

SANTA CRUZ COUNTY HOMELESS ACTION PARTNERSHIP

Local Continuum of Care Written Standards

For CA-508 Watsonville/Santa Cruz City and County Continuum of Care

The Homeless Action Partnership (HAP) has developed the following standards for the Santa Cruz County Continuum of Care (CoC). They are intended to govern the provision of assistance for individuals and families. All programs receiving Emergency Solutions Grant (ESG) or Continuum of Care (CoC) funds are required to comply with these standards. Each project may have its own program rules or focus, but they must all align with these standards.

EVALUATING AND DOCUMENTING ELIGIBILITY FOR ASSISTANCE

1. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance consistent with the recording keeping requirements and definitions for "homeless" and "at-risk of homelessness."

The Santa Cruz County Continuum of Care provides funding for the following types of programs: Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), Transitional Housing (TH), Emergency Shelter (ES), Street Outreach (SO), Supportive Services Only (including Coordinated Entry), and Planning. As set forth in the HEARTH Act, there are four categories of participant eligibility for CoC funds: 1) Literally Homeless, 2) Imminent Risk of Homelessness, 3) Homeless Under Other Federal Statutes (subject to cap), and (4) Fleeing/Attempting to Flee Domestic Violence.

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1. Literally Homeless
 - a. Eligibility should be documented in the following manner (in order of preference):
 - i. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - ii. Written observation by an outreach worker; or
 - iii. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter.
 - b. If the provider is using anything other than a Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.
2. Imminent Risk of Homelessness
 - a. Eligibility should be documented in the following manner (in order of preference):
 - i. A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; or
 - ii. For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
 - iii. A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; and
 - iv. Certification that no subsequent residence has been identified; and
 - v. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.
3. Homeless Under Other Federal Statute (Not typically used in the Santa Cruz County CoC)
4. Fleeing/Attempting To Flee Domestic Violence (DV)
 - a. Eligibility should be documented in the following manner (in order of preference):
 - i. For victim service providers:
 - ii. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.
 - iii. For non-victim service providers:
 - iv. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
 - v. Certification by the individual or head of household that no subsequent residence has been identified;

- and
- vi. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Additional Eligibility Requirements for the ESG Program Only:

Agencies receiving ESG funds, may, depending upon program type, serve individuals and families who are "homeless" or "at-risk of homelessness." All agencies receiving ESG funds will follow state and federal documentation guidelines to demonstrate homelessness, at-risk status, and income eligibility. Agencies will either develop internal documentation forms, or utilize ESG mandated forms as available and appropriate. Agencies will ensure that participant documentation of eligibility is recorded and maintained in accordance with state and federal guidelines.

The applicable standards for the definition of "homeless" in ESG programs are the same as above. The applicable standards for the definition of "at-risk of homelessness" are as follows:

AT RISK OF HOMELESSNESS means:

- 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;
 - 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 literal homelessness situation; 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 general purpose 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 there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - a. 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
 - b. 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(3) 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 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.

ESG INCOME

Only at risk households who have an income below 30% of area median income will be eligible for services under ESG funding. (This ESG income standard does not apply to CoC or other funding.) Income eligibility will be documented through the collection of pay stubs, benefit statements and third party statements whenever possible. All agencies will follow guidance from federal and state regulations in the development, implementation and monitoring of ESG income eligibility documentation requirements. Agencies will utilize internal, state and/or federal forms for record keeping as available and appropriate.

STREET OUTREACH

2. Standards for targeting and providing essential services related to street outreach.

Providers of street outreach services must target unsheltered homeless individuals and families, meaning those 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. Providers may target unique groups within the overall unsheltered homeless population as follows.

Any agency seeking ESG or CoC funds for outreach will be asked to develop detailed written standard for the HAP's review. The agency must design an outreach plan that contains targeting strategies built around both a general outreach plan and one targeted to the unique niches that the partners fill. This plan will include:

1. A listing of the target groups.
2. How you have determined that this target group contains eligible participants.
3. How you will outreach to this target group.
4. What are the challenges of reaching each target group.
5. What minimal information that will be provided including information and referral for housing related needs.

EMERGENCY SHELTER AND DIVERSION

3. Standards for admission, diversion, referral, and discharge by emergency shelters, including standards regarding length of stay, and safeguards to meet the safety and shelter needs of special populations and persons with the highest barriers to housing.

Admission to emergency shelter facilities will be limited to those who meet the definition of "homeless" described above. Additional eligibility requirements (e.g., serving youth or families) may be created at the program level. Any length of stay limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

Upon initial contact with the point-of-entry, homeless persons will be screened by intake staff to determine appropriate diversion tactics. Diversion tactics may range from immediate case management assistance in determining available and unutilized resources, to referrals for existing homelessness prevention and/or rapid re-housing programs.

If diversion is not possible, the homeless person may be admitted to emergency shelter. The maximum length of stay will be determined by agency policy. No person or persons who are facing or suspect they may face a threat of violence will be discharged into an unsafe condition. Emergency shelter workers will work in collaboration with functional needs support service providers to arrange safe accommodations for those who are or may be facing a threat of violence. Those who are in danger of a violent crime, or feel they may be, will be entered into a secure database system that is comparable to HMIS. All other emergency shelter admissions will be entered into HMIS.

All persons discharged from emergency shelters will have their exit status entered into either HMIS or a comparable database, and will be provided discharge paperwork as applicable or upon request.

Under the coordinated entry process, homeless persons who are determined through assessment to have the highest barriers to housing – due to a myriad of factors including tri-morbidity, history of chronic homelessness, etc. – will be prioritized for existing housing resources and paired with existing supportive services to increase the likelihood of staying successfully housed.

Per federal requirements, the age and gender of a child under 18 cannot be used as a basis for denying any family's admission to a shelter.

4. Standards for assessing, prioritizing, and reassessing needs for essential services related to emergency shelter.

Under the CoC's coordinated entry system, the VI-SPDAT is the standardized assessment tool that will be used by all ES programs to assess, prioritize, and reassess participants needs for essential services related to ES, as well as for referral to the most appropriate housing and service interventions. The first tier of assessment occurs as they access our area's 2-1-1 program, where qualified advocates will assist those seeking services. In keeping with federal guidelines, our CoC is committed to prioritizing those who are experiencing chronic homelessness, homeless veterans, and families with children who are experiencing a homeless condition.

Upon determination of the appropriate program for referral, the next tier of assessment will involve more complex case management services to be performed by representatives of the program to which the persons were referred.

Under coordinated entry, VI-SPDAT re-assessment will be at least once per year for participants who remain homeless that long. In addition, program participants will meet with case managers throughout their participation in the program, and will have regular

progress assessments or evaluations. Participants will also be given the opportunity to provide assessment and feedback of programs as well. Each ES provider ESG funding will be required to have a provable system of program evaluation. Additionally, participating ES providers in our CoC will share their experiences providing clients services, and refine service delivery based on feedback from service providers as well as participants.

PREVENTION AND RAPID REHOUSING

5. Standards for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

Households that are assessed to be homeless, and that meet the income standards (where applicable), are eligible for RRH services. Prioritization for RRH referral is based upon the prioritization criteria outlined in the *Smart Path to Housing and Health: Coordinated Assessment and Referral System Policies & Procedures Manual*.

Households that are assessed to be at risk of homelessness, and that meet the income standards (if applicable), are eligible for homelessness prevention services. Additional risk factors for prioritizing limited assistance include: Seniors, families with dependent children, former foster youth, chronically homeless, veterans, victims of domestic violence, and medically vulnerable individuals.

Each prevention or RRH provider will be responsible for serving potential participants that are referred through the coordinated entry system in order of referral, with provisions for priority service for eligible households prioritized through coordinated entry by the CoC.

RRH households will be re-certified at least annually; prevention households will be re-certified at least quarterly.

6. Standards for determining what percentage or amount, of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance.

Each ESG or CoC-funded agency will be responsible for determining income as a basis of eligibility for or determining the amount or type of services. (Note: There are no firm income limitations for RRH or prevention programs except for those that may be required by a funding source.) As part of this income determination the relevant staff person will ascertain the amount that the household is able to contribute towards rental payments. Factors to consider may include: Potential upcoming income increases / decreases, family size, availability of other resources to meet costs and other factors as determined by the agency staff in consultation with the household.

Due to the great variety of circumstances among homeless and at risk families and individuals in Santa Cruz County, the CoC has determined that each individual prevention or RRH program may (within CoC, ESG, or other funder requirements) decide internally if they will charge participants a set percentage of income, a set percentage of actual rent, or a set dollar amount while receiving RRH or prevention services, or if they will provide a phased payment plan dependent on individual household circumstances. Individual agencies may also decide to not have participants pay any rental costs while receiving services. Each program should use a progressive engagement and assistance approach.

Each participant and landlord will receive written verification of the amount and duration of assistance provided by the agency and rent to be paid by the participant. Income to be calculated includes: wages of adults in household, cash benefits, child support and self-employment income. Employment income of children, non-cash benefits and sporadic gifts will not be counted as available income in determining rental payments.

As the overall goal of the CoC is to ensure that households are able to maintain housing independently, it is important that each agency properly assess potential households to ensure that they are a good match for the program, and to refer them to more extensive supports as available if the household is not likely to be able to maintain housing costs independently.

7. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time, lease requirements, and participant re-evaluations.

Again, due to the great variety of circumstances among homeless and at risk families and individuals in Santa Cruz County, the CoC has determined that each individual prevention or RRH program may set a maximum number of months that a program participant may receive rental assistance, or a maximum number of times that a Program participant may receive rental assistance. The total

period for which any participant may receive services must not exceed 24 months in three years. However, no individual or family may receive more than a cumulative total of eighteen months of rental assistance, including any rental assistance paid in arrears.

Each agency will perform initial screening to determine the number of months that a client will initially receive a commitment of rent assistance, including payments in arrears. This initial commitment will be in writing and verified by the agency representative and the participant. Factors to take into consideration during the initial commitment are the participant's ability to pay rent in the immediate month and subsequent months such as anticipated change in income, time necessary to recover from unexpected expenses, etc. Short-term rental assistance may begin as soon as an applicant and a unit have been approved.

As the program participant is nearing the end of their initial commitment of assistance, the caseworker will contact the household to assess their need for continued assistance. After a review of the participant's continued eligibility, the caseworker will make a recommendation regarding the receipt of additional rental assistance, and this recommendation will be forwarded to the supervisor for review and approval. In addition to this analysis of additional assistance requirements, each participant will need to recertify each three month period providing the required, completed sections of the application forms and back-up verification documents.

Over the course of program participation, the caseworker will continue to meet with the household on an as needed basis, and will re-determine the eligibility of the household at least every three months. In the event that a program participant reaches 12 months of rental assistance, their unit will be re-inspected for continued compliance with rent reasonableness and habitability standards.

Rent may be paid in arrears as long as it allows the client to remain in their unit or move to another unit. Rental months paid in arrears are included in the maximum number of assistance months.

8. Standards for determining the type, amount, and duration of housing stabilization and/or relation services to provide to a program participant, including the limits, on the homelessness prevention or rapid rehousing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

Each agency will perform initial screening to determine the number of months that a client may initially receive a commitment of stabilization services. This initial commitment will be in writing and verified by the agency representative and the participant.

Consistent with funding source limits, prevention or RRH programs may determine the type, maximum amount and duration of housing stabilization and relocation services for individuals and families who are in need of homelessness prevention or rapid rehousing assistance through the initial evaluation, re-evaluation and ongoing case management processes

Additional requirements:

1. Program participants must meet with a case manager at least once a month for the duration of assistance, except where prohibited by requirements under Violence Against Women Act (VAWA) or Family Violence Prevention and Services Act (FVSP).
2. Program participants must be assisted, as needed, in obtaining appropriate supportive services, like mediation or mental health treatment or services essential for independent living; and mainstream benefits like Medicaid, SSI, or TANF.
3. Except for housing stability case management, the total period for which any program participant may receive service costs must not exceed 24 months during any three-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.
4. Security Deposits: ESG or CoC funds may pay for a security deposit that is equal to no more than two months' rent.
5. Last Month's Rent: If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG or CoC funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any three-year period.
6. Utility Payments: ESG or CoC funds may pay for up to 24 months of utility payments per program participant, per service, including up to six months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any three-year period.
7. Housing Stability Case Management: ESG or CoC funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance

cannot exceed thirty days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.

8. **Maximum Amounts and Periods of Assistance:** Prevention and RRH providers may set a maximum dollar amount that a program participant may receive for each type of financial assistance. Each provider may also set a maximum period for which a program participant may receive any of the types of assistance or services under this section. However, except for housing stability case management, the total period for which any program participant may receive the services under paragraph (b) of this section must not exceed 24 months during any three-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family. The agency may set a maximum number of months that a program participant may receive rental assistance, or a maximum number of times that a program participant may receive rental assistance. The total period for which any participant may receive services must not exceed 24 months in three years. However, no family may receive more than a cumulative total of eighteen months of rental assistance, including any rental assistance paid in arrears.
9. **Short-term and medium-term rental assistance** must follow applicable HUD definitions and requirements.
10. **Compliance with Fair Market Rent (FMR) Limits and Rent Reasonableness:** Rental assistance is prohibited from being provided for a housing unit, unless the total rent for the unit does not exceed the fair market rent established by HUD.
11. **Compliance with Minimum Habitability Standards:** The revised habitability standards (shelter and housing standards) incorporate lead-based paint remediation and disclosure requirements. If ESG funds are used to help a Program Participant remain in or move into permanent housing, that housing must meet habitability standards.
12. **Rental Assistance Agreement and Lease Standards:** The rental assistance agreement must set forth the terms under which rental assistance will be provided.
13. Each program participant receiving rental assistance must have a legally binding, written lease between program participant and the owner) for the rental unit, unless the assistance is solely for rental arrears. Project-based rental assistance leases must have an initial term of one year.
14. No rental assistance can be provided to a household receiving rental assistance from another public source for same time period (except 6 months of arrears).

TRANSITIONAL HOUSING

Transitional Housing (TH) is designed to provide homeless individuals and families with interim stability and support to successfully move to and maintain permanent housing.

9. Standards regarding eligibility criteria and targeting for transitional housing.

Households are eligible for TH if they meet the following eligibility standards:

- Must meet the HUD definition of homeless.
- Must meet any additional eligibility criteria set forth in the NOFA through which a project was funded and the grant agreement (e.g. households fleeing domestic violence).
- Programs may establish additional eligibility requirements (e.g., serving youth or families) beyond those specified here in line with applicable legal requirements.

All referrals to TH and assessment for type and level of services must come through the coordinated entry system. Prioritization for TH referral is based upon the prioritization criteria outlined in the *Smart Path to Housing and Health:*

Coordinated Assessment and Referral System Policies & Procedures Manual.

Chronically homeless households being referred to TH must be informed that by entering a TH project, they may lose eligibility for PSH project dedicated to serving chronically homeless households.

10. Standards regarding length of stay, supportive services, and assistance for transitional housing.

The following minimum standards will be applied to all TH programs:

- Maximum length of stay cannot exceed 24 months.
- Assistance in transitioning to permanent housing must be provided.
- Supportive services must be provided throughout the duration of stay in TH.
- Program participants in transitional housing must enter into a lease, sublease or occupancy agreement for a term of at least one month. The lease, sublease or occupancy agreement must be automatically renewable upon expiration, except on prior

notice by either party, up to a maximum term of 24 months.

PERMANENT SUPPORTIVE HOUSING

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

11. Standards regarding eligibility criteria, prioritizing, and targeting for permanent supportive housing.

Households are eligible for PSH if they meet the following eligibility standards:

- Households must meet the HUD definition of homelessness.
- One adult or child member of the household must have a disability.
- Must follow any additional eligibility criteria set forth in the NOFA through which a project was funded and the grant agreement (e.g. Projects originally funded under the Samaritan Housing Initiative must continue to serve chronically homeless individuals and families; projects funded under the Permanent Supportive Housing Bonus must continue to serve the homeless population outlined in the NOFA under which the project was originally awarded).
- Programs may establish additional eligibility requirements (e.g., serving youth or families) beyond those specified here in line with applicable legal requirements.

All referrals to PSH and assessment for type and level of services must come through the coordinated entry system. Prioritization for TH referral is based upon the prioritization criteria outlined in the *Smart Path to Housing and Health:*

Coordinated Assessment and Referral System Policies & Procedures Manual.

Adoption of HUD Notice CPD-16-11:

The CoC has adopted the orders of priority for CoC-funded PSH as established in Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing. As such, all PSH eligible households will be prioritized in the following order of priority:

1. Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.
2. Chronically Homeless Individuals and Families with the Longest History of Homelessness.
3. Chronically Homeless Individuals and Families with the Most Severe Service Needs.
4. Other Chronically Homeless Individuals and Families.

The Smart Path/CES Steering Committee will develop appropriate prioritization policies for youth-only housing projects.

12. Standards regarding length of stay, supportive services, and assistance in permanent supportive housing.

- There can be no predetermined length of stay in PSH.
- Supportive services designed to meet the needs of the project participants must be made available to the project participants throughout the duration of stay in PSH.
- Project participants in PSH must enter into a lease (or sublease) agreement for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month.

ADDITIONAL STANDARDS APPLICABLE TO ALL PROGRAM TYPES

13. Participation in HMIS.

All ESG and CoC funded programs must participate in the Santa Cruz County Homeless Management Information System (HMIS) by collecting and entering required data on all participants served. Each agency receiving ESG or CoC funds will ensure that data on all persons served and all activities assisted are entered into the Santa Cruz County HMIS, in accordance with HUD's standards on participation, data collection, and reporting, and in accordance with locally approved HMIS policies and procedures. Such agencies must also participate in CoC HMIS Technology Committee meetings.

If the ESG or CoC funding recipient is a domestic violence agency, or other Victim Services Provider as defined in VAWA and related federal law, the recipient is prohibiting from entering client data into HMIS, but must instead entered such data into a comparable data system as defined in applicable HUD guidance.

The HAP actively encourages non-ESG or CoC-funded programs to participate in the Santa Cruz County HMIS.

14. Participation in Coordinated Entry.

All ESG and CoC funded programs are required to participate in the CoC's coordinated entry system and comply with all federal CoC and ESG coordinated entry requirements. In addition, all ESG-funded programs are required to comply with state ESG coordinated entry requirements.

Participation on coordinated entry requires using the applicable VI-SPDAT assessment tool, and following established policies procedures outlined in *Smart Path to Housing and Health: Coordinated Assessment and Referral System Policies & Procedures Manual*. It also requires attendance at Smart Path/Coordinated Entry System Steering Committee meetings.

15. Emphasis on Housing First.

All ESG or CoC funded programs must use Housing First (and progressive engagement practices), including the following:

- Ensuring low-barrier, easily accessible assistance to all people, including, but not limited to, people with no income or income history, and people with active substance abuse or mental health issues;
- Helping participants quickly identify and resolve barriers to obtaining and maintaining housing;
- Seeking to quickly resolve the housing crisis before focusing on other non-housing related services;
- Allowing participants to choose the services and housing that meets their need, as practical;
- Connecting participants to services available in the community that foster long-term housing stability;
- Offering financial assistance and supportive services in a manner that offers a minimum amount of assistance initially, adding more assistance over time if needed to quickly resolve the housing crisis. The type, duration, and amount of assistance offered shall be based on an individual assessment of the household, and the availability of other resources or support systems to resolve their housing crisis.

16. Participation in the HAP and coordination with other service providers,

All CoC and ESG funded providers are expected to participate in our area's CoC, known as the Homeless Action Partnership (HAP), and will work collaboratively to coordinate funding that addresses the needs of the entire CoC. To meet these goals, the CoC requires that all ESG and CoC funded providers not only participate in HMIS and coordinated entry, but also

- Attend HAP meetings and work groups.
- Ensure that staff members coordinate as needed regarding referrals and service delivery with staff members from other CoC agencies in order to ensure that services are not duplicated and clients can easily and efficiency access the services they need.
- Ensure that staff members participate in any CoC trainings related to improving coordination among HAP members.

17. Educational policies and liaison.

All programs that serve households with children or unaccompanied youth, must:

- Take the educational needs of children into account when placing families in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education
- Inform families with children and unaccompanied youth of their educational rights, including providing written materials, help with enrollment, and linkage to McKinney Vento Liaisons as part of intake procedures.
- Not require children and unaccompanied youth to enroll in a new school as a condition of receiving services.
- Allow parents or the youth (if unaccompanied) to make decisions about school placement.
- Not require children and unaccompanied youth to attend after-school or educational programs that would replace/interfere with regular day school or prohibit them from staying enrolled in their original school.
- Post notices of student's rights at each program site that serves homeless children and families in appropriate languages.
- Designate staff that will be responsible for:

- ensuring that homeless children and youth in their programs are in school and are receiving all educational services they are entitled to.
- coordinating with the CoC, the Department of Social Services, the County Office of Education, the McKinney Vento Coordinator, the McKinney Vento Educational Liaisons, and other mainstream providers as needed.

18. Equal Access and non-discrimination.

General HAP Anti-Discrimination Policy

The HAP does not tolerate discrimination on the basis of any protected class, including actual or perceived race, color, religion, national origin, sex, age, familial status, disability, sexual orientation, gender identity, or marital status. All CoC programs must comply with applicable equal access and nondiscrimination provisions of federal and state civil rights laws. Any programs that are required by a funding source to limit participants (e.g., HOPWA agencies may only serve persons living with HIV/AIDS) will avoid discrimination to the maximum extent allowed by their funding sources and their authorizing legislation.

Program Requirements Regarding Equal Access and Non-Discrimination

- Providers must have non-discrimination policies in place and assertively outreach to people least likely to engage in the homeless system.
- Providers must comply with all federal statutes and rules including the Fair Housing Act, the Americans with Disabilities Act, and Equal Access to Housing Final Rule.
- The people who present together for assistance, regardless of age or relationship, are considered a household and are eligible for assistance as a household.
- Projects that serve families with children must serve all types of families with children; if a project targets a specific population (e.g., women with children), these projects must serve all families with children that are otherwise eligible for assistance, including families with children that are headed by a single adult or consist of multiple adults that reside together.
- The age and gender of a child under 18 must not be used as a basis for denying any family's admission to a project.
- Providers must abide by the *Equal Access to Housing in HUD Programs – Regardless of Sexual Orientation or Gender Identity* Final Rule published in 2012 and the subsequent Final Rule under 24 CFR 5 General HUD Program Requirements; Waivers, September 2016.
- The HAP encourages providers to practice a person-centered model that strongly incorporates participant choice and inclusion of subpopulations present in the Santa Cruz County service area, including homeless veterans, youth, families with children, and victims of domestic violence.