

NAPA CONTINUUM OF CARE WRITTEN STANDARDS

OVERVIEW

This document establishes minimum standards for housing and services funded by the Continuum of Care Homeless Assistance (CoC) Program and the Emergency Solutions Grants (ESG) Program. The Napa CoC will work to ensure programs providing outreach, shelter, housing, and other services to individuals experiencing homelessness in Napa County will be coordinated and integrated, and follow best practices in a manner consistent with the programs' funding sources and populations they serve.

All providers of housing and services shall take actions to create an effective, welcoming, and affirming environment for all program participants and employees, including, but not limited to, persons of all races, ethnicities, ages, abilities, sexual orientation, gender identities and gender expressions.

GENERAL STANDARDS

i. Compliance with Eligibility Requirements and Applicable Program Standards

Providers must ensure programs conform to applicable eligibility and other requirements established by federal and state rules. Those requirements may include, but are not limited to: the McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act (42 USC 11302); the U.S. Department of Housing and Urban Development (HUD) Continuum of Care Program Interim Rule, 24 CFR Part 578; CoC Final Rule Defining "Homeless"; CoC Final Rule Defining "Chronically Homeless"; federal ESG regulations and definitions, including CFR 576.1 et seq., 24 CFR 576.400 et. seq; California Department of Housing and Community Development (HCD) ESG regulations, 25 CCR 8400 et seq.; Notice on Coordinated Entry, CPD 17-01; Notice on Order of Priority in CoC Program-Funded Permanent Supportive Housing Beds, CPD 16-11; Final Rule: Violence Against Women Reauthorization Act 2013 – Implementation in HUD Housing Programs (24 CFR 200 et. seq) (VAWA); Final Rule on Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs (24 CFR Part 5), and other regulations set forth governing eligible use of CoC and ESG funds. Where not specifically set forth below, those regulations are incorporated by reference into these written standards.

ii. Evaluating Eligibility for Assistance

a. Federal Definitions of Homelessness

All CoC- and ESG-funded programs may serve only clients who meet federal definitions of homelessness, with the exception of homelessness prevention programs, which may serve

persons “at-risk of homelessness.” Napa programs that have dedicated or prioritized beds for clients who meet the definition of chronically homeless, must serve or prioritize those clients, as set forth in the HEARTH Final Rule Defining “Chronically Homeless.”

Homeless status must be verified at intake for all incoming consumers, and providers must make every effort to meet federal standards of documentation. Acceptable forms of documentation include third-party documentation, second-party documentation (observation by provider) if third-party documentation is not available, and client self-certification if the other forms are not available. If third-party documentation is not available, records must certify the due diligence undertaken to obtain such documentation.

b. Income Levels

Program participants receiving housing assistance where rent or occupancy charge is paid by the participant will be required to certify their income level, in compliance with 24 CFR § 578.103(a)(6).

iii. Coordinated Entry and Program Eligibility Assessment

If they have not yet received the VI-SPDAT 2.0 or F-VI-SPDAT 2.0 assessment, all adult members of the household will receive the assessment to identify acuity of housing and service needs.

As set forth in the Napa CoC Coordinated Entry Policies and Procedures, providers administering CoC- or ESG-funded permanent housing (either RRH or PSH) shall use Coordinated Entry to ensure housing is prioritized for the most vulnerable members of the community who are eligible for the provider’s program. Providers may also use Coordinated Entry to prioritize clients for other services and interventions.

iv. Documentation

All recipients and subrecipients of HUD funds must establish and maintain standard documentation to ensure Continuum of Care program funds are used in accordance with HUD requirements, 24 CFR 578.103(a). The Napa County Continuum of Care (CoC) complies with HUD requirements for serving eligible clients as well as maintaining eligibility documentation for each client. Each program must adopt policies and procedures that reflect and implement these policies.

a. Documentation to Demonstrate Eligibility

Documentation must be included in each client file to demonstrate eligibility as follows:

- *Literally homeless* (in order of preference)
 - Third party verification (HMIS print out or written referral using the Napa CoC template), or

- Written observation by an outreach worker, or
 - Certification by the individual or head of household seeking assistance stating that they were living on the streets or in shelter.
 - *Note:* If the provider uses anything other than third-party verification, the case file will include documentation of due diligence used to obtain it.
 - *Fleeing/attempting to flee domestic violence*
 - For victim service providers, an oral statement by the individual or head of household seeking assistance which states they are fleeing, have no subsequent residence, and lack resources. The statement must be documented by a self-certification or a certification by the intake worker.
 - For non-victim service providers, the following must be provided:
 - An oral statement by the individual or head of household seeking assistance that they are fleeing, documented by a self-certification or by the caseworker. Where the safety of individual or family is not jeopardized, the oral statement must be verified; and
 - Certification by the individual or head of household that no subsequent residence has been identified; and
 - Self-certification or other written documentation that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
 - *Chronically homeless*
 - For all clients who meet the definition of chronic homelessness (CH), documentation regarding their status as CH and disability will also be retained in each client file. Documentation for chronic homelessness will include the following:
 - Documentation showing the individual has been continuously homeless for one year or longer, or documentation of four episodes of homelessness occurring in the past three years that amounts to 12 months total;
 - Documentation of the individual’s disability, signed by a qualified professional.
- b. Documentation Procedures:

Each CoC-funded agency is responsible for ensuring that clients are eligible for its program, and that required documentation is retained to demonstrate eligibility and compliance with all CoC and subrecipient grant agreements.

Napa County's Coordinated Entry Team, which works in conjunction with Abode Services-administered outreach and assessment team, shall gather and verify client eligibility documentation, as outlined below, prior to recommending clients for placement into CoC-funded housing. Prior to accepting a client referral, all CoC-funded programs must review documentation to ensure it is up to date, complete, and establishes program eligibility.

Documentation will be organized in each client file according to the Client File Checklist. The Checklist will be placed on the first page of each client file.

The following documents will be collected/or verified through PH program enrollment:

At intake/assessment:

- Verification of Homelessness Form – Note preference for Third Party Verification Form
- Personal identification (If the participant is unable to produce personal identification, the participant shall not be barred from programs, but may be assisted in obtaining identification.)
- Homeless Management Information System (HMIS) Intake Form
- HMIS Confidentiality Acknowledgement Form
- HMIS Privacy Policy Notice
- Release of Information (ROI)
- VI-SPDAT 2.0 or VI-F-SPDAT 2.0
- Verification of Chronic Homelessness Form AND Certification of Disability Form [if applicable]

At enrollment/housing/move-in:

- Budget Form
- Client Rent Calculations
- Initial Rental Subsidy Request
- Monthly Subsidy Request
- Housing Quality Standards (HQS) Inspection Checklist
- Disclosure of Information on Lead-Based Paint
- Lead-Based Paint Brochure *with client signature*
- Rent reasonableness/Fair Market Rent documentation

- Program Service Agreement
- Notice of Occupancy Rights required by VAWA
- Certification Form required by VAWA
- Lease Addendum required by VAWA

The following documentation will be updated at least annually:

- Budget Form
- Client Rent Calculations
- HQS Inspection Checklist
- Signed Occupancy Agreements or Leases
- Program Service Agreement

Programs will also document the cost of services provided to each client, including any payments made on behalf of each client, per 24 CFR 576.500(f) and 24 CFR 578.53(a).

ESG Programs will maintain additional documentation to demonstrate:

- The program participant met with a case manager at least once per month. 24 CFR 576.401(e)(1-2) and 24 CFR 576.500(f).
- The program used a plan to assist the program participant to retain permanent housing after the ESG assistance ends, 24 CFR 576.401(d)(1); 24 CFR 576.401(d)(2); 24 CFR 576.500(f).
- Programs made efforts to assist each program participant to obtain mainstream or other resources as needed. 24 CFR 576.401(d)(1); 24 CFR 576.401(d)(2); 24 CFR 576.500(f).
- Rental Assistance Agreements were entered with each owner before providing the owner with rental assistance payments. 24 CFR 576.106(e), 24 CFR 576.500(h), 24 CFR 576.106(f).

c. Documentation Templates:

The following documentation templates will be regularly updated and distributed to all CoC-funded projects, and are posted on the CoC website. CoC-funded projects must use the below in each file, where applicable:

1. Homeless Management Information System (HMIS) Intake Form
2. HMIS Confidentiality Acknowledgement Form

3. HMIS Privacy Policy Notice
4. Release of Information (ROI)
5. Verification of Homelessness Form
6. Third Party Homeless Certification Form
7. If Chronic Homelessness is indicated on the HMIS Intake Form, Verification of Chronic Homelessness Form, AND
8. If Chronic Homelessness is indicated on the HMIS Intake Form, Verification of Disability Form
9. Budget Form
10. Client Rent Calculation Form
11. Initial/Monthly Rental Subsidy Request
12. HQS Inspection Checklist
13. Disclosure of Information on Lead-Based Paint
14. Lead-Based Paint Brochure *with client signature*
15. Notice of Occupancy Rights required by VAWA
16. Certification Form required by VAWA
17. Lease Addendum required by VAWA

d. Documentation Training

The CoC will provide an annual training to staff members of all CoC-funded agencies regarding documentation procedures and templates

v. Recordkeeping

All records pertaining to CoC funds will be retained for 5 years from the expenditure of the grant, or, in the case of documentation of each program participant's eligibility and other program participant records, for 5 years after the expenditure of all funds from the grant under which the program participant was served. 24 CFR 578.103(c)(1-3). Records required include the following, according to 24 CFR 578.103(a):

- Verification of Homeless Status
- Verification of Chronic Homeless Status (if applicable)
- Annual Income Verification and Rent Contribution Calculation for Participants receiving Housing Assistance
- Program Participant Records
- Signed Occupancy Agreements or Leases
- Notice of Occupancy Rights and Certification Forms required by VAWA

- Housing Quality Standards Checklist
- Services Provided
- Other records required by HUD or individual programs

HUD may monitor projects as long as records are maintained. 24 CFR 578.103(d)(1). All client files are available for HUD monitoring, and will be reviewed during CoC monitoring visits at least once per fiscal year.

vi. Participation in HMIS

All CoC- and ESG- funded projects must ensure that data on all persons served and all activities provided under these federally funded programs are entered into the HMIS, in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. Victim service providers may use a comparable database, independent from the HMIS. All CoC- and ESG-funded projects must comply with the requirements in the Napa CoC HMIS Policies and Procedures Manual.

vii. Participation in Coordinated Entry

The CoC has established a Coordinated Entry System in compliance with HCD ESG regulations, 25 CCR 8409; HUD Coordinated Entry Notices CPD-17-01 and CPD-16-11; VAWA Reauthorization Act of 2013; and the CoC Program Interim Rule, 24 CFR Part 578. All CoC- and ESG-funded programs are committed to participating in this system . All referrals from CoC- and ESG-funded programs, including screening for program eligibility and prioritization, occur according to Napa CoC’s Coordinated Entry System protocols.

The Coordinated Entry System promotes comprehensive and coordinated access to assistance regardless of where an individual or family is located in the CoC service area, and uses the VI-SPDAT 2.0 and F-VI-SPDAT 2.0, a standardized assessment tool that ensures that the community prioritizes assistance for people with the most urgent and severe needs and to those who have been homeless for the longest period of time.

viii.Coordination with Local School Districts

All CoC- and ESG- funded projects will ensure that individuals and families who become homeless will be informed of their eligibility for education services. CoC- and ESG-funded programs must coordinate with local education authorities and school districts to ensure all children are enrolled in early childhood programs or in school and connected to appropriate educational services.

ix. Coordination with Other Targeted Homeless Services

All CoC- and ESG- funded projects will ensure that they are coordinated and integrated with all other targeted homeless services in the Napa CoC, including those programs and providers listed under 24 CFR 576.400(b), as a part of the strategic, community-wide system to prevent and end homelessness for the Napa CoC.

x. Housing First

All CoC- and ESG-funded programs are committed to adopting a Housing First approach and reducing barriers for accessing their services.

xi. Maintaining Family Unity

CoC- and ESG-funded programs may not deny admission to any household on the basis that there is a child under the age of 18, deny admission to any member of the family, or otherwise separate family members, with the following exceptions:

- Projects that serve a limited demographic approved by HUD or HCD will not be required to expand their client base as a result of this policy.

Program participants may contact a CoC representative if they believe involuntary separation has occurred. The Board representative and case managers will determine whether family members are being involuntarily separated at the time of program entry and report to the CoC, which will take appropriate action.

xii. Unaccompanied and Parenting Youth

In compliance with orders of priority for ESG-funded and CoC-funded housing and services, and using an assessment protocol, the CoC will prioritize housing and services for unaccompanied youth under age 18 and 18 to 24 based on factors such as vulnerability to victimization, length of time homeless, severity of service needs, high risk of continued trauma or harm, unsheltered homelessness history, and lack of access to family and community support networks.

Unaccompanied youth under age 18 may be referred to the local child welfare agency; youth over age 18 will be referred to local youth housing/services providers and also will have access to the full range of CoC/ESG resources for which they are eligible.

xiii. Safeguards for Special Populations

For providers serving special populations, such as survivors of domestic violence, families, seniors, mentally ill and disabled individuals, and veterans, safety and shelter safeguards shall be described in the service provider’s policies and clearly communicated to program participants.

The Napa CoC is committed to ensuring safe access to shelter, housing and services for survivors of domestic violence and works with local domestic violence providers to ensure

safety planning and appropriate referrals. Per the Violence Against Women Reauthorization Act (VAWA) 2013, no survivor will be evicted, or assistance denied or terminated by a CoC-funded program because he/she is a survivor of domestic violence. Nor shall any survivor be denied tenancy or occupancy rights due to adverse factors caused by being a survivor. The CoC has an Emergency Transfer Plan (as required by 24 CFR 5.2005 and 24 CFR 578.99(j)(6)) to protect victims of domestic violence, dating violence, sexual assault or stalking serviced by the CoC (Appendix A). This plan is being implemented through the Coordinated Entry System and all CoC- and ESG-funded agencies and related staff. Agencies will provide emergency transfers for domestic violence survivors receiving rental assistance or otherwise residing in CoC- or ESG-funded units. To exercise their rights under VAWA, a survivor need only to self-certify. Lease provisions will also include protections required under VAWA (Appendix B).

Households with children will be prioritized for services based on need, as indicated by factors such as vulnerability to victimization, number of previous homeless episodes, unsheltered homeless, criminal history, and bad credit or rental history. Veterans determined to be ineligible for federal Department of Veterans Affairs services will be eligible for CoC- and ESG-funded resources as appropriate. Providers shall make every effort to ensure that their services are accessible and appropriate for individuals and families with the highest barriers to housing and who are likely to be homeless the longest.

STREET OUTREACH

Street outreach is the provision of essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Examples of street outreach include engagement, case management, emergency health services, emergency mental health services, transportation, and services for special populations.

i. Eligibility for and Targeting Outreach

ESG- and CoC-funded street outreach programs will target for services individuals who meet the criteria under paragraph (1)(i) of the “homeless” definition under 24 CFR §576.2 and under 24 CFR 578. The Napa CoC leverages multiple funding sources for Street Outreach programs and those activities may serve individuals qualified under other federal and state regulations.

ii. Providing Essential Services

Street Outreach services providers will screen individuals with the VI-SPDAT 2.0 and F-VI-SPDAT 2.0 to identify acuity of housing and service needs as a part of the coordinated entry system.

They will then offer necessary and appropriate engagement, case management, emergency health and mental health, and transportation services.

EMERGENCY SHELTER

i. Admission, Diversion, Referral, and Discharge

a. Admission

Emergency Shelter providers shall admit individuals and families who meet the HUD definition of “homeless” and their agency’s eligibility criteria, following assessment of eligibility (as outlined above) and priority for services. Individuals and families shall not be denied shelter because they are victims of domestic violence, dating violence, sexual assault or stalking.

b. Diversion and Referral

Persons seeking assistance shall be screened with the community-approved assessment tool. Depending on the person’s needs and preferences, Emergency Shelter staff will refer them to the appropriate services. Napa is in the process of developing a system for efficient triage and diversion from emergency shelter for those who have safe alternative options.

c. Discharge and Length of Stay

Any length of stay limitations shall be determined by each provider and clearly communicated to program participants. Providers should make every effort to ensure that program participants are discharged from Emergency Shelter services only when they choose to leave or when they have successfully obtained safe permanent housing.

ii. Assessing, Prioritizing, and Reassessing Need for Emergency Shelter

a. Assessment and Prioritization

Program participants will be assessed with the community-approved assessment tool and any additional assessment tool that shelter providers may choose to determine participants’ needs for shelter. Participants will be prioritized for Emergency Shelter services according to their level of need with priority for those with the most urgent and severe needs.

b. Reassessment

Program participants will be reassessed by their case manager according to each provider’s policies, but emergency shelter staff shall re-administer the community-approved assessment tool when the client’s prior assessment is out of date (older than one year), or whenever

participants experience major changes in health, life circumstances, or at the request of a program provider to ensure appropriate placement into housing or services.

iii. Coordination Among Providers

Emergency Shelter providers will coordinate with essential services providers, homeless prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers by actively engaging in partnerships and through the CoC. Emergency Shelter staff are aware of and able to access a wide array of housing and services directly and through the CoC's coordinated entry system. Emergency Shelter providers, with the support of CoC members, will make every effort to leverage other programs, services, and resources targeted to address homelessness and poverty within Napa County.

Emergency Shelter operators shall ensure that participants are assessed for immediate health and safety needs, including identification of any barriers to obtaining housing, as well as provided with access to a wide array of community and housing services, including housing location and placement assistance. Participants are assisted with creating housing plans and are actively assisted in overcoming any barriers to securing housing, using a housing first, progressive engagement model.

HOMELESSNESS PREVENTION

Homelessness Prevention assistance will be provided to families and individuals who fall under the federal definition of "at-risk" of homelessness and who are eligible for such services under a provider's criteria. Homeless prevention providers will prioritize services for families and individuals with the highest needs and barriers to retaining housing. Risk factors that determine who would be most in need of Homeless Prevention to avoid becoming homeless include but are not limited to the following: loss or imminent loss of employment or income, loss or imminent loss of housing, being "doubled up" in housing, and unstable family situation.

Individual prevention assistance cannot exceed 24 months in a three-year period, and Homelessness Prevention providers must conduct participant evaluations at least every three months.

RAPID REHOUSING

The goal of Rapid Rehousing (RRH) assistance is to end homelessness and move participants into permanent housing as quickly as possible. RRH is also designed to provide individuals and families with the least amount of assistance necessary to ensure housing stability, and ensure individuals and families receiving assistance remain stably housed after the conclusion of such assistance.

As sufficient resources become available, CoC- and ESG-funded RRH providers will make every effort to rehouse eligible families that become homeless within 30 days of becoming homeless.

i. Eligibility for RRH Assistance

Eligibility requirements for RRH may vary depending on the funding source. Determination of eligibility must be based on the participant’s status at intake, which is the time the participant enters the project and begins receiving assistance under the grant program. Eligibility must be clearly noted and documented in the participant’s file. Perceived housing barriers such as lack of income or employment or sobriety shall not affect eligibility.

In order to qualify for RRH assistance in CoC-funded programs, households must fall within HUD’s definition of “homeless”:

1. Literally homeless;
2. At imminent risk of losing their primary night-time residence;
3. Unaccompanied youth under 25 years of age or families with children and youth who do not otherwise qualify as homeless under this definition but who are defined as homeless under another Federal statute and meet additional specified criteria; or
4. Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions.

The CoC Program Notice of Funding Availability (NOFA), HCD’s ESG funding requirements, or the program grant agreement may impose additional eligibility requirements not reflected in the regulation.

In order to qualify for RRH in ESG-funded programs according to 24 CFR §576.104, households must meet the criteria under paragraph 1 of the “homeless” definition in 24 CFR §576.2:

1. Living in a public or private place not meant for human habitation;
2. Living in temporary shelter, which includes congregate shelters and transitional housing, or
3. Exiting an institution where the individual or family has resided for 90 or fewer days and was living in shelter or in a place not meant for habitation before entering the institution.

Program participants will also be eligible if they meet the criteria under paragraph 4 of the HUD CoC Final Rule “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the ESG “homeless” definition. All people who are literally homeless who cannot quickly secure housing on their own or with another form of assistance are screened for and offered rapid re-housing assistance, to the extent they are eligible and assistance is

available. Program participants are referred to other forms of homeless assistance in the CoC service area according to Napa CoC's Coordinated Entry System Policies and Procedures.

ii. **Prioritization and Placement**

The CoC will use the Coordinated Entry System to prioritize access to assistance for people with the most urgent and severe needs. Napa County CoC's system of prioritization complies with the Notice on Coordinated Entry 17-01 and aligns with the recommended order of priority established in 25 CCR 8409 for ESG-funded activities.

All CoC- and ESG- funded programs participate in the coordinated entry system and use the community assessment tools, VI-SPDAT 2.0 and F-VI-SPDAT 2.0, to assess individuals for housing priority. The CoC will prioritize RRH resources on a rotating basis in order to best serve the most vulnerable individuals and families. The highest-scoring participants within the RRH-identified range (5-9) of the VI-SPDAT 2.0 (or F-VI-SPDAT 2.0) will be prioritized for available RRH resources. In addition, case conferencing will identify additional participants scoring in the higher PSH-identified ranges (10-13) who might be best served by RRH resources. Case conferencing will be used to determine eligibility and client choice, and ties among highest-scoring individuals and families will be broken by length of time homeless.

When an available RRH resource is identified, the program will notify the coordinated entry team. The coordinated entry team will review the HMIS-generated priority list, including any anonymized lists generated through the Napa County victim service provider, to identify the highest-scoring families or individuals score within the 5-9 range, and in higher ranges on a rotating basis. The coordinated entry team will then work with the program to refer the client to the available housing resource according to the Coordinated Entry Policies and Procedures. (See Napa CoC Coordinated Entry System Policies and Procedures.)

a. **Bridge Housing**

Bridge housing helps clients to move immediately out of homelessness and into a temporary setting until permanent housing is available. Bridge housing may be appropriate to address barriers such as limited finances, unavailability of appropriate housing programs, and lack of vacant housing stock.

When a household scores a 10 or above on the VI-SPDAT/F-VI-SPDAT 2.0 and PSH is an appropriate intervention but no beds are currently available, the household may be referred to RRH as a bridge as housing and case management resources permit. In referring households to bridge housing, the Coordinated Entry team will balance the need to provide immediate care for the community's most vulnerable households against the need to match tenants with safe, adequately supported housing situations that will promote the community's long-term ability to increase its supply of available and affordable housing. Placement in bridge housing for a

limited number of clients will be decided on a case-by-case basis and take into consideration the community's resources and needs.

Where RRH is being used as bridge housing for a household who scored in PSH range, clients will be re-assessed at least one month prior to program transfer to confirm that PSH remains the appropriate intervention.

iii. Determining Participant Contribution

Each provider shall verify the participant's income prior to approval for initial financial assistance. Documentation of the participant's income and expenses shall be maintained in the participant's file, as required by 24 CFR § 576.500(e) and 24 CFR § 578.103(a)(6). Income is not a requirement to participate in RRH.

The amount or percentage of rent each program participant must pay and the maximum amount or percentage of rental assistance that a program participant may receive is determined on a case-by-case basis. Financial assistance is not a standard "package" and is flexible to adjust to households' unique needs and resources as participants' financial circumstances or housing costs change.

Rental subsidies will be based on the program's assessment of the client's family and financial situation. Case managers will adjust the amount of contribution over the term of the client's participation in the program, based on monthly assessment. If a client's income or ability to pay increases (e.g. due to access to additional resources, a new or higher paying job within the household, etc.), the program will re-adjust client income contributions as necessary.

Participants may receive up to 100 percent of rent costs depending on need, and housing may cost greater than 30 percent of participant income. Programs will work with each participant on a tailored plan to help them obtain self-sufficiency in the shortest amount of time possible.

iv. Length of Rental Assistance

RRH offers short-term (up to 3 months) or medium-term (3 to 24 months) rental assistance along with supportive services to help participants retain housing beyond the assistance period. A one-year lease is required, and individual assistance cannot exceed 24 months in a three-year period. The length of rental assistance will be determined by each agency as necessary to use resources efficiently while also minimizing returns to homeless. Case managers will re-assess clients for ongoing need at monthly check-ins to identify significant life or income changes and adjust assistance as necessary, and will clearly communicate the duration and amount of rental assistance to program participants.

v. Service Requirements for RRH Assistance

Case managers will offer services in order to assist households to successfully retain housing and move off of the subsidy and into self-sufficiency. During the clients' participation in the program, case managers must meet with participants not less than once per month to assist the program participant in ensuring long-term housing stability. Case management will be offered in a manner consistent with Housing First principles, and participation in services unrelated to obtaining or maintaining permanent housing is voluntary.

Services offered will include but are not limited to the creation of an individualized housing plan, designed to re-house and stabilize participants as quickly as possible. Participants are also provided assistance to locate and obtain a wide array of permanent housing through individualized Housing Plans, financial assistance for move-in and stabilization costs, other community resources (e.g., subsidized childcare, legal resources) and housing case management to help achieve Housing Plan goals. Staff are informed of a wide array of housing options to help participants achieve their Housing Plan goals, and will use a progressive engagement approach to help households end homelessness as rapidly as possible with minimal support and resources.

Projects are exempt from the services requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits the recipient operating the project from making its housing conditional upon the participant's acceptance of services.

Programs may provide supportive services for no longer than 6 months after rental assistance stops.

vi. Re-assessment

RRH providers shall conduct participant re-assessments at least annually. At a minimum, re-assessment must establish and document ongoing need and lack of resources and support networks. ESG-funded RRH re-assessments must also demonstrate that the program participant does not have an annual income that exceeds 30% of the median family income for the area.

In all programs, case managers will regularly re-assess clients for any significant life changes and modify assistance as necessary. Assessments will focus on potential barriers to obtain and/or maintain housing to determine where case management can best support participants.

vii. Housing Requirements for RRH

All housing supported by RRH resources must meet HUD requirements, including but not limited to Housing Quality Standards, rent reasonableness standards, Fair Market Rates (FMR) (as relevant), environmental review, and others.

PERMANENT SUPPORTIVE HOUSING

i. Prioritizing Need for Permanent Supportive Housing (PSH)

All prioritization decisions will take place through the coordinated entry system, informed by community-approved assessment tool scores, through the creation of a common community queue in HMIS that will serve as a single prioritized list for PSH. Households with the highest VI-SPDAT scores will be prioritized for PSH openings, and ties will be broken based on length of time homeless. Clients in need of emergency transfer will also be prioritized according to the Emergency Transfer Plan.

In addition, the Coordinated Entry team will ensure that the CoC Program-funded PSH is aligned with and follows the orders of priority listed under “**Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing.**”

The following is the order of priority in CoC-funded PSH beds dedicated to or prioritized for persons experiencing chronic homelessness:

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

The following is the order of priority in CoC-funded PSH beds nondedicated or prioritized for persons experiencing chronic homelessness:

- a. First Priority—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs.
- b. Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs.
- c. Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs.

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

RENTAL ASSISTANCE LEASE REQUIREMENTS

Persons receiving rental assistance in CoC-funded programs must have an initial lease of at least one year, renewable for terms that are a minimum of one month long, and terminable only for cause, pursuant to 24 CFR 578.51(l)(1). An exemption from HUD must be requested for any initial lease terms less than one year.

Leases must include the Notice of Occupancy Rights and Certification forms required by VAWA, and any other notifications required by law. Pursuant to the Napa CoC policy of Housing First, leases may not include provisions that contain restrictions targeted to recipients of supportive housing subsidies, and are not typical for a lease.

Leases must be kept in the client file and updated annually upon renewal.

HOUSING QUALITY STANDARDS (HQS) AND LEAD BASED PAINT (LBP)

All CoC-funded agencies are responsible for completing Housing Quality inspections for every unit occupied by participants of their program, and are required to retain up-to-date documentation to demonstrate compliance with 24 CFR part 578.75(b). Each CoC-funded agency is required to have at least one HQS trained specialist, or contract with such a specialist.

i. Inspections

Prior to lease signing, the HQS specialist shall visit the unit to conduct the inspection using the HUD-required Housing Quality Inspection Checklist to ensure the assisted unit meet applicable housing standards. As part of the HQS inspection, units shall be evaluated for lead-based paint (LBP) issues and the required level of inspection shall occur. If questions about housing quality arise during the inspection, the agency/HQS specialist will work directly with the landlord to resolve those issues. The agency will discuss with the landlord the needed repairs, timeline to complete the repairs, cost, and who will pay for the repairs. Repairs and follow-up inspections shall be documented. Clients may not occupy units that do not pass minimum HQS.

ii. Required Documentation

After the inspection is complete and all issues are resolved, the agency will present the HQS inspection checklist, Lead-Based Paint Brochure and Disclosure of Information on Lead-Based Paint Hazards to the client for signature. A signed copy of each of these documents will be retained in each client file.

All units will be inspected at least annually, with required documentation retained in file.

APR SUBMISSIONS

As required by 24 CFR 578.104(e) and 2 CFR Section 200.328(b), recipients of HUD funds must collect and report data in an Annual Performance Report (APR). APRs are due in the Sage reporting system 90 days after the grant period ends.

All CoC-funded projects are responsible for ensuring their APR is submitted on time, and shall work with the HMIS Lead to verify data quality and accuracy.

The HMIS Lead will provide a draft APR to CoC-funded agencies for review within 30 days after the grant period ends. The agency will review the APR within the two-week period outlined below. If errors are identified, agencies will notify the HMIS Lead and work with Bitfocus to revise any data, reporting errors, or omissions.

The HMIS Lead will notify the agency when the APR is ready for submission. The agency will enter the required information in Sage and upload the APR in the required CSV format, and will submit the APR at least one week in advance to the submission deadline. The agency will notify the HMIS Lead when the APR has been submitted in Sage. The HMIS Lead will then review the submission for completion.

i. APR Review and Submission Timeline

Below is the timeline for APR submissions. Grant extensions or amendments may alter this timeline:

Agency	Project	Grant Year	APR Prepared by HMIS Administrator for Agency Review	Project APR Review Period	Agency Submits APR in Sage	APR Deadline in Sage
HHSA	Home to Stay	1/1-12/31	1/31	1/31-2/14	2/28	3/31
HHSA	PSH I	8/1-7/31	8/31	8/31-9/14	9/30	10/31
HHSA	PSH II	8/1-7/31	8/31	8/31-9/14	9/30	10/31
HHSA	Coordinated Assessment	2/1-1/31	2/28	2/28-3/15	3/31	4/30
HHSA	HMIS	4/1 – 3/31	4/30	4/30-5/14	5/31	6/30
Buckelew	Napa PSH	1/1 – 12/31	1/31	1/31 – 2/14	2/28	3/31
Housing Authority	Shelter Plus Care	8/1 – 7/31	8/31	8/31 – 9/14	9/30	10/31

ii. Process for Obtaining Information from DV Agencies to Complete the Annual Performance Report (APR)

Domestic violence (DV) agencies receiving CoC funds will meet with the HMIS Lead as soon as the grant year ends. The HMIS Lead will gather the necessary information and combine DV agency data with the appropriate CoC- funded project APR. The HMIS Lead will then share the completed APR with the outside technical assistance provider to review for errors. The completed APR will be submitted to HUD according to the timeline above.

MONITORING

Under 24 CFR part 578.7, the CoC is required to evaluate CoC- and ESG-funded projects and outcomes. As the Collaborative Applicant, HHSA is responsible for coordinating this evaluation on an annual basis. Additionally, 24 CFR part 578.23(c) requires all recipients of CoC funds to monitor their projects and subrecipients at least annually. HHSA or its designee (“monitor”) will review documents and make on-site visits to all recipients and subrecipients of CoC funds annually to ensure compliance with HUD regulations and to assess program performance and effectiveness.

i. Scope of Monitoring

Annual monitoring will be conducted through a monitoring visit to each recipient and subrecipient each fiscal year. HHSA or its designated monitor will notify projects of monitoring visits at least 30 days prior to the scheduled visit and inform them of the scope of the monitoring and documents needed.

Documents to be provided and reviewed may include: client files, agency policies and procedures, grant agreements or contracts with HUD or HUD recipients, financial reports and associated backup documentation (including timesheets), financial audits, match letters and drawdowns, recent invoice and drawdown history, and any other documents necessary to verify compliance with contracts, grant agreements, and HUD regulations. In addition to assessing compliance, monitors may also make suggestions for program improvements, share best practices, and offer technical assistance. Monitors will also seek to identify areas of success and strong practices that may be shared with other grantees.

ii. Monitoring Procedures

Prior to the monitoring visit, HHSA will review prior monitoring reports, recent programmatic and financial reports, and recent financial audits to identify any additional items that should be included in the visit or review. In particular, any areas that raised concerns and/or required corrective action during the prior visit or review will be included.

The monitor will reach out to the program’s primary contact at least 30 days prior to the monitoring visit, including proposed dates, expected length of time and staff who should attend. Prior to the initial monitoring visit, programs will be requested to prepare a random sample of at

least three client files, and a random sample of at least three line items from invoices. Additional files and invoices may also be requested for review.

After each visit, a monitoring report will be completed and sent to projects within 30 days. For each concern identified, the monitor will note the requirement that is not being met and include a description of the corrective action that needs to be taken. Monitoring is an ongoing process and is intended to improve program effectiveness and management efficiency.

FINANCIAL MANAGEMENT

The Napa CoC is committed to effectively and efficiently using all CoC funds in a timely manner on eligible activities. All new project applicants are expected to initiate the approved projects promptly in accordance with the CoC NOFA. New project applicants will be recommended for funding only if they demonstrate they can start operations in a timely manner with sufficient time to complete the post-award process within the awarded grant term. The CoC will quarterly monitor newly awarded grants to ensure timely start up. Projects not on schedule for timely initiation shall be reviewed for possible reallocation of funds.

Each recipient will draw down funds from eLOCCS at least once per quarter and shall effectively use all of its allocated funds. The CoC shall review the drawdown and grant utilization records of each CoC-funded project on an annual basis. Projects that have low utilization records or histories of de-obligation of funds shall prepare statements explaining the causes and plans to correct the failure to draw down and/or use allocated funds. The CoC may take corrective action, up to and including reallocation of CoC funds.

APPENDIX

- [U.S. Department of Housing and Urban Development \(HUD\) Continuum of Care Program Interim Rule, 24 CFR Part 578](#)
- [Emergency Solutions Grants Program Interim Regulations, 24 CFR Parts 91 and 576](#)
- [McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\) Act \(42 USC 11302\)](#)
- [California Department of Housing and Community Development \(HCD\) ESG regulations, 25 CCR 8400 et seq.](#)
- [Notice on Coordinated Entry, CPD 17-01](#)
- [Notice on Order of Priority in CoC Program-Funded Permanent Supportive Housing Beds, CPD 16-11](#)
- [Final Rule Defining "Homeless"](#)
- [Defining-Chronically-Homeless-Final-Rule.pdf](#)

- [Equal-Access-Final-Rule-2016.pdf](#)
- [Violence Against Women Reauthorization Act of 2013: Implementation in HUD Housing Programs](#)

APPENDIX A

EMERGENCY TRANSFER PLAN FOR SURVIVORS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

EMERGENCY TRANSFERS

The Napa CoC is committed to protecting the safety of tenants in HUD-funded programs who are survivors of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), tenants who are survivors of domestic violence, dating violence, sexual assault, or stalking may request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.¹ The ability of housing providers and the Coordinated Entry System (CES) to honor such request for tenants currently receiving assistance may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether another dwelling unit is available for transfer placement and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), and ensures the Napa CoC and its CoC- and ESG-funded providers are in compliance with VAWA requirements.

KEY TERMS

Emergency Transfer Plan. Provides for emergency transfers for survivors receiving rental assistance or in units subsidized under a covered housing program.

External Emergency Transfer. Emergency relocation of a tenant to another unit where the tenant would be considered a new applicant.

¹ Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

Internal Emergency Transfer. Emergency relocation of a tenant to another unit where the tenant would not be a new applicant.

Safe Unit. A unit the victim believes is safe.

Victim. A victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L.

ELIGIBILITY FOR EMERGENCY TRANSFERS

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if:

- a) The tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit; OR
- b) If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

EMERGENCY TRANSFER REQUEST DOCUMENTATION

To request an emergency transfer, the tenant shall notify the housing provider or Access Point, and submit a written request for a transfer to a Safe Unit. The Access Point or housing provider will provide reasonable accommodations to this policy for individuals with disabilities.

The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under the housing provider's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

CONFIDENTIALITY

CoC- and ESG-funded housing providers operating within the geographic boundaries of the Napa CoC will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives their housing provider written permission to release the information on a time-limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant.

See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about CoC- and ESG-funded housing providers' responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

EMERGENCY TRANSFER TIMING AND AVAILABILITY

The CE system operating within the geographic boundaries of the Napa CoC cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. The CE system and network of providers will, however, work together with NEWS and act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. The CE system or housing provider may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If within the geographic boundaries of the Napa CoC, there are no safe and available units, the CE system will work with NEWS and other available resources to assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, the CE system will also assist tenants in contacting the regional and national organizations offering assistance to survivors of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

BIFURCATION

A housing provider may bifurcate a lease or terminate assistance to any tenant who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, or

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stalking. The victim of the criminal activity cannot be removed as long as they are still a lawful occupant. 23 CFR 578.99(j)(7), cross-referencing 24 CFR 5.2009(a)(1).

Case managers should work with the remaining tenant to assess whether they can remain safely in the unit, and if an emergency transfer is needed.

RETENTION OF DOCUMENTS AND REPORTING REQUIREMENTS

A record of all Emergency Transfer requests and outcomes of those requests must be retained by housing providers and the CES for five years from the date of the request or outcome (whichever is later). Emergency Transfer requests and outcomes must be reported to HUD annually.

SAFETY AND SECURITY OF TENANTS

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Local assistance may be found through NEWS 24/7 Hotline at (707) 255-NEWS (6397), or by email at info@napanews.org. The NEWS administrative office at 1141 Pear Tree Lane Suite 220, is open Monday through Friday, 8:00am to 5:00pm. Walk-ins are welcome, or survivors can call to make an appointment with an advocate, 707-252-3687.

Tenants who are living outside of Napa County who have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233 for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

APPENDIX B
LEASE ADDENDUM

VIOLENCE AGAINST WOMEN AND JUSTICE DEPARTMENT REAUTHORIZATION ACT OF 2005

TENANT	LANDLORD	UNIT NO. & ADDRESS
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This lease addendum adds the following paragraphs to the Lease between the above referenced Tenant and Landlord.

Purpose of the Addendum

The lease for the above referenced unit is being amended to include the provisions of the Violence Against Women and Justice Department Reauthorization Act of 2005 (VAWA).

Conflicts with Other Provisions of the Lease

In case of any conflict between the provisions of this Addendum and other sections of the Lease, the provisions of this Addendum shall prevail.

Term of the Lease Addendum

The effective date of this Lease Addendum is _____. This Lease Addendum shall continue to be in effect until the Lease is terminated.

VAWA Protections

1. The Landlord may not consider incidents of domestic violence, dating violence or stalking as serious or repeated violations of the lease or other “good cause” for termination of assistance, tenancy or occupancy rights of the victim of abuse.
2. The Landlord may not consider criminal activity directly relating to abuse, engaged in by a member of a tenant’s household or any guest or other person under the tenant’s control, cause for termination of assistance, tenancy, or occupancy rights if the tenant or an immediate member of the tenant’s family is the victim or threatened victim of that abuse.
3. The Landlord may request in writing that the victim, or a family member on the victim’s behalf, certify that the individual is a victim of abuse and that the

Certification of Domestic Violence, Dating Violence or Stalking, Form HUD-91066, or other documentation as noted on the certification form, be completed and submitted within 14 business days, or an agreed upon extension date, to receive protection under the VAWA. Failure to provide the certification or other supporting documentation within the specified timeframe may result in eviction.

Tenant

Date

Landlord

Date

U.S. Dept. of Housing and Urban Development
OMB Approval No. 2502-0204
Form HUD-91067