

## Scranton/Lackawanna County Continuum of Care Policies and Procedures

In accordance with HUD regulations (24CFR Part 578), representatives from relevant organizations that serve homeless and formerly homeless individuals and other interested, relevant organizations within the following geographic areas, Scranton and Lackawanna County have established a Continuum of Care to carry out the duties assigned in the aforementioned regulations. That Continuum of Care is named the Scranton/Lackawanna County Continuum of Care (SLCCoC) and has established a Board, in accordance with the process described in the bylaws.

SLCCoC is a united coalition of community systems that assist homeless and near homeless residents in the area to obtain housing, economic stability, and an enhanced quality of life through comprehensive services. SLCCoC addresses critical issues related to homelessness through a coordinated community-based process of identifying and addressing needs utilizing not only HUD dollars, but also mainstream resources and other sources of funding. This is often achieved through the work of the CoC Board and sub-committees that help comprise the SLCCoC.

The SLCCoC Board has adopted the policies contained herein to ensure compliance with HUD regulations and to support efforts to assist homeless and near homeless residents in the region to obtain housing, economic stability and enhanced quality of life. These policies were developed over time by the SLCCoC Board. The policies were adopted in full by the SLCCoC Board in November 2015 and may be amended by a majority vote at any meeting of the Steering Committee, with a quorum present. Amendments made by the Steering Committee subsequent to November 2015 have been incorporated accordingly.

### ARTICLE I: PROCESS FOR MONITORING OUTCOMES OF ESG RECIPIENTS

ESG Recipients will notify the CoC of all ESG sub recipients at the same time the sub recipients are notified that their contracts will be awarded in order to maintain an accurate inventory of assistance available for the Coordinated Assessment System and set up of ESG program and reporting tools in the HMIS system.

The HMIS Lead will cooperate with ESG Recipients in providing needed performance or client HMIS information. The CoC Collaborative Applicant will conduct at least a bimonthly monitoring of ESG sub-recipients via HMIS to ensure data quality and quarterly monitoring to evaluate program outcomes. This quarterly monitoring will be shared with the ESG recipient.

The CoC Collaborative applicant will provide ESG Recipients with required Consolidated Action Plan and CAPER data.

### ARTICLE II: RATING AND RANKING CRITERIA

The CoC has developed a *Rating and Ranking Policy*. Please refer to this document for the process whereby projects are evaluated and ranked for the annual NOFA process.

### ARTICLE III: Prioritization Policy for Permanent Supportive Housing

This CoC will base prioritization for permanent supportive housing on [Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#). Households meeting the definition of chronic homelessness will be prioritized for all Permanent Supportive Housing vacancies upon turnover.

All CoC Program-funded PSH must take new participants from the single prioritized Chronic Homeless list for individuals or for families as appropriate, which is created using the Coordinated Entry process along with the criteria outlined in the above referenced notice.

### ARTICLE IV: WRITTEN STANDARDS FOR ADMINISTERING ASSISTANCE

#### **CoC Program Rapid Rehousing Rental Assistance**

Rapid Rehousing Permanent Housing Projects are designed to provide flexible programming that will expedite a household's ability to become self-sufficient through time-limited rental subsidy programs. Per 24 CFR part 578.37(a)(1)(ii), the CoC will establish annually priority populations to receive Rapid Rehousing assistance consistent with HUD Continuum of Care Program NOFA requirements and in response to analysis of point in time count and housing inventory and unmet needs reports.

#### **RRH Participant Eligibility**

- To be eligible RRH assistance, at initial evaluation households must:

1) Demonstrate literal homelessness (i.e., HUD Category One) or that household is fleeing/attempting to flee DV (HUD Category Four); and

2) Have completed a VI-SPDAT during their current episode of homelessness; or

3) Have been deemed appropriate for RRH via DV provider staff evaluation.

- There is no income requirement for RRH assistance.
- In order to be eligible for RRH assistance, households must be referred to the RRH program through the Coordinated Entry system, or been evaluated by DV provider staff and deemed appropriate for RRH.
- Households are not required to enter shelter to be eligible for RRH assistance.
- As indicated by HUD, households who are eligible for Permanent Supportive Housing (PSH) and awaiting PSH placement are also eligible to receive RRH assistance and will retain their homeless status and, if applicable, chronically homeless status.

**Determining the type of assistance & amount or percentage of rent each program participant must pay**

- RRH programs are required to use a housing first model for the provision of assistance, i.e. providing permanent housing assistance to homeless households without clinical pre-requisites, such the completion of a treatment program, evidence of sobriety, or other programmatic pre-requisites outside of the standards set forth in this document.
- RRH participants may receive eligible supportive services alone or a combination of eligible supportive services and rental assistance. At a minimum, all participants must attend monthly case management meetings in accordance with HUD regulations 24 CFR Part 578
- Tenant rent contribution may be adjusted at any time. There is no minimum dollar amount rent requirement; tenant rent contribution may be zero for households with no income.
- In addition to rental assistance, eligible program costs are defined in 24 CFR Part 578 and include:
  - **Financial assistance** (eligible under rental assistance): security deposits, first and last month's rent, property damage; CoC RRH assistance **may not** be used for payment of rent in arrears. Total property damage payments during a single enrollment in the RRH program may not exceed an amount equal to one month of the participant household's rent.
  - **Supportive services:** Case management, child care, education services, employment assistance and job training, food, housing search and counseling services, including mediation, credit repair, and payment of rental application fee, legal services, life skills training, mental health services, moving costs, outpatient health services, outreach services, substance abuse treatment services, transportation, utility deposits

#### **Limitations on amount, frequency and duration of assistance**

- In accordance with HUD regulations 24 CFR Part 578, participants may receive eligible supportive services for no longer than 6 months after rental assistance stops.
- Participants may also receive eligible supportive services and/or short-term (up to 3 months) and/or medium-term (for 4 to 24 months) tenant-based rental assistance.
- Participants must be re-evaluated at least every 90 days to determine the need for continued assistance. This requirement applies to both supportive services and rental assistance. Through each re-evaluation the recipient or sub recipient must determine that the continuation of assistance is necessary to avoid literal homelessness.
- Under no circumstances may assistance be provided for more than the maximum period or dollar amount authorized by HUD regulations 24 CFR Part 578. Accordingly, rental assistance shall be calculated using current Fair Market Rent amounts for Scranton/Lackawanna County.
- Participants may be eligible for rapid re-housing assistance for multiple episodes of literal homelessness based on their need. If participants present for RRH assistance after initial assistance has been provided, Coordinated Entry or other designated entity will facilitate a case review to determine how to best assist the participant household to establish housing stability and will consider other methods and resources to stabilize in housing.

#### **Vacancies**

If a unit assisted under this section is vacated before the expiration of the lease, the assistance for the unit may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless occupied by another eligible person. No additional assistance will be paid until the unit is occupied by another eligible person. Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies.

According to the Interim Rule: The recipient or sub recipient must provide leasing assistance funds as set forth in §578.49. Occupancy agreements and subleases are required as specified in § 578.77(a).

### **Coordinated Assessment**

The CoC has chosen to use the No Wrong Door Approach in regards to the Coordinated Assessment System whereby a client could come to any of the CoC's six participating agencies and receive the same needs assessment for the purpose of identifying potential diversion resources and/or the level of housing need for the individual or family. This system eliminates the need for households to go from agency to agency telling the same story, and will lead to the appropriate referral for services or housing program. Please see the CoC document, [Coordinated Assessment Policy and Procedures](#) for more detail.

The CoC shall adopt the provisions and requirements set out in HUD Notice CPD-164-11 for Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless status as the baseline written standards for operations of the CoC Coordinated Assessment System. The CoC shall use the VI-SPDAT and the SPDAT as the standardized assessment tool to verify severity of service needs.

### **Housing First**

Housing First is an approach in which housing is offered to people experiencing homelessness without 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. HUD encourages all recipients of CoC Program-funded PSH to follow a Housing First approach to the maximum extent practicable.

Notice CPD 14-012 states that Projects that claimed to be Housing First in the 2013 NOFA must practice Housing First for both the FY 2013 and FY 2014 operating years. As follows, if a project has identified as practicing housing first for the FY 2015 operating year, it must practice that policy for the FY 2015 operating year and so on.

[Article V: Miscellaneous Policies and Procedures](#)

### **Educational Services for Children**

## **Background**

Federal law ensures educational rights and protections for children and young adults 18 - 24 experiencing homelessness. Protections apply to children and youth who are living with a parent or guardian and those who are not. Every school district and public charter school in CT is required to designate a homeless liaison who is responsible for ensuring the identification, school enrollment and stability, attendance and opportunities for academic success of students in homeless situations using a child centered, best interest framework for decision-making. In addition, HUD establishes requirements for CoCs and project applicants through the annual CoC competition, and the Scranton/Lackawanna County Continuum of Care (SLCCoC) has established related requirements. This document summarizes basic information about the responsibilities of sub CoCs and recipients/sub-recipients of CoC and ESG funds. For more information or to find contact information for the local homeless liaison please visit: <http://youthhelp.org>

Information is also available at the National Center for Homeless Education: <http://center.serve.org/nche/briefs.php>

### **Responsibility of CoC**

SLCCoC is responsible for coordinating with local school districts, charter schools, and Early Education providers in the following ways:

- Helping to identify children and young adults who are eligible for educational services. If a child or young adult does not have a fixed, regular, and adequate place to sleep at night, he or she is eligible. This includes those living in places not meant for human habitation, emergency shelters, transitional housing, motels/hotels, campgrounds, in doubled-up situations, or in housing that lacks utilities, is infested or has other dangerous conditions.
- Helping to ensure that all families with children and young adults who qualify are informed about their educational rights and their eligibility for educational services and they receive those services.
- Attending relevant meetings and planning events held by local school districts.
- Ensuring that the local school districts' homeless liaisons are aware of the Coordinated Entry process for connecting homeless families and young adults to ESG & CoC resources and helping to resolve any issues that might arise in linking eligible households to those resources.
- Helping to ensure that when placing families in emergency, transitional or permanent housing, consideration is given to the educational needs of children, including placing children as close as possible to schools of origin and early childhood education programs.

### **Responsibilities of Recipients/Sub-Recipients and Sample Policy**

Recipients and sub-recipients of CoC and ESG funds serving families with children and/or young adults 18-24 are responsible for the things outlined in the sample policy below, which is intended to help providers comply with requirements established under federal law, by HUD through the annual CoC project application, and by SLCCoC. All projects receiving CoC funds that are serving families with children and/or young adults 18-24 are required to have similar policies. Projects may opt to adapt this sample policy or to adopt a different policy that fulfills the requirements.

**Purpose:** To ensure that participants in Scranton/Lackawanna County Continuum of Care are helped to understand their educational rights established under Subtitle VII-B of the McKinney-Vento Homeless Assistance Act and most recently reauthorized by the Every Student Succeeds Act; To ensure that children and young adults are immediately enrolled in school, as required by federal and State law, & to ensure that they are connected to transportation and educational services to help them succeed in school.

**Policy:**

1. All housing, whether temporary or permanent, provided by the CoC project shall be located in neighborhoods that are accessible to community resources and services, including schools, libraries, and other educational services.
2. The Program Director and/or his/her designee is responsible for:
  - a. Ensuring that all families with children and young adults participating in this project are informed about their educational rights and their eligibility for educational services at intake and as necessary thereafter.
  - b. Ensuring that no matter where they live, how long they have lived there, or how long they plan to stay, all children and young adults participating in the project are enrolled in school immediately, even if they lack the paperwork normally required (e.g., school records, records of immunization, and other required health records, proof of residency, guardianship, and other documents), are unable to pay fines or fees, or have missed application or enrollment deadlines. Students have the right to enroll in school and attend classes while the school gathers needed documents. Enrollment shall occur as quickly as possible and within no more than 48 hours of project entry. Children and young adults who are not required by State law to enroll in school shall be encouraged and assisted but not required to enroll. Families shall be encouraged and assisted to enroll children in early childhood education programs. Enrollment includes attending classes and participating fully in school activities and applies to youth without a parent or guardian.
3. Assist unaccompanied youth to choose and enroll in a school, giving priority to his/her wishes and assisting to exercise his/her right to appeal.
4. Advocating as necessary to ensure that homeless students are able to continue to attend their school of origin (i.e., where they went before becoming homeless or the school in which they were last enrolled) the entire time they are homeless and until the end of the academic year during which they find permanent housing. This includes pre-schools and the designated receiving school at the next grade level when a student completes the final grade level served by the school of origin. Remaining in the school of origin should be presumed to be in the best

interest of the student unless contrary to the request of the parent, guardian or unaccompanied youth.

5. Assisting, as necessary, to ensure that the parent, guardian, or unaccompanied youth is provided with the required written explanation of decisions made by school districts/charter schools and how to appeal them and that they are referred to the local school district's homeless liaison who must carry out the dispute resolution process as expeditiously as possible. f. Assisting, as necessary, to appeal any decision by the local school district or charter school that it is not in the student's best interest to attend the school of origin or the school where they currently live if requested by the parent, guardian or unaccompanied youth.

6. Advocating, as necessary, to ensure that if a dispute arises over eligibility, school selection, or enrollment, the student is immediately enrolled in the school in which enrollment is sought, pending resolution of all available appeals.

7. Advocating, as necessary, to secure the transportation services to which students are entitled (i.e., to and from the school or preschool of origin, including until the end of the year when the student obtains permanent housing).

8. Assisting, as necessary, to secure temporary transportation services through other means, if possible, when school districts/charter schools are unable to immediately provide such required services.

9. Advocating on behalf of homeless students as necessary to ensure that they receive the services for which they are eligible according to their needs and comparable to those provided to other students, including assistance from the local school district's homeless liaison, Early Intervention Program for Infants and Toddlers with Disabilities, Head Start, other preschool programs, services for disabled students, free school meals, services for English language learners, gifted and talented services, before and after school care, career and technical education, summer learning, online learning, and referrals to health, mental health, dental and other services.

10. Advocating as necessary to ensure that homeless students who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet and charter schools, summer school, career and technical education, advanced placement, online learning, and athletic programs.

11. Advocating, as necessary, to ensure that students receive appropriate full or partial credit for coursework, including consulting with the prior school about partial coursework completed, evaluating students' mastery of partly completed courses, and offering credit recovery.

12. Advocating as necessary to ensure that all homeless youth receive information and individualized counseling regarding college readiness, college selection, the application process, financial aid, and the availability of on-campus supports; and that unaccompanied homeless youths are informed of their status as independent students for the purposes of Federal financial aid for postsecondary education and assisted in receiving verification of such status.

13. Advocating as necessary to ensure that records, including information about a student's living situation, are kept private.
14. Helping homeless students to succeed in school and to get help from the local homeless education liaison, as necessary.
15. Developing relationships with colleges to access higher education services specifically for homeless young adults.
16. Designating a staff person who is responsible for:
  - § Helping participants to understand their educational rights
  - § Ensuring that children and young adults are enrolled in school and early childhood education
  - § Ensuring that students get access to all services, programs, and extracurricular activities for which they are eligible
  - § Ensuring that children and young adults receive the transportation services to which they are entitled

These need not be the only responsibilities of the designated staff person.

16. Ensuring that the designated staff person is involved in the development of participants' service plans where there are extensive or significant unmet educational needs.
17. Ensuring that no policies, procedures, or practices that are inconsistent or interfere with the educational rights established under federal law are adopted by the project.

### **Non-Discrimination Policy**

CoC programs do not discriminate based on race, color, religion, national origin, ancestry or place of birth, sex, gender identity, sexual orientation, disability, marital status or age. CoC and ESG programs will grant equal access to programs or facilities consistent with gender identity, and provide families with equal access.

### **Preventing Family Separation**

Families experiencing homelessness should not be separated when receiving services unless the health and well-being of children are at immediate risk. The age and gender of a child under the age of 18 shall not be used as a basis for denying a family's admission to any housing services. In addition, a broad definition of family must be used that allows for single parent households of any gender identity, two parent households including same sex parents and LGBT parents, and extended families to be served together with their children.

### **Persons with Limited English Proficiency**

The CoC and partner agencies will take reasonable steps to ensure meaningful access to their programs and activities for persons who are limited in their English proficiency, regardless of national origin. Such steps may include translating marketing materials and documents essential to providing services into languages prevalent in the community, as well as providing language assistance while providing services, including oral and written translation where appropriate.