

**Winston-Salem/Forsyth County Continuum of Care  
Permanent Supportive Housing (PSH) Assistance and Prioritization  
Policies and Procedures**

These policies and procedures shall apply to HUD Continuum of Care (CoC) Program-funded PSH programs. CoC-funded PSH programs shall operate in compliance with HUD CoC regulations at 24 CFR 578 and HUD Notice CPD-16-11 which is attached and incorporated herein.

**PART ONE: POLICIES**

**I. Prioritization Policies for PSH**

Consistent with 24 CFR 578.7(a)(9) this document includes policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance. The following policies shall apply to use of HUD-funded CoC PSH programs in Winston-Salem/Forsyth County:

- A. **All CoC PSH beds shall be dedicated or prioritized to chronically homeless persons,** based on the length of time in which an individual or family has resided in a place not meant for human habitation or an emergency shelter and the severity of service needs.
- B. **When there are no chronically homeless individuals and families in the CoC,** housing placement shall follow the following order of priority:
  1. **First Priority—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs--**An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four **occasions** where they have been living or residing in a place not meant for human habitation, or in an emergency shelter but where the cumulative time homeless is at least 12 months and has been identified as having severe service needs.
  2. **Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs.** An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.
  3. **Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs.** An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

4. **Fourth Priority–Homeless Individuals and Families with a Disability Coming from Transitional Housing.** An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation or in an emergency shelter. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

PSH programs targeting a specific population shall follow the order of priority stated above while also considering the program’s goals and needs of the target population. For example, a CoC Program-funded PSH project that is funded to target homeless persons with HIV/AIDS will prioritize its turnover beds to chronically homeless persons with HIV/AIDS with the longest histories of homelessness and most severe service needs, consistent with paragraph A above. However, if no homeless persons with HIV/AIDS are on the CIC priority list and meet the priorities described in paragraph A above, then the program may select a homeless participant with HIV/AIDS from the CIC priority list, using the priorities listed in paragraph B above.

## II. Other PSH Policies

- A. CoC PSH programs shall be targeted to serve persons with the highest needs and greatest barriers towards obtaining and maintaining housing rather than on a “first-come, first-serve” basis or based on selection of those who are deemed most likely to succeed.
- B. CoC PSH shall be operated as a Housing First model and will not place preconditions or eligibility requirements beyond HUD’s eligibility requirements and will not require participants to participate in supportive services or be subject to other rules such as sobriety as a condition of housing.
- C. All CoC Program-funded PSH programs will accept referrals only through a single prioritized list of potential participants maintained by the Community Intake Center (CIC). The CIC will track housing placement of all PSH referrals.
- D. As required by the HUD CoC Rule at 24 CFR 578.3, the CoC will use a standardized assessment tool for coordinated intake and assessment.
- E. If two households present for assistance and fall under the same order of priority, but one is a Veteran household, the Veteran household shall be prioritized for PSH.
- F. Generally, disabled persons coming from emergency shelter or places not meant for human habitation are eligible for PSH. Persons who were in one of those locations then who are exiting an institution where they have stayed for 90 days or less also are eligible for PSH.
- G. Although providers trying to determine eligibility of persons for PSH must obtain documentation, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.

- H. PSH projects must provide supportive services for the residents to enable them to live as independently as is practicable throughout the duration of their residence in the project. However, PSH project participants shall not be required to participate in services as a condition of housing.
- I. Program records of direct service provider agencies shall document that the provider conducts an ongoing assessment of the supportive services needed by the residents of the project, the availability of such services, and the coordination of services needed to ensure long-term housing stability and must make adjustments, as appropriate.
- J. At least annually, each provider of PSH assistance shall conduct an assessment of the service needs of its program participants and adjust services accordingly. This requirement shall apply to agencies responsible for provision of supportive services in each project.

### **III. Key Definitions**

A. **Housing First.** Housing First is an approach in which housing is offered to homeless people without imposing preconditions (such as sobriety, mental health treatment, or a minimum income threshold) or service participation requirements and in which rapid placement and stabilization in permanent housing are primary goals. PSH projects that use a Housing First approach promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, or participation in services.

B. **Chronically Homeless** persons are defined in the HUD CoC Rule at 578.3. In summary, chronically homeless persons are individuals or families who meet all of the following criteria:

(1) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

(i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

(ii) Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

- C. **Severe Service Needs**—Persons with severe service needs are described in HUD Notice CPD-16-11. In summary, persons having the most severe service needs:
1. Have a history of high use of crisis services such as emergency rooms, jails, and psychiatric facilities
  2. Have significant health or behavioral health challenges that require support to stay in housing
  3. Can have their severe service needs identified and verified through administrative data of the CoC or other systems (e.g. the mental health system, hospitals or jails) and/or the use of the standardized assessment tool used for coordinated intake and assessment or have been identified by Medicaid departments as high-need, high cost beneficiaries.
- D. **Permanent Supportive Housing** means permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.
- E. **Dedicated PSH Bed**—A bed in a unit in a CoC PSH program which has been funded specifically by HUD as a bed dedicated for use only by chronically homeless persons.
- F. **Prioritized PSH Bed**—A bed in a unit in a CoC PSH program for which the CoC has made an annual commitment to prioritize the program for chronically homeless persons, even though the program was not originally dedicated to chronically homeless persons.

#### IV. Eligibility

Subject to the prioritization requirements described in this document, eligible persons for CoC PSH may include homeless, disabled persons coming directly from emergency shelter or places not meant for human habitation.

#### V. Documentation

PSH programs must collect, maintain and retain documentation to substantiate each participant's status in relation to homelessness, disability and severity of needs. Programs must include a summary statement of eligibility determination in each participant file.

- A. **Homelessness**—Evidence must be documented to show that the head of household is currently homeless and is living in an emergency shelter or a place not meant for human habitation. To properly document the length of time homeless, it is important to document the start and end date of each occasion of homelessness.
- B. **One Year Homeless**--To document chronic homeless status for homeless occasions that were continuous for at least one year, an individual or head of household must have been living in emergency shelters or in places not meant for human habitation for one year without a break. A "break" is considered to be at least seven or more consecutive nights not in an emergency shelter or place not meant for human habitation. At least 9 months of

the year must be documented by (1) HMIS data, (2) a written referral or (3) a written observation by an outreach worker.

- C. Homeless Four Times in Three Years**-To document chronic homeless status based on at least four episodes of homelessness in three years, at least three of the occasions must be documented by either (1) HMIS data, (2) a written referral or (3) a written observation by an outreach worker.

A single encounter with a homeless service provider on a single day within 1 month that is documented through third-party documentation is sufficient to consider an individual or family as homeless for the entire month unless there is any evidence that the household has had a break in homeless status during that month (e.g., evidence in HMIS of a stay in transitional housing).

- D. Disabling Condition**—Evidence of a disabling condition may include:

1. Written verification of the condition from a professional licensed by the state to diagnose and treat the condition;
2. Written verification from the Social Security Administration, such as an award letter;
3. Copies of a disability check (e.g., Social Security Disability Insurance check or Veterans Disability Compensation).

## **VI. Housing Placement and Eligibility**

*Once a chronically homeless household has been determined to be eligible and is accepted into a CoC PSH program*, the household remains eligible even if they do not remain in emergency shelter or places not meant for human habitation while awaiting housing placement. Such persons may stay with friends or family or in hotels and retain eligibility for the PSH program. They may also stay in transitional housing temporarily, as long as no transitional housing requirements are placed on the program participants and as long as the PSH program is actively assisting the participant to be permanently housed as soon as possible. This provision does not extend to persons who were considered to be chronically homeless but who entered a transitional housing program prior to acceptance into the PSH program. Such persons are ineligible to enter a PSH program directly from a transitional housing program. Also, chronically homeless persons entering rapid re-housing retain their chronic homeless status for purposes of eligibility for permanent supportive housing. However, time spent in rapid re-housing does not contribute towards the time requirement for chronic homeless status.

## **PART II: PROCEDURES**

### **I. Intake and Eligibility Determination**

Each PSH program must document that the CoC's prioritization policy and procedures have been incorporated into its program intake procedures. Furthermore, intake records for each participant must show that the prioritization procedures have been followed.

Intake will be accomplished through a combination of coordinated intake and assessment and program intake by subrecipient and partner agencies. Through the intake process, programs must document homeless status and disability. The order of priority of documentation of homelessness shall be (1) third-party documentation, (2) intake worker observations and (3) self-certification.

CoC permanent supportive housing may be provided only to individuals with disabilities and families in which one adult or child has a disability. Intake records must document acceptable evidence of the qualifying individual's disability. The requirements for documenting disability are:

- a. written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long continuing or of indefinite duration and substantially impedes the individual's ability to live independently;
- b. written verification from the Social Security Administration;
- c. the receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation);
- d. intake staff-recorded observation of disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence in paragraph (c)(1), (2), (3), or (4) of this section.

### **II. Income and Assistance**

For CoC PSH programs, income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). PSH Programs must examine a program participant's income initially, and if there is a change in family composition (e.g., birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly.

Each program participant on whose behalf rental assistance payments are made must pay a contribution toward rent in accordance with section 3(a)(1) of the U.S. Housing Act of 1937 (42 U.S.C. 1437a(a)(1)). of the U.S. Housing Act of 1937 (42 U.S.C. 1437a(a)(1)). (ii) Income of program participants must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a).

### **III. Other Procedures**

Records must show that PSH assistance is provided without a designated length of stay. Participants receiving permanent housing assistance must have a signed lease agreement of at least 1 year that is renewable (for a minimum term of 1 month) and terminable only for cause.

In permanent supportive housing projects where a qualifying program participant dies, is incarcerated, or institutionalized for more than 90 days, records must document that surviving members of the household who were living in a CoC Program-assisted housing at time of the qualifying member's death, long-term incarceration, or long-term institutionalization received rental assistance until the expiration of the lease in effect at the time of the qualifying member's death, long-term incarceration, or long-term institutionalization

#### **IV. Referrals**

Agencies designated by the City of Winston-Salem shall process PSH referrals from the Community Intake Center. No other applicants may be considered for CoC-funded PSH assistance. Required forms for PSH cases shall be provided by the City of Winston-Salem. Additional forms may be used by agencies. Referral agencies shall notify the Community Intake Center and City of Winston-Salem when referring accepted participants to the Housing Authority. Agencies will enter each PSH participant into the PSH project in the Homeless Management Information System (HMIS) when the participant occupies the PSH-assisted unit.

#### **V. Termination**

Any provider or administrator of PSH assistance shall have a formal termination of assistance process that includes at least the following:

- a. the program participant's receipt of written program rules and a written copy of the termination process before the participant began to receive assistance;
- b. the program participant's receipt of written notice containing a clear statement of the reasons for termination;
- c. a review of the decision, in which the program participant was given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- d. the program participant's receipt of prompt written notice of the final decision.

#### **VI. Complaints and Appeals**

Any provider or administrator of PSH assistance shall have a written policy with appropriate procedures to handle complaints and appeals. The City of Winston-Salem shall be notified by the provider within three business days of receipt of any complaint or appeal.