



# HUMBOLDT HOUSING & HOMELESSNESS COALITION

## HUMBOLDT COUNTY CONTINUUM OF CARE

CONTINUUM OF CARE WRITTEN STANDARDS OF SERVICE

February 8, 2023

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The following standards will govern the CoC- and ESG- funded projects in the Humboldt County Continuum of Care. Each program may focus or operate a little differently; however, they will align with these overall standards.

## PURPOSE

The HEARTH Act requires the Humboldt County Continuum of Care to have written policies and procedures that govern the provision of assistance to individuals and families. These policies and procedures provide guidance to local providers in administering CoC-funded assistance in the following areas:

- Policies and procedures for evaluating individuals’ and families’ eligibility for assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;
- Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance;

The policies and procedures are not intended to be in lieu of or in place of the Interim Regulations for the HEARTH Act, but are intended to clarify local decisions regarding program administration. All HUD funded providers must follow the Interim Regulations in its entirety.

## PARTICIPANT ELIGIBILITY AND DOCUMENTATION STANDARDS

The Humboldt County Continuum of Care funds or will fund in 2021 the following program types: Permanent Supportive Housing, Planning, Rapid Rehousing, and Coordinated Entry. As set forth in the HEARTH Act, there are four categories of participant eligibility: 1) Literally Homeless, 2) Imminent Risk of Homelessness, 3) Homeless Under Other Federal Statutes, and (4) Fleeing/Attempting to Flee Domestic Violence. The Humboldt County Continuum of Care elects to serve categories 1, 2, and 4 due to the shortage of resources for those priority populations and excessive demand.

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

### 1. LITERALLY HOMELESS

Eligibility should be documented in the following manner (in order of preference):

- a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
- b. Written observation by an outreach worker; or
- c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;

If the provider is using anything other than a Third-Party Verification, the case file must include documentation of due diligence to obtain third party verification.

### 2. IMMINENT RISK OF HOMELESSNESS

Eligibility should be documented in the following manner (in order of preference):

- a. A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; or

- b. For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
- c. A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; and
- d. Certification that no subsequent residence has been identified; and
- e. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

**3. HOMELESS UNDER OTHER FEDERAL STATUTE (NOT APPLICABLE IN THE HUMBOLDT COUNTY CONTINUUM OF CARE)**

**4. FLEEING/ATTEMPTING TO FLEE DV**

Eligibility should be documented in the following manner (in order of preference):

**For victim service providers:**

- a. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

**For non-victim service providers:**

- a. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
- b. Certification by the individual or head of household that no subsequent residence has been identified; and
- c. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

As defined in the HEARTH Act, eligibility for Permanent Supportive Housing is limited to categories 1 and 4. Participants must also meet the HUD definition of chronically homeless found at 24 CFR 91.5. All applicable HUD recordkeeping requirements relating to documentation of eligibility must be satisfied within 60 days of intake.

**PRIORITIZATION AND TARGETING**

The Humboldt County Continuum of Care prioritizes individuals and families experiencing homelessness for permanent housing assistance and has committed to adopting a Housing First approach in CoC/ESG programs.

The Humboldt County CoC established the Coordinated Entry System in August 2016, which prioritizes individuals and families with the most severe service needs for all available permanent supportive housing and rapid rehousing.

**Reporting Vacancies/Availability/Turnover:** Permanent Supportive Housing and Rapid Rehousing providers participating in the Coordinated Entry system are required to alert the Coordinated Entry Coordinator of any new or pending vacancies (e.g., due to turnover or a new program coming online) as soon as possible, but no later than seven days following a vacancy.

**Housing Placement Case Conference:** The Coordinated Entry Coordinator will run updated Community Queue lists from HMIS monthly. Different lists will be generated as needed to account for different eligibility

requirements for various Permanent Housing vacancies. For example, some projects only serve people with serious mental illness, HIV/AIDS. Clients at the top of the list will be selected for a Housing Placement Case Conference among all provider agencies included in the HMIS Release of Information who have served those clients. The Housing Placement Case Conference will select clients for housing placement by using all available information to prioritize those with the most severe service needs and greatest barriers to housing for placements. The committee may consider any combination of the following factors:

- a. significant challenges or functional impairments, including any physical, mental, developmental, or behavioral health disabilities regardless of the type of disability, which require a significant level of support in order to maintain permanent housing (this factor focuses on the level of support needed and is not based on disability type);
- b. high utilization of crisis or emergency services to meet basic needs, including but not limited to emergency rooms, jails, and psychiatric facilities;
- c. the extent to which people, especially youth and children, are unsheltered;
- d. vulnerability to illness or death;
- e. risk of continued homelessness;
- f. vulnerability to victimization, including physical assault, trafficking, or sex work; or
- g. other factors determined by the committee that are based on severity of needs.

The Housing Placement Case Conference will also be the venue to discuss transfers of clients between different Permanent Housing programs.

**Client Choice:** The Housing Placement Case Conference will take clients' known preferences into account when generating referrals. Should a prospective tenant choose to reject a particular housing placement, case managers will attempt to determine the reason for the clients' refusal to accept the offered housing and to communicate this reason to the Coordinated Entry Coordinator.

## HUD NOTICE CPD-16-11

The Humboldt County CoC has adopted the order of priority described in Notice CPD-16-11.

### ORDER OF PRIORITY IN COC AND ESG PROGRAM-FUNDED PERMANENT SUPPORTIVE HOUSING, RAPID REHOUSING, AND THE EMERGENCY HOUSING VOUCHER PROGRAM

#### **FIRST PRIORITY: CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES WITH THE LONGEST HISTORY OF HOMELESSNESS AND WITH THE MOST SEVERE SERVICE NEEDS AND RECENTLY HOMELESS HOUSEHOLDS AS DEFINED**

All individuals and households that meet the HUD definition of chronic homelessness are deemed to be among those households with the longest histories of homelessness.

Individuals and families with the most severe service needs are those for whom at least one of the following is true:

1. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or
2. Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
3. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.

Severe service needs are identified through the use of the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT). The individual or head of household must score an eight or higher on the VI-SPDAT in order to meet criteria for the first priority group.

The HHHC and the Housing Authority of the County of Humboldt have agreed to set aside 87 Emergency Housing Vouchers for people that meet the criteria above. The Housing Placement Case Conference committee shall refer persons meeting the first order of priority to the Housing Authority of the County of Humboldt for potential enrollment in the Emergency Housing Voucher Program using the criteria set forth in these standards. The Housing Authority shall inform the Coordinated Entry System when it is ready to accept a referral or referrals from this group.

The HHHC and the Housing Authority of the County of Humboldt have also agreed to set aside 87 vouchers for people that meet all of the following criteria:

- A. The household must have previously been classified by a CoC member agency as meeting the literally homeless criteria above;
- B. The household is not currently homeless because a CoC member agency provided homeless assistance (financial assistance or services), temporary rental assistance or some type of other assistance;
- C. The household could utilize an Emergency Housing Voucher without needing to move; and
- D. The CoC member agency certifies that the loss of such assistance would result in a return to homelessness or the family having a high risk of housing instability.

Households that meet these criteria will be referred to the Housing Authority based on income, with the lowest income households being referred first. Household income shall be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). In the event of a tie, the household that has been receiving rental assistance for the longest time will be referred first. The Housing Authority shall inform the Coordinated Entry System when it is ready to accept a referral or referrals from this group.

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**SECOND PRIORITY: CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES WITH THE LONGEST HISTORY OF HOMELESSNESS.**

A chronically homeless individual or head of household, as defined in 24 CFR 578.3, for which both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,
2. The CoC or CoC program recipient has not identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

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**ORDER OF PRIORITY IN PERMANENT SUPPORTIVE HOUSING BEDS NOT DEDICATED OR PRIORITIZED FOR PERSONS EXPERIENCING CHRONIC HOMELESSNESS**

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**FIRST PRIORITY: HOMELESS INDIVIDUALS AND FAMILIES WITH A DISABILITY WITH THE MOST SEVERE SERVICE NEEDS.**

An individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter for any period of time, including persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution and has been identified as having the most severe service needs.

**SECOND PRIORITY: HOMELESS INDIVIDUALS AND FAMILIES WITH A DISABILITY WITH A LONG PERIOD OF CONTINUOUS OR EPISODIC HOMELESSNESS.**

An individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 6 months or on at least three separate occasions in the last 3 years where the cumulative total is at least 6 months. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution and had been living or residing in one of those locations for at least 6 months or on at least three separate occasions in the last 3 years where the cumulative total is at least 6 months.

**THIRD PRIORITY: HOMELESS INDIVIDUALS AND FAMILIES WITH DISABILITY COMING FROM PLACES NOT MEANT FOR HUMAN HABITATION, SAFE HAVENS, OR EMERGENCY SHELTERS.**

An individual or family that is eligible for CoC Program-funded PSH who has been living in a place not meant for human habitation, a safe haven, or an emergency shelter. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution.

**FOURTH PRIORITY: HOMELESS INDIVIDUALS AND FAMILIES WITH A DISABILITY COMING FROM TRANSITIONAL HOUSING.**

An individual or family that is eligible for CoC Program-funded PSH who is coming from transitional housing, where prior to residing in the transitional housing lived on streets or in an emergency shelter, or safe haven. This priority also includes homeless individuals and homeless households with children with a qualifying disability who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and are living in transitional housing—all are eligible for PSH even if they did not live on the streets, emergency shelters, or safe havens prior to entry in the transitional housing.

**STANDARDS FOR ADMINISTERING ASSISTANCE**

**PERMANENT SUPPORTIVE HOUSING**

1. Permanent Supportive Housing is community-based housing without a designated length of stay.
2. All CoC funded PSH programs must enter into a lease agreement with tenants that must be at least one year in duration and renewable. The lease agreement must observe Fair Housing regulations.
3. Participants in PSH rental assistance programs are expected to pay the higher of 30% of their income (monthly, adjusted) or 10% of their gross monthly income toward rent (including utilities). If the participant has zero income, the participants are not required to pay rent, but their supportive services partner is expected to work with them to secure income (either earned or unearned) as soon as possible. In no circumstance can a tenant be charged an amount above the rent calculation standard established by HUD.
4. Participants must meet with a case manager once per month and be reevaluated once per year.
5. Participants in leasing programs may be charged an occupancy charge up to 30% of the monthly adjusted income; 10% of the family's gross income; or the portion of the family's welfare assistance.
6. CoC-funded PSH projects are strongly encouraged to prioritize or dedicate beds to chronically homeless individuals and families, including chronically homeless youth and domestic violence survivors.

## RAPID REHOUSING

1. Rapid rehousing is designed to allow individuals and families receiving assistance to remain stably housed after the conclusion of such assistance.
2. Rental subsidies provided are based on client income. Initial assistance can be as much as 100% of rent depending on client income. Client will pay a percentage of their income in rent based on the program's assessment of the client's financial and family situation.
3. Rental assistance would decline in steps based upon a fixed timeline at the program's discretion based upon the client's financial and family situation.
4. The goal is for households to "graduate" from the program once they no longer meet the eligibility requirements of the program's funding source and/or a Case Manager determines assistance can be terminated, whichever comes first. If the household does not attain any of these goals, assistance ends at 24 months (or earlier time as set by the program).
5. An assessment tool is used regularly to determine the need for ongoing assistance
6. Move In Assistance will be targeted to households who are assessed as able to maintain their unit after the assistance. The amount of move-in assistance is determined by the program, within the limits set by the program's funding source. Move In Assistance may be provided as one time assistance or in tandem with Rental Assistance/Rental Subsidies.
7. In order to qualify for rapid rehousing, households must fall within the target population as well as satisfy the following criteria:
  - a. Meet the current HUD definition of literally homeless for Rapid Re-housing services
  - b. Be the highest priority household available
  - c. Other eligibility criteria created at the program level
8. All housing supported by rapid rehousing resources must meet all HUD requirements, including but not limited to, Housing Quality Standards, rent reasonableness standards, FMR (as relevant), environmental review, and others.
9. Case Managers will provide intensive case management services in order to assist households to successfully retain housing and move off the subsidy and into self-sufficiency. Services will be provided at the program offices and Case Managers will conduct home visits when appropriate.
10. During the clients' participation in the program, clients must meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. The project is exempt from this requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits the recipient operating the project from making its housing conditional upon the participant's acceptance of services.
11. All clients may receive follow-up services for up to 6 months to ensure housing stability and assess the effectiveness of RRH programs.

## TRANSITIONAL HOUSING

1. Transitional Housing facilitates the movement of homeless individuals and families to PH within 24 months of entering TH.
2. All CoC funded TH programs must enter into a lease or occupancy agreement with tenants that must be at least one month in duration. The lease agreement must observe Fair Housing regulations.
3. Participants in TH rental assistance programs are expected to pay the higher of 30% of their income (monthly, adjusted) or 10% of monthly gross income toward rent (including utilities). If the participant has zero income, the participants are not required to pay rent, but their supportive services partner is expected to work with them to secure income (either earned or unearned) as soon as possible. In no circumstance

can a tenant be charged an amount above the Rent Reasonableness standard established by HUD. Rents collected from residents of TH may be reserved in whole or part to assist the residents from they are collected to move to PH.

4. Participants in leasing programs may be charged an occupancy charge up to 30% of the monthly adjusted income; 10% of the family's gross income; or the portion of the family's welfare assistance.

## POLICIES AND PROCEDURES

The Continuum of Care (CoC) Interim Rule requires that each CoC have certain policies in writing and approved by the CoC. While the CoC has a number of policies and practices that comply with HUD requirements, important requirements include:

1. Grant Performance Monitoring
2. Education Policies
3. Family Admission/Separation Policies
4. Domestic Violence Policies

## GRANT PERFORMANCE MONITORING

The Humboldt County CoC is responsible for monitoring projects that receive Continuum of Care (CoC) and Emergency Solutions Grant (ESG) funds to ensure that the projects are performing adequately, operated effectively, managed efficiently, and in compliance with HUD requirements.

The Executive Committee acting in its capacity as the CoC Board will be responsible for monitoring CoC and ESG project performance through designated CoC staff and subcommittees. It will do so in coordination with the projects that are awarded those funds.

**QUARTERLY:** The designated body will review program and community-level performance using CoC-developed performance benchmarks. This body will also identify any underperforming, taking into account reduced outcomes due to high-needs populations. To the extent that technical assistance and training is needed, the committee will provide recommendations to the CoC Board. Underperforming projects may be selected for more intensive, on-site monitoring. This may include site visits, client feedback, and/or grant records. Ongoing poor performers may be selected for targeted technical assistance or other response.

**ANNUALLY:** In addition to the quarterly reports, the CoC Board or designated monitoring body may include a review of the HUD Consolidated Annual Performance and Evaluation Report (CAPER) as well as other local sources to ensure compliance with HUD requirements.

## EDUCATION POLICIES

Consistent with the CoC Program Interim Rule 24 CFR §578.23, all CoC and ESG programs assisting families with children or unaccompanied youth must:

1. Take the educational needs of children into account when placing families in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education
2. Inform families with children and unaccompanied youth of their educational rights, including providing written materials, help with enrollment, and linkage to McKinney Vento Liaisons as part of intake procedures.
3. Not require children and unaccompanied youth to enroll in a new school as a condition of receiving

services.

4. Allow parents or the youth (if unaccompanied) to make decisions about school placement.
5. Not require children and unaccompanied youth to attend after-school or educational programs that would replace/interfere with regular day school or prohibit them from staying enrolled in their original school.
6. Post notices of student's rights at each program site that serves homeless children and families in appropriate languages.
7. Designate staff that will be responsible for:
  - a. ensuring that homeless children and youth in their programs are in school and are receiving all educational services they are entitled to.
  - b. coordinating with the CoC, the Department of Social Services, the County Office of Education, the McKinney Vento Coordinator, the McKinney Vento Educational Liaisons, and other mainstream providers as needed.

In order to ensure compliance and to assist providers in meeting these requirements, the CoC will provide training on these issues annually and will include these in the funding competition review and ranking process.

## FAMILY ADMISSION/SEPARATION POLICIES

Consistent with the CoC Program Interim Rule §578.93, neither CoC nor ESG program-funded projects may involuntarily separate families: The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives CoC or ESG funds. The gender and marital status of a parent or parents may also not be used as a basis for denying any family's admission to a project that receives CoC or ESG funds.

The CoC will work closely with providers to ensure that placement efforts are coordinated to avoid involuntary family separation, including referring clients for the most appropriate services and housing to match their needs.

Any client that believes that they or a family member has experienced involuntary separation may report the issue to the CoC. The CoC will investigate the claim and take appropriate remedial action.

## DOMESTIC VIOLENCE/PRIVACY POLICIES

All efforts shall be made to protect the privacy and safety of domestic violence survivors and to uphold client choice by presenting a range of housing and service options. The following procedures are in place to do that.

### PRIVACY AND SAFETY

Programs which are primarily for survivors of violence are prohibited from contributing client-level data into the HMIS. However, these programs must record client-level data within a comparable internal database and be able to generate aggregate data for inclusion in reports.

Non-victim service providers shall protect the privacy of individuals and families who are fleeing, or attempting to flee violence, by not including intake/treatment data in HMIS.

The location of Domestic Violence shelters/programs shall not be made public.

Staff responsible for coordinated intake/assessment shall receive training on protecting the safety and privacy of individuals who are fleeing, or attempting to flee violence.

For each program participant who moved to a different Continuum of Care due to imminent threat of further violence under § 578.51(c)(3), the CoC program must retain:

1. **DOCUMENTATION OF THE ORIGINAL INCIDENCE OF VIOLENCE.** This may be written observation of the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; medical or dental records; court records or law enforcement records; or written certification by the program participant to whom the violence occurred or by the head of household.
2. **DOCUMENTATION OF THE REASONABLE BELIEF OF IMMINENT THREAT OF FURTHER VIOLENCE, WHICH WOULD INCLUDE THREATS FROM A THIRD-PARTY, SUCH AS A FRIEND OR FAMILY MEMBER OF THE PERPETRATOR OF THE VIOLENCE.** This may be written observation by the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; current restraining order; recent court order or other court records; law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts; or a written certification by the program participant to whom the violence occurred or the head of household.

**Emergency Transfer Priority.** An Emergency Transfer Plan provides for emergency transfers for survivors of domestic violence receiving rental assistance or residing in units subsidized under a covered housing program (including CoC- and ESG- funded programs). Per the Violence Against Women Act and the Humboldt County CoC’s Written Standards of Service, any consumer who is a survivor of domestic violence, dating violence, sexual assault, or stalking who expressly requests an emergency transfer and a) against whom a sexual assault occurred on the premises of his or her HUD-funded housing program during the 90-day calendar period preceding the date of the request for transfer; or b) who reasonably believes that he or she is imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking if they remain in their HUD-funded dwelling unit, qualifies for Emergency Transfer priority. For more information, see the Humboldt County CoC Emergency Transfer Plan listed as Attachment B to these Policies & Procedures.

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## CERTIFICATION OF HOMELESSNESS

### FOR VICTIM SERVICE PROVIDERS

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

### FOR NON-VICTIM SERVICE PROVIDERS

1. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
2. Certification by the individual or head of household that no subsequent residence has been identified; and
3. Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

## EXPANDING THE WRITTEN STANDARDS

In the future the CoC will likely wish to further expand and refine the written standards to cover:

1. Prioritization for other housing types (e.g. prevention)
2. Additional housing requirement options
3. Additional options for service requirements

In addition, the written standards may include:

1. Reasonable accommodation processes
2. Other policies and procedures