



Winston-Salem/Forsyth County Continuum of Care Written Standards

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Introduction

These written standards shall guide the provision of assistance under the Emergency Solutions Grants (ESG) Program and the Continuum of Care (CoC) Program offered by the U.S. Department of Housing and Urban Development (HUD) in the Winston-Salem/Forsyth County Continuum of Care (CoC). All recipients and subrecipients of ESG or CoC program funding must follow and consistently apply these standards.

Geographic Area Covered

ESG and CoC assistance shall be offered in Winston-Salem and other areas of Forsyth County, consistent with the geographic area of service of the Continuum of Care.

Authority

These standards are promulgated by the CoC under the authority of the Winston-Salem/Forsyth County Continuum of Care Governance Charter, which is contained in an appendix to these standards. CoC-wide policies and procedures must be consistent with these standards and approved by the CoC in order to be valid policies and procedures of the CoC. Agencies and programs are encouraged to develop policies and procedures that are consistent with these standards and may be required by the City, State or Federal Government to do so for funding eligibility.

Programs Covered

The following program types are covered by these standards if funded under the ESG or CoC Programs:

- Street Outreach
- Emergency Shelter (operations and essential services)
- Rapid Re-housing
- Permanent Supportive Housing
- Coordinated Entry

All programs using HUD CoC and ESG funding must adhere to these performance standards and will be monitored by the Continuum of Care Administrator to ensure compliance. Programs also are subject to monitoring by HUD and the State.

Program Eligibility

These standards include policies and procedures for evaluating individuals' and families' eligibility and determining the process for prioritizing eligible households in street outreach, emergency shelter, rapid rehousing, homelessness prevention programs and permanent supportive housing programs. The criteria under which participants will be evaluated for eligibility of assistance are described under each program area within this document.

Program Coordination

Through coordinated intake and assessment and individual case planning, referral to ESG and CoC funded programs will be coordinated to the maximum extent practicable with other federally-funded programs available to assist persons in the CoC who are eligible for such programs, including but not limited to the following programs:

- Continuum of Care Program, including the Permanent Supportive Housing Program
- HUD-VASH
- Supportive Services for Veterans Families
- Homeless Providers Grant and Per Diem Program
- Domiciliary Care for Homeless Veterans (DCHV) Program
- Health Care for Homeless Veterans
- Education for Homeless Children and Youth Grants for State and Local Activities
- Grants for the Benefit of Homeless Individuals (SAMHSA)
- Runaway and Homeless Youth Program
- Emergency Food and Shelter Program
- Office on Violence Against Women Programs
- Veterans Justice Outreach Program

The CoC and member agencies will coordinate and integrate, to the maximum extent practicable, CoC and ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible, including but not limited to the following:

- Public Housing Program
- Housing Choice Voucher Program
- HOME Tenant-based Rental Assistance Program
- Supportive Housing for Persons with Disabilities (Section 811)
- Temporary Assistance for Needy Families (TANF)
- Health Center Program and State Children's Health Insurance Program
- Head Start
- Mental Health and Substance Abuse Block Grants
- Workforce Investment Act Programs

Violence Against Women Act (VAWA)

Programs subject to standards under VAWA and its implementing regulations shall operate in compliance with 24 Code of Federal Regulations part 5.2, Subpart L, Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, as described in Appendix C. The regulations protect housing of survivors of domestic and dating violence, sexual assault, and stalking. Standards of the CoC related to VAWA are described herein.

Termination and Grievances

The standards for termination and grievance are described under each program area in this document. Agencies must have program rules which describe policies and procedures for handling terminations and addressing grievances. In general, agencies shall have policies and procedures to ensure that:

- a) Termination shall be limited to the most severe cases. Programs will exercise sound judgment and examine all extenuating circumstances when determining if violations warrant program termination prior to program completion. Programs provide participants with a written copy of program rules and the termination process before the participant begins to receive assistance, with a receipt or acknowledgment signed by the client
- b) Programs follow a formal written termination procedure which, at a minimum, must consist of: (1) Written notice to the program participant containing a clear statement of the reasons for termination; (2) a process for mutual review of the decision, in which the program participant is 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 (3) Prompt written notice of the final decision to the program participant.
- c) Grievance policies shall clearly define when, how and with whom grievances and appeals must be filed. Policies shall include the right for the participant to contact the agency's director, the City of Winston-Salem and the U.S. Department of Housing and Urban Development (HUD).

Data and Confidentiality

All programs must be operated in compliance with HUD Homeless Management Information System (HMIS) Data Standards and in consistency with the HMIS Participation Agreement executed by the agency operating the program. Agencies shall follow the confidentiality and privacy practices described in the HMIS Policies and Procedures attached to and incorporated into these standards as Appendix D. Data on clients served and activities provided with ESG or CoC funds must be entered into the Homeless Management Information System (HMIS) (or comparable database for domestic violence agencies) within the timeframe specified in the HMIS Policies and Procedures. Clients receiving assistance must be provided with all applicable releases of information, required forms and information on the complaint process for each agency or program in which they participate.

Program-Specific Standards

Street Outreach

Under the ESG regulations at 24 CFR 576.101, ESG funds may be used for the costs of providing essential services necessary to reach out to unsheltered homeless people and engage them; connecting them with emergency shelter, housing, or critical services; and providing case management, emergency health and mental health services, and transportation. Street outreach is also an eligible activity under the CoC regulations at 24 CFR 578.53.

Street outreach programs are designed to engage unsheltered people in settings such as campsites, public parks, libraries, bus or train stations, exit or entrance ramps to roads and highways, abandoned buildings, or under bridges. Outreach workers may also engage people at the site of local organizations such as soup kitchens. Street outreach programs serve as the front door for unsheltered individuals to services for homeless persons, including pathways to permanent housing. Street outreach should be coordinated with the coordinated entry system and should operate with a Housing First approach to ensure that unsheltered persons may move quickly from places not meant for human habitation into permanent housing.

The first priority of referrals to street outreach from coordinated entry shall be persons residing on the streets, in vehicles or other places not meant for human habitation that have refused or are unlikely to engage with other homeless service providers in the community; or people residing on the streets, in vehicles or other places not meant for human habitation that are matched to transitional housing, rapid re-housing or permanent supportive housing but are not yet housed.

Street Outreach Performance Standards

Standard 1: Staffing Street outreach programs shall adequately staff services with qualified personnel to ensure quality of service delivery, effective program administration, and the safety of staff and program participants.

Benchmarks:

- a) The organization selects employees and/or volunteers with adequate and appropriate knowledge and experience for working with unsheltered individuals and families.
- b) The organization facilitates the opportunity for employees and/or volunteers to attend webinars and/or trainings on program requirements, compliance, and best practices.
- c) The organization trains employees and/or volunteers on program policies and procedures, available local resources, and specific skill areas relevant to assisting clients in the program.

Standard 2: Identification and Engagement Street outreach programs will locate, identify, and build relationships with unsheltered people experiencing homelessness and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs, mainstream social services, and permanent housing programs.

Benchmarks:

- a) Street outreach shall be targeted to unsheltered homeless persons as described in Category 1 of the HUD definition of homelessness. They shall have a primary nighttime residence that is a public or private place not meant for human habitation, such as campsites, abandoned buildings, bus or train stations, in cars, or under bridges.
- b) Street outreach programs shall use HUD's standard order of priority for documenting evidence to determine unsheltered homeless status. Client files must document that the agency attempted to obtain the documentation in the preferred order. The order should be as follows:

- i. Third-party documentation (including Homeless Management Information System—HMIS--records)
- ii. Intake worker observations through outreach and visual assessment
- iii. Self-certification of the person receiving assistance
- c) Street outreach programs shall only deny service to unsheltered individuals if the individual does not meet the unsheltered homeless definition or the safety of staff is at imminent risk. Programs may make services available and encourage engaged individuals to participate in services but shall not make utilization of other services a requirement for participation in street outreach services.
- d) Street outreach programs funded through the ESG or CoC program shall use the HMIS designed by the CoC and shall follow all policies and procedures thereof, including timeliness of data entry and ensuring confidentiality of client records. In addition, all paper files shall be securely maintained with access strictly reserved for staff who need the information.
- e) Street outreach programs may deny entry for program specific violations relating to safety and security of program staff and participants.

Standard 3: Access to Services Street outreach programs will provide assertive outreach and engagement to unsheltered individuals living in places not meant for human habitation, and assist them in accessing emergency shelter, physical and behavioral health services, income supports, and permanent housing, including participation in the CoC's coordinated entry system.

Benchmarks:

- a) Street outreach programs will collaborate with local service or basic needs providers and organizations where unsheltered individuals seek basic services such as food pantries, crisis centers, community centers, day shelters, and others, and may set up regularly scheduled times to outreach and engage unsheltered individuals in these locations.
- b) Street outreach programs must actively participate in the CoC's coordinated assessment system. Program staff should assess unsheltered individuals using the standardized assessment tool used for coordinated entry and advocate for permanent housing for these individuals at the local case conferencing meeting.

Standard 4: Planning and Evaluation Street outreach programs will conduct ongoing planning and evaluation to ensure programs continue to meet community needs for individuals and families experiencing unsheltered homelessness.

Benchmarks:

- a) Agencies maintain written goals and objectives for their services to meet outcomes required by ESG.
- b) Programs review case files of clients to determine if existing services meet their needs. As appropriate, programs revise goals, objectives, and activities based on their evaluation.
- c) Programs conduct, at a minimum, an annual evaluation of their goals, objectives, and activities, adjusting the program as needed to meet the needs of the community.

- d) Programs review project performance data at least quarterly in HMIS to ensure reliability of data.

Emergency Shelter

An Emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Within the CoC, emergency shelter is provided to individuals primarily in order to provide relief from weather conditions and as a place to meet basic needs of persons without other housing options. Emergency shelter should not be considered as a permanent living solution.

Diversion may be used to reduce entry to shelters or the incidence of unsheltered homelessness. The main goal of diversion is to help people to maintain their current housing situation or identify resources within their networks to help them stay housed. Diversion assistance may include landlord-tenant mediation, small amounts of financial assistance, or connection to mainstream resources. Diversion allows the homeless system to work alongside households who are entering shelter or are at imminent risk of becoming homeless to problem-solve and identify solutions to that household's housing crisis. Reducing the numbers of people who enter shelter due to housing instability will ensure that shelter is reserved for and targeted to those who have no other options.

Emergency shelters should operate from a Housing First philosophy. Programs with a Housing First approach believe that anyone can be housed and the barriers to permanent housing can be minimized. Housing First allows emergency shelters to move individuals and families experiencing homelessness more quickly from their shelter beds into permanent housing, thus meeting the main objective of emergency shelter. It is the intention of the WSFC Continuum of Care to assist every person experiencing homelessness and either living on the streets or in need of emergency shelter to move into permanent housing as quickly as possible.

Emergency shelters can help reduce the number of unsheltered individuals and families in the community by reducing barriers in their programs and accepting high-need individuals or families. Emergency shelters should provide triage and interim beds for high-need and chronically homeless individuals and families while they partner with permanent housing programs to place participants.

Every emergency shelter program should participate in the coordinated intake and assessment system. The Coordinated Entry System in Forsyth County, known as the Community Intake Center, provides consistent and uniform access, assessment, prioritization, and referral processes to determine the most appropriate response to each person's immediate housing needs.

According to HUD, written standards for emergency shelter must include:

- Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grants (ESG);
- Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and

safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest;

- Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter
- Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid rehousing assistance providers; other homeless assistance providers; and mainstream service and housing providers

Emergency Shelter Performance Standards

Standard 1: Staffing The program shall adequately staff services with qualified personnel to ensure quality of service delivery, effective program administration, and the safety of program participants.

Benchmarks:

- a) The agency should select employees and/or volunteers with adequate and appropriate knowledge and experience for working with individuals and families experiencing homelessness and/or other issues that place individuals and families at risk of homelessness.
- b) The agency should provide time for all employees and/or volunteers to attend webinars and/or trainings on program requirements, compliance and best practices.
- c) All employees and/or volunteers should be trained on program policies and procedures, available local resources, and specific skill areas relevant to assisting clients in the program.
- d) For programs using the Homeless Management Information System (HMIS), the agency shall take steps to ensure that all end users abide by the NC HMIS User and Participation Agreements, including adherence to the strict privacy and confidentiality policies.
- e) Supervisors should have adequate and appropriate knowledge and experience for working with individuals and families experiencing homelessness and/or other issues that place individuals and families at risk of homelessness.
- f) All program staff should have written job descriptions that address tasks staff must perform and the minimum qualifications for the position.

Standard 2: Eligibility Programs will actively participate in the community's coordinated assessment system. Programs will serve the most vulnerable individuals and families needing assistance.

Benchmarks:

- a) All adult program participants must meet the following program eligibility requirements in ESG-funded emergency shelter: 18 years or older and literally homeless, imminently at-risk of homelessness, and/or fleeing or attempting to flee domestic violence (see Category 1, 2, and 4 of the HUD homeless definition, attached to these standards as Appendix A)
- b) All ESG funded shelters must use the standard order of priority for documenting evidence to determine homeless status and must document in the client file that the agency attempted to obtain the documentation in the preferred order. The order should be as follows:
 - i. Third-party documentation (including HMIS)
 - ii. Intake worker observations through outreach and visual assessment
 - iii. Self-certification of the person receiving assistance
- c) Programs will follow the following provisions in regards to provision of shelter:
 - i. Programs shall notify each entering participant of any limitations on length of stay in the facility.
 - ii. Programs may deny entry to shelter based on household makeup only if it does not violate HUD's Fair Housing and Equal Opportunity requirements; singles-only programs can disqualify households with children; families-only programs can disqualify single individuals
 - iii. Programs may deny entry if all program beds are full.
 - iv. If the program has in residence at least one family with a child under the age of 18, the program may exclude registered sex offenders and persons with a criminal record that includes a violent crime from the program so long as the child resides in the same housing facility (24 CFR 578.93).
 - v. Persons who have been convicted of a sex offense or an offense against a minor are required to establish and maintain registration in compliance with the North Carolina Sex Offender and Public Protection Registration Programs, which are governed by Chapter 14, Article 27A of the North Carolina General Statutes. Any offender required to register under Article 27A is prohibited from knowingly residing within 1,000 feet of the property on which any public or nonpublic school or child care center is located.
 - vi. Programs will not disqualify an individual or family from entry because of employment status or lack of income.
 - vii. Programs will not disqualify an individual or family because of evictions or poor rental history.
 - viii. Programs may make services available and encourage adult household members to participate in program services, but will not make service usage a requirement to deny initial or ongoing services in shelter.
 - ix. Programs will maintain release of information, case notes, and all pertinent demographic and identifying data in HMIS as allowable by program type. Paper files should be maintained in a locked cabinet behind a locked door with access strictly reserved for case workers and administrators who need said information.
 - x. Programs may deny entry or terminate services for program specific violations relating to safety and security of program staff and participants.

- d) Shelter facilities in the community will coordinate intake procedures to optimize bed availability and bed utilization. If a facility is full, it will refer persons to other shelters, if available and appropriate.
- e) As needed, the CoC will support the operation of an overflow shelter during the times of the year in which demand is the greatest and weather conditions are most dangerous to those sleeping outside.

Standard 3: Shelter Standards Shelters will provide safe, temporary housing options that meet participant needs in accordance within guidelines set by the Department of Housing and Urban Development.

Benchmarks:

- a) Shelters must meet state or local government safety, sanitation, and privacy standards, including the NC ESG Minimum Habitability Standards for Emergency Shelters, attached as Appendix B.
- b) Shelters providing shelter to families may not deny shelter to a family on the basis of the age and gender of a child under 18 years of age.
- c) Programs must work to link their clients to permanent housing programs, such as rapid rehousing and permanent supportive housing, in the community.

Standard 4: Shelter Services Shelters which provide case management or similar services shall provide clear information about services and fair access to services.

Benchmarks:

- a) Shelters must provide the client with a written copy of the program rules and the termination process before he/she begins receiving assistance.
- b) Shelters will make available information and/or assistance to clients to help them access mainstream services such as life skills, representative payee services, education services, employment services, cash and non-cash income, behavioral health services, physical health services and legal services.

Standard 5: Terminations Termination should be limited to only the most severe cases. Programs will exercise sound judgment and examine all extenuating circumstances when determining if violations warrant program termination

Benchmarks:

- a) Shelters will provide the client with a written copy of the program rules and the termination process before he/she begins receiving assistance and keep a copy signed by the client in the file.

- b) If a program participant violates program requirements, the program may terminate the assistance in accordance with a formal process established by the agency that recognizes the rights of individuals affected. The program must document that it considered any extenuating circumstances and made significant attempts to help the client continue in the program.
- c) Programs may prohibit admittance to shelter when a client has presented a safety risk to staff or other clients. If an unadmitted client presents him/herself at a later date, programs should review the case to determine if the program may provide assistance at a later date.

Standard 6: Client Records Shelters will ensure that all client files are complete and up-to-date and information is held in confidentiality.

Benchmarks:

- a) Client and program files will, at a minimum, contain all information and forms required by HUD in the Continuum of Care regulations at 24 CFR 576.500 and by the state ESG office.
- b) All client information will be entered into the NC HMIS in accordance with data quality, timeliness, and additional requirements found in the agency and user participation agreements and in the CoC's HMIS Policies and Procedures.
- c) Programs must maintain the security and privacy of written client files and shall not disclose any client-level information without written permission of the client as appropriate, except to program staff and other agencies as required by law. Clients must give informed consent to release any client identifying data to be utilized for research, teaching, and public interpretation. All programs must have a consent for release of information form for clients to use to indicate consent in sharing information with other parties.
- d) All records pertaining to ESG funds must be retained for the greater of 5 years or the participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served. Agencies may substitute original written files with microfilm, photocopies, or similar methods.

Standard 7: Planning and Evaluation Shelter will conduct ongoing planning and evaluation to ensure programs continue to meet community needs for individuals and families experiencing homelessness.

Benchmarks:

- a) Agencies will maintain written goals and objectives for their services.
- b) Programs will regularly review project performance data in HMIS to ensure reliability of data and effective performance. Programs should review this information, at a minimum, quarterly.
- c) Programs will conduct, at a minimum, an annual evaluation of their goals, objectives, and activities, making adjustments to the program as needed to meet the needs of the community.

Rapid Re-housing and Homelessness Prevention

Housing stabilization involves helping people to obtain and/or keep housing. Two forms of housing stabilization programs are the Rapid Re-housing (RRH) program and the homelessness prevention program (HPP).

Rapid Rehousing is a national best practice model designed to help individuals and families exit homelessness as quickly as possible, return to permanent housing, and achieve long-term stability. Using a Housing First approach, rapid rehousing does not require adherence to preconditions such as employment, income, absence of criminal record, or sobriety. Financial assistance and housing stabilization services match the specific needs of the household.

The core components of rapid rehousing are housing identification/relocation, short- and/or medium-term rental and other financial assistance, and case management and housing stabilization services. The Forsyth Rapid Re-Housing Collaborative (FRRH) is a partnership of local agencies to provide rapid re-housing assistance to homeless households who but for this assistance would not be able to re-enter permanent housing. Rapid re-housing program policies and procedures applicable to all programs in Forsyth County are found in the attached “Forsyth County Rapid Re-housing Program Policies and Procedures” adopted by the Winston-Salem/Forsyth County Continuum of Care in June, 2015, with adopted amendments in January, 2017.

Homelessness prevention can play an important role in ending homelessness. Like rapid rehousing programs, homelessness prevention programs can provide financial assistance and housing stabilization services such as case management. In order to end homelessness, communities must prevent new episodes of homelessness and returns to homelessness for individuals and families in housing crises. However, it can be difficult to determine which households would have become homeless if not for provision of homelessness prevention assistance. For this reason, homelessness prevention programs should develop methods to determine which households are at greatest risk of becoming homeless and target their financial assistance and housing stability resources accordingly.

Standards for rapid re-housing and homelessness prevention programs must have:

- Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid rehousing assistance
- 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;
- 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
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, 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.

Rapid Re-housing and Homelessness Prevention Performance Standards

Standard 1: Staffing Programs shall adequately staff services with qualified personnel to ensure quality of service delivery, effective program administration, and the safety of program participants.

Benchmarks:

- a) The agency should select employees and/or volunteers with adequate and appropriate knowledge and experience for working with individuals and families experiencing homelessness and/or other issues that place individuals and families at risk of homelessness.
- b) The agency should provide time for all employees and/or volunteers to attend webinars and/or trainings on program requirements, compliance and best practices.
- c) All employees and/or volunteers should be trained on program policies and procedures, available local resources, and specific skill areas relevant to assisting clients in the program.
- d) For programs using the Homeless Management Information System (HMIS), the agency shall take steps to ensure that all end users abide by the NC HMIS User and Participation Agreements, including adherence to the strict privacy and confidentiality policies.
- e) Supervisors should have adequate and appropriate knowledge and experience for working with individuals and families experiencing homelessness and/or other issues that place individuals and families at risk of homelessness.
- f) All program staff should have written job descriptions that address tasks staff must perform and the minimum qualifications for the position.

Standard 2: Eligibility and Intake Programs will actively participate in the coordinated assessment system by only taking referrals from the Community Intake Center.

Benchmarks:

- a) All adult program participants must meet the following program eligibility requirements: 18 years or older and literally homeless and/or fleeing or attempting to flee domestic violence (see Category 1 and 4 of the HUD homeless definition, attached to these standards as Appendix A)
- b) Homelessness prevention programs work with households who meet the at-risk of homelessness definition (Category 2 of the HUD homeless definition, attached to these standards as Appendix A)
- c) Adult household members participate in developing and carrying out an appropriate housing stability plan and maintain accountability of said plan.

- d) Programs will not disqualify an individual or family because of prior evictions, poor rental history, criminal history, or credit history.
- f) Programs shall use HUD's standard order of priority for documenting evidence to determine homeless status. Grantees must document in the client file that the agency attempted to obtain the documentation in the preferred order. The order should be as follows:
 - iv. Third-party documentation (including Homeless Management Information System—HMIS--records)
 - v. Intake worker observations through outreach and visual assessment
 - vi. Self-certification of the person receiving assistance
- g) Programs will maintain release of information, case notes, and all pertinent demographic and identifying data in HMIS as allowable by program type.
- h) Programs may deny or reject referrals from the Community Intake Center using the process described in the Community Intake Center Policies and Procedures. Denials should be infrequent. The specific allowable criteria for denying a referral shall be published by each program. All participating projects shall provide the reason for each service denial in writing to the CIC Coordinator.
- i) Re-evaluations for program eligibility shall be conducted in accordance with the Forsyth Rapid Re-housing Collaborative (FRRC) Policies and Procedures, which are an appendix to these standards.
- j) Income verification is not required to establish ESG Rapid Rehousing (ESG-RRH) eligibility but may be considered in determining vulnerability status. At the client's annual recertification, to remain eligible for ESG Rapid Re-housing assistance, the household's total annual income must not exceed 30% of the Area Median Income.

Standard 3: Housing Assistance Rapid re-housing programs will assist participants in locating and moving into safe, affordable housing, while providing housing stabilization and case management services meant to facilitate long- term stability.

Benchmarks:

- k) Programs should take a progressive approach when determining the amount of money that households will contribute toward their monthly rent payment. Programs should remain flexible, taking into account the unique and changing needs of the household. Financial assistance and services provided shall be provided in accordance with the Forsyth Rapid Re-housing Collaborative (FRRC) Policies and Procedures, which are an appendix to these standards.
- l) When determining the amount and length of financial assistance, programs should base their decision on the needs of the household and its long-term housing stability plan. Financial assistance and services provided shall be provided in accordance with the Forsyth Rapid Re-housing Collaborative (FRRC) Policies and Procedures, which are an appendix to these standards.
- m) The frequency of rapid re-housing assistance shall be governed by the Forsyth Rapid Re-housing Collaborative (FRRC) Policies and Procedures, which are an appendix to these standards.

Standard 4: Housing Retention Programs providing homelessness prevention assistance will assist participants in staying in their current housing situation, if possible, or assist households at imminent risk of homelessness to move into another suitable unit as defined under the specific program type.

Benchmarks:

- a) Prevention programs should target assistance to the households most likely to experience homelessness if not for the assistance.
- b) In evaluating current housing, programs consider whether the current unit meets Housing Quality Standards and long-term sustainability for the household.
- c) Programs will determine the amount that households will contribute toward their monthly rent payment, subject to any regulations of the funding source.

Standard 5: Services Programs will facilitate service coordination by assisting program participants in obtaining appropriate supportive services and other federal, state, local, and private assistance as needed and/or requested by the household. Program staff will be knowledgeable about mainstream resources and services in the community.

Benchmarks:

- a) Programs should arrange with appropriate community agencies and individuals the provision of education, employment, and training; schools and enrichment programs; healthcare and dental clinics; mental health resources; substance abuse assessments and treatment; legal services, credit counseling services; and other assistance requested by the participant.
- b) Programs shall coordinate with other mainstream resources for which participants may need assistance: emergency financial assistance; domestic violence shelters; local housing authorities, public housing, and Housing Choice Voucher programs; temporary labor organizations; childcare resources and other public programs that subsidize childcare; youth development and child welfare; WIC; Supplemental Nutritional Assistance Program (SNAP); Unemployment Insurance; Social Security benefits; Medicaid/Medicare or other comparable services if available.
- n) Requirements for rapid re-housing program participants to meet with a case manager not less than once per month to assist the participant in ensuring long-term housing stability are described in the Forsyth Rapid Re-housing Collaborative (FRRC) Policies and Procedures, which are an appendix to these standards.
- o) Case management follow-up shall be available through all rapid re-housing program providers as determined to be necessary by the agency to ensure long-term housing stability.

Standard 6: Termination Termination should be limited to the most severe cases. Programs will exercise sound judgment and examine all extenuating circumstances when determining if violations warrant program termination prior to program completion.

Benchmarks:

- d) Programs provide participants with a written copy of program rules and the termination process before the participant begins to receive assistance, with a receipt or acknowledgment signed by the client
- e) Programs follow a formal written termination procedure which, at a minimum, must consist of: (1) Written notice to the program participant containing a clear statement of the reasons for termination; (2) a process for mutual review of the decision, in which the program participant is 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 (3) Prompt written notice of the final decision to the program participant.

Standard 7: Planning and Evaluation Homelessness prevention and rapid rehousing programs will work with the community to conduct ongoing planning and evaluation to ensure programs continue to meet community needs for individuals and families experiencing homelessness or at-risk of homelessness.

Benchmarks:

- a) Agencies will maintain written goals and objectives for their services.
- b) Programs will regularly review project performance data in HMIS to ensure reliability of data and effective performance. Programs should review this information, at a minimum, quarterly.
- c) Programs will conduct, at a minimum, an annual evaluation of their goals, objectives, and activities, making adjustments to the program as needed to meet the needs of the community.

Permanent Supportive Housing

Permanent supportive housing means permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently. Permanent supportive housing (PSH) programs provide safe, stable homes through long-term rental assistance, paired with long-term intensive case management services, to highly vulnerable individuals and families with complex issues who are otherwise at risk of serious health and safety consequences from being homeless. This model seeks to provide a stable housing option and the necessary supportive services for individuals and families who would not succeed in other permanent housing settings.

Permanent supportive housing is designed for persons with disabilities, including severe mental health, physical health, HIV/AIDS, and/or substance abuse disorders, especially targeting individuals and families meeting the U.S. Department of Housing and Urban Development's definition of chronic homelessness. Types of permanent supportive housing include HUD CoC Permanent Supportive Housing, HUD-VASH, and other programs that combine services and rental assistance in the community specifically to house this population.

Successful permanent supportive housing programs use the national best practice called Housing First, the model in which programs house all persons as quickly as possible without preconditions such as sobriety, income, or behavioral requirements and pair supportive services matched to the needs of the household. Long-term studies and local data demonstrate that individuals and families experiencing homelessness, even chronic homelessness, can move into a home with case management, follow a standard lease, and successfully remain in housing over a long period of time.

Under the Continuum of Care Program, written standards must include policies and procedures for evaluating individuals' and families' eligibility for assistance and policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance. These standards are reflected in the attached Permanent Supportive Housing (PSH) Assistance and Prioritization Policies and Procedures, approved by the CoC in March, 2017 and the Community Intake Center Policy and Procedures Manual, approved by the CoC in December, 2017. Other PSH standards are described below.

Permanent Supportive Housing Performance Standards

Standard 1: Staffing Programs shall adequately staff services with qualified personnel to ensure quality of service delivery, effective program administration, and the safety of program participants.

Benchmarks:

- a) The agency should select employees and/or volunteers with adequate and appropriate knowledge and experience for working with individuals and families experiencing homelessness and/or other issues that place individuals and families at risk of homelessness.
- b) The agency should provide time for all employees and/or volunteers to attend webinars and/or trainings on program requirements, compliance and best practices.
- c) All employees and/or volunteers should be trained on program policies and procedures, available local resources, and specific skill areas relevant to assisting clients in the program.
- d) For programs using the Homeless Management Information System (HMIS), the agency shall take steps to ensure that all end users abide by the NC HMIS User and Participation Agreements, including adherence to the strict privacy and confidentiality policies.
- e) Supervisors should have adequate and appropriate knowledge and experience for working with individuals and families experiencing homelessness and/or other issues that place individuals and families at risk of homelessness.
- f) All program staff should have written job descriptions that address tasks staff must perform and the minimum qualifications for the position.

Standard 2: Eligibility and Intake PSH programs will take referrals only from the Community Intake Center and shall follow appropriate intake and assessment practices.

Benchmarks:

- a) To be eligible for PSH, all adult program participants must be literally homeless or fleeing domestic violence (see Category 1 and Category 4 of the Homeless Definition in Appendix A).
- b) PSH can only provide assistance to individuals with disabilities and families in which one adult or child has a disability.
- c) Programs shall not disqualify an individual or family because of prior evictions, poor rental history, criminal history, credit history, lack of income or employment status.
- d) Programs shall use HUD's standard order of priority for documenting evidence to determine homeless status. Grantees must document in the client file that the agency attempted to obtain the documentation in the preferred order. The order should be as follows:
 - vii. Third-party documentation (including Homeless Management Information System--HMIS--records)
 - viii. Intake worker observations through outreach and visual assessment
 - ix. Self-certification of the person receiving assistance
- e) Programs will maintain release of information, case notes, and all pertinent demographic and identifying data in HMIS as allowable by program type. Paper files should be maintained in a locked cabinet behind a locked door with access strictly reserved for case workers and administrators who need said information.

Standard 3: Prioritization Permanent supportive housing beds are prioritized based on adopted local policies.

Benchmarks:

- a) PSH beds are prioritized based on the Permanent Supportive Housing (PSH) Assistance and Prioritization Policies and Procedures, approved by the CoC in March, 2017 and the Community Intake Center Policy and Procedures Manual, approved by the CoC in December, 2017. In general, those policies state that (1) PSH shall be prioritized to chronically homeless persons and (2) when there are no chronically homeless individuals and families identified in the CoC, housing placement shall follow an order of priority based on time homeless and/or severity of needs.

Standard 4: Housing Placement Programs will provide safe, affordable permanent housing paired with intensive case management services to participants to ensure long-term housing stability.

Benchmarks:

- a) Tenants will have a lease in their name, and, therefore, they have full rights of tenancy under landlord-tenant law.
- b) Housing shall not be time-limited, and the lease is renewable at tenants' and owners' option.

- c) Leases shall not have any provisions that would not be found in leases held by someone who does not have a disability.
- d) Tenants must have choices in the support services that they receive. Participation in services shall be voluntary and tenants cannot be evicted for rejecting services. As needed, services shall be designed to reduce harm and promote recovery with a goal of facilitating housing stability.
- e) Any house rules or program rules are to be similar to those found in housing for people who do not have disabilities and do not restrict visitors or otherwise interfere with a life in the community. Also, housing is to be integrated into the community to the fullest possible extent, with neighbors who do not have disabilities.
- f) Housing must be affordable, based on the General HUD Program Requirements at 2 Code of Federal Regulations Part 5, under which, generally, tenants pay no more than 30 percent of their income toward rent and utilities.
- g) As needs change over time, tenants are to be able to receive more intensive or less intensive support services without losing their homes.

Standard 5: Case Management Programs shall provide access to intensive case management services by trained staff to each individual and/or family in the program.

- a) Either through program staff or through other programs connected to the permanent housing program, participants will receive basic life skills training, including housekeeping, grocery shopping, menu planning and food preparation, and consumer education, as well as assistance in obtaining transportation and obtaining vital documents (such as social security cards, birth certificates, school records).
- b) Either through program staff or through other programs connected to the permanent housing program, participants will receive assistance in accessing cash and non-cash income and benefits through employment, mainstream benefits, childcare assistance, health insurance, and other sources.
- c) Programs shall keep case notes to document participant acceptance or refusal of all services.

Appendices:

Documents attached to these standards as appendices include:

- I. [HUD Definition of Homelessness](#)
- J. [Shelter Habitability Standards](#)
- K. [CoC Standards Under the Violence Against Women Act](#)
- L. [Homeless Management Information System \(HMIS\) Policies and Procedures](#)
- M. [Forsyth County Rapid Re-Housing Program Policies and Procedures](#)
- N. [Community Intake Center Policy and Procedure Manual \(Coordinated Entry\)](#)
- O. [Permanent Supportive Housing Policies and Procedures](#)
- P. [Winston-Salem/Forsyth County Continuum of Care Governance Charter](#)

Appendix A: HUD Definition of Homelessness

<p>Literally Homeless (Category 1)</p>	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence:</p> <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, hotels/motels paid for by charitable organizations or federal, state, and local government programs; or • Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
<p>Imminent Risk of Homelessness (Category 2)</p>	<p>Individual or family who will imminently lose their primary residence, provided that:</p> <ul style="list-style-type: none"> • Residence will be lost within 14 days of the date of application for homeless assistance; • No subsequent residence has been identified; and • Lacks resources or support networks needed to obtain other permanent housing
<p>Homeless Under Other Federal Statutes (Category 3)</p>	<p>Unaccompanied youth under age 25, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> • Are defined as homeless under other listed federal statutes; • Have not had a lease, ownership, or occupancy agreement in permanent housing during the 60 days prior to the date of homeless assistance application; • Have moved two or more times in the preceding 60 days; and • Can be expected to continue in such status for an extended period of time due to special needs or barriers
<p>Fleeing/Attempting to Flee Domestic Violence (Category 4)</p>	<p>Individual or family who:</p> <ul style="list-style-type: none"> • Is fleeing/attempting to flee Domestic Violence / Victim Service Provider; • Has no other residence; and • Lacks resources or support networks needed to obtain other permanent housing

Appendix B:
NC ESG Minimum Habitability Standards for Emergency Shelters

This form is available at the following web address:

<https://www.ncdhhs.gov/divisions/aging-and-adult-services/nc-emergency-solutions-grant/nc-emergency-solutions-grant-%E2%80%93-0>

(See form 3.2)

Appendix C:
Winston-Salem/Forsyth County Continuum of Care (CoC)
Standards and Policies Under the Violence Against Women Act (VAWA)

In December, 2016, the U.S. Department of Housing and Urban Development (HUD) issued regulations pursuant to the 2013 reauthorization of the Violence Against Women Act (VAWA). The regulations protect housing of survivors of domestic and dating violence, sexual assault, and stalking. Standards of the CoC related to VAWA are described herein.

1. Programs subject to this standard and these regulations shall operate in compliance with 24 Code of Federal Regulations part 5.2, Subpart L, Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking.
2. Covered persons includes victims or survivors of domestic violence, dating violence, sexual assault, or stalking who are applying for, or are the beneficiaries of, assistance under a HUD program covered by the Violence Against Women Act (VAWA).
3. Covered programs include the HOME Investment Partnerships (HOME) program (42 U.S.C. 12741 et seq.), with implementing regulations at 24 CFR part 92; homeless programs under title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360 et seq.), including the Emergency Solutions Grants program (with implementing regulations at 24 CFR part 576) and the Continuum of Care program (with implementing regulations at 24 CFR part 578).
4. Housing programs providing rapid re-housing, permanent supportive housing or other permanent housing assisted by the Continuum of Care (CoC) Program, Emergency Solutions Grant (ESG) Program, or HOME-Tenant Based Rental Assistance (HOME-TBRA) are subject to these rules and standards.
5. Covered housing providers are organizations which provide housing or provide financial assistance through covered programs to house covered persons.
6. The protections are not limited to women but cover victims or survivors of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation. Consistent with the nondiscrimination and equal opportunity requirements at 24 CFR 5.105(a), victims cannot be discriminated against on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD programs must also be operated consistently with HUD's Equal Access Rule at § 5.105(a)(2), which requires that HUD-assisted and HUD-insured housing are made available to all otherwise eligible individuals and families regardless of actual or perceived sexual orientation, gender identity, or marital status.
7. Consistent with 24 CFR Part 5, subpart L, any covered housing provider shall provide to each of its applicants and to each of its tenants a copy of Form HUD-5380, **Notice of Occupancy Rights under the Violence Against Women Act**. Each covered housing provider shall make available upon request to any applicant or tenant Form HUD-5383, **Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking** and Form HUD-5382, **Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking** and Alternate Documentation.
8. Each covered housing provider shall establish an emergency transfer plan which allows for survivors to move to a safe unit if they fear for their life and safety. A *safe unit* refers to a unit that the victim of domestic violence, dating violence, sexual assault, or stalking

believes is safe. The model emergency transfer plan provided in Form HUD-5381 shall be used by all covered housing providers in the CoC; the model notwithstanding, the emergency transfer plan shall be consistent with 24 Code of Federal Regulations part 5.2, Subpart L, Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking.

9. Covered housing providers shall assist tenants with both internal emergency transfers and external emergency transfers. Internal emergency transfers are transfers to another unit where the tenant is not required to submit an application. External emergency transfers are transfers where a tenant requests a transfer to a unit where an application is required. If a covered housing provider has no safe and available units for which a tenant who needs an emergency transfer is eligible for an internal emergency transfer, the covered housing provider will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move as an external emergency transfer. These provisions notwithstanding, housing providers' emergency transfer plans shall state that a request does not guarantee continued assistance or an external transfer to other, subsidized housing.
10. The emergency transfer plan must provide that a tenant receiving rental assistance through, or residing in a unit subsidized under, a covered housing program who is a victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer if: (i) The tenant expressly requests the transfer; and (ii)(A) The tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying; or (B) In the case of a tenant who is a victim of sexual assault, either the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying, or the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for transfer. Where applicable, the emergency transfer plan must describe policies for a tenant who has tenant-based rental assistance and who meets the requirements of this section to move quickly with that assistance.
11. The emergency transfer plan must detail the measure of any priority given to tenants who qualify for an emergency transfer under VAWA in relation to other categories of tenants seeking transfers and individuals seeking placement on waiting lists.
12. The emergency transfer plan must incorporate strict confidentiality measures to ensure that the covered housing provider does not disclose the location of the dwelling unit of the tenant to a person who committed or threatened to commit an act of domestic violence, dating violence, sexual assault, or stalking against the tenant.
13. The emergency transfer plan must allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available. Units that are immediately available for internal emergency transfer shall include vacant units that are owned, managed or otherwise under operational control of the housing provider and which can be inspected and ready for move-in within seven calendar days. Tenants who qualify for an emergency transfer shall have priority over other tenants seeking an internal transfer.
14. The emergency transfer plan must describe policies for assisting a tenant in making an internal emergency transfer under VAWA when a safe unit is not immediately available, and these policies must ensure that requests for internal emergency transfers

- under VAWA receive, at a minimum, any applicable additional priority that housing providers may already provide to other types of emergency transfer requests.
15. The emergency transfer plan must describe reasonable efforts the covered housing provider will take to assist a tenant who wishes to make an external emergency transfer when a safe unit is not immediately available. The plan must include policies for assisting a tenant who is seeking an external emergency transfer under VAWA out of the covered housing provider's program or project, and a tenant who is seeking an external emergency transfer under VAWA into the covered housing provider's program or project. These policies may include: (i) Arrangements, including memoranda of understanding, with other covered housing providers to facilitate moves; and (ii) Outreach activities to organizations that assist or provide resources to victims of domestic violence, dating violence, sexual assault, or stalking.
 16. Nothing may preclude a tenant from seeking an internal emergency transfer and an external emergency transfer concurrently if a safe unit is not immediately available.
 17. The emergency transfer plan may require documentation from a tenant seeking an emergency transfer, provided that: (i) The tenant's submission of a written request to the covered housing provider, where the tenant certifies that the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying, shall be sufficient documentation of the requirements in paragraph (e)(2) of this section; (ii) The covered housing provider may, at its discretion, ask an individual seeking an emergency transfer to document the occurrence of domestic violence, dating violence, sexual assault, or stalking, in accordance with § 5.2007, for which the individual is seeking the emergency transfer, if the individual has not already provided documentation of that occurrence; and (iii) No other documentation is required to qualify the tenant for an emergency transfer.
 18. The covered housing provider must make its emergency transfer plan available upon request and, when feasible, must make its plan publicly available.
 19. The covered housing provider must keep a record of all emergency transfers requested under its emergency transfer plan, and the outcomes of such requests, and retain these records for a period of three years, or for a period of time as specified in program regulations. Requests and outcomes of such requests must be reported to HUD annually.
 20. Protections offered under VAWA include:
 - a. Notification of occupancy rights
 - b. Protection against denial of admission or termination of assistance or eviction due to being a victim or survivor of domestic violence, dating violence, sexual assault, or stalking if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy
 - c. Protection from having domestic violence, dating violence, sexual assault, or stalking be considered a lease violation or cause for terminating assistance, tenancy or occupancy rights
 - d. Lease bifurcation, under which a covered housing provider may, in accordance with the regulations, remove a household member from a lease in order to evict, remove, terminate occupancy rights, or terminate assistance to such member who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking against an affiliated individual or other individual, without regard

to whether the household member is a signatory to the lease; and without evicting, removing, terminating assistance to, or otherwise penalizing a victim or survivor of such criminal activity who is also a tenant or lawful occupant.

Appendix D:
Homeless Management Information System (HMIS)
Policies and Procedures

The HMIS Policies and Procedures are available at this link:

<https://forsythendhomelessness.org/wsf-coc-policies-procedures/>

Appendix E

Forsyth County Rapid Re-Housing Program Policies and Procedures

The policies and procedures are available at:

<https://forsythendhomelessness.org/wsfc-coc-policies-procedures/>

Appendix F
Community Intake Center (CIC) Policies and Procedures

The policies and procedures are available at:

<https://forsythendhomelessness.org/wsfc-coc-policies-procedures/>

Appendix G
Permanent Supportive Housing Policies and Procedures

The policies and procedures are available at:

<https://forsythendhomelessness.org/wsfc-coc-policies-procedures/>

Appendix H

Winston-Salem/Forsyth County Continuum of Care Governance Charter

The Governance Charter is available at:

<https://forsythendhomelessness.org/wsfc-coc-policies-procedures/>