



**Tri-County Homeless Interagency Council**  
**Continuum of Care Written Standards**  
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## Overview

The Tri-County Homeless Interagency Council (Tri-HIC) is the Housing and Urban Development (HUD) designated homeless continuum of care for the City of Wilmington and counties of Brunswick, New Hanover and Pender (NC-506).

The purpose of the Tri -HIC is to assist local governmental jurisdictions, homeless service providers, and community groups in the development of policies, plans, resources, and programs for reducing homelessness and its accompanying conditions.

We are committed to creating the systematic changes necessary to prevent and end homelessness. At the same time, we work to meet the immediate needs of people who are currently experiencing homelessness or who are at risk of becoming homeless.

In March 2015, to better align our Continuum of Care (CoC) with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, members of Tri-HIC voted unanimously to approve the Cape Fear Council of Governments to provide a home for the administrative staff for the CoC and serve as the fiscal agent and collaborative applicant for the ESG and HUD CoC grants.

The CoC has adopted a set of written standards to ensure: a fair and transparent process in vetting projects for funding, efficient and effective delivery of crisis services, the reduction in the number of individuals that enter the shelter system, and reduction in the amount of time that households spend in crisis services before placement into permanent housing. The standards apply to all applications for state and federal funds and may be adopted for use with local funding competitions as well.

Tri-HIC utilizes HUD funding to support the operation of programs for Street Outreach, Emergency Shelter, Homelessness Prevention, Permanent Supportive Housing, and Rapid Re-Housing. Tri-HIC requires applicants seeking funding for emergency shelter (ES), homelessness prevention services (HPS), permanent supportive housing (PSH) and rapid re-housing (RRH) to practice a Housing First model.

Coordinated Entry (CE) is an assessment-based process, required by the federal government that ensures CoC partners prioritize the most vulnerable individuals/families seeking housing and are required to utilize CE (regardless of funding source) for program entry except when it prevents access to emergency services (emergency shelter and street outreach).

All CoC participating organizations must have termination and grievance policies that are made available to all people being served, which clearly state the rights of those individuals. The CoC expects that the CoC's grievance policy will be embedded within the organization's policy [Complaint/Grievance Form](#)

The CoC serves clients in the following ways:

- **Divert** those who are at-risk of becoming homeless by assessing their needs and referring them to appropriate resources to maintain their housing.
- **Coordinate a** referral process for those who are homeless or at risk of homelessness to be screened for the most appropriate resources to address their needs.
- **Prioritize** those who are literally homeless for shelter services and/or permanent housing.

- **Connect** homeless individuals and families to mainstream resources and services as soon as possible.
- **Provide** programs within the CoC to meet the needs of special populations, such as victims of domestic violence, sexual assault, etc.
- **House** individuals and families in the shortest time possible.

## Homeless Management Information System (HMIS)

The CoC requires the use of a HMIS system to track data on persons experiencing homelessness served throughout the CoC. HMIS is used for system measures in the following ways: gaps analysis, Point-In-Time Count, Housing Inventory Count, and System Performance Measures. The system is also used to measure the performance of individual agencies through various reports including the CAPER and APR.

HMIS provides a central database for managing client engagement, services, and outcomes. The CoC is moving toward requiring all participating agencies to use HMIS for Case Management. CoC Staff and the HMIS Lead agencies provide training on the use of the HMIS system including case management, reporting and basic data entry.

The HMIS system includes financial management modules that can be used by agencies to track spending. The CoC requires funded agencies to provide quarterly reporting on spending by the 15th of the month after the quarter ends or, if the agency chooses to use HMIS, access to pull financial reporting from HMIS.

Agencies using HMIS will use the designated forms within the HMIS system for projects that they are operating. Client information entered should be timely, accurate and complete. Information is protected according to HMIS privacy standards, and clients are given the option of the privacy level pursuant to their privacy needs. Participating agencies sign an ROI that encourages programs to share relevant client data in order to serve clients effectively.

CoC partner organizations must make available to clients the following documents upon entry:

1. HMIS Release of Information form
2. HMIS Public Notice
3. agency client guidelines
4. agency policies & procedures
5. agency and CoC grievance policies

## Homelessness Program Categories

### Homelessness Prevention (HP)

#### **Standards for Targeting and Providing Prevention Services:**

Homelessness Prevention programs provide funding and person-centered housing case management to individuals and families who are at risk of becoming homeless. This includes those whose income is at or below 30% of Area Median Income (AMI) and who do not have sufficient resources or support systems (e.g. family, friends, etc) available to prevent them from becoming homeless. A person can apply for assistance within 21 days of the date that their occupancy will be terminated, based on written notification (i.e. letter, email, text)

Agencies receiving funds for homelessness prevention must confirm that an individual or family *meets one* of the following criteria:

- Has moved two or more times during the 60 days immediately prior to the application for assistance due to economic reasons
- Is living in the home of another because of economic hardship (including doubled up families and “couch surfing”)
- Lives in a hotel/motel and the cost of the hotel/motel stay is NOT paid by charitable organizations or by Federal, State, or local government programs for low-income individuals
- Lives in a Single Room Occupancy (SRO) or efficiency apartment/unit in which there are more than two persons living OR lives in a larger housing unit in which there are more than 1.5 persons per sleeping room.
- Is exiting a publicly funded institution or system of care
- Lives in [substandard housing](#)
- Is a child/youth who does not qualify as homeless under section 24 CFR § 576.2 but qualifies under one of the following federal definitions: *Runaway and Homeless Youth Act, Head Start Act, Violence Against Women Act of 1994, McKinney-Vento Homeless Assistance Act*, etc. the parent(s)/guardian(s) of that child living with the child also meets criteria.

Prevention programs must show the capacity to provide person-centered, housing stability case management. Housing search assistance may be provided for 30 days prior to a household being housed either directly or through an identified housing location partner. Housing search assistance may be provided for more than 30 days as long as the agency can document the need for ongoing search efforts.

The project must have the capacity to provide Housing Stability Case Management for up to 24 months after they are re-housed or their current housing is stabilized. Continuation of case management and the decision to exit case management should be based on the family’s projected ability to remain stably housed.

Providers must engage in the following activities to ensure that Homelessness Prevention funds are effectively utilized:

1. Providers will prioritize families with children and households with disabilities.
2. Providers will use due diligence when verifying that a family meets the criteria for assistance using the document standards below:
  - a. The “at-risk” condition by obtaining documentation relevant to the applicant’s statement of their condition. If a lease is expiring and is not being renewed, a notice of nonrenewal of lease termination is required. If a lease is being terminated for cause (i.e. non-payment or violation) a court order resulting from that legal action is required. Self-declarations will not be accepted when the applicant has a legally binding lease. For those without a legally binding lease, an equivalent notice is required.
  - b. Verify resources available to the family using federal standards of verification, starting with 3rd party written or documented verification (preferred form) and including available income and assets of the individual/family.
3. Providers will assist applicants who are ineligible and at risk of homelessness with a referral to other area partners as available or with other funding administered by the provider. This includes referrals to other area partners who have been identified as having funding sources that could potentially provide assistance.

## Street Outreach Engagement

### **Standards for Targeting and Providing Essential Outreach Services:**

Street Outreach services target unsheltered, homeless individuals/families in order to build relationships for the purpose of providing immediate support, intervention and connections with homeless assistance programs or other social services and housing programs. Applicants for funding to support street outreach must demonstrate that the program has the specific strategies to reach unsheltered persons in the community, which includes meeting individuals/families in the physical location of their choice. Street Outreach thrives on building relationships with other service providers that will help people move off the streets as quickly as possible.

The CoC expects that Street Outreach providers operate according to the following:

1. Seek out and meet individuals/families experiencing homelessness where they are located in the community. An initial need and eligibility assessment is conducted in the field. Eligible individuals/families are provided the following as desired: engagement, case management, emergency health services, emergency mental health services, transportation, or other appropriate services specific to special needs populations.
2. Inform and refer individuals/families to Coordinated Entry (CE). Educate individuals/families on the emergency shelter options. Outreach workers develop relationships with individuals/families in order to encourage connections with other service providers that will help people move off the streets as quickly as possible.
3. Develop/maintain relationships with emergency shelters in order to quickly facilitate entry for any person desiring shelter.
4. Use *Housing First* principles.

## Emergency Shelter

### Standards for Emergency Shelters:

The CoC allows anyone experiencing homelessness to access emergency shelter programs immediately, without being assessed and then referred to the shelter through the Coordinated Entry (CE) process. Shelters funded through federal or state funds and operating within the CoC are expected to work toward the goal of helping individuals/families resolve their housing crisis within 30 days. All funded agencies must attend CE meetings.

1. Shelter residents will be screened using the *NC HMIS Street Outreach and Shelter Intake Form*. This is to ensure that all HMIS required data elements are collected upon entry to the greatest extent possible. Participants will be screened to ensure that they meet the Category 1 or Category 4 definitions of homelessness as per the ESG Interim Rule and by using ESG issued Homeless Verification forms. The COC has adopted these forms as their standard, regardless of funding source. Funded shelters will follow the process of verification starting with third party verification, staff observation (if a third-party verification cannot be obtained), and lastly, accepting self-certification.
2. Funded emergency shelters may incorporate additional screening questions for entry that meet the organizations mission and population served, as long as the program follows the *Housing First* principles.
3. Funded emergency shelters will provide clients with the following documents upon entry; HMIS release of information form, HMIS Public Notice, client guidelines, program policies & procedures, and grievance policy. Funded emergency shelters will have termination and grievance policies that are provided to all people being served by the shelter. These policies will include the shelter residents' individual rights, as well as the agency's chain of command including points of contact to address grievances.
4. Funded emergency shelters must operate seven (7) days a week and must have written policies and procedures for emergencies and natural disasters.

## Rapid Re-Housing

### Standards for Rapid Re-Housing (RRH):

RRH is used to quickly move individuals and families from homelessness into housing. This includes: those who are literally homeless, living in shelter, or in a place not meant for human habitation and cannot be diverted through another resource to immediate housing. The long-term goal of the program is housing retention.

RRH programs must show the capacity to provide person-centered, housing stability case management. Housing search assistance may be provided for 30 days prior to a household being housed either directly or through an identified housing partner. Housing search assistance may be provided for more than 30 days as long as the agency can document the need for ongoing search efforts.

RRH programs must use Housing *First* principles to provide financial assistance. There is no minimum income or employment requirement nor is there a requirement for clients to participate in case management, treatment, or education programs. However, these types of support services are beneficial in helping participants to sustain housing. Assistance is available to clients based on need for up to 24 months in order to maintain stable housing. Client participation is voluntary.

Individuals/families who score in the range of 4-7 on the VI-SPDAT will be referred to RRH programs and will be prioritized for RRH assistance. VI-SPDAT scores of 8+ will be considered for RRH assistance if the individual/family is not chronically homeless and/or no PSH openings are available at the time of assessment.

After 12 months, in order to be eligible for continued financial assistance, program participants must have an annual income at or below 30 percent of the area median income (AMI). Person-centered housing stability case management is not income specific and must be available to households for up to 24 months after they are housed.

Termination from the RRH program does not automatically disqualify an individual from receiving assistance at a later date. Clients may be reassessed for additional assistance if the issue requiring program termination has been resolved and the client is within the designated time period for assistance and meets RRH criteria.

If the provider is considering an exit destination to anything other than a leased unit, they must educate the client on their rights as a tenant. In non-leased situations (boarding house, family placement, relocation, etc.) programs must provide case management for at least 90 days following the placement in order to ensure stability, longevity and tenants' awareness of their rights.

RRH providers engage in the following activities to ensure that RRH funds are effectively utilized:

1. Referred from Coordinated Entry (CE). Service is based on a combination of need and first come-first served basis.
2. Serve those below 30% of Area Median Income (AMI), which will be documented using verification of income and asset certification forms and supported by corresponding financial statements (pay stubs, benefits award letter, bank statements, and any other form of income statements). RRH providers will use the guidelines set out in [24 CFR 5.609](#) when calculating income.
3. Conduct a realistic assessment of the household's budget to ensure housing costs (rent, utilities & other resident required costs) for proposed units do not exceed 40% of the gross household income.
4. Ensure that the household budget addresses potential barriers to maintaining housing including possible increases in travel costs for those who work and/or other household costs associated with the location.
5. Take all steps to ensure and document that rental rates are reasonable and that the condition of the unit provides for the safety and well-being of those being placed into housing. Staff will determine rent reasonableness for the unit in the county where the individual/family is being housed using HUD standards for determination of rent reasonableness. Staff will inspect all units using the habitability standards established by HUD. Documentation of habitability is required including the inspection results, lead based paint, and/or other conditions.
6. Provision of sufficient financial assistance to obtain and maintain permanent housing.
7. Re-evaluation of household income at least every six (6) months.

Program participants rent portion will be determined by the following:

- Households are not required to pay a portion of the first month's rent.
- Households with Housing Barrier Matrix Score 4-5 AND VI-SPDAT Score 6 or higher are not required to pay a portion of the rent for two months.
- Households with income will be required to pay no more than 40% of gross household income toward rent for the remaining months that assistance is provided.
- RRH providers will use the Fair Market Rent and Utility Allowances for Tenant-Furnished Utilities from the housing authority with jurisdiction in the county where the unit is located when determining rental assistance.

## Permanent Supportive Housing (PSH)

### **Standards for Permanent Supportive Housing (PSH):**

PSH is the recommended housing intervention for individuals who are chronically homeless and have a disabling condition. It provides a combination of affordable housing with case management support to provide housing stability for those that are likely to continue to experience homelessness without ongoing assistance.

Tri-HIC partners provide various types of permanent supportive housing. All PSH funded through the HUD Continuum of Care grant process must utilize the Coordinated Entry (CE) system as a process for receiving new tenants. PSH providers should refer to the CE Policies and Procedures for additional standards regarding screening and acceptance of new tenants.

If the provider is considering any exit destination other than a leased unit, they must educate the client on their rights as a tenant. In non-leased situations (boarding house, family placement, relocation, etc...) programs must provide case management for at least 90 days following the placement in order to ensure stability, longevity and awareness of their rights.

PSH providers must be Housing First as outlined below and defined by HUD guidance:

- Reduces barriers to housing entry
  - Does not screen out for current or past substance abuse
  - Does not screen out for type of disability (including mental and physical illness)
  - Does not screen out for past legal issues, except those dictated by federal guidelines
  - Does not screen out for little or no income
  - Does not screen out for poor credit or rental history
  - Does not screen out for current or experience as a victim of domestic violence
- Reduces barriers to housing retention
  - Does not evict for non-compliance with a housing plan
  - Does not evict for violation of rules that are not part of a standard lease
  - Does not evict for drug or alcohol use
  - Does not evict for non-compliance with medication or a treatment plan
  - Practices policies to prevent lease violations and evictions
- Offers person-centered services and case management:
  - Case management is separate from property management
  - Offer services based on tenants needs and requests
    - Services can be provided by the PSH program or a community provider
  - Additional/outside services are voluntary
  - Offer case management services in settings that meet the residents needs
  - Bring resources on-site
  - Incentivize engagement in services
  - Train staff on best practice approaches to case management
  - Have a process for resident feedback

Tenant Rights under PSH Programs:

- Tenants must be informed of and educated of their full rights, responsibilities, and legal protections. PSH tenants are protected under the fair housing laws and should be informed of their rights as well as their responsibilities as tenants in a legally binding lease.
- The tenant lease functions as the termination policy, which legally ensures that tenants receive sufficient notice of termination and have a right to appeal termination to the organizational leadership.

## Emergency Housing Vouchers - Partnerships with Wilmington Housing Authority

*This section is pending development.*