

Guidelines for Adopting a Housing-Focused Approach to Operations

1. Housing-Focused Defined

a. Definition

For the purposes of this Agreement, "Housing-Focused" refers to a model of housing assistance that prioritizes rapid placement and stabilization in housing. This approach does not impose service participation requirements or preconditions.

b. Program Application

The Project application, as incorporated in the HUD NOFO and based on the Sub-recipient's HUD application, specifies that:

i. *Minimal Programmatic Prerequisites*: Individuals experiencing homelessness are offered permanent housing without preconditions such as sobriety, completion of alcohol or drug treatment, or agreement to a treatment plan upon entry.

ii. *Voluntary Supportive Services*: *Supportive* services are offered voluntarily to assist participants in maintaining housing stability. Participation in services is not required to retain housing, although services may be used to engage tenants through techniques like harm reduction, motivational interviewing, and recovery-oriented care.

c. Certification of Housing-Focused Approach

The Sub-recipient has certified, in its request for HUD Continuum of Care funding, that it will operate the Project using a Housing-Focused approach.

2. Denial of Eligibility for Services under Housing-Focused Approach

The Sub-recipient shall not deny eligibility or access to the Project based on conditions or restrictions that are not essential to eligibility, including but not limited to:

- a. Minimum income requirements;
- b. Perceived lack of housing readiness;
- c. Substance use history (current or past);

- d. Criminal record, unless state- or federally-mandated restrictions apply;
- e. Refusal or failure to participate in supportive services;
- f. Non-completion of treatment, non-compliance with medications, or lack of progress on a service plan;
- g. Disability or type of disability;
- h. Current or past history of domestic violence (e.g., lack of protective order, separation from abuser, law enforcement involvement);
- i. Poor credit or financial history;
- j. Poor or no rental history;
- k. Family composition (as defined by HUD Equal Access rules);
- l. Sexual orientation;
- m. Gender identity;
- n. Lack of transportation;
- o. Intake or operational hours of the Project;
- p. Presence of pets; or
- q. Any other non-standard activity that is not part of a typical lease agreement under Florida landlord-tenant law.

3. Termination of Service under Housing-Focused Approach

The Sub-recipient shall not make continued eligibility contingent on any non-essential conditions, including those listed in Paragraph 2, and the following:

- a. Loss of income or failure to increase income;
- b. A domestic violence survivor's decision to reunite with the abuser;
- c. Eviction, displacement, or relocation from a housing unit.

4. Additional Housing-Focused Guidelines

The Sub-recipient shall:

- a. Adjust the intensity and duration of services based on the evolving needs of Program Participants;
- b. Provide clear opportunities for individuals with disabilities to request reasonable accommodations during the service delivery process;
- c. In the case of eviction, displacement, or relocation, continue providing services to the Program Participant until they are transferred to another PSH provider or terminated from services following approval by the COC Case Conference Committee;
- d. Notify the designated CoC CE-designated Point of Contact and assigned Case Manager within two (2) business days if a Program Participant is under consideration for exit due to the exceptions outlined in Paragraph 5;

e. Notify the CoC CE-designated Point of Contact regarding Case Management openings before registry management meetings.

5. Exceptions to Housing-Focused Approach

Notwithstanding the provisions in Paragraphs 2, 3, and 4, the following actions will not be considered a violation of the Housing-Focused approach:

- a. Requirements imposed by local, state, or federal laws;
- b. Documented, imminent threats to the health and safety of program staff;
- c. Mutually agreed upon Sub-recipient- or Project-specific conditions or circumstances.