



Central Florida Commission on Homelessness FL-507 Written Standards

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Introduction

The Central Florida Commission on Homelessness (CFCH) is responsible for coordinating and implementing a regional homeless response system to meet the needs of persons experiencing or at imminent risk of homelessness within our geographic area.

Both the Emergency Solution Grant (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Rules state that each Continuum of Care must establish written rules for the administration of ESG and CoC assistance. Additionally, the Florida Department of Children and Families Homelessness Assistance Grants implemented by Homeless Services Network of Central Florida to fund CoC initiatives require eligible activities to be outlined in a set of written standards. All programs that receive ESG, CoC, or DCF Homelessness Assistance funding, or Veteran Affairs funds (unless otherwise limited by program guidelines) are required to abide by these written standards. The CoC strongly encourages programs that do not receive any of these sources of funds to accept and utilize these written standards to harmonize the regional efforts to the benefit of those experiencing homelessness.

The majority of these standards are informed by the ESG and/or HEARTH Rules, however additional standards have been established to assist the CoC in meeting State of Florida funding program guidelines, support Coordinated Entry goals, enhance CoC performance outcomes, and to help the CoC reach the goal of ending homelessness in our region. This is a living document that will evolve with regional needs and funder requirements.

These written standards have been developed in consultation with CoC and ESG recipients and with service providers. These regional partners provided input on standards, performance measures and the process for full implementation of standards throughout the CoC from the perspective of those organizations that are directly providing homeless housing and services, including Homelessness Prevention (HP), Street Outreach (SO), Coordinated Entry (CE), Emergency Shelter (ES), Transitional Housing (TH), Supportive Housing for Homeless People with Disabilities, Rapid Re-housing (RRH), and Supportive Services Only (SSO). These standards were also reviewed and approved by the CFCH Lived Experience Council and with input from the CFCH Technical Expertise Committee.

Programs Overview

Continuum of Care (CoC) Program

CFCH provides governance and strategic leadership for the Department of Housing and Urban Development's (HUD) Continuum of Care Program for the Florida Counties of Orange, Osceola, and Seminole. The Lead Agency for CFCH is Homeless Services Network of Central Florida, Inc. (HSN). CoC funds are available annually and awarded to Lead Agencies by HUD through a grant application process. Central Florida's CoC FL-507 subcontracts with other community partners to fund the direct services provided thru the CoC Program.

The Continuum of Care Program is designed to fund projects focused on providing housing and supportive services to individuals and families experiencing homelessness. The Program is focused on helping individuals who are literally homeless as defined by HUD, and reducing first time homelessness. Projects funded through the CoC program aim to assist persons experiencing homelessness with obtaining and maintaining permanent housing, by providing the necessary wraparound services to sustain housing placement, and increase the participant's likelihood of success in the program.

CoC program components and uses of assistance (eligible activities) include:

- Supportive Housing, specifically
 - Supportive Housing for Homeless People with Disabilities
 - Supportive Rapid Rehousing
- Transitional Housing
- Support Service Only, including Coordinated Entry
- Homeless Management Information System
- Homelessness Prevention (in limited circumstances)
- Administration

Funds may be used to pay for eligible costs listed in 24 CFR Part 578.39 through 578.63.

Emergency Solutions Grant (ESG) Program

The ESG program is awarded to entitlement jurisdictions as well as the State of Florida through the U.S. Department of Housing and Urban Development (HUD). The State of Florida is required to distribute its portion of the grant for projects operated by local government agencies or private non-profit organizations, or the combination of both. The Florida Department of Children and Families (DCF) has chosen to have the Continuum of Care (CoC) Lead Agency, the Homeless Services Network for our region, be responsible for administering the State of Florida's portion of ESG funding. ESG Funds from the State are available annually and awarded to Lead Agencies by DCF through a grant application process. The Central Florida Commission on Homelessness uses these funds to fund eligible organizations referred to as Sub-subrecipients.

The purpose and design of the Federal ESG Program is to help improve the quality and quantity of emergency shelters for persons experiencing homelessness, assist with the costs associated operating emergency shelters, to fund essential supportive services geared around homelessness prevention, and to support Rapid Rehousing projects.

ESG funds allow persons experiencing homelessness to have access to safe, sanitary, habitable, and functional shelter, paired with the services and assistance they need to improve their situations. ESG funds cover a variety of relocation and stabilization services, as well as short- and/or medium-term rental assistance aimed at homelessness prevention or rapid rehousing. Finally, the program can assist street outreach programs to connect unsheltered homeless persons with local housing and supportive services.

The funds under this program are intended to target two populations of persons facing housing instability:

- 1) Individuals and families who are currently in housing, but are at risk of becoming homeless, and in need of temporary rent or utility assistance to prevent them from becoming homeless, or assistance to move to another unit (prevention); and
- 2) Individuals and families who are experiencing homelessness, (SO, ES, TH,) and need temporary assistance in order to obtain housing and retain it (RRH).

HUD expects that these resources will be targeted and prioritized to serve households that are most in need of this temporary assistance, and are most likely to achieve stable housing, whether subsidized or unsubsidized, outside of ESG after the program concludes. ESG assistance is not intended to provide long-term support for program participants, nor will it be able to address all of the financial and supportive services needs of households that affect housing stability. Rather, assistance should be focused on housing stabilization, linking program participants to community resources and mainstream benefits, and helping them develop a plan for future housing instability.

ESG funds may be used for five program components (six eligible activities):

- Street outreach,
- Emergency shelter,
- Homelessness prevention,
- Rapid re-housing assistance, and
- Homeless Management Information Systems (HMIS); as well as
- Administrative activities.

The five program components and the eligible activities that may be funded under each are set forth in 24 CFR 576.101 through 24 CFR 576.107.

State of Florida Homeless Assistance Funding

The State of Florida through the Department of Children and Families provides funds to local communities allocated annually. Funding for homeless assistance distributed by DCF must be coordinated through the CoCs per Florida Statute. Central Florida's CoC FL-507 subcontracts with other community partners to fund the direct services provided to the homeless population. Partnering with each CoC gives local control of projects that are tailored to the needs of each community.

The State Office on Homelessness enters into multi-year unified contracts with each CoC for eligible grants. These Unified Homelessness Grants combine all applicable funds (Emergency Solutions Grant, Temporary Assistance for Needy Families (TANF)/Homelessness Prevention Grant, Challenge Grant, and Staffing Grant) into a single contract for each CoC.

As permissible by Florida Statute, the CoC seeks to align all resources provided through the State Office on Homelessness with the CoC and ESG Programs. When opportunity exists within the state Homeless Prevention, Challenge, and Staffing Grants, the CoC will maximize the flexibility and eligibility of activities to assist those experiencing homelessness in Central Florida.

Activities broadly defined include provision of: Homeless Prevention/Diversion; Street Outreach; Emergency Shelter; Bridge Housing; Supportive Housing (TH/RRH/SHPD); HMIS; Coordinated Entry; and Administrative support for the above mentioned activities.

State of Florida Homeless Assistance Funding components and uses of assistance (eligible activities) include:

- Supportive Housing, specifically
 - Supportive Housing for Homeless People with Disabilities
 - Supportive Rapid Rehousing
- Emergency and Interim Housing
 - Emergency Shelter (Services, Operations, and Capital Equipment) for congregate and non-congregate shelter options
 - Bridge Housing
 - Transitional Housing
- Support Service Only, including Street Outreach, Coordinated Entry, Housing Search, Disaster Preparedness and Response
- HMIS
- Homelessness Prevention & Diversion (in limited circumstances)
 - Housing Assistance
 - Family Reunification
 - Supportive Services
 - Housing Search
- Staff associated with eligible activities
- Administrative costs associated with eligible activities
- Technical assistance associated with eligible activities

Supportive Services for Veteran Families (SSVF)

The Veteran Administration's (VA) Supportive Services for Veteran Families (SSVF) program is a nationwide initiative aimed at preventing homelessness among veterans and their families. Established by the U.S. Department of Veterans Affairs (VA), the program focuses on providing a range of supportive services to very low-income veteran families residing in or transitioning to permanent housing.

Key Components of the SSVF Program:

Rapid Rehousing: This component assists homeless veteran families by helping them quickly transition to permanent housing. The program offers temporary financial assistance for housing-related expenses such as rent, utilities, and moving costs.

Homelessness Prevention: SSVF aims to prevent at-risk veteran families from becoming homeless. This is achieved by providing short-term financial assistance and support to stabilize their current housing situation.

Outreach and Case Management: SSVF grantees conduct outreach activities to identify and engage veteran families in need of assistance. Case management services include developing individualized housing stability plans, connecting veterans to VA benefits, and coordinating access to community resources.

Financial Planning Services: The program offers financial planning services to help veteran families achieve long-term stability. This includes budgeting, managing debts, and improving credit scores.

Legal Assistance: SSVF provides access to legal assistance for issues that may threaten housing stability, such as landlord-tenant disputes, child support, and outstanding fines.

Employment Assistance: To enhance veterans' income and self-sufficiency, the program provides employment services, including job training, resume development, and job placement support.

Eligibility Criteria: The head of the household or the spouse must be a veteran with a discharge status other than dishonorable. The household income must be below 50% of the area median income (AMI). The family must either be homeless or at risk of becoming homeless.

Program Goals: The primary goals of the SSVF program are to promote housing stability, prevent homelessness, and improve the overall well-being of veteran families. By addressing the immediate housing needs and providing comprehensive supportive services, the program seeks to ensure that veteran families can achieve long-term stability and self-sufficiency.

Implementation and Impact: SSVF is implemented through grants awarded to non-profit organizations and consumer cooperatives. These grantees are responsible for delivering the supportive services and ensuring compliance with VA guidelines.

For additional information about SSVF, please see the SSVF Program Guide at https://www.va.gov/HOMELESS/ssvf/docs/SSVF_Program_Guide.pdf.

Definitions

Homeless (as defined by the Continuum of Care (CoC) Program)

Category 1: An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- b. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
- c. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

Category 2: An individual or family who will imminently lose their primary nighttime residence, provided that:

- a. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
- b. No subsequent residence has been identified; and
- c. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

Category 3: Unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition, but who:

- a. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
- b. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
- c. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
- d. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the

presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

Category 4: Any individual or family who:

- a. Is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;
- b. Has no other residence; and
- c. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

At-Risk of Homelessness (as defined by the CoC Program)

- a. An individual or family who:
 1. Has an annual income below 30 percent of median family income for the area, as determined by HUD; and,
 2. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and,
 3. Meets one of the following conditions:
 - A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - B. Is living in the home of another because of economic hardship;
 - C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - D. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 - E. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - F. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

- G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
- b. A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
- c. A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Other Definitions

Bridge Housing – type of emergency shelter provided to a person or household experiencing homelessness for whom a housing plan is in place and for which a permanent housing placement is imminent. Bridge Housing may also be provided in the event that an individual or household enrolled in a supportive housing program may need temporary shelter when a unit is lost, and during which a new permanent unit is being identified.

Chronically Homeless –

- a. A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - 1. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - 2. Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;
- b. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

- c. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (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) – the group composed of representatives of relevant organizations, which generally includes nonprofit homeless 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; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

Diversion – Housing problem-solving process that may include assertive housing planning, flexible financial assistance, and/or relocations assistance to prevent an individual or household from entering the homelessness response system, or provides newly homeless households with rapid resolution of their housing crisis.

Emergency Shelter – any facility, the primary purpose of which is to provide a temporary shelter for the persons experiencing homelessness in general or for specific populations of which does not require occupants to sign leases or occupancy agreements.

Family - a household that contains at least one minor. The minor may not currently be with the household, but must plan on living with the household w/in 90 days.

Homeless Management Information System (HMIS) – The information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

Homelessness Prevention – Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in the Category 1 definition of homelessness above.

Household – A household is a single individual or a group of persons who apply together to a continuum project for assistance and who live together in one dwelling unit, or, for persons who are not housed, who would live together in one dwelling unit if they were housed.

Housing Navigation – Process of assisting a household in obtaining proper and complete documentation to determine and support eligibility for a particular supportive housing intervention to address a homeless situation.

Housing Search – Process of assisting a household find and secure housing.

Supportive Housing for Homeless People with Disabilities (SHPD) – SHPD is a longer-term supportive housing program in which housing assistance (e.g., long-term leasing or rental assistance) and supportive services are provided to assist households with at least one member (adult or child) with a disability in achieving housing stability and who have experienced homelessness for a long time or repeated instances.

Private Nonprofit Organization – a private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

Program Participant – an individual or family who is assisted under any CFCH program. CFCH prefers not to utilize the term “Client” to describe persons participating in any project or intervention.

Rapid Re-Housing – Housing relocation and stabilization services and/or short-and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

Service Area – CFCH CoC FL-507’s service area includes the entirety of Orange, Osceola and Seminole counties and cities contained within.

Street Outreach – Essential Services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care.

Subrecipient – a unit of general-purpose local government or private nonprofit organization to which a recipient makes available CoC and/or ESG funds.

Supportive Housing – Individualized supportive services, to include but not limited to ongoing wraparound case management, provided in tandem with housing support. In CoC 507, “supportive housing” interventions include Rapid Re-housing, Transitional Housing, and Supportive Housing for People with Disabilities.

Transitional Housing – Temporary housing with supportive services to individuals and families experiencing homelessness with the goal of interim stability and support to successfully move to and maintain permanent housing.

Victim Service Provider – a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

Standards for All Project Types

Guiding Principles

Housing Plus Services Homelessness Prevention

Homelessness prevention services are grounded in the principle that the most effective way to end homelessness is to keep it from occurring in the first place. All prevention efforts focus on maintaining safe, stable, and permanent housing, and minimizing the disruption and trauma associated with housing instability.

Wherever possible, households at imminent risk of homelessness should be supported to remain housed or rapidly stabilized in a permanent housing situation rather than entering the homelessness response system. Prevention services are not stand-alone supports, but part of a housing plus services continuum that prioritizes long-term stability, financial sustainability, and connection to community resources.

Prevention efforts address the immediate housing crisis while also building the foundation for ongoing stability. Supports may include short-term financial assistance, mediation with landlords or family members, connection to mainstream benefits and resources, and individualized problem-solving that centers the household's strengths and preferences.

Housing Plus Services Homeless Services

Housing Plus Services Homeless Services is a programmatic and systemic approach that prioritizes providing permanent housing and supportive services 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 secondary concerns, such as getting a job, budgeting properly, or attending to substance use issues. Housing Plus Services is NOT housing only. It is housing, plus participant-driven services, connection to mainstream resources and community integration. Housing is the foundation upon which help and healing begin for persons experiencing homelessness.

Wherever possible, persons arriving at the "front door" of the homelessness emergency response system should be diverted to a permanent housing situation rather than being serviced by emergency shelters and transitional housing programs. When people interact with Street Outreach all effort should move along a trajectory with the goal of housing placement. Even when day services are necessary and ongoing, efforts will be directed to identifying and securing safe and sustainable housing.

When emergency shelter is the appropriate option to avoid unsafe habitation, diversion should continue with all early efforts to end the individual or family's housing crisis as rapidly as possible. Supportive housing opportunities should be explored when diversion to permanent housing is not successful.

Core Elements of Housing Plus Services at the Project Level

- Access to projects is not contingent on sobriety, minimum income requirements, lack of a criminal record (including status on the sex offender registry), completion of treatment, participation in services, status or other unnecessary conditions.
- Projects do everything possible not to reject a household on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that are interpreted as indicating a lack of "housing readiness."
- People with disabilities are offered clear opportunities to request reasonable accommodations within application and screening processes and during tenancy and building and apartment units include special physical features that accommodate disabilities.
- Housing and service goals and plans are highly participant-driven.
- Participation in services is voluntary and not a condition of program participation, but can and should be used to persistently engage participants to ensure housing stability.
- Services are recovery oriented while informed by a philosophy that recognizes that drug and alcohol use and addiction should not mean denial of housing and supportive services. Participants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid and reduce risky behaviors and engage in safer practices that may include multiple forms of treatment and supports.
- Substance use in and of itself, without other lease violations, is not considered a legitimate rationale for eviction.

Coordinated Entry and Resource Prioritization

Coordinated Entry aims to help each household that experiences homelessness get the appropriate service intervention. Supportive housing assistance is prioritized based upon level of acuity, vulnerability, severity of service needs, and length of homelessness to ensure households needing the most help receive it in a timely manner.

CFCH operates a hybrid coordinated entry process in which there is "no-wrong-door," to access housing and services. Any provider can participate in coordinated entry. Access Points are maintained throughout the tri-county area. Individuals who self-refer by calling 211 are connected to a triage specialist for diversion mediation, assessment and referral when appropriate.

Currently, the CoC Funded Transitional Housing, Rapid Re-Housing, Supportive Housing for People with Disabilities, Youth Homelessness Demonstration Program, and Supportive Services for Veteran Families require use of the CoC coordinated entry process. Coordinated entry

policies and procedures change based on current needs and available resources. See the Central Florida Commission on Homelessness website for the most up to date Coordinated Entry Policies and Procedures.

Person-Centered

A Person-Centered approach is trauma-informed, dignified, safe, and incorporates participant choice. Assistance is allocated effectively by households linked to the most appropriate intervention strategy based on individual needs and choice.

Centering Lived Expertise of Homelessness

Centering lived expertise of homelessness is essential to any authentic and effective effort to improve homelessness interventions. Those who have experienced homelessness firsthand carry a deep, embodied knowledge of the barriers, misinformed practices, and missed opportunities that systems too often fail to see. Their insights ground our strategies in reality, challenge our assumptions, and ensure that services are designed with dignity, fairness, and practical impact in mind. Elevating these voices is not just about inclusion - it's a matter of effectiveness, accountability, and designing systems that truly work. When we center lived expertise, we move from doing things *for* people to building solutions *with* them.

CFCH assesses projects based on how meaningfully agencies engage persons with lived experience in governance, program design and evaluation. Engagement of people with lived experience is a factor in competitive applications for funding administered by the HSN.

Strength/Asset-Based

An asset-based approach is one that focuses on the inherent strengths of participants and deploys these personal strengths to aid in the achievement of the participants' goals.

Specifically, the approach honors the following:

- 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.
- Supportive services culture incorporates a progressive engagement model and Motivational Interviewing as a best practice for delivery of services

HMIS Participation

The Homeless Management Information System is the backbone of service coordination and collaboration. All CFCH member agencies serving persons experiencing homelessness are encouraged to contribute to a robust and open HMIS in compliance with Central Florida HMIS policies found at <https://www.hmiscfl.org/hmis-governance/policies>. All funded CoC, DCF, VA

and ESG projects are required to track program and client-level data in HMIS. Victim Service Providers (VSP) are not required to track data through HMIS as a safety measure for survivors, however, another comparable database must be maintained that meets all HMIS data standards when utilizing CoC and/or ESG funds. If a provider is unsure if they should use HMIS or a comparable database, they should reference this HUD Decision Tree:

<https://files.hudexchange.info/resources/documents/HMIS-When-to-Use-a-Comparable-Database.pdf>. VSPs and non-HMIS participating Emergency Shelter and Transitional Housing providers are also required to submit aggregate Point in Time Count and Housing Inventory Chart data to the Lead Agency.

Safeguards to Meet Safety Needs of Special Populations

All program participants seeking services who meet Category 4 of the homeless definition (including survivors of domestic violence and human trafficking) should first be referred to emergency shelters that specialize in serving persons fleeing domestic violence or human trafficking.

All sub-recipient shelters, whether they specialize in Category 4 homelessness or not, will require relevant staff to receive training in Confidentiality/Privacy, HIPAA & Professional Ethics as well as Domestic Violence Safety Planning.

Sub-recipients must have policies and/or procedures to ensure that client records are maintained in a confidential manner and keep written (paper) records pertaining to households under lock and key with designated personnel granted access to those files. Sub-recipients must also comply with HMIS policies and procedures related to notifying the HMIS lead agency of any employees or volunteers who have an HMIS license and leave the employment/volunteer service of the sub-recipient. HMIS policies and procedures can be found at: [2023_08-21_FL507-CoC_HMIS-Policies-Procedures_V1.4-FINAL.pdf \(hmiscfl.org\)](https://www.hudexchange.info/resources/documents/2023_08-21_FL507-CoC_HMIS-Policies-Procedures_V1.4-FINAL.pdf).

Equal Access, Gender Inclusion and Sexual Orientation Non-Discrimination

In order to center the work of ending homelessness on the persons most impacted, CFCH is committed to providing access to services without barriers. All CoC/ESG funded services must be in compliance with the equal access rule and in alignment with CFCH policy on Gender Inclusion and Non-Discrimination https://www.cfch.org/wp-content/uploads/2020/04/Policy-on-Gender-Inclusion-and-Sexual-Orientation-Non-Discrim_Draft-Presented-for-Approval.docx
 ***[edit] “As directed by HUD/ law”

Access to Mainstream Resources

CoC, DCF, VA and ESG funded projects are required to certify coordination and integration of homeless programs with other federal mainstream resources; i.e., health, social service, and

employment programs for which homeless persons may be eligible. Utilizing mainstream resources ensures more resources are available for housing; provides program flexibility; meets HUD match requirements; increases movement out of homelessness; and leverages other resources. Examples include:

- Medicaid
- State Children's Health Insurance Program
- VA Healthcare
- Food Stamps
- Temporary Aid for Needy Families (TANF)
- Supplemental Security Income (SSI/SSDI)
- Workforce Investment Act (WIA)
- Public Housing Authorities (PHA)

Community Coordination and Participation

Additional coordination is accomplished through project-type work groups, including shelter, supportive rapid rehousing, supportive housing for homeless people with disabilities, veteran services and youth services. All ESG recipients and funded agencies are required to participate in these CoC-wide project type workgroups.

Program Participants Grievance Procedures

CoC member agencies will maintain a publicly posted formal grievance procedure to be used by program participants. Agencies should encourage program participants and staff to resolve issues before they get to the formal grievance level, however a formal process should be in place that provides the highest level of accountability for alleged violations of practice or procedure.

Once a grievance has been documented and delivered to the designated agency representative, that representative will review the client file and discuss the concerns with relevant staff. The designated agency representative will call the client within 48 hours to schedule a meeting. Once the client agrees to the meeting, every attempt will be made to resolve the grievance. If staff have been implicated in the grievance, they will be asked to attend this meeting unless there are specific allegations that result in a safety concern for the staff member or client. Additional steps may involve escalation to the agency's senior executive staff and board of directors.

The agencies shall investigate all grievances and have a policy in place to protect the client against retaliation.

For CoC funded programs the grievance procedure must also provide a mechanism for resolution beyond the agency's senior executive staff and board to include the following:

1. All grievances must be documented in writing and first submitted to the sub-recipient agency's department supervisor who will address the issues specific to the grievance.

Documentation should include steps taken by the sub-recipient agency to resolve the conflict.

2. Grievances not resolved within the CoC funded program should be submitted to Homeless Services Network's senior executive for review in consultation with CoC ad hoc grievance committee appointed by the CoC Managing Board (grievance@hsncfl.org).
3. Grievances will only involve the program participant filing the grievance. The agency and Homeless Services Network of Central Florida staff will not discuss any other clients with the person filing the grievance.

If no resolution is reached at Homeless Services Network of Central Florida, the client may then request the CFCH Managing Board review the matter within 30 days of the grievance. The grievance should be addressed to: CFCH Managing Board 142 E. Jackson Street, Orlando, FL 32801. The CFCH Managing Board, or its appointed Grievance Committee, will respond within 14 days of receipt of the complaint or grievance advising the participant of the next step in the process. The decision of the CFCH Managing Board will be final.

Verification of Program Eligibility

Before a household can be enrolled in a supportive housing program, their eligibility must be formally verified. This verification occurs through the Navigation process. For more information on the Navigation process and requirements for program eligibility, please see the Policies and Procedures for Coordinated Entry, available on the Central Florida Commission on Homelessness website.

Intervention Specific Standards

(Intervention Specific Standards apply to CoC, State of Florida Department of Children and Families Homelessness Assistance, and ESG funded projects unless otherwise specified)

Homelessness Prevention

Overview: In general, CFCH encourages homelessness prevention programs to target serving households that would otherwise become homeless without the receipt of emergency assistance and would be completely stable in permanent housing afterwards. When communities engage in homelessness prevention services, attention to proper targeting strategies should be considered in program design. While communities have struggled to find appropriate targeting thresholds, enough evidence exists to suggest that homelessness prevention dollars that go to those easiest and most proximate to serve are often provided to households with the capacity to self-resolve, or who are not the most likely to need eventual homelessness response services.

As funds are limited, CFCH supports programs that are strategic in serving households that are most likely to become homeless: these are usually higher barrier households with imminent housing crises who mirror those households already in emergency shelters (considering: household income; disabilities; criminal records; past evictions; multiple moves in the previous six months – 1 year; pregnancy; benefits received, TANF, etc.; number of and length of previous homeless episodes; living situation prior to homeless assistance system; employment status; household size and composition). By targeting those households most similar to the ones already in emergency shelter for assistance, communities maximize their chances that homelessness prevention resources will return maximum results in terms of preventing future episodes of homelessness. A variety of tools and guidance has been developed by HUD and the National Alliance to End Homelessness to assist communities in targeting homeless prevention assistance.

CoC Program funded Prevention

HUD funded CoC Program funds can only be used for Homeless Prevention activities in HUD designated High Performing Communities. At this time, CoC 507 does not have this designation. As such, CoC 507 cannot use CoC Program funds for Homeless Prevention activities.

ESG funded Prevention

Eligibility: An individual or family who:

1. Has an annual income below 30 percent of median family income for the area, as determined by HUD; and,
2. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition in this section; and,

3. Meets one of the following conditions:
 - A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - B. Is living in the home of another because of economic hardship; or
 - C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance.

Income Requirements: ESG limits eligibility for homelessness prevention assistance to individuals and families with incomes below 30 percent of AMI at intake, and incomes that do not exceed 30 percent of AMI at re-evaluation (not less than once every 3 months).

ESG Prevention General Requirements: All client files must contain documentation on the current housing status at intake and determination of a client meeting one of the established HUD definitions of “homelessness” to help determine the type of assistance to be provided.

1. Re-assessments (or re-evaluations) are required for program participants receiving assistance.
2. Participants will have their income assessed, using 24 CFR Part 5 requirements, upon intake and every three months to ensure eligibility.
3. Case management is required at least once per month and for every month in which a participant receives financial assistance.
4. Duration of rental assistance:
 - a. Short Term: up to 3 months;
 - b. Medium term: more than 3 months but less than 24 months during any 3-year period
5. Landlord/Vendor Payments (rents, utilities and other payments) will be paid directly to the landlord/vendor.
 - a. Housing Inspections are required prior to program participants receiving this type of ESG assistance.
 - b. Fair Housing market rates apply.
 - c. Lead-based paint remediation and disclosure applies to all ESG funded housing.

Eligible Expenses

Please note, the following is a list of what may be eligible for funding but does not guarantee funding. Subrecipients should always refer to their specific budget for available funds.

1. Financial assistance costs
 - a. Housing relocation and stabilization services
 - i. Rental application fees
 - ii. Security deposits (no more than 2x the monthly rent)
 - iii. Last month's rent
 - iv. Utility payments
 - v. Moving costs

- vi. Costs for emergency transfer, if conditions for an emergency transfer are met
- b. Rental assistance
 - i. Short or medium-term assistance
 - ii. One-time payment for up to 6 months of rental arrears

For additional information, please see § 576.106 Short-term and medium-term rental assistance.
- 2. Services costs
 - a. Housing search and placement
 - b. Housing stability case management
 - c. Mediation
 - d. Legal services
 - e. Credit repair

Please see § 576.105 for additional information including time limits for the above eligible activities.

ESG Prevention Sub-Recipient Requirements: Sub-recipients who receive funding through ESG will be subject to the following requirements:

1. Staff and volunteers who interact with program participants will attend CoC provided Diversion training at least once annually.
2. Homelessness Prevention sub-recipients should provide information and referrals to other community services to meet client needs.

ESG Prevention Habitability Requirements: When providing homelessness prevention funding for housing, dwellings must meet ESG Minimum Habitability Standards

(<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>)

SSVF Funded Prevention

Please see the most recent SSVF Program Guide for an updated outline of eligible SSVF Prevention expenses. Please note, the SSVF Program Guide provides a list of what may be eligible for funding but does not guarantee funding. Subrecipients should always refer to their specific budget for available funds.

Other (Excluding HUD CoC, ESG, YHDP and SSVF) funded Prevention, to include but not limited to State of Florida funds

Eligibility: Applicant households must (1) be imminently losing their primary nighttime residence, (2) have no other residence, and (3) not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from becoming literally homeless. To further qualify for services under category 1, the grantee must (4) document that the participant meets **at least one** of the following conditions:

- a) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

- b) Is living in the home of another because of economic hardship;
- c) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- d) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
- e) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, or correctional institution) without a stable housing plan;
- f) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved screening tool.

Eligible Expenses:

Please note, the following is a list of what may be eligible for funding but does not guarantee funding. Subrecipients should always refer to their specific budget for available funds. Other activities may be approved with prior approval from Homeless Services Network of Central Florida staff.

1. Financial assistance costs
 - a. Rental arrears, to include late fees if outlined in the lease agreement
 - b. Mortgage arrear assistance
 - c. Minor repairs to home
 - d. Utility arrears
 - e. Housing application fees
 - f. Background check costs for housing
 - g. Pet fees
 - h. First/last month of rent and/or security deposit
 - i. Utility deposit
 - j. Utility assistance
 - k. Moving costs (to include up to 3 months of storage and movers)
 - l. Court fees and costs
 - m. Bridge housing
 - n. Short-term rental assistance
 - o. Transportation assistance, to include reunification assistance
2. Services costs
 - a. Housing search and placement
 - b. Housing stability case management
 - c. Mediation
 - d. Legal services
 - e. Credit repair
 - f. Medical (to include behavioral health and primary care)
 - g. Personnel responsible for confirming amounts due, preparing financial assistance requests, and coordinating payment processing on behalf of households at risk of homelessness.

Street Outreach & Pre-Eligibility Determination

Overview: Coordinated street outreach that identifies and engages people living in unsheltered locations, such as in cars, parks, abandoned buildings, encampments, and on the streets, plays critical roles within systems for ending homelessness. Effective street outreach reaches people who might not otherwise seek assistance or come to the attention of the homelessness service system and ensures that people's basic needs are met while supporting them along pathways toward housing stability.

CFCH has adopted [Core Elements of Effective Street Outreach to People Experiencing Homelessness](#) as guiding principles in our community's street outreach practice: Effective street outreach is: Systematic, Coordinated, and Comprehensive; housing focused; Person-Centered, Trauma-Informed, Culturally Responsive; and Emphasizes Safety and Reduces Harm.

CFCH requires that agencies conducting street outreach activities must engage with unsheltered homeless persons for the purpose of providing immediate support, intervention or connections with coordinated entry and mainstream social service programs. The connection of any unsheltered person to an emergency shelter, supportive housing, and/or referral to social service agencies will serve as immediate support and intervention for housing stabilization or critical services. Engagement also includes pre-eligibility determination for supportive housing programs.

Agencies are encouraged to use evidenced-based practices for their street outreach efforts; including Homeless Services that quickly connect individuals to permanent housing in the face of acute barriers to entry into housing programs. Additionally, the agencies will participate in the CFCH street outreach working groups, registry management meetings and utilize the Coordinated Access Assessment to identify barriers to housing.

Although all homeless persons are considered a vulnerable population, street outreach activities should work to prioritize those who are extremely vulnerable (ex. Adults with disabilities, unaccompanied youth, acute medical needs), focusing on quality over volume of interactions.

Eligibility: Individuals/families who meet the following criteria are eligible for Street Outreach services (inclusive of all funded outreach, ie, ESG/CoC/Challenge/other):

1. Meet HUD criteria for one of the following definitions:
 - a. Homeless Category 1: Literally Homeless; or
 - b. Homeless Category 3: Unaccompanied Homeless Youth under 25 years of age;
 - c. Homeless Category 4: Fleeing/attempting to flee DV (where the individuals/families also meet the criteria for Category 1); AND
 2. Individuals and families must be living on the streets or other places not meant for human habitation and be unwilling or unable to access services in an emergency shelter
- Income eligibility does not need to be assessed for program participants.

Intake and Assessment: CFCH requires that agencies conducting street outreach activities must provide individuals and families with an assessment and enter data into HMIS or a comparable database for DV providers. CFCH encourages providers to develop relationships with unsheltered homeless persons that will help connect them with emergency shelter and housing services primarily through a CFCH Coordinated Entry referral.

Coordination Requirements All funded outreach will work closely with other CoC providers to ensure that clients are getting connected to the appropriate resources and that efforts are not being duplicated. This work will include:

1. Coordination of services with emergency shelters and CES whenever possible;
2. Reviewing HMIS to determine if unsheltered persons have already used services within the homeless crisis response system;
3. Conducting pre-eligibility determination for eligibility for permanent housing projects;
4. Referring individuals to emergency shelters to meet immediate need;
5. Referring Unaccompanied Homeless Youth under the age of 25 to Youth System Guides;
6. Referring Veterans to Veterans outreach staff for confirmation of veteran status and linkage to VA funded emergency shelter beds; and
7. Assuming “Navigator” roles and responsibilities, as assigned.
8. Working to connect unsheltered persons to mainstream benefits (ie., Health Benefits, Food Assistance, Disability Income; Legal Documentation/Services; Education; Employment Assistance, etc.)

Eligible Activities

Please note, the following is a list of what may be eligible for funding but does not guarantee funding. Subrecipients should always refer to their specific budget for available funds.

ESG Funded Outreach

1. Engagement
2. Case management
3. Emergency health services
4. Emergency mental health services
5. Transportation
6. Services for Special Populations

For additional information, please see § 576.101.

CoC Program Funded Outreach

Other (Excluding HUD CoC, ESG, YHDP and SSVF) funded Prevention, to include but not limited to State of Florida funds

Eligible Expenses:

Please note, the following is a list of what may be eligible for funding but does not guarantee funding. Subrecipients should always refer to their specific budget for available funds. Other activities may be approved with prior approval from Homeless Services Network of Central Florida staff.

1. Financial Assistance
 - a. Bridge housing
 - b. Basic daily activity services to include but not limited to restrooms, showers, clothing, food, mail, laundry, and medical assistance
 - c. Transportation assistance, to include reunification assistance
 - d. First/last month of rent and/or security deposit
 - e. Utility deposits
 - f. Utility arrears
 - g. Utility assistance
 - h. Rental arrears
 - i. Housing application fees
 - j. Background check costs for housing
 - k. Pet fees
 - l. Moving costs (to include up to 3 months of storage and movers)
2. Supportive Services
 - a. Outreach staff
 - b. Medical (to include behavioral health and primary care)
 - c. Housing search and placement
 - d. Mediation
 - e. Legal services
 - f. Credit repair
3. Other
 - a. Disaster Pre/Response
 - i. To include but not limited to purchase of materials needed to equip agencies to provide street outreach services before an event and hazard and/or overtime pay for outreach staff to work during pre/response events

Day Service Centers (Day Shelters)

Overview: The primary purpose of Day Service Centers / Day Shelters is to meet immediate needs of unsheltered persons experiencing homelessness (ex., showers, food, clothing, mail, employment opportunities, etc.). Additional medium-term services such as case management, financial assistance, healthcare navigation, primary or behavioral healthcare may also be provided. CFCH encourages all day service providers to couple housing-focused mediation and problem-solving strategies as part of their efforts to serve immediate and basic needs.

CFCH has established minimum standards that align with ESG Program interim rule establishing safety, sanitation, and privacy in emergency shelters, including Day Service Centers, operating within the CoC and/or are funded with ESG.

Eligibility: Participants seeking services from Day Service Centers may meet HUD criteria for homelessness as either literally homeless (Homeless Category 1), at imminent risk of homelessness (Homeless Category 2), homeless under another federal statute (Homeless Category 3), or fleeing/attempting to flee domestic violence (Homeless Category 4).

Income eligibility does not need to be assessed for program participants.

Diversion, Intake and Assessment: Whenever possible, Day Service Centers will provide all persons with a housing-focused conversation identifying possible opportunities to avoid entering (Diversion) the emergency response system and returning to housing permanency as quickly as possible. Diversion is a guided conversational mediation strategy to slow down the housing crisis with an individual and/or household to identify potential strengths and capacities that exist to end their episode of homelessness through family reunification, conflict resolutions, return to previous housing situation, or identifying other possible safe housing situations. Diversion can be a successful strategy with or without flexible financial assistance to provide rent arrears, housing deposits, groceries, gas, transportation, etc.

CFCH encourages providers to develop relationships with unsheltered homeless persons that will help connect them with emergency shelter and housing services primarily through a referral to the CFCH Coordinated Entry System.

Day Service Centers should make every effort to enter data into HMIS or a comparable database for DV providers.

ESG Day Service (Day Shelter) Standards: ESG funded **Day Services** are dependent upon agency participation in Coordinated Entry.

Provided Services: Day Services are encouraged to complete a Housing Plan with any program participant who has engaged services for at least 30 days. The plan should be updated at least quarterly. Copies of the plan should be kept in the client file.

Coordination Requirements: Coordination among service providers occurs primarily through CE for supportive housing assistance. Day Services providers must coordinate with supportive housing providers to ensure navigation and supportive housing case managers have access to program participants to determine Supportive Housing eligibility.

Day Services providers should all provide information about the following programs, and give assistance accessing these programs, if it assists in meeting identified needs:

- 211 – Local information hotline for social services
- Social security benefits
- Food stamps assistance
- Affordable housing database
- Job training programs
- Health services
- Education programs
- Services for victims of domestic violence
- Veteran services

Shelter Habitability: Day Service Centers must meet ESG Minimum Habitability Standards (<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>)

Requirements for all CoC funded Day Services (including but not limited to YHDP funded Day Services):

1. HMIS data entry: Day services providers that receive CoC funds must input information into HMIS, or a comparable database, about the services provided;
2. Serve as an Access Point for Coordinated Entry; and
3. Staff need to be trained on Trauma Informed Care, Motivational Interviewing, and other best practices

Other (Excluding HUD CoC, ESG, YHDP and SSVF) funded Day Service Centers, to include but not limited to State of Florida funds

Eligible Expenses

Please note, the following is a list of what may be eligible for funding but does not guarantee funding. Subrecipients should always refer to their specific budget for available funds. Other activities may be approved with prior approval from Homeless Services Network of Central Florida staff.

1. Day Center operations
2. Financial Assistance
 - a. Bridge housing
 - b. Basic daily activity services to include but not limited to restrooms, showers, clothing, food, mail, laundry, and medical assistance

- c. Rental arrears, to include late fees if outlined in the lease agreement
- d. Mortgage arrear assistance
- e. Minor repairs to home
- f. Utility arrears
- g. Housing application fees
- h. Background check costs for housing
- i. Pet fees
- j. First/last month of rent and/or security deposit
- k. Utility deposit
- l. Utility assistance
- m. Moving costs (to include up to 3 months of storage and movers)
- n. Court fees and costs
- o. Bridge housing
- 3. Supportive Services
 - a. Day Center staff
 - b. Housing search and placement
 - c. Mediation
 - d. Legal services
 - e. Credit repair
 - f. Medical (to include behavioral health and primary care)
- 4. Other
 - a. Disaster Pre/Response
 - i. To include but not limited to purchase of materials needed to equip agencies to provide outreach services before an event and hazard and/or overtime pay for staff to work during pre/response events

Emergency Shelter (Nighttime)

Overview: Emergency shelters serve a critical role in providing immediate, short-term housing and support for individuals and families experiencing homelessness. CFCH is committed to housing focused emergency services to persons experiencing homelessness, and encourages shelters to adopt a Housing Plus Services philosophy, an Open-Access approach to entry, and Rapid Housing Placement.

Housing Plus Services Philosophy: shelter will operate under the Housing Plus Services Homeless Services model, which prioritizes providing permanent housing as the foundation for addressing other issues such as mental health, substance abuse, and employment. The idea is that once stable housing is secured, individuals can better focus on improving other aspects of their lives.

Open Access: shelters will lower barriers and minimize the obstacles that often prevent individuals from accessing shelter services. This means fewer requirements and restrictions, such as sobriety, participation in programs, or meeting specific behavioral conditions. The focus is on ensuring that people have a safe place to stay while emphasizing work towards housing.

Rapid Housing Placement: Staff at housing focused shelters will work diligently to quickly assess clients' needs and connect them with permanent housing options. This involves coordination with local housing providers, landlords, and various housing programs like Rapid Rehousing and Supportive Housing for Homeless People with Disabilities.

Emergency shelters play a vital role in the broader Continuum of Care (CoC) system by acting as an entry point for individuals and families into the homeless services system, where they can receive assessments and be connected to longer-term housing solutions and supportive services.

CFCH has established minimum standards that align with ESG Program interim rule establishing safety, sanitation, and privacy in emergency shelters funded operating within the CoC and/or are funded with ESG.

CFCH and its contracted emergency housing organizations provide the following services to facilitate self-sufficiency and independence:

- Safe, temporary emergency shelter in partnership with the coordinated entry and assessment policies and procedures;
- Housing-focused, person-centered, strength-based, trauma informed case management services;
- Assistance with obtaining housing;

- Referrals to supportive services for special populations such as children, program participants with disabilities, program participants with behavioral health needs, Veterans, etc.; and
- Participating in the CFCH HMIS directly or through data merging.

Eligibility: Homeless program participants entering into the shelter system must meet the HUD criteria for homelessness as either literally homeless (Homeless Category 1), at imminent risk of homelessness (Homeless Category 2), homeless under another federal statute (Homeless Category 3) or fleeing/attempting to flee domestic violence (Homeless Category 4).

Income eligibility does not need to be assessed for program participants.

Individual shelter providers are encouraged to post information about any additional eligibility criteria their shelter requires. Shelters are encouraged to make their services as low-barrier as possible. Shelter providers must have their own policy and procedure for shelter operations.

Established procedures should describe:

1. Circumstances in which the household may not qualify or would be denied;
2. Notification of denial; and
3. A household's right to review the decision.

Every effort must be made to shelter families as a single unit. Gender, sex, and/or age of children under age 18 must not be used as a basis for denying any family's admission to an emergency shelter assisted. ESG funding explicitly requires compliance with CFCH policy. (See Appendix 1: CFCH Policy on Involuntary Separation of Homeless Families)

Diversion, Intake and Assessment: Whenever possible, shelters will provide all persons at the emergency shelter front door with a housing-focused conversation identifying possible opportunities to avoid entering (Diversion) the emergency response system and returning to housing permanency as quickly as possible. Diversion is a guided conversational mediation strategy to slow down the housing crisis with an individual and/or household to identify potential strengths and capacities that exist to end their episode of homelessness through family reunification, conflict resolutions, return to previous housing situation, or identifying other possible safe housing situations. Diversion can be a successful strategy with or without flexible financial assistance to provide rent arrears, housing deposits, groceries, gas, transportation, etc.

Housing-focused mediation should not stop upon intake into emergency shelters. Assertive and active engagement in finding housing solutions for program participants should be explored before assessing persons for community-wide supportive housing resources.

Families residing in shelter will be continuously engaged with a housing problem-solving conversation for up to 30 days. If the family is still residing in shelter after 30 days with no exit strategy, the shelter will ensure completion of the universal prioritization tool and Coordinated

Entry enrollment, if not already completed, and initiate the referral for CoC supportive housing programs.

Length of Stay: Since each emergency shelter has a unique role in the regional homeless services system, sub-recipients are allowed to establish their own policies regarding length of stay. However, all sub-recipients are required to participate in the establishment of system-wide baselines and benchmarks for HUD system performance measures including length of stay, returns to homelessness and increase income. Each shelter project should continuously monitor participant length of stay metrics and work diligently to return persons to sustainable housing placements as quickly as possible.

Safeguards to meet safety and shelter needs of special populations (DV): Emergency Shelters must comply with Emergency Transfer plans for victims of domestic violence or human trafficking.

Reassessing Need: Emergency shelter program participants will have a re-evaluation done at least once in the first year and annually thereafter, confirming that the household lacks sufficient resources and support networks necessary to retain housing without assistance (explicit ESG funding requirement).

Emergency shelters serving families or youth must complete a Housing Plan with any program participant who has resided in the shelter for at least 30 days. These plans should be updated at least quarterly. Emergency shelters serving individuals must complete a Housing Plan for any program participant who has resided in the shelter for at least 3 months, and the plan should be updated at least quarterly. Copies of the plan should be kept in the client file in HMIS.

Coordination Requirements: Coordination among service providers occurs primarily through CE for housing assistance. Shelters must coordinate with supportive housing providers to ensure navigation and supportive housing case managers have access to program participants to determine supportive housing eligibility. Additional coordination is accomplished through project-type work groups, including shelter, rapid rehousing, permanent supportive housing, Veteran and youth services. All HUD funded agencies are required to participate in these CoC-wide project type workgroups.

Given this context, sub-recipients will be subject to the following coordination requirements:

Emergency Shelter providers should all provide information about the following programs, and give assistance accessing these programs, if it assists in meeting identified needs:

- 211 – Local information hotline for social services
- Social security benefits
- Food stamps assistance
- Affordable housing database
- Job training programs

- Health services
- Education programs
- Services for victims of domestic violence
- Veteran services

Shelter Habitability: Emergency shelter providers must meet HUD Minimum Habitability Standards (<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>) and should be inspected at least once every five years or upon request.

Private sector hotel/motel buildings being used as bridge housing through payment for standard hotel occupancy for individual rooms must comply with all local building codes and habitability standards as documented by a valid certificate of occupancy visible in a public space of the building(s) or upon request.

Eligible Expenses

Please note, the following is a list of what may be eligible for funding but does not guarantee funding. Individual projects' should always refer to their specific budget for allocated funds.

ESG Funded Emergency Shelter Activities

1. Essential services
 - a. Case management;
 - b. Child care;
 - c. Education services;
 - d. Employment assistance and job training;
 - e. Outpatient health services
 - f. Legal services
 - g. Life skills training
 - h. Mental health services
 - i. Substance abuse treatment services
 - j. Transportation
 - k. Services for special populations
2. Renovation
3. Shelter operations

For additional information, please see 24 CFR § 576.102 - Emergency shelter component.

Other (Excluding HUD CoC, ESG, YHDP and SSVF) funded Emergency Shelter, to include but not limited to State of Florida funds

Other activities may be approved with prior approval from Homeless Services Network of Central Florida staff.

1. Essential services;

- a. Case management focused on obtaining and maintaining housing while providing wrap around services ;
- b. Referral for mainstream services;
- c. Transportation assistance;
- d. Shower access;
- e. Laundry;
- f. Food;
- g. Diversion/ Rapid exit financial assistance
 - i. Rental arrears, to include late fees if outlined in the lease agreement
 - ii. Utility arrears
 - iii. Housing application fees
 - iv. Background check costs for housing
 - v. Pet fees
 - vi. First/last month of rent and/or security deposit
 - vii. Utility deposit
 - viii. Utility assistance
 - ix. Moving costs (to include up to 3 months of storage and movers)
 - x. Court fees and costs
 - xi. Bridge housing
 - xii. Short-term rental assistance
 - xiii. Transportation assistance, to include reunification assistance
- 2. Acquisition of alternative shelter space (e.g., mobile shelters);
- 3. Renovation;
- 4. Shelter operations
 - a. Showers;
 - b. Laundry;
 - c. On-site meals;
 - d. Telephone and internet access
 - e. Disaster preparedness and response
- 5. Capital expenditures to repair or expand shelter capacity

Transitional Housing

Overview: Transitional housing is temporary supportive housing used to facilitate the movement of households experiencing homelessness to permanent housing. Homeless persons may live in transitional housing for up to 24 months and receive supportive services such as substance use recovery, mental and behavioral health services, primary healthcare, childcare, job training, and home furnishings that help them live more independently. All transitional housing programs are encouraged to align programming with the regional guiding principles (including: TH projects serving Veterans, youth age 18-24, DV/HT survivors, and substance users).

Eligibility: CFCH funded transitional housing projects must follow any additional eligibility criteria set forth in the HUD CoC NOFO, and Youth Homeless Demonstration Program (YHDP) through which a project was funded, the grant agreement and the HEARTH Act Interim Rule (24 CFR 578).

Minimum Standards for Transitional Housing Assistance: All referrals to CoC funded transitional housing and assessment for type and level of services must come through CFCH's coordinated entry process. The following minimum standards will be applied to all transitional housing programs:

- Assistance in transitioning to permanent housing must be made available and provided as early as possible based on participant choice.
- Supportive services are offered throughout the duration of the stay.
- Participants in transitional housing must enter into a lease, sublease or occupancy agreement for the 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 of 24 months, unless otherwise directed by the funding authority.

Unless otherwise prohibited by other project funding sources, transitional housing projects are encouraged to utilize a low-barrier housing and services approach (i.e., not have service participation requirements or preconditions to entry, such as sobriety or minimum income threshold), and must prioritize rapid placement and stabilization in permanent housing while providing comprehensive wrap-around supportive services.

Coordination Requirements: Coordination among service providers occurs primarily through CE for supportive housing assistance. Transitional Housing providers must coordinate with supportive housing providers to ensure navigators and supportive housing case managers have access to program participants to determine supportive housing eligibility.

Transitional housing providers should all provide information about the following programs, and give assistance accessing these programs, if it assists in meeting identified needs:

- 211 – Local information hotline for social services

- Social security benefits
- Food stamps assistance
- Affordable housing database
- Job training programs
- Health services
- Education programs
- Services for victims of domestic violence
- Veteran services

Habitability: Transitional Housing providers must meet HUD Minimum Habitability Standards (<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>) and should be inspected at least once every five years or upon request.

Eligible Expenses for Transitional Housing (Excluding HUD CoC, ESG, YHDP and SSVF), to include but not limited to State of Florida funds:

Other activities may be approved with prior approval from Homeless Services Network of Central Florida staff.

1. Essential services;
 - a. Case management focused on obtaining and maintaining housing while providing wrap around services;
 - b. Referral for mainstream services;
 - c. Transportation assistance;
 - d. Laundry;
 - e. Food;
2. Financial assistance;
 - a. Rental arrears, to include late fees if outlined in the lease agreement
 - b. Utility arrears
 - c. Housing application fees
 - d. Background check costs for housing
 - e. Pet fees
 - f. First/last month of rent and/or security deposit
 - g. Utility deposit
 - h. Utility assistance
 - i. Moving costs (to include up to 3 months of storage and movers)
 - j. Court fees and costs
 - k. Bridge housing
 - l. Short-term rental assistance
 - m. Transportation assistance, to include reunification assistance
3. Acquisition of transitional housing space;
4. Renovation;
5. Transitional housing operations
 - a. Operations staff
 - b. Telephone and internet access

- c. Repairs
 - d. Disaster preparedness and response
- 6. Capital expenditures

Supportive Rapid Re-Housing

Overview: Rapid Re-Housing is available to help those who are experiencing homelessness (category 1 and 4) to 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 for CFCH (Federal, County, & State) Funded RRH: In addition to eligibility published in the HEARTH Act Interim Rule, projects must follow any additional eligibility criteria set forth in the CoC NOFO or YHDP NOFO through which a project was funded and the grant agreement.

Currently, CoC 507 has RRH projects for the following subpopulations: families; survivors of domestic violence or human trafficking who are fleeing or attempting to flee; unaccompanied Youth or Young Adult (18 – 24) headed households; and Veterans.

Minimum Standards for Rapid Re-Housing Assistance:

- Verified homelessness status must be HUD Category I or IV (exception, YHDP RRH, and other sub-population-specific projects).
- Household income must be below 50% AMI at entry for most CoC and ESG funding sources, which may be waived for specific projects.
- Referrals must come through CE.
- Maximum participation in a rapid re-housing program cannot exceed 24 months in any three-year period (exceptions provided for YHDP RRH).
- Supportive services must be offered throughout the duration of their stay in housing. Participants are required to meet with a Housing Stability Case Manager not less than once per month to assist the participant in ensuring long-term housing stability.
- Participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration, except when prior notice is given by either party (exception, YHDP RRH).
- Must re-evaluate quarterly that the participant lacks sufficient resources and support networks necessary to retain housing without assistance.
- Rapid Re-Housing program participants will be reassessed annually to determine that income is not greater than 30% of AMI for ESG, and not greater than 80% for all other funded RRH as established by HUD. Subrecipients will use 24 CFR Part 5 definitions for calculating annual income (exception, YHDP RRH).
- Short-term RRH assistance (less than 3 months), which may include moving assistance, rental assistance (including security/utility deposits, rental arrears, pro-rate rent) should include access to supportive services as needed.

Determining Rental Assistance Limits: 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.

Coordination Requirements: Rapid Rehousing providers should all provide information about the following programs, and give assistance accessing these programs, if it assists in meeting identified needs:

- 211 – Local information hotline for social services
- Social security benefits
- Food stamps assistance and food pantries
- Affordable housing database
- Job training programs, including CareerSource
- Health services
- Education programs
- Services for victims of domestic violence
- Veteran services
- 4-C Child Care services
- Head Start
- Mustard Seed

Habitability: All CoC funded permanent housing units are subject to HUD's required inspection standards. As of this update, the currently required inspection standard is a Housing Quality Standards (HQS) inspection. Please confirm with HSN staff the most up-to-date inspection standard to ensure meeting the active requirement. If not otherwise required, Rapid Rehousing providers must ensure dwellings meet Minimum Habitability Standards (<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>) and should be inspected at least annually while receiving financial assistance or upon request (ex., ESG, State of Florida, etc).

Eligible Expenses

Please note, the following is a list of what may be eligible for funding but does not guarantee funding. Individual projects' should always refer to their specific budget for allocated funds.

ESG Funded RRH

1. Financial assistance
 - a. Rental application fees;
 - b. Security deposits (up to 2x the monthly rent);
 - c. Last month's rent;
 - d. Utility deposit;
 - e. Utility payments;
 - f. Moving costs
2. Rental assistance
 - a. Short or medium-term ongoing rental assistance. A participant cannot receive more than 24 months of rental assistance in any 3 year period.

3. Services cost
 - a. Housing search and placement;
 - b. Housing stability case management;
 - c. Mediation;
 - d. Legal services;
 - e. Credit repair

CoC Program Funded RRH

1. Rental Assistance
 - a. Short or medium-term ongoing rental assistance. A participant cannot receive more than 24 months of rental assistance in any 3 year period.
 - b. Security deposit (up to 2x the rent)
 - c. Utility assistance
2. Supportive Services
 - a. Annual assessment of services;
 - b. Moving costs;
 - c. Case management;
 - d. Childcare;
 - e. Education services;
 - f. Employment assistance and job training;
 - g. Food;
 - h. Housing search and counseling services;
 - i. Legal services;
 - j. Life skills training;
 - k. Mental health services;
 - l. Outpatient health services;
 - m. Outreach services
 - n. Substance abuse treatment services;
 - o. Transportation;
 - p. Utility deposits

For additional information, please see § 578.53 Supportive services.

Other (Excluding HUD CoC, ESG, YHDP and SSVF) funded RRH, to include but not limited to State of Florida funds

Other activities may be approved with prior approval from Homeless Services Network of Central Florida staff.

1. Financial Assistance
 - a. Rental arrears, to include late fees if outlined in the lease agreement
 - b. Utility arrears
 - c. Housing application fees
 - d. Background check costs for housing
 - e. Pet fees
 - f. First/last month of rent and/or security deposit

- g. Utility deposit
 - h. Utility assistance
 - i. Moving costs (to include up to 3 months of storage and movers)
 - j. Court fees and costs
 - k. Bridge housing
 - l. Short-term rental assistance
 - m. Transportation assistance, to include reunification assistance
2. Services costs
- a. Housing search and placement
 - b. Housing stability case management
 - c. Mediation
 - d. Legal services
 - e. Credit repair
 - f. Medical (to include behavioral health and primary care)

SSVF Funded RRH

Please see the most recent SSVF Program Guide for an updated outline of eligible SSVF RRH expenses.

Transitional Housing-Rapid Re-housing (TH-RRH)

Overview: Transitional Housing-Rapid Re-Housing is a joint component project that combines the CoC Transitional Housing and Rapid Re-housing components into one project. It provides participants with options to quickly reside in Temporary Housing and subsequently move into permanent housing through RRH.

Eligibility for the TH-RRH project: This project is currently only available through the Youth Homelessness Demonstration Project (YHDP). Youth or Young Adults must meet the HUD criteria for homelessness as either literally homeless (Homeless Category 1), at imminent risk of homelessness (Homeless Category 2), homeless under another federal statute (Homeless Category 3) or fleeing/attempting to flee domestic violence (Homeless Category 4).

Please see the Brighter Days handbook (CoC 507's local YHDP initiative) for additional information about the project.

Supportive Housing for Homeless People with Disabilities

Overview: Supportive housing for homeless people with disabilities (SHPD) is designed to provide long-term housing solutions coupled with supportive services for individuals and families experiencing long periods of homelessness who have disabilities. SHPD pairs ongoing leasing or rental assistance with supportive services to assist homeless persons with a disability achieve housing stability.

Eligibility: Households are eligible for SHPD if they meet HUD's definition of "chronic homelessness," as follows:

1. A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who:
 - a. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and
 - b. Has been homeless and living as described for at least 12 months* or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described.
2. An individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria 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 of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

CoC Program-funded SHPD projects are required to follow a Housing Plus Services approach to the maximum extent practicable. A household that meets the above eligibility is eligible even if the household does not want to participate in the project's supportive services. SHPD projects must not have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs.

Minimum Standards for SHPD:

- There can be no predetermined length of stay for a SHPD project, nor preconditions to entry (ex. Current or previous substance usage, income, history of victimization, criminal record (except restrictions imposed by federal law or local ordinance)).
- Supportive services designed to meet the needs of the participants must be made available to the participants throughout the duration of stay in SHPD.
- Participants in SHPD 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.
- Participants in SHPD are required to contribute 30% of their income towards rent.
- Organizations that are providing SHPD 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.

Determining Rental Assistance Limits: 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.

Habitability: All CoC funded permanent housing units are subject to HUD's required inspection standards. As of this update, the currently required inspection standard is a Housing Quality Standards (HQS) inspection. Please confirm with HSN staff about the required inspection standard to ensure meeting the most recent requirement.

Eligible Expenses

CoC Program Funded SHPD

1. Rental Assistance
 - a. Ongoing rental assistance until the participant is able to self-sustain
 - b. Utility assistance
2. Supportive Services
 - a. Annual assessment of services;
 - b. Moving costs;
 - c. Case management;
 - d. Childcare;
 - e. Education services;
 - f. Employment assistance and job training;
 - g. Food;
 - h. Housing search and counseling services;
 - i. Legal services;
 - j. Life skills training;
 - k. Mental health services;
 - l. Outpatient health services;
 - m. Outreach services
 - n. Substance abuse treatment services;
 - o. Transportation;
 - p. Utility deposits

For additional information, please see § 578.53 Supportive services.

Other (Excluding HUD CoC, ESG, YHDP and SSVF) funded SHPD, to include but not limited to State of Florida funds

Other activities may be approved with prior approval from Homeless Services Network of Central Florida staff.

1. Financial assistance costs
 - a. Rental arrears, to include late fees if outlined in the lease agreement
 - b. Utility arrears
 - c. Housing application fees

- d. Background check costs for housing
 - e. Pet fees
 - f. First/last month of rent and/or security deposit
 - g. Utility deposit
 - h. Utility assistance
 - i. Moving costs (to include up to 3 months of storage and movers)
 - j. Court fees and costs
 - k. Bridge housing
 - l. Recurring rental assistance
 - m. Transportation assistance, to include reunification assistance
2. Services costs
- a. Housing search and placement
 - b. Housing stability case management
 - c. Mediation
 - d. Legal services
 - e. Credit repair
 - f. Medical (to include behavioral health and primary care)

HMIS

All CoC and ESG funded projects must enter client-level data into HMIS and comply with [HMIS Policies and Procedures](#) and workflows. HMIS Policies and Procedures, HMIS Privacy Plan, and all other HMIS related documents can be found at: [HMIS GOVERNANCE – HMIS FL-507 \(hmiscfl.org\)](#).

Victim Service agencies are not allowed to enter data into HMIS. Instead, these agencies must use a comparable data system and provide aggregate data to the CoC for documentation related to system performance measures, Point in Time Count, and the Housing Inventory Chart. Victim Service agencies will be required to certify that their comparable database meets HMIS standards as established by HUD.

Coordinated Entry and Assessment

The Coordinated Entry process (CE) is a way for all CFCH homeless services providers to work together with a “no wrong door” approach to provide services to our homeless neighbors. The main goal of CE is to create a real time list of individuals experiencing homelessness in our community, then quickly and efficiently match those people to case management services, available housing, and other resources. We use evidence-based tools to systematically end homelessness. Within that process we are using universal tools and forms that will help ensure that those who are most vulnerable will get housed as quickly as possible.

CE is partnering with community agencies like health care providers, public school systems, correctional facilities, homeless services providers, and many others to better prioritize those with the greatest needs. Persons experiencing homelessness can be assessed by going to community access points, community HUBs, calling 2-1-1, meeting with outreach workers on the streets, or by seeking services at other agencies participating in CE in the tri-county area.

Full Coordinated Entry Policies and Procedures can be found here: https://www.cfch.org/wp-content/uploads/2023/08/CES-Policies-and-Procedures_-2022.pdf

Disaster Preparedness

CFCH Disaster Preparedness guide can be found here:

<https://static1.squarespace.com/static/61200c4a2ec57063cb010a11/t/68c1a4e0c97e05013469bd45/1757521120985/CFCH+FL-507+Extreme+Weather+and+Disaster+Protocol+2025+compressed.pdf>

Other Standards

Conflicts of Interest

Sub-recipients must avoid any conflict of interest in carrying out activities funded by the CoC program and ESG.

Organizational Conflicts of Interest:

CoC funded sub-recipients must comply with the conflict of interest requirements found at https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants. Additional requirements for ESG funded agencies is found at <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-additional-requirements/conflict-of-interest>.

The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the recipient, the sub-recipient, or a parent or subsidiary of the sub-recipient. Sub-recipients must not conduct initial evaluation or provide homelessness prevention assistance to persons living in property owned by the sub-recipient or parent/subsidiary of the sub-recipient.

Individual Conflicts of Interest:

Recipients and sub-recipients must comply with HUD's Administration requirements (24 CFR 85.36 or 84.42 for procurement of goods and services. For all other transactions and activities:

- Restrictions on financial interests and benefits apply to employees, agents, consultants, officers and elected or appointed officials of the recipient or subrecipient if they have certain types of responsible positions.
- Restrictions pertain to financial gain for self, family or those with business ties.

Exceptions: Upon written request by the recipient, HUD may grant exceptions on a case by case basis. (see 24 CFR 576.404(b)(3)(ii))

Fair Housing & Civil Rights Requirements

Agencies must comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a). In addition, agencies must make known that CoC Program, YHDP, ESG, and YHDP rental assistance and services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about and equal access to the financial assistance and services provided under these program. Among other things, this means that each subgrantee must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964. This may mean providing language assistance or ensuring that program information is available in the appropriate languages for the geographic area served by the jurisdiction and that limited English proficient persons have meaningful access to assistance. In addition, all notices and communications shall be provided in a manner that is effective for persons with hearing, visual, and other communication related disabilities consistent with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.6.

If the procedures that the agency intends to use to make known the availability of the rental assistance and services are unlikely to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for such rental assistance and services, the agency must establish additional procedures that will ensure that such persons are made aware of the rental assistance and services.

Under section 808(e)(5) of the Fair Housing Act, HUD has a statutory duty to affirmatively further fair housing. HUD requires the same of its funding recipients.

Agencies will have a duty to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex,

disability, and familial status. Examples of affirmatively furthering fair housing include: (1) marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency; (2) making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities (see, for example, HUD's rule on effective communications at 24 CFR 8.6); (3) providing fair housing counseling services or referrals to fair housing agencies; (4) Informing participants of how to file a housing discrimination complaint, including providing the toll-free number for the HUD Housing Discrimination Hotline: 1-800-669-9777; and (5) recruiting landlords and service providers in areas that expand housing choice to program participants.

Equal Participation of Religious Organizations

Agencies that are religious or faith-based are eligible, on the same basis as any other organization, to participate in ESG and CoC. Neither the federal government nor a grantee shall discriminate against an organization on the basis of the organization's religious character or affiliation.

Agencies that are directly funded under ESG or CoC may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If an organization conducts such activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for the program participants.

A religious organization that participates in ESG or CoC will retain its independence from federal, state, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that it does not use direct ESG funds to support any inherently religious activities, such as worship, religious instruction, or proselytization. Among other things, faith-based organizations may use space in their facilities to provide ESG or CoC-funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, a ESG or CoC-funded religious organization retains its authority over its internal governance, and it may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.

Agencies that participate in the ESG or CoC program shall not, in providing program assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief.

Lobbying and Disclosure Requirements

The disclosure requirements and prohibitions of section 319 of the Department of the Interior and Related Agencies Appropriations Act for Fiscal Year 1990 (31 U.S.C. 1352) (the Byrd Amendment), and implementing regulations at 24 CFR part 87, apply to CoC Program, SSVF, YHDP, and ESG funds. Applicants must disclose, using Standard Form LLL (SF-LLL),

“Disclosure of Lobbying Activities,” any funds, other than federally appropriated funds, that will be or have been used to influence federal employees, members of Congress, or congressional staff regarding specific grants or contracts.

Drug-Free Workplace Requirements

The Drug-Free Workplace Act of 1988 (41 U.S.C. 701, et seq.) and HUD’s implementing regulations at 24 CFR part 21 apply to ESG and the CoC Program. 38 CFR Part 48 applies to SSVF.

Sub-Recipient Policies and Procedures

Each sub-recipient of CoC and ESG funds must also create agency level policies and procedures to include, but not limited to:

- Admission criteria (program eligibility, required documentation, use of CES)
- Shelter stay (length of stay; involuntary family separation; case management and other services; meeting safety and shelter needs of special population; assessing; prioritizing; and reassessing individuals’ and families’ needs for essential services related to emergency shelter, etc.)
- Additional requirements (use of HMIS; recordkeeping; coordination among other providers of services for homeless individuals and families, etc.)
- Discharge and termination procedures (required documentation; file closing; grievance procedures, etc.)
- Requirement for person with lived experience to serve on Board of Directors

Policies and procedures should also address Nondiscrimination and Equal Opportunity Requirements, Fair Housing, Lead Based Paint Requirements, Lobbying and Disclosure requirements and Drug-free Workplace Requirements.

Appendices: Other Relevant CFCH (CoC FL-507) Policies and Procedures

Appendix 1: Policy Against Involuntary Separation of Families

Policy against Involuntary Separation of Families

Central Florida Commission on Homelessness (CFCH CoC FL-507)

Purpose: Ensure that families experiencing homelessness are served in a trauma-informed manner that reduces harm and does not unnecessarily separate them from their family unit.

Background: HUD issued regulations that all shelters are prohibited from denying access to families based on the age of a child. This requirement has been issued through the HEARTH Act and through the ESG Interim Rule. All HUD-funded projects will comply with this requirement. Non-compliance may result in removal of funds.

Policy: The CFCH (CoC FL-507) strongly supports the prohibition against involuntary family separation, has adopted, and incorporated this prohibition as policy and as a special condition in all family housing contracts executed as of October 1st, 2023. In an effort to maintain family unity, for housing serving families with children, the age and gender of a child under age 18 shall not be used as a basis for denying any family's admission. 24 CFR § 578.93(e).

Additionally, recipients may not deny admission to any member of the family (e.g., 15-year-old son). Family includes but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability.

Any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such. While it is acceptable for a shelter or housing program to limit assistance to households with children, it may not limit assistance to only women with children. Such a shelter must also serve the following family types, should they present, in order to be in compliance with the Equal Access rule: Single male head of household with minor child(ren); and any household made up of two or more adults, regardless of sexual orientation, marital status, or gender identity, presenting with minor child(ren).

Additionally, all family shelters, regardless of funding, should accommodate any family composition unless there is a justifiable reason why the agency cannot do so. Please see the following for specific information: HEARTH Act language on family separation: SEC. 404. PREVENTING INVOLUNTARY FAMILY SEPARATION. “(a) IN GENERAL.—... any project sponsor receiving funds under this title to provide emergency shelter, transitional housing, or permanent housing to families with children under age 18 shall not deny admission to any family based on the age of any child under age 18. “(b) EXCEPTION.—Notwithstanding the requirement under subsection (a), project sponsors of transitional housing receiving funds under this title may target transitional housing resources to families with children of a specific age only if the project sponsor— “(1) operates a transitional housing program that has a primary purpose

of implementing an evidence-based practice that requires that housing units be targeted to families with children in a specific age group; and “(2) provides such assurances, as the Secretary shall require, that an equivalent appropriate alternative living arrangement for the whole family or household unit has been secured.”

<https://www.hudexchange.info/resource/1715/mckinney-vento-homeless-assistance-act-amended-by-hearth-act-of-2009/>

Appendix 2: Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA)

Purpose: To ensure compliance with federal eligibility requirements, beneficiaries receiving assistance through CDBG, ESG, HOME, and HOME-ARP programs - whether fully or partially funded with federal funds - must meet the requirements of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA). This law restricts certain public benefits to U.S. citizens and qualified aliens.

Background:

Policy: CoC 507 operated programs that are funded partially or in full by CDBG, ESG, HOME-ARP programs must verify the eligibility, pursuant to PRWORA, of all clients that receive a benefit from the funded program.

PRWORA requires the verification of participants immigration status.

If an individual is a U.S. citizen or U.S. national, the following must be provided:

Primary Evidence of Citizenship (Stand-Alone – Establishes Both Identity and Citizenship):

- U.S. passport or passport card (current or expired if issued without limitation)
- Certificate of Naturalization (N-550 or N-570)