or landlord of any housing for which assistance is being provided that:
  - Requires the owner or landlord of the housing to comply with Federal protections for protections for victims of domestic violence, dating violence, sexual assault, or stalking; and
  - Requires the owner or landlord of the housing to include a lease provision that includes all requirements that apply to tenants, the owner, or the lease under Federal protections for victims of domestic violence, dating violence, sexual assault, or stalking, including the prohibited bases for eviction and restrictions on construing lease.
- Organizations that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a participant’s assistance is terminated only in the most severe cases.

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#### CURRENT PERFORMANCE INDICATORS FOR COC PSH SERVING HOUSEHOLDS **WITHOUT CHILDREN**<sup>22</sup>

- Timeliness of HMIS Data Entry
  - All project entry and exit assessments are entered in HMIS within 3 days (72 hours)
  - All annual assessments entered within 30 days before or after the anniversary of the head of household’s project start date
- HMIS Data Quality
  - The “percent of Error Rate” is 10% or less for all categories: personally identifiable information, Universal Data Elements, and income and Housing Data Quality
  - The “Percent of Records Unable to Calculate” is 10% or less for chronic homelessness

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<sup>22</sup> Performance Indicators represent 2017-2018 APR data. The Philadelphia CoC updates performance indicators annually.

- Housing Stability
  - 95% or more of all participants will remain stable in PSH or exit to other permanent housing destinations
- Reduction in Length of Time Homeless
  - Time from program entry date to move-in is 45 days or less
- Connection to non-cash mainstream benefits
  - 82% or more of adult participants will have mainstream (non-cash) benefits
- Connection to health insurance
  - 100% of all participants will be connected to health insurance at project exit or annual assessment
- Increase in income from sources other than employment
  - 51% or more of adult participants will increase income from sources other than employment
- Increase in income from employment
  - 11% or more of adult participants will increase income from employment

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**CURRENT PERFORMANCE INDICATORS FOR PSH SERVING HOUSEHOLDS WITH CHILDREN<sup>23</sup>**

- Timeliness of HMIS Data Entry
  - All project entry and exit assessments are entered in HMIS within 3 days (72 hours)
  - All annual assessments entered within 30 days before or after the anniversary of the head of household's project start date
- HMIS Data Quality
  - The "percent of Error Rate" is 10% or less for all categories: personally identifiable information, Universal Data Elements, and income and Housing Data Quality
  - The "Percent of Records Unable to Calculate" is 10% or less for chronic homelessness
- Housing Stability
  - 95% or more of all participants will remain stable in PSH or exit to other permanent housing destinations
- Reduction in Length of Time Homeless
  - Time from program entry date to move-in is 45 days or less
- Connection to non-cash mainstream benefits
  - 82% or more of adult participants will have mainstream (non-cash) benefits
- Connection to health insurance
  - 100% of all participants will be connected to health insurance at project exit or annual assessment
- Increase in income from sources other than employment
  - 51% or more of adult participants will increase income from sources other than employment
- Increase in income from employment
  - 11% or more of adult participants will increase income from employment

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<sup>23</sup> Performance Indicators represent 2017-2018 APR data. The Philadelphia CoC updates performance indicators annually.

The Philadelphia CoC Standards for Providing Assistance under the Continuum of Care and Emergency Solutions Grant Programs were approved by the Philadelphia CoC Board on November 13, 2017.

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Elizabeth G. Hersh  
Director, City of Philadelphia Office of Homeless Services  
Co-Chairperson, Philadelphia Continuum of Care Board

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Date

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John Ducoff  
Co-Chairperson, Philadelphia Continuum of Care Board

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Date

## APPENDIX A: HUD HOMELESS DEFINITION CATEGORIES

Category	Definition	Required Documentation	Philadelphia Service Eligibility
<b>Category 1 – Literally Homeless</b>	<p>Household lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ol style="list-style-type: none"> <li>Has a primary nighttime residence that is a public or private place not meant for human habitation;</li> <li>Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u></li> <li>Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution</li> </ol>	<ul style="list-style-type: none"> <li>Written observation by the outreach worker; or</li> <li>Written referral by another housing or service provider; or</li> <li>Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;</li> </ul> <p>For individuals exiting an institution – one of the forms of evidence above and:</p> <ul style="list-style-type: none"> <li>Discharge paperwork or written/oral referral, or</li> <li>Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited institution</li> </ul>	<p>Emergency Housing</p> <p>Transitional Housing</p> <p>Rapid Re-Housing</p> <p>Permanent Supportive Housing</p>
<b>Category 2 – Imminent Risk of Homelessness</b>	<p>Household will imminently lose their primary nighttime residence, provided that:</p> <ol style="list-style-type: none"> <li>Residence will be lost within 14 days of the date of application for assistance; <u>AND</u></li> <li>No subsequent residence has been identified; <u>AND</u></li> <li>Household lacks the resources or support networks needed to obtain other permanent housing</li> </ol>	<ul style="list-style-type: none"> <li>A court order resulting from an eviction action notifying the household that they must leave; or</li> <li>For households leaving a hotel or motel – evidence that they lack the financial resources to stay; or</li> <li>A documented and verified oral statement; and</li> <li>Certification that no subsequent residence has been identified; and</li> <li>Self-certification or other written documentation that the household lacks the financial resources and support necessary to obtain permanent housing</li> </ul>	<p>Prevention</p> <p>Emergency Housing (if household will become Literally Homeless that night)</p>

Category	Definition	Required Documentation	Philadelphia Service Eligibility
<b>Category 3 – Homeless under other Federal Statutes</b>	Not Applicable in Philadelphia		
<b>Category 4 – Fleeing/ attempting to flee domestic violence</b>	Any household who: <ol style="list-style-type: none"> <li>a. Is fleeing, or is attempting to flee, domestic violence;</li> <li>b. Has no other residence; <u>AND</u></li> <li>c. Lacks the resources or support networks to obtain other permanent housing</li> </ol>	<ul style="list-style-type: none"> <li>• <i>For victim service providers:</i> <ul style="list-style-type: none"> <li>○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker</li> </ul> </li> <li>• <i>For non-victim service providers:</i> <ul style="list-style-type: none"> <li>○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where safety is not jeopardized, the oral statement must be verified; and</li> <li>○ Certification by the individual or head of household that no subsequent residence has been identified; and</li> <li>○ Self-certification, or other written documentation, that the household lacks the financial resources and support to obtain other permanent housing.</li> </ul> </li> </ul>	Prevention Emergency Housing Transitional Housing Rapid Re-Housing Permanent Supportive Housing

## APPENDIX B: AT RISK OF HOMELESSNESS DEFINITIONS

Category	Definition	Philadelphia Service Eligibility
<b>Category 1 – Individuals and Families</b>	An individual or family who: <ol style="list-style-type: none"> <li>1. Has an annual income below 30% of median family income for the area; AND</li> <li>2. Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND</li> <li>3. Meets one of the following conditions:               <ol style="list-style-type: none"> <li>(A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR</li> <li>(B) Is living in the home of another because of economic hardship; OR</li> <li>(C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR</li> <li>(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR</li> <li>(E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR</li> <li>(F) Is exiting a publicly funded institution or system of care; OR</li> <li>(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan</li> </ol> </li> </ol>	Homelessness Prevention
<b>Category 2 – Unaccompanied Children and Youth</b>	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute.	Homelessness Prevention
<b>Category 3 – Families with Children and Youth</b>	An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.	Homelessness Prevention

## APPENDIX C: COMMON TERMS, ACRONYMS, AND DEFINITIONS

### Chronically Homeless (HUD definition):

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

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

**DedicatedPLUS:** A permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals with disabilities, and families in which one adult or child has a disability, including unaccompanied homeless youth, that at intake are:

- experiencing chronic homelessness as defined in 24 CFR 578.3;
- residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
- residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;
- residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
- residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
- receiving assistance through a Department of Veterans Affairs(VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA’s homeless assistance system.

**Homeless Management Information System (HMIS)** – A computerized data collection system that tracks services received by homeless people, helps identify gaps in services within the continuum, and allows for greater collaboration among service providers as the system provides a “history” of a homeless person’s involvement in the system of care making it easier for caseworkers to evaluate the situation and provide

services in the most efficient manner. In addition, the HMIS system can help accurately describe a community's homeless population including unduplicated census counts, need for increased capacity to fill service gaps. This system is required by HUD for all continuums of care.

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

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

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

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

**Safe Haven** – Housing that serves hard-to-serve persons with mental illness experiencing homelessness who came from the streets and have been unable or unwilling to participate in supportive services. The housing must provide 24-hour residence for eligible persons for an unspecified period, have an overnight capacity limited to 25 or fewer persons, and provide low-demand services and referrals for the residents.

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

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

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

## APPENDIX D: RRH - ANNUAL INCOME INCLUSIONS & EXCLUSIONS

Annual Income INCLUDES:	
(1)	The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;
(2)	The full amount of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits and other similar types of periodic receipts,
(3)	Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay;
(4)	Welfare assistance. Welfare or other payments to families or individuals, based on need, that are made under program funded, separately or jointly, by Federal, State or local governments (e.g, Social Security)
(5)	Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from persons not residing in the dwelling;
(6)	Net income from the operation of a business or profession;
(7)	Interest, dividends, and other net income of any kind from real and personal property;
(8)	All regular pay, special pay and allowances of a member of the Armed Forces, except special hostile fire pay.

Annual income EXCLUDES:	
(1)	Income from employment of children (including foster children) under the age of 18 years;
(2)	Payments received for the care of foster children or foster adults (usually individuals with disabilities, unrelated to the tenant family, who are unable to live alone);
(3)	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains, and settlement for personal or property;
(4)	Amounts received by the family, that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
(5)	Income of a live-in aide as defined in Sec. 813.102;
(6)	The full amount of student assistance paid directly to the student or to the educational institution;
(7)	Amounts received under training programs funded by HUD;
(8)	Amounts received by a disabled person that are disregarded for a limited time for purposes of SSI income eligibility and benefits because they are set aside for use under a Plan for Achieving Self-Support (PASS); or
(9)	Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and which are made solely to allow participation in a specific program;
(10)	A resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring lawn maintenance, and resident initiatives coordination. No resident may receive more than one such stipend during the same period of time;
(11)	Compensation from state or local employment training programs and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for a limited period as determined in advance;
(12)	Temporary, non-recurring or sporadic income (including gifts);
(13)	For all initial determinations and reexaminations of income carried out on or after April 23, 1993, reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
(14)	Earnings in excess of \$480 for each full time student 18 years old or older (excluding the head of household and spouse);

(15)	Adoption assistance payments in excess of \$480 per adopted child;
(16)	Deferred periodic payments of SSI income and social security benefits;
(17)	Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit;
(18)	Amounts paid by a State agency to a family with a developmentally disabled family member living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home;
(19)	<p>Amounts specifically excluded by any other federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that included assistance under the U.S. Housing Act of 1937:</p> <ul style="list-style-type: none"> <li>(a) The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017(b));</li> <li>(b) Payments to volunteers under the Domestic Volunteer Service Act of 1973 (42 U.S.C.5044, 5058);</li> <li>(c) Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626);</li> <li>(d) Income derived from certain sub marginal land of the United States that is held in t rust for certain Indian tribes (25 U.S.C. 459e);</li> <li>(e) Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8624(f));</li> <li>(f) Payments received under programs funded in whole or in part under the Job Training Partnership Act (29 U.S.C. 1552(b));</li> <li>(g) Income derived from the disposition of funds of the Grand River Band of Ottawa Indians (Public Law 94-540, 90 Statute 2503-2504);</li> <li>(h) The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the Court of Claims (25 U.S.C. 1407-1408) or from funds held in trust for an Indian tribe by the Secretary of Interior (25 U.S.C. 117);</li> <li>(i) Scholarships funded under Title IV of the Higher Education Act of 1965 including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs that are made available to cover the costs of tuition, fees, books, equipment, materials, supplies, transportation, and miscellaneous personal expenses of a student at an educational institution (20 U.S.C.1087uu);</li> <li>(j) Payments received from programs funded under Title V of the Older Americans Act of 1965 (U.S.C. 3056(f));</li> <li>(k) Payments received after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in the In Re Agent Orange product liability litigation, M.D.L. No. 381 (E.D.N.Y.); and</li> <li>(l) Payments received under Maine Indian Claims Settlement Act of 1980 (Pub.L. 96-420, 94 Statute 1785);</li> <li>(m) Earned income tax credit refund payments received from the Internal Revenue Service on or after January 1, 1991. Payments may be received in a resident's regular pay or as a single sum payment;</li> <li>(n) Payments received as AmeriCorps Living Allowances (29 U.S.C. Sec.1552);</li> <li>(o) Payments received under WIC-Supplemental Food Program for Women, Infants, and Children;</li> <li>(p) Payments received under the National School Lunch Program (42 U.S.C. 175-176);</li> <li>(q) Payments received under the Child Nutrition Act (42 U.S.C. 1771-1778);</li> <li>(r) Payments received under the Child Care Block Grant Act of 1990.</li> </ul>

## APPENDIX E: ADDITIONAL SOURCES OF HOMELESSNESS PREVENTION FUNDING

Eligibility under additional sources of funding for Homelessness Prevention:

**Housing Trust Fund:**

Resident of Philadelphia City/County for a minimum of 30 days

**CSBG:**

1-time payment (rent arrears, security deposit, first & last month's rent), average amount of assistance is \$1,000 per, monthly household income at or below 125% FPL.

**HOME:**

Participants are eligible to receive rental assistance up to 12 months, participants receiving more than one month rental assistance are required to meet with their housing stabilization specialist/social worker at least once per month, participants are required to contribute 30% of their monthly adjusted income or 10% of the monthly income (higher of the two amounts) towards rent, and participant household incomes are recertified every 3 months, monthly household income at or below 50% AMI.

## APPENDIX F: 2018 AREA MEDIAN INCOME (AMI) LIMITS

Family Size	Annual Income	30% AMI	50% AMI
1	\$28,150	\$18,350	\$30,600
2	\$32,150	\$21,000	\$35,000
3	\$36,150	\$23,600	\$39,350
4	\$40,150	\$26,200	\$43,700
5	\$43,400	\$29,420	\$47,200
6	\$46,600	\$33,740	\$50,700
7	\$49,800	\$38,060	\$54,200
8	\$53,000	\$42,380	\$57,700

## APPENDIX G: ORDER OF PRIORITY

Individuals and families are prioritized for housing resources within the associated “band” based on their VI-SPDAT score. When there are multiple individuals or families with the same VI-SPDAT score, the housing unit is then prioritized using the following tie-breakers in the following order:

1. Chronic status, then
2. Length of time homeless, then
3. Current living situation (unsheltered prioritized above sheltered), then
4. Housing Assessment Date (oldest assessment date prioritized first)

For example, if there are two individuals who scored 18, and both are identified as chronically homeless, then the unit is prioritized for the household with the longest cumulative length of time homeless. If both individuals were experiencing homelessness for the same amount of time, then the unit is prioritized for the individual who is currently unsheltered. Lastly, if both are unsheltered, the unit is prioritized for the individual with the oldest assessment date.

The CEA-BHRS Order of Priority is based off of the Order of Priority included in HUD’s Prioritization Notice (Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing). Permanent Supportive Housing beds dedicated or prioritized for occupancy by persons experiencing chronic homelessness will only receive referrals for households who meet HUD’s definition of chronic homelessness. That means if none of the households who scored 18 meet the definition of chronic homelessness, then the highest prioritized household that scored a 17 will be referred. When there are no chronically homeless individuals or families prioritized for PSH, referrals are made following the prioritization order below for beds not dedicated or prioritized for occupancy by persons experiencing chronic homelessness:

- First Priority – Individuals and families with a disability who has experienced fewer than four occasions of homelessness but where the cumulative time homeless is at least 12 months and has been identified as having severe service needs.
- Second Priority – Individuals and families with a disability experiencing homelessness and has been identified as having severe service needs.
- 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
- Fourth Priority – Homeless individuals and families with a disability coming from transitional housing

### PRIORITIZED BY-NAME-LIST

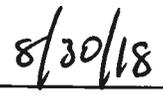
The prioritization order is managed through the use of a Prioritized By-Name-List. The By-Name-List is generated by HMIS during the prioritization process and serves as the basis of the CEA-BHRS referral process.

The Philadelphia CoC Standards for Providing Assistance under the Continuum of Care and Emergency Solutions Grant Programs were approved by the Philadelphia CoC Board on August 28, 2018.

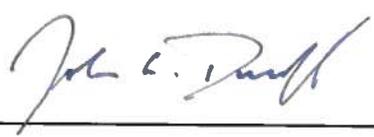
 

Elizabeth G. Hersh

Co-Chair, Philadelphia CoC Board



Date



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Co-Chair, Philadelphia CoC Board



Date