

## Before Starting the CoC Application

The CoC Consolidated Application is made up of two parts: the CoC Application and the CoC Priority Listing, with all of the CoC's project applications either approved and ranked, or rejected. The Collaborative Applicant is responsible for submitting both the CoC Application and the CoC Priority Listing in order for the CoC Consolidated Application to be considered complete.

The Collaborative Applicant is responsible for:

- Reviewing the FY 2015 CoC Program Competition NOFA in its entirety for specific application and program requirements.
- Using the CoC Application Detailed Instructions for assistance with completing the application in e-snaps.
- Answering all questions in the CoC Application. It is the responsibility of the Collaborative Applicant to ensure that all imported and new responses in all parts of the application are fully reviewed and completed. When doing so, please keep in mind that:
  - This year, CoCs will see that a few responses have been imported from the FY 2013/FY 2014 CoC Application. Due to significant changes to the CoC Application questions, most of the responses from the FY 2013/FY 2014 CoC Application could not be imported.
    - For some questions, HUD has provided documents to assist Collaborative Applicants in filling out responses.
    - For other questions, the Collaborative Applicant must be aware of responses provided by project applicants in their Project Applications.
  - Some questions require that the Collaborative Applicant attach a document to receive credit. This will be identified in the question.
  - All questions marked with an asterisk (\*) are mandatory and must be completed in order to submit the CoC Application.

For Detailed Instructions click [here](#).

## 1A. Continuum of Care (CoC) Identification

### **Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**1A-1. CoC Name and Number:** NE-500 - Nebraska Balance of State CoC

**1A-2. Collaborative Applicant Name:** State of Nebraska

**1A-3. CoC Designation:** CA

**1A-4. HMIS Lead:** Center on Children, Families and the Law

## 1B. Continuum of Care (CoC) Engagement

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**1B-1. From the list below, select those organizations and persons that participate in CoC meetings. Then select "Yes" or "No" to indicate if CoC meeting participants are voting members or if they sit on the CoC Board. Only select "Not Applicable" if the organization or person does not exist in the CoC's geographic area.**

Organization/Person Categories	Participates in CoC Meetings	Votes, including electing CoC Board	Sits on CoC Board
Local Government Staff/Officials	Yes	Yes	Yes
CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes	Yes
Law Enforcement	Yes	Yes	Yes
Local Jail(s)	No	No	No
Hospital(s)	No	No	No
EMT/Crisis Response Team(s)	No	No	No
Mental Health Service Organizations	Yes	Yes	Yes
Substance Abuse Service Organizations	Yes	Yes	Yes
Affordable Housing Developer(s)	No	No	No
Public Housing Authorities	Yes	Yes	No
CoC Funded Youth Homeless Organizations	Yes	Yes	Yes
Non-CoC Funded Youth Homeless Organizations	Yes	Yes	Yes
School Administrators/Homeless Liaisons	Yes	No	No
CoC Funded Victim Service Providers	Yes	Yes	Yes
Non-CoC Funded Victim Service Providers	Yes	Yes	Yes
Street Outreach Team(s)	No	No	No
Youth advocates	Yes	Yes	Yes
Agencies that serve survivors of human trafficking	Yes	Yes	Yes
Other homeless subpopulation advocates	No	No	No
Homeless or Formerly Homeless Persons	Yes	Yes	Yes

**1B-1a. Describe in detail how the CoC solicits and considers the full range of opinions from individuals or organizations with knowledge of homelessness in the geographic area or an interest in preventing and ending homelessness in the geographic area. Please provide two examples of organizations or individuals from the list in 1B-1 to answer this question. (limit 1000 characters)**

The CoC has two primary methods used to solicit opinions regarding preventing and ending homelessness: through regular meetings of the CoC and through a task force that meets regularly to plan and align CoC strategies with the Federal Strategic Plan. For example the Ten Year Plan Strategic Planning committee includes affordable housing developers with experience developing tax credit housing. They are able to provide input on how to coordinate project based development with CoC resources. The lead from the State in the federal PATH funding participates in CoC meetings and ensures coordination between these services and CoC funded outreach and engagement.

**1B-1b. List Runaway and Homeless Youth (RHY)-funded and other youth homeless assistance providers (CoC Program and non-CoC Program funded) who operate within the CoC's geographic area. Then select "Yes" or "No" to indicate if each provider is a voting member or sits on the CoC Board.**

Youth Service Provider (up to 10)	RHY Funded?	Participated as a Voting Member in at least two CoC Meetings within the last 12 months (between October 1, 2014 and November 15, 2015).	Sat on the CoC Board as active member or official at any point during the last 12 months (between October 1, 2014 and November 15, 2015).
Care Corps	No	Yes	Yes
Community Action Partnership of Western Nebraska	Yes	Yes	Yes
Cirrus House	No	Yes	Yes
RAFT	No	Yes	Yes
Boys and Girls Home of Grand Island	No	Yes	No
Maryland Living Center	No	Yes	Yes

**1B-1c. List the victim service providers (CoC Program and non-CoC Program funded) who operate within the CoC's geographic area. Then select "Yes" or "No" to indicate if each provider is a voting member or sits on the CoC Board.**

Victim Service Provider for Survivors of Domestic Violence (up to 10)	Participated as a Voting Member in at least two CoC Meetings within the last 12 months (between October 1, 2014 and November 15, 2015).	Sat on CoC Board as active member or official at any point during the last 12 months (between October 1, 2014 and November 15, 2015).
DOVES Program	Yes	Yes
Hope Harbor	Yes	Yes
SAFE Center	Yes	Yes
Crisis Center	Yes	Yes
Healing Hearts and Families	Yes	Yes
Center for Survivors	Yes	No
Bright Horizons	Yes	No
Hope Crisis Center	Yes	Yes
SASA	Yes	Yes

**1B-2. Does the CoC intend to meet the timelines for ending homelessness as defined in Opening Doors?**

Opening Doors Goal	CoC has established timeline?
End Veteran Homelessness by 2015	Yes
End Chronic Homelessness by 2017	Yes
End Family and Youth Homelessness by 2020	Yes
Set a Path to End All Homelessness by 2020	Yes

**1B-3. How does the CoC identify and assign the individuals, committees, or organizations responsible for overseeing implementation of specific strategies to prevent and end homelessness in order to meet the goals of Opening Doors? (limit 1000 characters)**

The Balance of State CoC coordinates with the other two CoCs in Nebraska on a statewide Opening Doors plan. Participation in the statewide planning initiative was encouraged for all CoC members. The goal has been to assure that an appropriate cross section of organizations including homeless services providers, applicable state and local agencies, private sector, and formerly homeless are all participating. In addition to homeless assistance providers, the Opening Doors initiative engaged in outreach to affordable housing developers, a wide spectrum of state and local agencies and other stakeholders. The New Project/Renewal Evaluation committee has the responsibility for ensuring that the goals of Opening Doors are addressed by new projects seeking funding. The HMIS committee tracks outcomes and uses that to provide information to the CoC on progress in achieving the goals of Opening Doors.

**1B-4. Explain how the CoC is open to proposals from entities that have not previously received funds in prior CoC Program competitions, even if the CoC is not applying for any new projects in 2015. (limit 1000 characters)**

The Balance of State CoC is a unique structure representing all of rural Nebraska. Because of the vast size of the area covered, the CoC works in close cooperation with five regional CoCs. These regional CoCs elect the BoS Board and hold regular monthly or bi-monthly meetings in addition to the monthly Board meetings. The regional CoCs solicit participation by new organizations and the BoS CoC provides technical assistance to new applicants in meeting application and program requirements. The CoC announces the availability of funding to the regional CoCs which publicize the funding in announcements, newsletters, and community bulletins. Whether a new project will be funded depends on the experience and capacity of the applicant, the extent to which the project addresses key unmet needs in the CoC, and the extent to which the project follows a Housing First/low barriers approach and whether the project addresses a high priority underserved population.

**1B-5. How often does the CoC invite new members to join the CoC through a publicly available invitation?** Annually

## 1C. Continuum of Care (CoC) Coordination

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**1C-1. Does the CoC coordinate with other Federal, State, local, private and other entities serving homeless individuals and families and those at risk of homelessness in the planning, operation and funding of projects? Only select "Not Applicable" if the funding source does not exist within the CoC's geographic area.**

Funding or Program Source	Coordinates with Planning, Operation and Funding of Projects
Housing Opportunities for Persons with AIDS (HOPWA)	Yes
Temporary Assistance for Needy Families (TANF)	Yes
Runaway and Homeless Youth (RHY)	Yes
HeadStart Program	Yes
Other housing and service programs funded through Federal, State and local government resources.	Yes

**1C-2. The McKinney-Vento Act, as amended, requires CoCs to participate in the Consolidated Plan(s) (Con Plan(s)) for the geographic area served by the CoC. The CoC Program interim rule at 24 CFR 578.7(c)(4) requires that the CoC provide information required to complete the Con Plan(s) within the CoC's geographic area, and 24 CFR 91.100(a)(2)(i) and 24 CFR 91.110(b)(1) requires that the State and local Con Plan jurisdiction(s) consult with the CoC. The following chart asks for information about CoC and Con Plan jurisdiction coordination, as well as CoC and ESG recipient coordination.**

CoCs can use the CoCs and Consolidated Plan Jurisdiction Crosswalk to assist in answering this question.

	Number	Percentage
Number of Con Plan jurisdictions with whom the CoC geography overlaps	1	
How many Con Plan jurisdictions did the CoC participate with in their Con Plan development process?	1	100.00 %
How many Con Plan jurisdictions did the CoC provide with Con Plan jurisdiction level PIT data?	1	100.00 %
How many of the Con Plan jurisdictions are also ESG recipients?	1	
How many ESG recipients did the CoC participate with to make ESG funding decisions?	1	100.00 %

How many ESG recipients did the CoC consult with in the development of ESG performance standards and evaluation process for ESG funded activities?	1	100.00 %
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**1C-2a. Based on the responses selected in 1C-2, describe in greater detail how the CoC participates with the Consolidated Plan jurisdiction(s) located in the CoC's geographic area and include the frequency, extent, and type of interactions between the CoC and the Consolidated Plan jurisdiction(s). (limit 1000 characters)**

The Balance of State CoC participates in the State of Nebraska Consolidated Plan. The Plan is developed by the Department of Economic Development - a lead agency in developing Opening Doors Nebraska. Data from the PIT count, the AHAR, and the HIC are shared with DED. The lead agency for the CoC is the State Dept of Health and Human Services which provides data and input to the development of the annual action plan and 5 year plan updates. In addition to contributing data to the annual plan, DED participation in quarterly Opening Doors meetings allows involvement in assessing and planning strategies to prevent/end homelessness. The CoC and DED coordinate at least quarterly on CON Plan issues. This coordination occurs through planning meetings, phone calls and emails and consumes about 6 hours/quarter.

**1C-2b. Based on the responses selected in 1C-2, describe how the CoC is working with ESG recipients to determine local ESG funding decisions and how the CoC assists in the development of performance standards and evaluation of outcomes for ESG-funded activities. (limit 1000 characters)**

ESG funding comes to the State Department of Health and Human services which combines the ESG with NHAP - Nebraska Homeless Assistance Program - funds. Priorities for ESG and NHAP funds are identified by the balance of state CoC and communicated to DHHS through regular and ongoing consultation. Data shared with ESG/NHAP include HMIS, PIT and subrecipient performance report cards which are issued to all ESG and CoC funded providers twice annually. The CoC establishes the performance standards which are incorporated into the HMIS generated report cards and used by DHHS in evaluating applicants for renewal funding.

**1C-3. Describe the how the CoC coordinates with victim service providers and non-victim service providers (CoC Program funded and non-CoC funded) to ensure that survivors of domestic violence are provided housing and services that provide and maintain safety and security. Responses must address how the service providers ensure and maintain the safety and security of participants and how client choice is upheld. (limit 1000 characters)**

ESG funding is provided to DV agencies to provide housing assistance to those fleeing violence. When a person/family presents at a homeless provider the intake worker will assess the level and nature of the threat to the household's safety. If DV is suspected, case workers ask if there is interest in connecting with a DV agency explaining that they have resources, skills, information, safety procedures, etc. to assist. Safety is of utmost concern. Most of the time the individual or family chooses to call the toll free Crisis line. Homeless service providers are instructed to maintain confidentiality of information of DV survivors. If the family presents at a DV provider, they will be assisted in developing a safety plan and provided the option of receiving housing assistance from the DV provider or a referral to a homeless services provider. ESG funded agencies make certain that no identifying information is entered into HMIS whenever they are serving households fleeing DV.

**1C-4. List each of the Public Housing Agencies (PHAs) within the CoC's geographic area. If there are more than 5 PHAs within the CoC's geographic area, list the 5 largest PHAs. For each PHA, provide the percentage of new admissions that were homeless at the time of admission between October 1, 2014 and March 31, 2015, and indicate whether the PHA has a homeless admissions preference in its Public Housing and/or Housing Choice Voucher (HCV) program. (Full credit consideration may be given for the relevant excerpt from the PHA's administrative planning document(s) clearly showing the PHA's homeless preference, e.g. Administration Plan, Admissions and Continued Occupancy Policy (ACOP), Annual Plan, or 5-Year Plan, as appropriate).**

Public Housing Agency Name	% New Admissions into Public Housing and Housing Choice Voucher Program from 10/1/14 to 3/31/15 who were homeless at entry	PHA has General or Limited Homeless Preference
Burwell Housing Authority		No
Hemingford Housing Authority		No
Humboldt Housing Authority		No
Hall County Housing Authority		No
Housing Partners of Western Nebraska		No

**1C-5. Other than CoC, ESG, Housing Choice Voucher Programs and Public Housing, describe other subsidized or low-income housing opportunities that exist within the CoC that target persons experiencing homelessness. (limit 1000 characters)**

The largest resource is the Nebraska Homeless Assistance Program funded by the State's Homeless Shelter Assistance Trust Fund. This program supports prevention and rapid rehousing and is a key factor in the increase of rapid rehousing beds in the CoC. The Nebraska Investment Finance Authority which operates the LIHTC program prioritizes applications for tax credits that include units serving homeless people. The CoC works with NIFA to prioritize projects for funding that establish preferences for serving homeless people.

**1C-6. Select the specific strategies implemented by the CoC to ensure that homelessness is not criminalized in the CoC's geographic area. Select all that apply. For "Other," you must provide a description (2000 character limit)**

Engaged/educated local policymakers:	<input checked="" type="checkbox"/>
Engaged/educated law enforcement:	<input type="checkbox"/>
Implemented communitywide plans:	<input checked="" type="checkbox"/>
No strategies have been implemented:	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>

## 1D. Continuum of Care (CoC) Discharge Planning

### Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**1D-1. Select the systems of care within the CoC's geographic area for which there is a discharge policy in place that is mandated by the State, the CoC, or another entity for the following institutions? Check all that apply.**

Foster Care:	<input checked="" type="checkbox"/>
Health Care:	<input checked="" type="checkbox"/>
Mental Health Care:	<input checked="" type="checkbox"/>
Correctional Facilities	<input checked="" type="checkbox"/>
None:	<input type="checkbox"/>

**1D-2. Select the systems of care within the CoC's geographic area with which the CoC actively coordinates to ensure that institutionalized persons that have resided in each system of care for longer than 90 days are not discharged into homelessness. Check all that apply.**

Foster Care:	<input checked="" type="checkbox"/>
Health Care:	<input checked="" type="checkbox"/>
Mental Health Care:	<input checked="" type="checkbox"/>
Correctional Facilities:	<input checked="" type="checkbox"/>
None:	<input type="checkbox"/>

**1D-2a. If the applicant did not check all boxes in 1D-2, explain why there is no coordination with the institution(s) and explain how the CoC plans to coordinate with the institution(s) to ensure persons discharged are not discharged into homelessness.  
(limit 1000 characters)**

## 1E. Centralized or Coordinated Assessment (Coordinated Entry)

### Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**CoCs are required by the CoC Program interim rule to establish a Centralized or Coordinated Assessment system – also referred to as Coordinated Entry. Based on the recent Coordinated Entry Policy Brief, HUD’s primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that it be easily accessible regardless of where or how people present for assistance. Most communities lack the resources needed to meet all of the needs of people experiencing homelessness. This combined with the lack of a well-developed coordinated entry processes can result in severe hardships for persons experiencing homelessness who often face long wait times to receive assistance or are screened out of needed assistance. Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. Coordinated entry processes also provide information about service needs and gaps to help communities plan their assistance and identify needed resources.**

**1E-1. Explain how the CoC’s coordinated entry process is designed to identify, engage, and assist homeless individuals and families that will ensure those who request or need assistance are connected to proper housing and services.  
(limit 1000 characters)**

All persons entering homeless assistance services or contacted through outreach are assessed (if willing) using the VISPDAT. Outreach is coordinated with PATH teams and VA SSVF funded outreach. The coordinated entry is in the initial stages of development. All community action agencies, victim services, and homeless services providers in rural Nebraska are advised of the process. Any individual or family with a score of 10 or greater are referred to the Most Vulnerable Referral Team MVRT which consists of all providers of PSH in the CoC as well those who initially engage homeless people. All providers notify the MVRT of any vacancies. The MVRT meets weekly; the list of persons waiting for PSH is prioritized to be sure that the chronic, the most vulnerable, and longest term homeless are prioritized. The MVRT reviews each case and offers available units to individual by priority order. For those not determined to be eligible for PSH other housing type referrals (TH, RRH, OPH) are made.

**1E-2. CoC Program and ESG Program funded projects are required to participate in the coordinated entry process, but there are many other organizations and individuals who may participate but are not required to do so. From the following list, for each type of organization or individual, select all of the applicable checkboxes that indicate how that organization or individual participates in the CoC's coordinated entry process. If the organization or person does not exist in the CoC's geographic area, select "Not Applicable." If there are other organizations or persons that participate not on this list, enter the information, click "Save" at the bottom of the screen, and then select the applicable checkboxes.**

Organization/Person Categories	Participates in Ongoing Planning and Evaluation	Makes Referrals to the Coordinated Entry Process	Receives Referrals from the Coordinated Entry Process	Operates Access Point for Coordinated Entry Process	Participates in Case Conferencing	Not Applicable
Local Government Staff/Officials	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
CDBG/HOME/Entitlement Jurisdiction	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Law Enforcement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Local Jail(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Hospital(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EMT/Crisis Response Team(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Mental Health Service Organizations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Substance Abuse Service Organizations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Affordable Housing Developer(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Public Housing Authorities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-CoC Funded Youth Homeless Organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
School Administrators/Homeless Liaisons	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-CoC Funded Victim Service Organizations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Street Outreach Team(s)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Homeless or Formerly Homeless Persons	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

University of Nebraska - Center for Children Families and the Law - HMIS Lead	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 1F. Continuum of Care (CoC) Project Review, Ranking, and Selection

### Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

### 1F-1. For all renewal project applications submitted in the FY 2015 CoC Program Competition complete the chart below regarding the CoC's review of the Annual Performance Report(s).

How many renewal project applications were submitted in the FY 2015 CoC Program Competition?	10
How many of the renewal project applications are first time renewals for which the first operating year has not expired yet?	1
How many renewal project application APRs were reviewed by the CoC as part of the local CoC competition project review, ranking, and selection process for the FY 2015 CoC Program Competition?	9
Percentage of APRs submitted by renewing projects within the CoC that were reviewed by the CoC in the 2015 CoC Competition?	100.00%

### 1F-2. In the sections below, check the appropriate box(s) for each section to indicate how project applications were reviewed and ranked for the FY 2015 CoC Program Competition. (Written documentation of the CoC's publicly announced Rating and Review procedure must be attached.)

Type of Project or Program (PH, TH, HMIS, SSO, RRH, etc.)	<input checked="" type="checkbox"/>
Performance outcomes from APR reports/HMIS	
Length of stay	<input checked="" type="checkbox"/>
% permanent housing exit destinations	<input checked="" type="checkbox"/>
% increases in income	<input checked="" type="checkbox"/>
	<input type="checkbox"/>

<b>Monitoring criteria</b>	
Participant Eligibility	<input checked="" type="checkbox"/>
Utilization rates	<input checked="" type="checkbox"/>
Drawdown rates	<input checked="" type="checkbox"/>
Frequency or Amount of Funds Recaptured by HUD	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
<b>Need for specialized population services</b>	
Youth	<input checked="" type="checkbox"/>
Victims of Domestic Violence	<input checked="" type="checkbox"/>
Families with Children	<input checked="" type="checkbox"/>
Persons Experiencing Chronic Homelessness	<input checked="" type="checkbox"/>
Veterans	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
None	<input type="checkbox"/>

**1F-2a. Describe how the CoC considered the severity of needs and vulnerabilities of participants that are, or will be, served by the project applications when determining project application priority. (limit 1000 characters)**

The CoC prioritizes PSH projects and projects that target youth and families. CoC policy is that all admissions to PSH must go through the coordinated entry MVRT process. Placement in PSH is prioritized based on severity of need and vulnerability. By prioritizing PSH projects in the ranking and by requiring these projects to admit the most vulnerable with the highest severity of need, the CoC ensured that these were the driving factors in project application priority. The populations prioritized for assistance by the CoC include those serving youth especially those that are literally homeless, chronically homeless, those fleeing domestic violence or Veterans. Any project serving those populations is prioritized for CoC support.

**1F-3. Describe how the CoC made the local competition review, ranking, and selection criteria publicly available, and identify the public medium(s) used and the date(s) of posting. In addition, describe how the CoC made this information available to all stakeholders. (Evidence of the public posting must be attached)  
(limit 750 characters)**

All of review, ranking and selection criteria were posted on the website of DHHS. The CoC board notified all participants of the posting though email notification to its mailing list. In addition, all regional and local CoCs in the State were provided email notification of the posting and encouraged to notify their communities.

**1F-4. On what date did the CoC and Collaborative Applicant publicly post all parts of the FY 2015 CoC Consolidated Application that included the final project application ranking? (Written documentation of the public posting, with the date of the posting clearly visible, must be attached. In addition, evidence of communicating decisions to the CoC's full membership must be attached.)** 11/16/2015

**1F-5. Did the CoC use the reallocation process in the FY 2015 CoC Program Competition to reduce or reject projects for the creation of new projects? (If the CoC utilized the reallocation process, evidence of the public posting of the reallocation process must be attached.)** No

**1F-5a. If the CoC rejected project application(s) on what date did the CoC and Collaborative Applicant notify those project applicants their project application was rejected in the local CoC competition process? (If project applications were rejected, a copy of the written notification to each project applicant must be attached.)** 11/02/2015

**1F-6. Is the Annual Renewal Demand (ARD) in the CoC's FY 2015 CoC Priority Listing equal to or less than the ARD on the final HUD-approved FY 2015 GIW?** Yes

# 1G. Continuum of Care (CoC) Addressing Project Capacity

## Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

### 1G-1. Describe how the CoC monitors the performance of CoC Program recipients. (limit 1000 characters)

The HMIS lead agency working with the CoC board has developed performance report cards for all CoC funded programs. These report cards cover key performance outcomes including serving the literally homeless, housing stability, job and income growth and the use of mainstream resources. Report cards are issued to providers twice annually. Summary reports are provided to the CoC board. Also examined are compliance with HUD requirements including APR submission, quarterly drawdowns and responding to HUD monitoring. Providers who fail to meet standards are notified. The information from these report cards is used along with the renewal evaluation process to establish the ranking of renewal applications and will be used to require poor performers to reallocate. The CoC is also implementing compliance monitoring of CoC funded projects by monitoring to assure that eligible participants are served, units are utilized, and funding is expended.

**1G-2. Did the Collaborative Applicant review and confirm that all project applicants attached accurately completed and current dated form HUD 50070 and form HUD-2880 to the Project Applicant Profile in e-snaps?** Yes

**1G-3. Did the Collaborative Applicant include accurately completed and appropriately signed form HUD-2991(s) for all project applications submitted on the CoC Priority Listing?** Yes

## **2A. Homeless Management Information System (HMIS) Implementation**

**Intructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2A-1. Does the CoC have a governance charter that outlines the roles and responsibilities of the CoC and the HMIS Lead, either within the charter itself or by reference to a separate document like an MOU? In all cases, the CoC's governance charter must be attached to receive credit. In addition, if applicable, any separate document, like an MOU, must also be attached to receive credit.** Yes

**2A-1a. Include the page number where the roles and responsibilities of the CoC and HMIS Lead can be found in the attached document referenced in 2A-1. In addition, in the textbox indicate if the page number applies to the CoC's attached governance charter or the attached MOU.** ALT, 3

**2A-2. Does the CoC have a HMIS Policies and Procedures Manual? If yes, in order to receive credit the HMIS Policies and Procedures Manual must be attached to the CoC Application.** Yes

**2A-3. Are there agreements in place that outline roles and responsibilities between the HMIS Lead and the Contributing HMIS Organizations (CHOs)?** Yes

**2A-4. What is the name of the HMIS software used by the CoC (e.g., ABC Software)?** ServicePoint  
**Applicant will enter the HMIS software name (e.g., ABC Software).**

**2A-5. What is the name of the HMIS software vendor (e.g., ABC Systems)?** Bowman Systems LLC  
**Applicant will enter the name of the vendor (e.g., ABC Systems).**

## 2B. Homeless Management Information System (HMIS) Funding Sources

### Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2B-1. Select the HMIS implementation coverage area:** Multiple CoCs

**\* 2B-2. In the charts below, enter the amount of funding from each funding source that contributes to the total HMIS budget for the CoC.**

### 2B-2.1 Funding Type: Federal - HUD

Funding Source	Funding
CoC	\$173,806
ESG	\$67,609
CDBG	\$0
HOME	\$0
HOPWA	\$0
<b>Federal - HUD - Total Amount</b>	<b>\$241,415</b>

### 2B-2.2 Funding Type: Other Federal

Funding Source	Funding
Department of Education	\$0
Department of Health and Human Services	\$0
Department of Labor	\$0
Department of Agriculture	\$0
Department of Veterans Affairs	\$0
Other Federal	\$0
<b>Other Federal - Total Amount</b>	<b>\$0</b>

**2B-2.3 Funding Type: State and Local**

<b>Funding Source</b>	<b>Funding</b>
City	\$0
County	\$0
State	\$0
<b>State and Local - Total Amount</b>	<b>\$0</b>

**2B-2.4 Funding Type: Private**

<b>Funding Source</b>	<b>Funding</b>
Individual	\$0
Organization	\$0
<b>Private - Total Amount</b>	<b>\$0</b>

**2B-2.5 Funding Type: Other**

<b>Funding Source</b>	<b>Funding</b>
Participation Fees	\$0
<b>Other - Total Amount</b>	<b>\$0</b>

<b>2B-2.6 Total Budget for Operating Year</b>	<b>\$241,415</b>
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## 2C. Homeless Management Information System (HMIS) Bed Coverage

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2C-1. Enter the date the CoC submitted the 2015 HIC data in HDX, (mm/dd/yyyy):** 04/15/2015

**2C-2. Per the 2015 Housing Inventory Count (HIC) indicate the number of beds in the 2015 HIC and in HMIS for each project type within the CoC. If a particular housing type does not exist in the CoC then enter "0" for all cells in that housing type.**

Project Type	Total Beds in 2015 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter beds	367	121	120	48.78%
Safe Haven (SH) beds	0	0	0	
Transitional Housing (TH) beds	395	20	226	60.27%
Rapid Re-Housing (RRH) beds	188	0	188	100.00%
Permanent Supportive Housing (PSH) beds	94	0	81	86.17%
Other Permanent Housing (OPH) beds	25	0	25	100.00%

**2C-2a. If the bed coverage rate for any housing type is 85% or below, describe how the CoC plans to increase this percentage over the next 12 months. (limit 1000 characters)**

39 additional emergency shelter HMIS beds have been added since the January 2015 housing inventory from 2 rescue mission shelters in the BOS CoC making the BOS CoC's current emergency shelter HMIS coverage 64%. An additional 55 emergency shelter beds at another major rescue mission will be on HMIS prior to the 2016 housing inventory which will increase the Nebraska BOS CoC ES HMIS coverage to 86.7%. A large rescue mission that provides both emergency shelter and transitional housing (122 beds) remains as the only major homeless housing provider in the BOS CoC not to be currently have a plan in place for joining the HMIS. The HMIS lead is continuing with state and regional CoC involvement to engage this rescue mission on the importance of joining the HMIS.

**2C-3. HUD understands that certain projects are either not required to or discouraged from participating in HMIS, and CoCs cannot require this if they are not funded through the CoC or ESG programs. This does NOT include domestic violence providers that are prohibited from entering client data in HMIS. If any of the project types listed in question 2C-2 above has a coverage rate of 85% or below, and some or all of these rates can be attributed to beds covered by one of the following programs types, please indicate that here by selecting all that apply from the list below.  
 (limit 1000 characters)**

VA Domiciliary (VA DOM):	<input type="checkbox"/>
VA Grant per diem (VA GPD):	<input type="checkbox"/>
Faith-Based projects/Rescue mission:	<input checked="" type="checkbox"/>
Youth focused projects:	<input type="checkbox"/>
HOPWA projects:	<input type="checkbox"/>
Not Applicable:	<input type="checkbox"/>

**2C-4. How often does the CoC review or assess its HMIS bed coverage?** Semi-Annually

## 2D. Homeless Management Information System (HMIS) Data Quality

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2D-1. Indicate the percentage of unduplicated client records with null or missing values and the percentage of "Client Doesn't Know" or "Client Refused" during the time period of October 1, 2013 through September 30, 2014.**

Universal Data Element	Percentage Null or Missing	Percentage Client Doesn't Know or Refused
3.1 Name	0%	0%
3.2 Social Security Number	3%	5%
3.3 Date of birth	0%	0%
3.4 Race	1%	1%
3.5 Ethnicity	0%	1%
3.6 Gender	0%	0%
3.7 Veteran status	0%	0%
3.8 Disabling condition	0%	0%
3.9 Residence prior to project entry	0%	0%
3.10 Project Entry Date	0%	0%
3.11 Project Exit Date	0%	0%
3.12 Destination	5%	5%
3.15 Relationship to Head of Household	2%	0%
3.16 Client Location	1%	0%
3.17 Length of time on street, in an emergency shelter, or safe haven	7%	0%

**2D-2. Identify which of the following reports your HMIS generates. Select all that apply:**

CoC Annual Performance Report (APR):	<input checked="" type="checkbox"/>
ESG Consolidated Annual Performance and Evaluation Report (CAPER):	<input checked="" type="checkbox"/>
Annual Homeless Assessment Report (AHAR) table shells:	<input checked="" type="checkbox"/>

APR Data Quality	<input type="checkbox"/>
None	<input type="checkbox"/>

**2D-3. If you submitted the 2015 AHAR, how many AHAR tables (i.e., ES-ind, ES-family, etc) were accepted and used in the last AHAR?** 10

**2D-4. How frequently does the CoC review data quality in the HMIS?** Monthly

**2D-5. Select from the dropdown to indicate if standardized HMIS data quality reports are generated to review data quality at the CoC level, project level, or both?** Both Project and CoC

**2D-6. From the following list of federal partner programs, select the ones that are currently using the CoC's HMIS.**

VA Supportive Services for Veteran Families (SSVF):	<input checked="" type="checkbox"/>
VA Grant and Per Diem (GPD):	<input type="checkbox"/>
Runaway and Homeless Youth (RHY):	<input checked="" type="checkbox"/>
Projects for Assistance in Transition from Homelessness (PATH):	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
None:	<input type="checkbox"/>

**2D-6a. If any of the federal partner programs listed in 2D-6 are not currently entering data in the CoC's HMIS and intend to begin entering data in the next 12 months, indicate the federal partner program and the anticipated start date. (limit 750 characters)**

There are no VA Grant Per Diem programs in NE-500.

## 2E. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count

### Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**The data collected during the PIT count is vital for both CoCs and HUD. Communities need accurate data to determine the size and scope of homelessness at the local level so they can best plan for services and programs that will appropriately address local needs and measure progress in addressing homelessness. HUD needs accurate data to understand the extent and nature of homelessness throughout the country, and to provide Congress and the Office of Management and Budget (OMB) with information regarding services provided, gaps in service, and performance. This information helps inform Congress' funding decisions, and it is vital that the data reported is accurate and of high quality.**

- 2E-1. Did the CoC approve the final sheltered PIT count methodology for the 2015 sheltered PIT count? Yes
- 2E-2. Indicate the date of the most recent sheltered PIT count (mm/dd/yyyy): 01/22/2015
- 2E-2a. If the CoC conducted the sheltered PIT count outside of the last 10 days of January 2015, was an exception granted by HUD? Not Applicable
- 2E-3. Enter the date the CoC submitted the sheltered PIT count data in HDX, (mm/dd/yyyy): 04/16/2015

## 2F. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count: Methods

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2F-1. Indicate the method(s) used to count sheltered homeless persons during the 2015 PIT count:**

Complete Census Count:	<input checked="" type="checkbox"/>
Random sample and extrapolation:	<input type="checkbox"/>
Non-random sample and extrapolation:	<input type="checkbox"/>
	<input type="checkbox"/>

**2F-2. Indicate the methods used to gather and calculate subpopulation data for sheltered homeless persons:**

HMIS:	<input checked="" type="checkbox"/>
HMIS plus extrapolation:	<input type="checkbox"/>
Interview of sheltered persons:	<input checked="" type="checkbox"/>
Sample of PIT interviews plus extrapolation:	<input type="checkbox"/>
	<input type="checkbox"/>

**2F-3. Provide a brief description of your CoC's sheltered PIT count methodology and describe why your CoC selected its sheltered PIT count methodology. (limit 1000 characters)**

NE-500 CoC conducts the sheltered PIT count utilizing the HMIS exclusively for persons sheltered in HMIS using programs and surveys, recorded on paper, of sheltered persons in non-HMIS programs. HMIS CHOs review and verify their data on the night of the PIT. Non-HMIS programs conduct CoC generated PIT count surveys of individuals sheltered during the evening of the PIT. The non-HMIS counts are transmitted to the HMIS lead, cross referenced and deduplicated (with the exception of victim service provider counts which are provided in aggregate). The HMIS Service based counts are also cross-referenced and deduplicated with HMIS recorded shelter data. The CoC uses this methodology as that most able to provide valid sheltered PIT counts across the large geography of the CoC and the method that maximizes the use of and the data entered into the HMIS. The HMIS lead develops surveys, written instructions, training to HMIS and non-HMIS providers.

**2F-4. Describe any change in methodology from your sheltered PIT count in 2014 to 2015, including any change in sampling or extrapolation method, if applicable. Do not include information on changes to the implementation of your sheltered PIT count methodology (e.g., enhanced training and change in partners participating in the PIT count). (limit 1000 characters)**

No change in methodology from 2014 to 2015.

**2F-5. Did your CoC change its provider coverage in the 2015 sheltered count?** No

**2F-5a. If "Yes" in 2F-5, then describe the change in provider coverage in the 2015 sheltered count. (limit 750 characters)**

## 2G. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count: Data Quality

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2G-1. Indicate the methods used to ensure the quality of the data collected during the sheltered PIT count:**

Training:	<input type="checkbox"/>
Provider follow-up:	<input checked="" type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Non-HMIS de-duplication techniques:	<input checked="" type="checkbox"/>
	<input type="checkbox"/>

**2G-2. Describe any change to the way your CoC implemented its sheltered PIT count from 2014 to 2015 that would change data quality, including changes to training volunteers and inclusion of any partner agencies in the sheltered PIT count planning and implementation, if applicable. Do not include information on changes to actual sheltered PIT count methodology (e.g., change in sampling or extrapolation method). (limit 1000 characters)**

No change in implementation from 2014 to 2015.

## 2H. Continuum of Care (CoC) Unsheltered Point-in-Time (PIT) Count

### Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

**The unsheltered PIT count assists communities and HUD to understand the characteristics and number of people with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground. CoCs are required to conduct an unsheltered PIT count every 2 years (biennially) during the last 10 days in January; however, CoCs are strongly encouraged to conduct the unsheltered PIT count annually, at the same time that it does the annual sheltered PIT count. The last official PIT count required by HUD was in January 2015.**

- 2H-1. Did the CoC approve the final unsheltered PIT count methodology for the most recent unsheltered PIT count? Yes
- 2H-2. Indicate the date of the most recent unsheltered PIT count (mm/dd/yyyy): 01/22/2015
- 2H-2a. If the CoC conducted the unsheltered PIT count outside of the last 10 days of January 2015, was an exception granted by HUD? Not Applicable
- 2H-3. Enter the date the CoC submitted the unsheltered PIT count data in HDX (mm/dd/yyyy): 04/16/2015

## 2I. Continuum of Care (CoC) Unsheltered Point-in-Time (PIT) Count: Methods

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2I-1. Indicate the methods used to count unsheltered homeless persons during the 2015 PIT count:**

Night of the count - complete census:	<input type="checkbox"/>
Night of the count - known locations:	<input checked="" type="checkbox"/>
Night of the count - random sample:	<input type="checkbox"/>
Service-based count:	<input checked="" type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
	<input type="checkbox"/>

**2I-2. Provide a brief description of your CoC's unsheltered PIT count methodology and describe why your CoC selected its unsheltered PIT count methodology. (limit 1000 characters)**

The unsheltered count was conducted by CoC outreach workers, community services staff, Veterans Affairs staff, county and local jurisdiction law enforcement and volunteers on the night of the count. Unsheltered count staff identified known locations of unsheltered persons in their local areas and conducted brief surveys of individuals identified. County and local law enforcement recorded unsheltered count and PI data for any unsheltered homeless person encountered from sundown to sunup on the night of the count. These data were provided to the HMIS lead. In addition to the known location counts and LE counts a service based count was conducted of those identifying as unsheltered homeless. Both the known place counts and the service based counts were cross referenced with each other and with HMIS and non-HMIS sheltered counts by the HMIS lead for deduplication. The HMIS lead created unsheltered count survey forms, and trained unsheltered count staff.

**2I-3. Describe any change in methodology from your unsheltered PIT count in 2014 (or 2013 if an unsheltered count was not conducted in 2014) to 2015, including any change in sampling or extrapolation method, if applicable. Do not include information on changes to implementation of your sheltered PIT count methodology (e.g., enhanced training and change in partners participating in the count). (limit 1000 characters)**

No change in unsheltered PIT count from 2014 to 2015

**2I-4. Does your CoC plan on conducting an unsheltered PIT count in 2016?** Yes

(If "Yes" is selected, HUD expects the CoC to conduct an unsheltered PIT count in 2016. See the FY 2015 CoC Program NOFA, Section VII.A.4.d. for full information.)

## 2J. Continuum of Care (CoC) Unsheltered Point-in-Time (PIT) Count: Data Quality

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2J-1. Indicate the steps taken by the CoC to ensure the quality of the data collected for the 2015 unsheltered population PIT count:**

Training:	<input checked="" type="checkbox"/>
"Blitz" count:	<input type="checkbox"/>
Unique identifier:	<input checked="" type="checkbox"/>
Survey question:	<input checked="" type="checkbox"/>
Enumerator observation:	<input type="checkbox"/>
	<input type="checkbox"/>
None:	<input type="checkbox"/>

**2J-2. Describe any change to the way the CoC implemented the unsheltered PIT count from 2014 (or 2013 if an unsheltered count was not conducted in 2014) to 2015 that would affect data quality. This includes changes to training volunteers and inclusion of any partner agencies in the unsheltered PIT count planning and implementation, if applicable. Do not include information on changes to actual methodology (e.g., change in sampling or extrapolation method). (limit 1000 characters)**

No change in implementation from 2014 to 2015.

## 3A. Continuum of Care (CoC) System Performance

### Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

### 3A-1. Performance Measure: Number of Persons Homeless - Point-in-Time Count.

#### \* 3A-1a. Change in PIT Counts of Sheltered and Unsheltered Homeless Persons

Using the table below, indicate the number of persons who were homeless at a Point-in-Time (PIT) based on the 2014 and 2015 PIT counts as recorded in the Homelessness Data Exchange (HDX).

	2014 PIT (for unsheltered count, most recent year conducted)	2015 PIT	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	560	549	-11
Emergency Shelter Total	203	182	-21
Safe Haven Total	0	0	0
Transitional Housing Total	320	343	23
Total Sheltered Count	523	525	2
Total Unsheltered Count	37	24	-13

### 3A-1b. Number of Sheltered Persons Homeless - HMIS.

Using HMIS data, CoCs must use the table below to indicate the number of homeless persons who were served in a sheltered environment between October 1, 2013 and September 30, 2014.

	Between October 1, 2013 and September 30, 2014
Universe: Unduplicated Total sheltered homeless persons	1,972
Emergency Shelter Total	1,318
Safe Haven Total	0
Transitional Housing Total	654

**3A-2. Performance Measure: First Time Homeless.**

**Describe the CoC’s efforts to reduce the number of individuals and families who become homeless for the first time. Specifically, describe what the CoC is doing to identify risk factors for becoming homeless for the first time.  
(limit 1000 characters)**

The CoC is seeking to identify the specific risk factors for homelessness in rural Nebraska. Through ESG and the NHAP program the CoC has identified the providers who are providing homeless prevention funding, assessing the VIPSDAT scores on these households and coordinating with these providers to identify the reasons why households need assistance. The CoC is in the early stages of implementing coordinated entry, focusing on PSH at present. It intends to develop and implement a diversion screening tool to be used by shelter providers. Once this is operational, it will advocate with ESG and NHAP to focus prevention efforts at diverting households from entering shelter.

**3A-3. Performance Measure: Length of Time Homeless.**

**Describe the CoC’s efforts to reduce the length of time individuals and families remain homeless. Specifically, describe how your CoC has reduced the average length of time homeless, including how the CoC identifies and houses individuals and families with the longest lengths of time homeless.  
(limit 1000 characters)**

Through the implementation of Coordinated Entry and the Most Vulnerable Review Team the NE BOS is making strides in identifying and reducing the length of time persons remain homeless. Prioritization of unit availability is ordered according to the BOS Priority Formula which includes chronic status, number of months continuously homeless, number of times homeless, and the vulnerability assessment. The NE BOS CoC examines homeless length of stay every six months and annually as part of the CoCs Performance Assessment. Emergency Shelter average stays have decreased from 27 days in 2012 to 22 days in 2014. Transitional housing length of stays have decreased from 200 days in 2012 to 173 days in 2014.

**\* 3A-4. Performance Measure: Successful Permanent Housing Placement or Retention.**

**In the next two questions, CoCs must indicate the success of its projects in placing persons from its projects into permanent housing.**

### 3A-4a. Exits to Permanent Housing Destinations:

In the chart below, CoCs must indicate the number of persons in CoC funded supportive services only (SSO), transitional housing (TH), and rapid re-housing (RRH) project types who exited into permanent housing destinations between October 1, 2013 and September 30, 2014.

	Between October 1, 2013 and September 30, 2014
Universe: Persons in SSO, TH and PH-RRH who exited	181
Of the persons in the Universe above, how many of those exited to permanent destinations?	172
% Successful Exits	95.03%

### 3A-4b. Exit To or Retention Of Permanent Housing:

In the chart below, CoCs must indicate the number of persons who exited from any CoC funded permanent housing project, except rapid re-housing projects, to permanent housing destinations or retained their permanent housing between October 1, 2013 and September 31, 2014.

	Between October 1, 2013 and September 30, 2014
Universe: Persons in all PH projects except PH-RRH	145
Of the persons in the Universe above, indicate how many of those remained in applicable PH projects and how many of those exited to permanent destinations?	125
% Successful Retentions/Exits	86.21%

### 3A-5. Performance Measure: Returns to Homelessness:

**Describe the CoC's efforts to reduce the rate of individuals and families who return to homelessness. Specifically, describe at least three strategies your CoC has implemented to identify and minimize returns to homelessness, and demonstrate the use of HMIS or a comparable database to monitor and record returns to homelessness. (limit 1000 characters)**

Returns to homelessness are tracked in HMIS. It is one of the key factors used by the CoC in evaluation project performance and determining whether to renew grants. Providers are informed of the percentage of their leavers from TH, PSH, and RRH who return to homelessness through twice annual performance reports. HMIS also tracks individuals and those who have been referred for homeless services and then are reported in HMIS as returning to a homeless status are flagged and this information is used to inform placement in coordinated entry. Any person or family shown as returning to homelessness will be flagged and any subsequent return to homelessness will be flagged for priority coordinated entry placement.

**3A-6. Performance Measure: Job and Income Growth.**

**Describe specific strategies implemented by CoC Program-funded projects to increase the rate by which homeless individuals and families increase income from employment and non-employment sources (include at least one specific strategy for employment income and one for non-employment related income, and name the organization responsible for carrying out each strategy).  
(limit 1000 characters)**

One specific area that all participants receive education on is budgeting. The case manager reviews the income and expenses, educating the client on where to cut expenses if needed. This provides a foundation to start discussion on how much money is needed to pay the bills for the family. Through the Family Development Model, the client scores themselves which also provides a window of opportunity to talk about goals of the client toward independence and stability. All clients are connected with the NE Department of Labor who works one-on-one with persons seeking skills and/or employment. The NE Works App helps locate jobs and other services for individuals at the NE Works website are career services, job seekers services, education services, labor market services, community services and benefits, financial services, veteran services, unemployment services, youth services, senior services, disability services and staff provided services.

**3A-6a. Describe how the CoC is working with mainstream employment organizations to aid homeless individuals and families in increasing their income.  
(limit 1000 characters)**

Central Nebraska Community Services works with Workforce Development and Vocational Rehabilitation to assist all participants in preparing for employment including help in developing resumes and approaching employers. It is also connected with the Community Colleges in its area to assist clients in enrolling in short-term 'Hands-on' programs focusing on commercial truck driving, welding and construction trades. Trained SOAR specialists cover the rural NE balance of state. Funded providers assist clients in applying online for TANF and other services. There are 8 currently funded PH programs and 6 funded TH programs, 6/8 PH and 4/6 TH have relationships with mainstream employment organizations with an overall 75% rate.

**3A-7. Performance Measure: Thoroughness of Outreach.**

**How does the CoC ensure that all people living unsheltered in the CoC's geographic area are known to and engaged by providers and outreach teams?  
(limit 1000 characters)**

The CoC serves the entirety of rural Nebraska. In Western Nebraska, case managers conduct outreach to all young persons identified. Outreach is linked to the local youth shelter which maintains an open door and youth may contact it at any time of day for assistance that will be followed up on by case managers. Outreach teams through PATH and SSVF participate in coordinated entry. All engaged persons are assessed using the VISPDAT with data entered into HMIS. Persons with a high score are referred to the MVRT where they are prioritized for placement in housing.

**3A-7a. Did the CoC exclude geographic areas from the 2015 unsheltered PIT count where the CoC determined that there were no unsheltered homeless people, including areas that are uninhabitable (e.g., deserts)?** No

**3A-7b. What was the the criteria and decision-making process the CoC used to identify and exclude specific geographic areas from the CoC's unsheltered PIT count? (limit 1000 characters)**

## 3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

### Objective 1: Ending Chronic Homelessness

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

**Opening Doors, Federal Strategic Plan to Prevent and End Homelessness (as amended in 2015) establishes the national goal of ending chronic homelessness. Although the original goal was to end chronic homelessness by the end of 2015, that goal timeline has been extended to 2017. HUD is hopeful that communities that are participating in the Zero: 2016 technical assistance initiative will continue to be able to reach the goal by the end of 2016. The questions in this section focus on the strategies and resources available within a community to help meet this goal.**

**3B-1.1. Compare the total number of chronically homeless persons, which includes persons in families, in the CoC as reported by the CoC for the 2015 PIT count compared to 2014 (or 2013 if an unsheltered count was not conducted in 2014).**

	2014 (for unsheltered count, most recent year conducted)	2015	Difference
Universe: Total PIT Count of sheltered and unsheltered chronically homeless persons	73	13	-60
Sheltered Count of chronically homeless persons	62	12	-50
Unsheltered Count of chronically homeless persons	11	1	-10

**3B-1.1a. Using the "Differences" calculated in question 3B-1.1 above, explain the reason(s) for any increase, decrease, or no change in the overall TOTAL number of chronically homeless persons in the CoC, as well as the change in the unsheltered count, as reported in the PIT count in 2015 compared to 2014. To possibly receive full credit, both the overall total and unsheltered changes must be addressed. (limit 1000 characters)**

The total count of chronic homeless decreased. There were no changes in the PIT methodology. The CoC is focused on ending chronic homelessness, has prioritized placements into PSH and other housing, and has implemented a policy wherein the only persons placed in PSH are chronic homeless with severe service needs.

**3B-1.2. From the FY 2013/FY 2014 CoC Application: Describe the CoC's two year plan (2014-2015) to increase the number of permanent supportive housing beds available for chronically homeless persons and to meet the proposed numeric goals as indicated in the table above. Response should address the specific strategies and actions the CoC will take to achieve the goal of ending chronic homelessness by the end of 2015. (read only)**

In the most recent PIT count, there were 58 CH individuals and 20 CH families. The BoS CoC also proposes that it will use reallocation in the two upcoming competitions to create at least an additional 12 CH beds by 2015. Additionally, the CoC is working with regional PHAs in rural Nebraska and increasing coordination with the VA. By increasing access to mainstream housing assistance and targeting VA PH resources, the CoC intends to free up sufficient CoC resources to finish the job of ending CH.

**3B-1.2a. Of the strategies listed in the FY 2013/FY 2014 CoC Application represented in 3B-1.2, which of these strategies and actions were accomplished? (limit 1000 characters)**

The CoC was not able to get additional new projects funded in the earlier competition as anticipated. In May of 2015, the CoC went live with its Most Vulnerable Resource Team, the coordinated process for prioritizing and referring chronically homeless to PSH. The CoC adopted policies in Nov. 2014 prioritizing chronically homeless and requiring admissions to PSH through a CoC-wide single waiting list.

**3B-1.3. Compare the total number of PSH beds (CoC Program and non-CoC Program funded) that were identified as dedicated for use by chronically homeless persons on the 2015 Housing Inventory Count, as compared to those identified on the 2014 Housing Inventory Count.**

	2014	2015	Difference
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homelessness persons identified on the HIC.	23	25	2

**3B-1.3a. Explain the reason(s) for any increase, decrease or no change in the total number of PSH beds (CoC Program and non CoC Program funded) that were identified as dedicated for use by chronically homeless persons on the 2015 Housing Inventory Count compared to those identified on the 2014 Housing Inventory Count. (limit 1000 characters)**

There was a gain of two beds. In 2014, there were 7 beds that were inaccurately listed as dedicated to Chronic Homeless. This data was corrected for 2015; additionally all 17 units of a PSH project working closely with coordinated entry are now dedicated (a net increase of 9 dedicated CH beds).

**3B-1.4. Did the CoC adopt the orders of priority in all CoC Program-funded PSH as described in Notice CPD-14-012: Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status ?**

Yes

**3B-1.4a. If “Yes”, attach the CoC’s written standards that were updated to incorporate the order of priority in Notice CPD-14-012 and indicate the page(s) that contain the CoC’s update.**

pages 24-25

**3B-1.5. CoC Program funded Permanent Supportive Housing Project Beds prioritized for serving people experiencing chronic homelessness in FY2015 operating year.**

Percentage of CoC Program funded PSH beds prioritized for chronic homelessness	FY2015 Project Application
Based on all of the renewal project applications for PSH, enter the estimated number of CoC-funded PSH beds in projects being renewed in the FY 2015 CoC Program Competition that are not designated as dedicated beds for persons experiencing chronic homelessness.	75
Based on all of the renewal project applications for PSH, enter the estimated number of CoC-funded PSH beds in projects being renewed in the FY 2015 CoC Program Competition that are not designated as dedicated beds for persons experiencing chronic homelessness that will be made available through turnover in the FY 2015 operating year.	27
Based on all of the renewal project applications for PSH, enter the estimated number of PSH beds made available through turnover that will be prioritized beds for persons experiencing chronic homelessness in the FY 2015 operating year.	27

This field estimates the percentage of turnover beds that will be prioritized beds for persons experiencing chronic homelessness in the FY 2015 operating year.

100.00%

**3B-1.6. Is the CoC on track to meet the goal of ending chronic homelessness by 2017?** Yes

This question will not be scored.

**3B-1.6a. If “Yes,” what are the strategies implemented by the CoC to maximize current resources to meet this goal? If “No,” what resources or technical assistance will be implemented by the CoC to reach the goal of ending chronically homeless by 2017? (limit 1000 characters)**

The use of the MVRT along with increased coordination with the VA will lead to the accomplishment of this goal

## 3B. Continuum of Care (CoC) Strategic Planning Objectives

### Objective 2: Ending Homelessness Among Households with Children and Ending Youth Homelessness

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**Opening Doors outlines the goal of ending family (Households with Children) and youth homelessness by 2020. The following questions focus on the various strategies that will aid communities in meeting this goal.**

**3B-2.1. What factors will the CoC use to prioritize households with children during the FY2015 Operating year? (Check all that apply).**

Vulnerability to victimization:	<input checked="" type="checkbox"/>
Number of previous homeless episodes:	<input checked="" type="checkbox"/>
Unsheltered homelessness:	<input checked="" type="checkbox"/>
Criminal History:	<input type="checkbox"/>
Bad credit or rental history (including not having been a leaseholder):	<input type="checkbox"/>
Head of household has mental/physical disabilities:	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
N/A:	<input type="checkbox"/>

**3B-2.2. Describe the CoC's plan to rapidly rehouse every family that becomes homeless within 30 days of becoming homeless on the street or entering shelter. (limit 1000 characters)**

The CoC uses the FAM SPDAT to assess and assist in prioritizing families for assistance. It has implemented coordinated entry for PSH and will expand it to include rapid rehousing in the upcoming program year. Families with a score above 5 on the VISPDAT will be prioritized. The CoC has used reallocation to increase the number of rapid rehousing units and policy is for ESG to prioritize rapid rehousing over other uses.

**3B-2.3. Compare the number of RRH units available to serve families from the 2014 and 2015 HIC.**

	2014	2015	Difference
RRH units available to serve families in the HIC:	18	46	28

**3B-2.4. How does the CoC ensure that emergency shelters, transitional housing, and permanent housing (PSH and RRH) providers within the CoC do not deny admission to or separate any family members from other members of their family based on age, sex, or gender when entering shelter or housing? (check all strategies that apply)**

CoC policies and procedures prohibit involuntary family separation:	<input checked="" type="checkbox"/>
There is a method for clients to alert CoC when involuntarily separated:	<input type="checkbox"/>
CoC holds trainings on preventing involuntary family separation, at least once a year:	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
None:	<input type="checkbox"/>

**3B-2.5. Compare the total number of homeless households with children in the CoC as reported by the CoC for the 2015 PIT count compared to 2014 (or 2013 if an unsheltered count was not conducted in 2014).**

**PIT Count of Homelessness Among Households With Children**

	2014 (for unsheltered count, most recent year conducted)	2015	Difference
Universe: Total PIT Count of sheltered and unsheltered homeless households with children:	90	113	23
Sheltered Count of homeless households with children:	89	113	24
Unsheltered Count of homeless households with children:	1	0	-1

**3B-2.5a. Explain the reason(s) for any increase, decrease or no change in the total number of homeless households with children in the CoC as reported in the 2015 PIT count compared to the 2014 PIT count. (limit 1000 characters)**

The total count of families increased, the sheltered count increased and the unsheltered count was brought to zero. The CoC succeeded in expanding the number of faith based rescue missions that are now participating in HMIS. The increased participation and coordination with these faith based providers led to the reported increase which is more an artifact of increased participation and more accurate information than an actual increase in family homelessness.

**3B-2.6. Does the CoC have strategies to address the unique needs of unaccompanied homeless youth (under age 18, and ages 18-24), including the following:**

Human trafficking and other forms of exploitation?	Yes
LGBTQ youth homelessness?	Yes
Exits from foster care into homelessness?	Yes
Family reunification and community engagement?	Yes
Positive Youth Development, Trauma Informed Care, and the use of Risk and Protective Factors in assessing youth housing and service needs?	Yes
Unaccompanied minors/youth below the age of 18?	Yes

**3B-2.6a. Select all strategies that the CoC uses to address homeless youth trafficking and other forms of exploitation.**

Diversion from institutions and decriminalization of youth actions that stem from being trafficked:	<input type="checkbox"/>
Increase housing and service options for youth fleeing or attempting to flee trafficking:	<input type="checkbox"/>
Specific sampling methodology for enumerating and characterizing local youth trafficking:	<input type="checkbox"/>
Cross systems strategies to quickly identify and prevent occurrences of youth trafficking:	<input type="checkbox"/>

Community awareness training concerning youth trafficking:	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
N/A:	<input type="checkbox"/>

**3B-2.7. What factors will the CoC use to prioritize unaccompanied youth (under age 18, and ages 18-24) for housing and services during the FY2015 operating year? (Check all that apply)**

Vulnerability to victimization:	<input checked="" type="checkbox"/>
Length of time homeless:	<input checked="" type="checkbox"/>
Unsheltered homelessness:	<input checked="" type="checkbox"/>
Lack of access to family and community support networks:	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
N/A:	<input type="checkbox"/>

**3B-2.8. Using HMIS, compare all unaccompanied youth (under age 18, and ages 18-24) served in any HMIS contributing program who were in an unsheltered situation prior to entry in FY 2013 (October 1, 2012 - September 30, 2013) and FY 2014 (October 1, 2013 - September 30, 2014).**

	FY 2013 (October 1, 2012 - September 30, 2013)	FY 2014 (October 1, 2013 - September 30, 2104)	Difference
Total number of unaccompanied youth served in HMIS contributing programs who were in an unsheltered situation prior to entry:	28	23	-5

**3B-2.8a. If the number of unaccompanied youth and children, and youth-headed households with children served in any HMIS contributing program who were in an unsheltered situation prior to entry in FY 2014 is lower than FY 2013, explain why. (limit 1000 characters)**

All of unaccompanied youth in both FY13 (average age 21.5) and FY14 (average age 21.8 were 18 or older with median age of 22. In FY2014 there was a 50% reduction in the number of unaccompanied youth entered into an emergency shelter in western Nebraska. The CoC has targeted resources, especially in Western Nebraska toward serving unaccompanied youth and the reduction in reported youth homelessness is likely related to this.

**3B-2.9. Compare funding for youth homelessness in the CoC's geographic area in CY 2015 to projected funding for CY 2016.**

	Calendar Year 2015	Calendar Year 2016	Difference
Overall funding for youth homelessness dedicated projects (CoC Program and non-CoC Program funded):	\$552,426.00	\$5,354,260.00	\$4,801,834.00
CoC Program funding for youth homelessness dedicated projects:	\$352,426.00	\$354,260.00	\$1,834.00
Non-CoC funding for youth homelessness dedicated projects (e.g. RHY or other Federal, State and Local funding):	\$200,000.00	\$5,000,000.00	\$4,800,000.00

**3B-2.10. To what extent have youth housing and service providers and/or State or Local educational representatives, and CoC representatives participated in each other's meetings over the past 12 months?**

Cross-Participation in Meetings	# Times
CoC meetings or planning events attended by LEA or SEA representatives:	12
LEA or SEA meetings or planning events (e.g. those about child welfare, juvenile justice or out of school time) attended by CoC representatives:	4
CoC meetings or planning events attended by youth housing and service providers (e.g. RHY providers):	12

**3B-2.10a. Given the responses in 3B-2.10, describe in detail how the CoC collaborates with the McKinney-Vento local education liaisons and State educational coordinators. (limit 1000 characters)**

The Homeless School liaison in Grand Island is very involved in the local and Regional Continuum of Care groups. She attends the meetings, is an active member on the steering group for Project Homeless Connect and works collaboratively when a family is in need of services. The other school systems do not have a specific homeless liaison but work through the school's counselor. When they have a family in need of services, they transport them to the office, and provide support during the meetings to ensure that information is shared so needs can be met. The CoC and the liaison work together to protect homeless students from discrimination and seek to secure appropriate housing. School district liaisons participate in CoC strategic planning including updating Opening Doors.

**3B-2.11. How does the CoC make sure that homeless participants are informed of their eligibility for and receive access to educational services? Include the policies and procedures that homeless service providers (CoC and ESG Programs) are required to follow. In addition, include how the CoC, together with its youth and educational partners (e.g. RHY, schools, juvenile justice and children welfare agencies), identifies participants who are eligible for CoC or ESG programs. (limit 2000 characters)**

It is the policy of the Nebraska Balance of State CoC that all youth eligible for educational services receiving services from any CoC and/or ESG funded programs be made aware of educational programs and assisted in accessing any educational services for which they are eligible. All funded providers who serve youth and children must identify those youth and children that are eligible for educational services, inform them of their eligibility for these services and ensure that all children are enrolled in school or early childhood education programs. All funded programs that serve children or youth must collaborate with the educational liaison at the local school district, and must contact the liaison whenever an eligible child or youth enters the program. All ESG and CoC funded providers are required to provide written materials to all families with children regarding their rights to educational services. To ensure compliance, the CoC as part of monitoring and the annual re-evaluation of funded programs requires providers to offer evidence that they are addressing the educational needs and requirements of children and youth served by the program.

## 3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

### Objective 3: Ending Veterans Homelessness

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**Opening Doors outlines the goal of ending Veteran homelessness by the end of 2015. The following questions focus on the various strategies that will aid communities in meeting this goal.**

**3B-3.1. Compare the total number of homeless Veterans in the CoC as reported by the CoC for the 2015 PIT count compared to 2014 (or 2013 if an unsheltered count was not conducted in 2014).**

	2014 (for unsheltered count, most recent year conducted)	2015	Difference
Universe: Total PIT count of sheltered and unsheltered homeless veterans:	30	18	-12
Sheltered count of homeless veterans:	21	11	-10
Unsheltered count of homeless veterans:	9	7	-2

**3B-3.1a. Explain the reason(s) for any increase, decrease or no change in the total number of homeless veterans in the CoC as reported in the 2015 PIT count compared to the 2014 PIT count. (limit 1000 characters)**

The number of homeless Veterans both sheltered and unsheltered decreased. The CoC and the VA have increased coordination and cooperation. There has been an expansion in SSVF funded programs in Nebraska so that the entire state is now covered. The CoC allocates funding for homeless Veterans targeted to the VA Community Based Outpatient Clinic which is the only VA facility in the balance of state. The CoC established protocols so that persons who indicate they are Veterans are referred to the VA for eligibility determination if they are willing to accept VA services. The combination of CoC resources, increased VA resources, and increased coordination between the CoC and the VA has resulted in reductions in Veteran homelessness.

**3B-3.2. How is the CoC ensuring that Veterans that are eligible for VA services are identified, assessed and referred to appropriate resources, i.e. HUD-VASH and SSVF? (limit 1000 characters)**

There is one PATH outreach team in rural Nebraska and it serves Grand Island which is also the location for a VA Community Based Outpatient Clinic (CBOC). Persons engaged who identify as having served in the military are referred to the CBOC for eligibility determination and services. There are three SSVF funded providers in rural Nebraska and they all provide outreach services and can make referrals to the VA for eligibility determination. ESG, NHAP and CoC funded providers who engage homeless people who identify as Veterans are referred either to the closest SSVF provider or the CBOC to determine eligibility for VA services. Homeless Veterans engaged by outreach that are not interested or willing to receive VA services are referred to CoC or ESG funded providers for assistance

**3B-3.3. For Veterans who are not eligible for homeless assistance through the U.S Department of Veterans Affairs Programs, how is the CoC prioritizing CoC Program-funded resources to serve this population? (limit 1000 characters)**

The CoC prioritizes both Veterans who are not eligible for VA services as well as those who have a personal preference to not use VA services. The CoC and the funded providers that are located near the CBOC have strong relations with the VA homeless lead. Persons engaged by the VA found to be ineligible by the VA for services are routinely referred to the provider in Grand Island (CNCS), which is funded by the CoC to provide rapid rehousing to Veterans with a priority to those not eligible for VA services. The CoC has implemented coordinated entry for PSH. All turnover beds in CoC funded PSH must be filled by referrals from coordinated entry by CoC policy. Coordinated entry gives first priority in placement to homeless Veterans. There are currently 7 funded PSH programs in the CoC and 100% of the turnover beds are prioritized for Veterans and chronically homeless.

**3B-3.4. Compare the total number of homeless Veterans in the CoC AND the total number of unsheltered homeless Veterans in the CoC, as reported by the CoC for the 2015 PIT Count compared to the 2010 PIT Count (or 2009 if an unsheltered count was not conducted in 2010).**

	2010 (or 2009 if an unsheltered count was not conducted in 2010)	2015	% Difference
Total PIT count of sheltered and unsheltered homeless veterans:	16	16	0.00%
Unsheltered count of homeless veterans:	0	7	0.00%

**3B-3.5. Indicate from the dropdown whether you are on target to end Veteran homelessness by the end of 2015.** Yes

This question will not be scored.

**3B-3.5a. If “Yes,” what are the strategies being used to maximize your current resources to meet this goal? If “No,” what resources or technical assistance would help you reach the goal of ending Veteran homelessness by the end of 2015? (limit 1000 characters)**

The CoC is on target and is fine tuning resources that are available. In this application, the CoC will retarget resources from PSH to rapid rehousing for Veterans as it has discovered through implementing coordinated entry that there is not a significant number of homeless Veterans remaining who need PSH and these can be served either through HUD-VASH or CoC funded PSH. The need is greater among Veterans without long term disabilities and they will be served through the new rapid rehousing project.

## 4A. Accessing Mainstream Benefits

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**4A-1. Does the CoC systematically provide information to provider staff about mainstream benefits, including up-to-date resources on eligibility and mainstream program changes that can affect homeless clients?** Yes

**4A-2. Based on the CoC's FY 2015 new and renewal project applications, what percentage of projects have demonstrated that the project is assisting project participants to obtain mainstream benefits, which includes all of the following within each project: transportation assistance, use of a single application, annual follow-ups with participants, and SOAR-trained staff technical assistance to obtain SSI/SSDI?**

### FY 2015 Assistance with Mainstream Benefits

Total number of project applications in the FY 2015 competition (new and renewal):	15
Total number of renewal and new project applications that demonstrate assistance to project participants to obtain mainstream benefits (i.e. In a Renewal Project Application, "Yes" is selected for Questions 3a, 3b, 3c, 4, and 4a on Screen 4A. In a New Project Application, "Yes" is selected for Questions 5a, 5b, 5c, 6, and 6a on Screen 4A).	15
Percentage of renewal and new project applications in the FY 2015 competition that have demonstrated assistance to project participants to obtain mainstream benefits:	100%

**4A-3. List the healthcare organizations you are collaborating with to facilitate health insurance enrollment (e.g. Medicaid, Affordable Care Act options) for program participants. For each healthcare partner, detail the specific outcomes resulting from the partnership in the establishment of benefits for program participants. (limit 1000 characters)**

Nebraska is not a Medicaid expansion state. Community Action Agencies, key participants in the Balance of State CoC have been contracted by the State to disseminate information on the health care marketplace. Navigators employed by the CA agencies assist clients in determining eligibility and applying for assistance. Support is provided in applying to Medicaid through Access Nebraska and has resulted in a 12% higher rate of Medicaid enrollment.

**4A-4. What are the primary ways that the CoC ensures that program participants with health insurance are able to effectively utilize the healthcare benefits available?**

<b>Educational materials:</b>	<input checked="" type="checkbox"/>
<b>In-Person Trainings:</b>	<input checked="" type="checkbox"/>
<b>Transportation to medical appointments:</b>	<input checked="" type="checkbox"/>
One-on-one support of navigation and applying for benefits	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
<b>Not Applicable or None:</b>	<input type="checkbox"/>

## 4B. Additional Policies

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**4B-1. Based on the CoC's FY 2015 new and renewal project applications, what percentage of Permanent Housing (PSH and RRH), Transitional Housing (TH) and SSO (non-Coordinated Entry) projects in the CoC are low barrier? Meaning that they do not screen out potential participants based on those clients possessing a) too little or little income, b) active or history of substance use, c) criminal record, with exceptions for state-mandated restrictions, and d) history of domestic violence.**

### FY 2015 Low Barrier Designation

Total number of PH (PSH and RRH), TH and non-Coordinated Entry SSO project applications in the FY 2015 competition (new and renewal):	15
Total number of PH (PSH and RRH), TH and non-Coordinated Entry SSO renewal and new project applications that selected "low barrier" in the FY 2015 competition:	15
Percentage of PH (PSH and RRH), TH and non-Coordinated Entry SSO renewal and new project applications in the FY 2015 competition that will be designated as "low barrier":	100%

**4B-2. What percentage of CoC Program-funded Permanent Supportive Housing (PSH), RRH, SSO (non-Coordinated Entry) and Transitional Housing (TH) FY 2015 Projects have adopted a Housing First approach, meaning that the project quickly houses clients without preconditions or service participation requirements?**

### FY 2015 Projects Housing First Designation

Total number of PSH, RRH, non-Coordinated Entry SSO, and TH project applications in the FY 2015 competition (new and renewal):	15
Total number of PSH, RRH, non-Coordinated Entry SSO, and TH renewal and new project applications that selected Housing First in the FY 2015 competition:	12
Percentage of PSH, RRH, non-Coordinated Entry SSO, and TH renewal and new project applications in the FY 2015 competition that will be designated as Housing First:	80%

**4B-3. What has the CoC done to ensure awareness of and access to housing and supportive services within the CoC's geographic area to persons that could benefit from CoC-funded programs but are not currently participating in a CoC funded program? In particular, how does the CoC reach out to for persons that are least likely to request housing or services in the absence of special outreach?**

Direct outreach and marketing:	<input checked="" type="checkbox"/>
Use of phone or internet-based services like 211:	<input type="checkbox"/>
Marketing in languages commonly spoken in the community:	<input type="checkbox"/>
Making physical and virtual locations accessible to those with disabilities:	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
Not applicable:	<input type="checkbox"/>

**4B-4. Compare the number of RRH units available to serve any population from the 2014 and 2015 HIC.**

	2014	2015	Difference
RRH units available to serve any population in the HIC:	29	85	56

**4B-5. Are any new proposed project applications requesting \$200,000 or more in funding for housing rehabilitation or new construction?** No

**4B-6. If "Yes" in Questions 4B-5, then describe the activities that the project(s) will undertake to ensure that employment, training and other economic opportunities are directed to low or very low income persons to comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (Section 3) and HUD's implementing rules at 24 CFR part 135?  
 (limit 1000 characters)**

n/a

**4B-7. Is the CoC requesting to designate one or more of its SSO or TH projects to serve families with children and youth defined as homeless under other Federal statutes?** No

**4B-7a. If "Yes" in Question 4B-7, describe how the use of grant funds to serve such persons is of equal or greater priority than serving persons defined as homeless in accordance with 24 CFR 578.89. Description must include whether or not this is listed as a priority in the Consolidated Plan(s) and its CoC strategic plan goals. CoCs must attach the list of projects that would be serving this population (up to 10 percent of CoC total award) and the applicable portions of the Consolidated Plan. (limit 2500 characters)**

n/a

**4B-8. Has the project been affected by a major disaster, as declared by President Obama under Title IV of the Robert T. Stafford Act in the 12 months prior to the opening of the FY 2015 CoC Program Competition?** No

**4B-8a. If "Yes" in Question 4B-8, describe the impact of the natural disaster on specific projects in the CoC and how this affected the CoC's ability to address homelessness and provide the necessary reporting to HUD. (limit 1500 characters)**

n/a

**4B-9. Did the CoC or any of its CoC program recipients/subrecipients request technical assistance from HUD in the past two years (since the submission of the FY 2012 application)? This response does not affect the scoring of this application.** No

**4B-9a. If "Yes" to Question 4B-9, check the box(es) for which technical assistance was requested.**

This response does not affect the scoring of this application.

<b>CoC Governance:</b>	<input type="checkbox"/>
<b>CoC Systems Performance Measurement:</b>	<input type="checkbox"/>
<b>Coordinated Entry:</b>	<input type="checkbox"/>
<b>Data reporting and data analysis:</b>	<input type="checkbox"/>
<b>HMIS:</b>	<input type="checkbox"/>
<b>Homeless subpopulations targeted by Opening Doors: veterans, chronic, children and families, and unaccompanied youth:</b>	<input type="checkbox"/>
<b>Maximizing the use of mainstream resources:</b>	<input type="checkbox"/>
<b>Retooling transitional housing:</b>	<input type="checkbox"/>
<b>Rapid re-housing:</b>	<input type="checkbox"/>
<b>Under-performing program recipient, subrecipient or project:</b>	<input type="checkbox"/>
	<input type="checkbox"/>
<b>Not applicable:</b>	<input checked="" type="checkbox"/>

**4B-9b. If TA was received, indicate the type(s) of TA received, using the categories listed in 4B-9a, the month and year it was received and then indicate the value of the TA to the CoC/recipient/subrecipient involved given the local conditions at the time, with 5 being the highest value and a 1 indicating no value.**

This response does not affect the scoring of this application.

Type of Technical Assistance Received	Date Received	Rate the Value of the Technical Assistance

## 4C. Attachments

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

For required attachments related to rejected projects, if the CoC did not reject any projects then attach a document that says "Does Not Apply".

Document Type	Required?	Document Description	Date Attached
01. 2015 CoC Consolidated Application: Evidence of the CoC's Communication to Rejected Projects	Yes	Public Posting of...	11/06/2015
02. 2015 CoC Consolidated Application: Public Posting Evidence	Yes		
03. CoC Rating and Review Procedure	Yes	Renewal Performan...	10/13/2015
04. CoC's Rating and Review Procedure: Public Posting Evidence	Yes		
05. CoCs Process for Reallocating	Yes	NE-500 Reallocati...	10/13/2015
06. CoC's Governance Charter	Yes	NE-500 Written St...	10/12/2015
07. HMIS Policy and Procedures Manual	Yes	HMIS Standard Ope...	10/08/2015
08. Applicable Sections of Con Plan to Serving Persons Defined as Homeless Under Other Fed Statutes	No		
09. PHA Administration Plan (Applicable Section(s) Only)	Yes		
10. CoC-HMIS MOU (if referenced in the CoC's Governance Charter)	No	HMIS Lead MOA wit...	10/08/2015
11. CoC Written Standards for Order of Priority	No	NE-500 Coc-ESG Wr...	11/05/2015
12. Project List to Serve Persons Defined as Homeless under Other Federal Statutes	No		
13. Other	No	HMIS Governance C...	10/08/2015
14. Other	No		
15. Other	No		

## **Attachment Details**

**Document Description:** Public Posting of NE-500 Ranking Priority List

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:** Renewal Performance Evaluation Standards

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:** NE-500 Reallocation Policy and Process

## **Attachment Details**

**Document Description:** NE-500 Written Standards Including HUD  
Prioritization (CPD 14-012)

## **Attachment Details**

**Document Description:** HMIS Standard Operating Policies and Procedures

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:** HMIS Lead MOA with HMIS contributing organizations

## **Attachment Details**

**Document Description:** NE-500 Coc-ESG Written Standards

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:** HMIS Governance Charter\_2015

## Attachment Details

**Document Description:**

## Attachment Details

**Document Description:**

## Submission Summary

Page	Last Updated
<b>1A. Identification</b>	11/13/2015
<b>1B. CoC Engagement</b>	11/13/2015
<b>1C. Coordination</b>	11/13/2015
<b>1D. CoC Discharge Planning</b>	11/13/2015
<b>1E. Coordinated Assessment</b>	11/13/2015
<b>1F. Project Review</b>	11/13/2015
<b>1G. Addressing Project Capacity</b>	11/13/2015
<b>2A. HMIS Implementation</b>	11/13/2015
<b>2B. HMIS Funding Sources</b>	11/13/2015
<b>2C. HMIS Beds</b>	11/13/2015
<b>2D. HMIS Data Quality</b>	11/13/2015
<b>2E. Sheltered PIT</b>	11/13/2015
<b>2F. Sheltered Data - Methods</b>	11/13/2015
<b>2G. Sheltered Data - Quality</b>	11/13/2015
<b>2H. Unsheltered PIT</b>	11/13/2015
<b>2I. Unsheltered Data - Methods</b>	11/13/2015
<b>2J. Unsheltered Data - Quality</b>	11/13/2015
<b>3A. System Performance</b>	11/13/2015
<b>3B. Objective 1</b>	11/13/2015
<b>3B. Objective 2</b>	11/13/2015
<b>3B. Objective 3</b>	11/13/2015
<b>4A. Benefits</b>	11/13/2015
<b>4B. Additional Policies</b>	11/13/2015
<b>4C. Attachments</b>	Please Complete
<b>Submission Summary</b>	No Input Required

**Nebraska Balance of State CoC**  
**WRITTEN STANDARDS FOR ESG/CoC**  
**SERVICE Delivery**

**Adopted by the Nebraska Balance of State CoC on June 10, 2015.**

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Each Emergency Solutions Grant (ESG) and Continuum of Care (CoC) funded service provider shall comply with the minimum written standards established by the Nebraska Balance of State Continuum of Care. Each provider may decide to set standards on their provision of ESG/CoC that exceed these minimum standards, but will at the very least comply with the following:

## GENERAL STANDARDS

### PARTICIPANT ELIGIBILITY:

Minimum standards for evaluating individual and family eligibility for assistance under Emergency Solutions Grant (ESG) and Continuum of Care (CoC) are:

- **Street Outreach** – People who are qualify as ‘unsheltered homeless,’ based on category (1)(i) of the “homeless” definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.101): *engagement, case management, emergency health and mental health services, transportation*

- **Emergency Shelter** – People who qualify as ‘homeless,’ based on categories (1, 2, or 4) of the “homeless” definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.102): *case management; child care; education, employment and life skills services; legal services; health, mental health and substance abuse services; transportation*

**NOT ALLOWABLE: Mortgage and mortgage arrearage payments.**

- **Rapid Re-housing** – CoC and ESG funded rapid rehousing will follow the standards as set forth below. People who qualify as ‘homeless,’ based on categories (1 or 4) of the “homeless” definition found at 24 CFR 576.2 and/or 578.3 and who are moving into a housing unit that meets HUD’s habitability and lead-based paint standards are eligible for the following activities, in compliance with federal ESG and CoC rules (24 CFR 576.104, 576.105, 576.106, 578.37, 578.51 and 578.77,). Persons who meet the ‘category 2’ homeless definition are eligible for CoC funded Rapid Rehousing provided the project was not funded under special NOFA conditions (reallocated projects) that limit eligibility to those living on the streets or in shelters. Additionally persons receiving rapid rehousing through the ESG program must have incomes at or below 30% of the area median income (AMI) at annual recertification:

- **Housing Relocation and Stabilization Services:** *moving costs, rent application fees (ESG only), security deposits, last month’s rent, utility deposits, utility payments,(ESG only) housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management*
- **Rental Assistance:** *short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing*

The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant’s portion of the rent (arrearages covered under ESG only). Rent amount must not exceed HUD’s published Fair Market Rent and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental assistance agreement between the landlord and agency and a written lease between tenant and landlord. Each provider offering rapid rehousing must reevaluate the need for continued assistance every 90 days. Continued assistance will be provided for up to three (3) months at a time. Eligibility and income shall be reviewed no less frequently than annually. Participants in rapid rehousing are required to meet with case managers no less frequently than monthly.

**NOT ALLOWABLE: Mortgage and mortgage arrearage payments.**

- **Homelessness Prevention** – People who qualify as ‘at risk of homelessness,’ based on categories (2 or 4) of the “homeless” definition or based on the “At risk of homelessness” definition found at 24 CFR 576.2 and who reside in a housing unit that meets HUD’s habitability and lead-based paint standards and have an annual income

below 30% of Area Median Income (AMI), are eligible for the following services, in compliance with federal ESG rules (24 CFR 576.103, 576.105, 576.106):

- **Housing Relocation and Stabilization Services:** *moving costs, rent application fees, security deposits, last month's rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management*
- **Rental Assistance:** *short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing*

The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord.

**NOT ALLOWABLE: Mortgage and mortgage arrearage payments.**

- **Transitional Housing.** Transitional housing facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering the housing. Eligible persons for transitional housing meet the homeless definition based on categories 1, 2 and 4. Providers of transitional housing services shall arrange for or make available services to participants to assist them in securing permanent housing within specified time periods. Transitional housing may be provided in scatter site or single site locations. Individuals and families assisted in transitional housing shall be provided housing accommodations as well as a services program intended to address issues that may hinder the household from obtaining or maintaining stable long term housing.
- **Permanent Supportive Housing for Persons with Disabilities.** Eligible households include individuals with disabilities and families in which one adult or child has a disability. To be served households must also meet the definition of homelessness according to category 1 and 4. Supportive services designed to meet the needs of program participants must be made available to participants. Permanent supportive housing may be provided on a scatter site or single site basis using tenant based rental assistance, leasing or operating costs to support the operations of a supportive housing facility as well as supportive services to meet resident needs.

Any permanent support housing developed in the continuum of care is required to follow the Housing First model described in these standards.

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#### COORDINATED ASSESSMENT:

Minimum standards for centralized or coordinated assessment system are:

- Once the Continuum of Care has developed and adopted a centralized or coordinated assessment system in accordance with HUD's requirements (24 CFR Part 578) all providers within the Continuum of Care's area, except for victim service providers, shall use that assessment system.
  - A victim service provider may choose not to use the Continuum of Care's assessment system. However, all victim service providers are required to use a centralized or coordinated assessment system that meets HUD's minimum requirements.
  - This shall include the use of a standardized assessment tool by all providers to determine the appropriate intervention to address the episode of homelessness and the prioritization of individuals and families for assistance based on the severity of their service needs and the length of time homeless.
  - Ongoing training and support will be provided to all CoC and ESG funded providers in the assessment, prioritization and placement process.
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#### PROGRAM COORDINATION:

Minimum standards for program coordination consist of on-going system and program coordination and integration of ESG and CoC funded activities to the maximum extent practicable with the following:

- a. Emergency shelter providers, essential services providers, homelessness prevention, transitional housing, permanent supportive housing and rapid rehousing assistance providers;
- b. Other homeless assistance providers, including:
  - HUD-Veterans Affairs Supportive Housing (HUD-VASH);
  - Education for Homeless Children and Youth Grants for State and Local Activities (McKinney-Vento Homeless Assistance Act);
  - Grants for the Benefit of Homeless Individuals;
  - Healthcare for the Homeless;
  - Programs for Runaway and Homeless Youth;
  - Projects for the Assistance in the Transition from Homelessness;
  - Services in Supportive Housing Grants;
  - Emergency Food and Shelter Program;
  - Transitional Housing Assistance Grants for Victims of Sexual Abuse, Domestic Violence, and Stalking Program;
  - Homeless Veterans Reintegration Program;
  - Domiciliary Care for Homeless Veterans Program;
  - VA Homeless Providers Grant and Per Diem Program;
  - Health Care for Homeless Veterans Program;
  - Homeless Veterans Dental Program;
  - Supportive Services for Veterans Families Program; and

- Veterans Justice Outreach Initiative
- c. Mainstream service and housing providers:
- Public housing programs assisted under section 9 of the U.S. Housing Act of 1937;
  - Housing programs receiving Section 8 tenant based or project based assistance;
  - Supportive Housing for Persons with Disabilities;
  - HOME Investment Partnerships Program;
  - Temporary Assistance for Needy Families;
  - Health Center Program;
  - State Children’s Health Insurance Program;
  - Head Start;
  - Mental Health and Substance Abuse Block Grants;
  - Services funded under the Workforce Investment Act; and
  - State Housing Related Assistance Program for Adults with Serious Mental Illness
- d. Continuum of Care (CoC) Networks:
- Local Continuum of Care (CoC) meetings – *Nebraska has seven geographic regions, each has a Local CoC;*
  - Balance of State (BoS) Continuum of Care and BoS Committee meetings – *Each of the five Local CoCs (excluding Omaha & Lincoln) has two voting representatives on the BoS CoC;*
  - Governor’s Commission on Housing and Homelessness (includes provider representatives); and
  - Various other committees, task forces and workgroups.
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**HMIS:**

Minimum standards for ESG data are:

- Providers, except for victim service providers shall actively utilize the Homeless Management Information System (HMIS), to enter data on people served and assistance provided under ESG.
- Victim service providers shall actively utilize a comparable data system that meets HUD’s standards (24 CFR 576.107).
- Every four years, the Balance of State CoC will engage in a procurement process to select the HMIS lead and to manage the HMIS system. The HMIS lead will be responsible for CoC, ESG, and NHAP HMIS activities. Continuity is a critical factor in a well-run HMIS system ; therefore preference in the procurement may be granted to the existing provider.
- The HMIS provider will recommend to the CoC an HMIS software solution for the CoC.
- The HMIS lead is responsible for:
  - Maintaining and updating the HMIS data system

- Providing training and support to all HMIS users
  - Supporting a HMIS coordinator in each of the CoC's regions
  - Generating regular reports based on HMIS data including counts of homeless persons and performance reports on CoC and ESG funded providers.
  - Providing reports to HUD as required including the Annual Homelessness Assessment Report (AHAR).
  - The CoC has also designated the HMIS lead to assist in implementing the system of coordinated access to be used in the CoC.
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#### INCOME DETERMINATION:

Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609. Annual income is defined as:

*Annual income* means all amounts, monetary or not, which:

- (1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- (2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- (3) Which are not specifically excluded in paragraph (c) of 24 CFR 5.609.
- (4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

Individuals and families assisted under ESG are required to have annual incomes at or below 30% of Area Median. There are no income limits for CoC assistance but in all instances in which participants are charged rent or occupancy charges, the amount charged must be based on participant's verified annual income for all sources.

In verifying income, ESG and CoC funded providers are required to obtain third party verification whenever possible. Self-certification or verification is to be accepted only when all efforts have been made to obtain third party verification have not produced results.

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#### CONNECTION WITH OTHER RESOURCES:

Minimum standards for connection with other resources consist of assisting each participant to obtain, if applicable:

- Appropriate support services including:
  - Permanent housing;
  - Medical health treatment;
  - Behavioral health services;
  - Counseling;
  - Supervision; and
  - Other services needed for independent living.
- Other governmental and private assistance available to help with housing stability including:

- Medicaid;
  - Medicare
  - Supplemental Nutrition Assistance Program;
  - Women, Infants and Children (WIC);
  - Federal-State Unemployment Insurance Program;
  - Supplemental Security Income (SSI);
  - Social Security Disability Insurance (SSDI);
  - Child and Adult Care Food Program; and
  - Other available assistance.
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#### TERMINATION OF ASSISTANCE:

Minimum standards for termination of assistance are:

- **In general** – If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases after other remedies have been attempted.
  - **Due process rights for individuals and families facing program termination** – When an ESG or CoC funded homeless assistance program seeks to terminate participation for any household, the required formal process shall minimally consist of:
    - Written notice clearly stating the reasons for termination;
    - Review of the decision that gives the participant opportunity to present objections to the decision and to have representation. Any appeal of a decision shall be heard by an individual different from and not subordinate to the initial decision-maker; and
    - Prompt written notice of the final decision on the appeal.
  - **Ability to provide further assistance** – Termination will not bar the provider from providing later additional assistance to the same family or individual.
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#### LEAD-BASED PAINT:

Minimum standards for all shelters and program participant-occupied housing consist of compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR 576.403, including the Lead-Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4856) and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R.

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#### SAFETY, SANITATION & PRIVACY:

Minimum standards for all shelters and program participant-occupied housing consist of compliance with the safety, sanitation & privacy requirements identified in 24 CFR 576.403 and 578.75, including:

##### **Minimum standards for emergency shelters:**

Any building for which ESG funds were used for conversion, major rehabilitation or other renovation or that receives ESG assistance for shelter operations shall meet state/local government safety and sanitation standards, as well as the following:

- Structure and materials–The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Products and appliances–Any ESG funded renovation, including major rehabilitation and conversion, must use Energy Star and WaterSense products/appliances.
- Access–The shelter must comply with the applicable Rehabilitation, Fair Housing and Americans with Disabilities Acts and implementing regulations.
- Space and security–Unless it is a day shelter, it must provide appropriate places to sleep, adequate space, and security for residents and their belongings.
- Interior air quality–Each shelter room/space must have proper ventilation and be pollutant free.
- Water supply–Must be free of contamination.
- Sanitary facilities–Each participant must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- Thermal environment–The shelter must have the necessary, properly operating heating/cooling facilities.
- Illumination and electricity–The shelter must have adequate and appropriate lighting and safe electrical sources.
- Food preparation–Any food preparation areas must be able to store, prepare, and serve safe and sanitary food.
- Sanitary conditions–The shelter must be in sanitary condition.
- Fire safety–Each occupied unit of the shelter must have at least one working smoke detector and when possible they should be near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas must have at least one working detector and there must be a second means of exiting the building in the event of an emergency.

**Minimum standards for permanent and transitional housing** – Providers shall not use ESG or CoC funding to help someone remain or move into housing if the housing does not meet the following minimum habitability standards.

- Structure and materials–The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Space and security–Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep.
- Interior air quality–Each room or space must have proper ventilation and be pollutant free.
- Water supply–Must be free of contamination.
- Sanitary facilities–Residents must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.

- Thermal environment–The housing must have the necessary, properly operating heating/cooling facilities.
  - Illumination and electricity–The structure must have adequate and appropriate lighting and safe electrical sources.
  - Food preparation–All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food.
  - Sanitary conditions–The housing must be in sanitary condition.
  - Fire safety:
    - There must be a second means of exiting the building in the event of an emergency.
    - Each unit must include at least one properly working smoke detector on each occupied level of the unit, located when possible in a hallway adjacent to a bedroom.
    - If the unit is occupied by a hearing-impaired person, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom he or she occupies.
    - The public areas of the housing must be equipped with a sufficient number of detectors, but not less than one for each area.
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#### CONFLICTS OF INTEREST:

Minimum standards for conflicts of interest are:

##### **Organizational conflicts of interest:**

- ESG and CoC assistance will not be contingent on the individual’s or family’s acceptance or occupancy of emergency shelter or housing owned by the provider or a provider’s subsidiary or parent.
- No provider, with respect to individuals or families occupying housing owned by the provider or a provider’s subsidiary or parent, will carry out the initial evaluation under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.

##### **Individual conflicts of interest:**

- When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 24 CFR 84.42 (private non-profit) or 24 CFR 85.36 (government).

##### **All transactions/activities:**

- No CoC board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.
  - **Conflicts prohibited** – No person involved with the ESG or CoC programs or who is in a position to participate in a decision-making process or gain inside information regarding the program’s activities, shall obtain a financial interest or benefit from an assisted activity; have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity’s proceeds (either himself or herself or those with whom he or she has family or business ties) during his or her tenure or for one year following tenure.
  - **Persons covered** – These conflict of interest provisions apply to any employee, agent, consultant, officer or elected or appointed official of the provider’s agency.

- **Exceptions** – A provider may request an exception to these provisions from HUD, only if he or she meets the threshold requirements identified in 24 CFR 576.404 and/or 578.95(d)(2)
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#### HOMELESS PARTICIPATION:

Minimum standards for homeless participation are:

- Each funded provider of CoC or ESG assistance must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or equivalent policymaking entity of the provider. (24 CFR 578.75(g))
- To the maximum extent possible, the provider shall involve homeless individuals and families in paid or volunteer work on the ESG or CoC funded facilities, in providing services under ESG or CoC and in providing services for occupants of ESG or CoC funded facilities (24 CFR 576.405 and 578.75).

#### FAITH-BASED ACTIVITIES:

Minimum standards for faith-based activities (24 CFR 576.406 and 578.87) are:

- Providers receiving ESG/CoC funding shall not engage in inherently religious activities as part of the ESG/CoC-funded programs or services. Such activities must be offered separately from ESG/CoC-funded programs and services and participation must be voluntary.
  - A religious organization receiving ESG/CoC funding retains independence from government and may continue with its mission provided that ESG/CoC funds are not used to support inherently religious activities. An ESG/CoC-funded organization retains its authority over its internal governance.
  - An organization receiving ESG/CoC funding shall not discriminate against a participant or prospective participant based on religion or religious beliefs.
  - ESG/CoC funding shall not be used for the rehabilitation of structures used specifically for religious activities, but may be used for rehabilitating structures that are used for ESG/CoC-eligible activities.
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**PROHIBITION AGAINST INVOLUNTARY FAMILY SEPARATION.** The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to any housing or shelter receiving funding from either ESG or CoC (578.93(e))

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#### NONDISCRIMINATION/EQUAL OPPORTUNITY/AFFIRMATIVE OUTREACH:

Minimum standards shall comply with the requirements for nondiscrimination, equal opportunity and affirmative outreach identified in §576.407 and 578.93(a-b).

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#### PROGRAM INCOME:

Minimum standards for private non-profit organizations for program income earned during the project period are that the program income shall be retained and used to finance the non-Federal share of the project or program. Records of the receipt and use of program income shall be retained. Program income may not be used to meet matching funding requirements.

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#### RECOVERED MATERIALS:

Minimum standards for the procurement of recovered materials shall comply with the requirements identified in §576.407(f) and 578.99(b), including that the recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

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**DISPLACEMENT:** Minimum standards for minimizing the displacement of persons (families, individuals, businesses, nonprofit organizations and farms) as a result of a project assisted under ESG and/or CoC shall comply with §576.408 and/or 578.83 and consist of:

**Minimizing displacement** – Consistent with ESG/CoC goals and objectives, the providers shall minimize displacing people as a result of ESG/CoC-funded projects.

**Temporary relocation not permitted** - No temporary relocation shall be required for an ESG/CoC-funded project. When a tenant has to move for an ESG/CoC-funded project, the tenant shall be treated as permanently displaced and offered relocation assistance and payments.

**Relocation assistance for displaced persons -**

In general – A displaced person shall be provided relocation assistance and advised of his or her Fair Housing Rights.

Displaced Person - A “displaced person” is defined as any person that moves from a permanent home as a result of ESG/CoC-funded acquisition, rehabilitation, or demolition of a project.

**A person does not qualify as a “displaced person” if the person:**

- Was evicted based on a violation of the lease or occupancy agreement; violation of the law; and the recipient determines that the eviction was not undertaken to evade the obligation to provide relocation assistance.
- Moved into the property after the application was submitted but was provided with written notice that he or she would not qualify as a “displaced person.”
- The person is ineligible under 49 CFR 24.2.
- HUD determines that the person was not displaced as a result of the project.

The State or the provider may request that HUD determine whether or not a displacement would be covered by this rule.

**Real property acquisition requirements** – The acquisition of real property for an ESG/CoC funded project is subject to the URA and Federal government wide regulations.

**Appeals** - A person who disagrees with the recipient's determination concerning whether the person qualifies as a displaced person, or the amount of relocation assistance may file a written appeal. A low-income person who disagrees with the recipient's determination may submit a written request for review of that determination by HUD.

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#### RECORDS & RECORDKEEPING:

Minimum standards shall ensure sufficient written records are established and maintained to enable the State and HUD to determine whether ESG/CoC requirements are being met and comply with §576.500 and 578.103, including the following:

- CoC records shall include the following documentation related to establishing and operating the Continuum of Care:
  - Evidence that the Board selected meets the requirements of 578.5(b);
  - Evidence that the CoC has been established and operated as set forth in subpart B of 24 CFR part 578 including published agendas and meeting minutes, an approved Governance Charter that is reviewed and updated annually, a written process for selecting a board that is reviewed and updated at least every five years, evidence required for designating a single HMIS for the CoC, and monitoring reports of recipients and sub-recipients.
  - Evidence that the CoC has prepared the HUD application for funds in accordance with 578.9
- Program participant records shall include written:
  - Determination and verification/certification that the program participant met the criteria for being Homeless or At Risk of Homelessness and that an effort was made to obtain written third-party verification, when possible and applicable.
  - For CoC funded projects, acceptable evidence of homeless status as set forth in 576.500(b).
  - Determination and verification/certification that the program participant was eligible or ineligible for the particular services and/or financial assistance
  - Determination and verification/certification that the program participant lacked sufficient resources and support networks to provide the assistance
  - Determination and verification/certification that the program participant met income requirements and that an effort was made to obtain written third-party verification, when possible and applicable. This includes annual documentation of income for each program participant who receives housing assistance where rent or an occupancy charge is paid by the program participant.

- Determination and verification/certification that the only households served through permanent supportive housing meet HUD's requirements of having a family member be a person with disabilities.
  - Identification of the specific services and financial assistance amounts that were provided to the program participant
  - When applicable, verification that the services were terminated in compliance with 576.402 and/or 578.91.
  - When adopted by the Continuum of Care, a copy of the CoC-approved centralized or coordinated assessment of the program participant
  - Copies of written leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with fair market rent, rent reasonableness and utility allowance requirements
  - Determination and verification that the housing unit met HUD's habitability and lead-based paint standards
  - Copy of individualized housing stability plan
  - Notes verifying case management services were provided at least monthly, unless exempt from this requirement
  - Notes verifying program participant's eligibility was re-evaluated at least every 3 months for homelessness prevention services or at least annually for rapid rehousing services
  - Notes verifying program participant was assisted to obtain necessary mainstream and other resources
- Program policies and procedures shall indicate:
    - Services are coordinated with Continuum(s) of Care, other homeless assistance/prevention programs and mainstream service and assistance programs
    - Compliance with HUD's ESG (24 CFR 576 and 578) requirements for:
      - Shelter and housing standards
      - Conflict of interest
      - Homeless participation
      - Faith-based activity
      - Nondiscrimination, equal opportunity and affirmative outreach
      - Uniform administrative rules (24 CFR part 84)
      - Environmental review
      - Lobbying and disclosure (24 CFR part 87)
      - Displacement, relocation and acquisition
      - Procurement (24 CFR 84.40-84.48)
    - Program participant records are kept secure and confidential
    - Participation in HMIS or comparable database
  - Financial records shall include:
    - Supporting documentation for all costs charged to ESG or CoC grant

- Documentation showing ESG or CoC funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles
  - Documentation of the receipt and use of program income
  - Documentation of the receipt and use of matching funds
  - Copies of procurement contracts
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## STREET OUTREACH STANDARDS

### MINIMUM STANDARDS:

#### **Targeting/Engagement:**

Providers of Street Outreach services shall target unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station airport or camping ground.

#### **Assessment/Service Provision/Referral/Prioritization:**

- Individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered the following Street Outreach services, as needed and appropriate: engagement, case management, emergency health and mental health, transportation services.
- When appropriate based on the individual's needs and wishes, the provision of or referral to rapid rehousing services that can quickly assist individuals to obtain safe, permanent housing shall be prioritized over the provision of or referral to emergency shelter or transitional housing services.

## EMERGENCY SHELTER STANDARDS

### MINIMUM STANDARDS:

- **Admission:**  
Providers of Emergency Shelter services shall admit individuals and families who meet the HUD definition of “homeless,” as specified in 24 CFR 576.2 (1, 2, & 4) and agencies’ eligibility criteria.
- **Assessment:**  
Individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered Emergency Shelter services, as needed and appropriate. Assessment shall be based on the coordinated assessment process employed by the CoC.
- **Prioritization/Diversion/Referral:**  
When appropriate based on the individual’s needs and wishes, the provision of or referral to Homeless Prevention or Rapid Rehousing services that can quickly assist individuals to maintain or obtain safe, permanent housing shall be prioritized over the provision of Emergency Shelter or Transitional Housing services.
- **Reassessment:**  
Program participants will be reassessed as case management progresses, based on the individual service provider’s policies.
- **Discharge/Length of Stay:**  
Program participants shall be discharged from Emergency Shelter services when they choose to leave or when they have successfully obtained safe, permanent housing. Any Length of Stay limitations shall be determined by the individual service provider’s policies and clearly communicated to program participants. Providers of shelter services are strongly encouraged not to discharge individuals and families who have not secured permanent housing and maintain those households in shelter until they can be placed in appropriate permanent housing.
- **Safety and Shelter Safeguards for Special Populations:**  
Safety and Shelter Safeguards shall be determined by the individual Special Population service provider’s policies and clearly communicated to program participants.

## HOMELESSNESS PREVENTION AND RAPID RE-HOUSING STANDARDS

### ELIGIBILITY/PRIORITIZATION:

Minimum standards for determining and prioritizing which eligible families and individuals shall receive homelessness prevention assistance and which eligible families and individuals shall receive rapid rehousing assistance are:

- **Rapid Re-housing (RR)** – To be eligible for RR Housing Relocation and Stabilization Services and Short-term and Medium-term Rental Assistance, people must:
  - Meet the federal criteria under category (1) of the “homeless” definition in 24 CFR 576.2 [ESG funded programs]
  - Meet the criteria under category (4) of the “homeless” definition in 24 CFR 576.2 and live in an emergency shelter or other place described in category (1) of the “homeless” definition. [ESG funded programs]
  - Program participant’s annual income, at annual review must be less than or equal to 30% of the Area Median Income [ESG Funded programs only]
  - Meet the federal requirements under categories 1, 2, or 4. (literally homeless, imminently losing primary nighttime residence, and fleeing domestic violence) for CoC funded projects
  - All participants must lack sufficient resources or support networks to retain housing without ESG or CoC assistance.
- **Homelessness Prevention (HP) ESG** – To be eligible for HP Housing Relocation and Stabilization Services and Short-term and Medium-term Rental Assistance, people must require HP services to prevent moving into an emergency shelter or another place described in category (1) of the “homeless” definition in 24 CFR 576.2, have an annual income below 30% of the median income for the area and:
  - Meet the federal criteria under the “at risk of homelessness” definition in 24 CFR 576.2 OR
  - Meet the criteria in category (2), or (4) of the “homeless” definition in 24 CFR 576.2.
- **Priority populations for Rapid Rehousing.**  
In providing rapid rehousing assistance, providers shall prioritize the following sub-populations:
  - Families with children;
  - Domestic violence survivors;
  - Single persons without long term disabilities; and
  - Veterans, especially those persons who have served in the US military but are not eligible for services from the Department of Veterans Affairs (VA) or who are unable to access services from the VA.

### PARTICIPANT CONTRIBUTION:

Minimum standards for determining what percentage or amount of rent and utilities costs each program participant shall pay while receiving homelessness prevention or rapid re-housing assistance are:

- Participant's income shall be verified prior to approval for initial and additional financial assistance. Documentation of the participant's income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in participant's file. This file shall also contain a plan to sustain housing following the assistance, including either a plan to increase income or decrease expenses or both.
- Participants are not required to contribute rent. Providers funded under ESG or CoC may pay up to 100 percent of the reasonable rent and utility costs for program participants. Providers may, at their discretion, choose to impose rental charges on participants. In the event that providers elect to charge rent or occupancy charges, these charges may not exceed those established in 24 CFR 578.77.
- Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider's policies and clearly communicated to program participants.

#### RENTAL ASSISTANCE DURATION AND ADJUSTMENT:

Minimum standards for determining how long a particular program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time are:

- Participants receive approval for the minimum amount of financial assistance necessary to prevent homelessness. Documentation of financial need shall be kept in the participant's file for each month of financial assistance received. Participants shall not be approved for more rental assistance than can be justified given their income and expenses at a given time.
- Approval for rental assistance shall be granted in three month increments. Providers must re-assess the continuing need for rental assistance before approving an additional three month increment. In no event will assistance under rapid rehousing exceed 24 months in any 36 month period.
- Any additional requirements regarding how long a program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time shall be determined by the individual service provider's policies and clearly communicated to program participants.

#### SERVICE TYPE, AMOUNT & DURATION:

Minimum 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 shall receive, such as the maximum amount of assistance, maximum number of months the program participant may receive assistance; or the maximum number of times the program participant may receive assistance are:

- **Financial Assistance:**

- **Use with other subsidies** – Payment for Financial Assistance costs shall not be provided to a participant who is receiving the same type of financial assistance through other public sources or to a participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.
- **Rental application fees [ESG only]** – Payment shall only be made for fees charged by the owner to all applicants.
- **Security deposits** – Payment shall not exceed two (2) month's rent.
- **Last month's rent** – Payment shall not exceed one (1) month's rent and shall be included in calculating the participant's total rental assistance.
- **Utility deposits [ESG/CoC]** – Payment shall only be made for gas, electric, water and sewage deposits.
- **Utility payments [ESG only]:**
  - Payment shall not exceed 24 months per participant, including no more than 6 months of utility payments in arrears, per service.
  - A partial payment counts as 1 month.
  - Payment shall only be made if the utility account is in the name of the participant or a member of the same household.
  - Payment shall only be made for gas, electric, water and sewage costs.
  - Participants shall not receive more than 24 months of utility assistance within any 3-year period.
- **Moving costs [ESG/CoC]** – reasonable one-time moving expenses are eligible.

- **Housing Relocation and Stabilization Services:**

- **Housing search and placement services** – Payment shall only be made for assisting participants to locate, obtain and retain suitable permanent housing through provision of the following services:
  - Assessment of housing barriers, needs and preferences
  - Development of an action plan for locating housing
  - Housing search
  - Outreach to and negotiation with owners
  - Assistance with submitting rental applications and understanding leases
  - Assessment of housing for compliance with ESG requirements for habitability, lead-based paint and rent reasonableness
  - Assistance with obtaining utilities and making moving arrangements
  - Tenant counseling

Payment for housing search and placement services shall not exceed 24 months during any 3-year period.

- **Housing stability case management** – Payment shall only be made for assessing, arranging, coordinating and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing or

to assist a participant in overcoming immediate barriers to obtaining housing through provision of the following services:

- Using the centralized or coordinated assessment system
- Conducting the initial evaluation, including verifying and documenting participant eligibility
- Counseling
- Developing, securing and coordinating services and obtaining Federal, State and local benefits
- Monitoring and evaluating participant progress
- Providing information and referral to other providers
- Developing an individualized housing and service plan
- Conducting re-evaluations

Payment for housing stability case management services provided while the participant is seeking permanent housing shall not exceed 30 days.

Payment for housing stability case management services provided while the participant is living in permanent housing shall not exceed 24 months.

- **Mediation [ESG only]** – Payment shall only be made for the cost of mediation between the participant and the owner or person with whom the participant is living, if it is necessary to prevent the participant from losing the permanent housing where he/she resides. Payment for mediation services shall not exceed 24 months during any 3-year period.
- **Legal services** – Payment shall only be made for the cost of legal services, if they are necessary to resolve a legal problem that prohibits the participant from obtaining permanent housing or will likely result in the participant losing the permanent housing where he/she resides. Payment for legal services shall not exceed 24 months during any 3-year period. Assistance may NOT be provided for immigration and citizenship matters. Payment arrangements may NOT include retainer or contingency fee agreements. Eligible subject matters for legal services include: child support, guardianship, paternity, emancipation, legal separation, orders of protection for victims of domestic violence, appeal of benefit claim denials, landlord tenant disputes and resolution of outstanding criminal warrants. Only approved Legal Services provider through NHAP can provide ESG legal services.
- **Credit repair [ESG only]** – Payment shall only be made for the cost of assisting the participant in obtaining skills related to household budgeting, managing money, accessing a free personal credit report and resolving personal credit problems. Payment will not be made for a debt or modification of a debt. Payment for credit repair services shall not exceed 24 months during any 3-year period.

- **Rental Assistance:**

- Payment shall not exceed 24 months total during a 3-year period in tenant-based or project-based (ESG only) housing.
- Payment for short-term rental assistance shall not exceed 3 months.
- Payment for medium-term rental assistance shall be for more than 3 months, but shall not exceed 24 months.
- Payment for rent arrears shall not exceed 6 months and shall be a one-time payment, including any late fees [ESG funded projects only – CoC not eligible]
- Except for a one-time payment of rental arrears on the participant’s portion, payment shall not be provided to a participant who is receiving tenant-based rental assistance or living in a unit receiving project-based assistance or to a participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments. [ESG only]
- Payment shall not exceed the Fair Market Rent established by HUD and shall comply with HUD’s standard of rent reasonableness (24 CFR 982.507).
- Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet and late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.
- Payment for shall only be made when there is a rental assistance agreement between the agency and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the subrecipient with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period and late payment penalty requirement as the participant’s lease.
- Payment of any late payment penalties incurred by the agency shall not be claimed for reimbursement.
- Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner, except for payment of rental arrears (ESG only).
- Payment shall only be made for units that have been inspected for HUD Housing Quality Standards and re-inspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet Housing Quality Standards.

- **Tenant-Based Rental Assistance**

The rental assistance agreement with the unit owner shall be terminated without further payment if:

- The participant moves out of the unit
- The lease terminates and is not renewed
- The participant becomes ineligible to receive ESG/CoC rental assistance

- **Project-Based Rental Assistance [ESG only]**

Payment shall only be made under the following conditions:

- The lease has an initial term of one year
- The rental assistance agreement covers one or more permanent housing units in the same building
- Each unit covered by the agreement is only occupied by participants
- Payment will only be made for up to 100% of the first month's rent, if the participant signs a lease and moves into the unit before the end of the month

Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

#### RE-EVALUATIONS:

Minimum standards for completing eligibility re-evaluations of individuals and families are:

##### Timing:

- Homelessness Prevention – participants shall be re-evaluated not less than once every three months
- Rapid Rehousing – participants shall be re-evaluated not less than once annually

##### Eligibility:

- The participant shall have an annual income that is 30 percent of median family income for the area or less, as determined by HUD [ESG only]; and
- The participant shall lack sufficient resources and support networks necessary to retain housing without ESG/CoC assistance.

## TRANSITIONAL HOUSING STANDARDS

#### ELIGIBILITY/PRIORITIZATION:

Minimum standards for determining and prioritizing which eligible families and individuals shall receive transitional housing are:

- To be eligible for transitional housing people must: Meet the federal criteria under category (1), (2) or (4) of the "homeless" definition in 24 CFR 576.2

Transitional housing shall be prioritized to serve the following populations of eligible homeless people:

- Youth
- Persons seeking to continue recovery in recovery-focused housing
- Institutional re-entry (may not be eligible for CoC funding but needed from people leaving criminal justice and mental health facilities)

- Persons fleeing domestic abuse or violence where it is not possible to find units for rapid rehousing

#### LIMITATION ON OCCUPANCY

No individual or family may be assisted in transitional housing for a period in excess of 24 months. No person shall be discharged from transitional housing into homelessness as a result of this limitation. Transitional housing programs are expected to place individuals and families into permanent housing within 12 months. Programs that maintain participants for longer than 24 months or those with over half their participants remaining for over 12 months may have their funding discontinued.

#### PARTICIPANT CONTRIBUTION

Individuals and families residing in transitional housing are not required to pay rent. Providers of transitional housing may impose occupancy charges. If the provider elects to charge rent or occupancy charges, the charges may not exceed those specified in 578.77.

#### PROGRAM FEES

No fee other than rent or occupancy charges as specified above may be charged to program participants. This includes meals, copayments for services, transportation and all other services that may be provided to program participants.

#### OCCUPANCY AGREEMENTS

All individuals and families served in transitional housing must be provided an occupancy agreement for a minimum of a monthly term and which can be renewed provided that the household does not remain in transitional housing for longer than 24 months. The agreement must specify the requirements for program participation. With the exception of programs providing recovery focused services for persons with substance use disorders, residents in transitional housing may not be required to participate in disability related services. Participants may be required to participate in services that are not disability related and may discharge participants for failure to participate in these services. No person may be terminated from transitional housing without first being provided the right to appeal that decision in accordance with the due process provisions at 24 CFR 578.91(b)

## PERMANENT SUPPORTIVE HOUSING STANDARDS

#### ELIGIBILITY/PRIORITIZATION:

Minimum standards for determining and prioritizing which eligible families and individuals shall receive permanent supportive housing are:

- To be eligible for permanent supportive housing people must: Meet the federal criteria under category (1) or (4) of the “homeless” definition in 24 CFR 576.2. Eligible households include individuals with disabilities and families in which one adult or child has a disability.
- **Priority populations for Permanent Supportive Housing.** In providing permanent supportive housing, providers shall prioritize the following populations:
  - Persons who are highly vulnerable with severe service needs;
  - Those who have been homeless for the longest period of time or who have had repeated episodes of homelessness over an extended period.
  - Veterans.
- **Order of priority in CoC program funded permanent supportive housing beds dedicated to persons experiencing chronic homelessness, and PSH beds prioritized for occupancy by persons experiencing chronic homelessness.**
  - First priority: chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs.
  - Second priority: chronically homeless families and individuals with the longest history of homelessness.
  - Third priority: chronically homeless individuals and families with the most severe service needs.
- **Order of priority in permanent supportive housing beds not dedicated or prioritized for persons experiencing chronic homelessness:**
  - First priority: homeless individuals and families with a disability and the most severe service needs;
  - Second priority: homeless individuals and families with a disability with a long period of continuous or episodic homelessness.
  - Third priority: homeless individuals and families with a disability with a long period of continuous or episodic homelessness.
  - Fourth priority: homeless individuals and families with a disability coming from transitional housing.
- **Single, Prioritized Wait List for Permanent Supportive Housing**
  - The Balance of State CoC will establish a single, prioritized wait list for permanent supportive housing. The wait list will be prioritized according to the order of priority identified above. The single priority waitlist and referral process will allow CoC participants to exercise freedom of choice. Participants may be offered access to housing that is not within their home communities but shall not require participants to relocate in order to obtain housing assistance.
- **Housing First.** Providers of permanent supportive housing shall use the Housing First model as outlined below. Any new projects funded by the CoC must use the Housing First model. Any existing permanent supportive housing project that has indicated in application to HUD that it employs the Housing First model must follow the standards as set forth below. Existing permanent supportive housing projects that have not indicated Housing First are ‘grandfathered’ from this policy.

- **Housing First projects:**
  - Housing is not contingent on compliance with services – participants are provided with a standard one year lease agreement. The lease agreement can only be terminated in accordance with the State of Nebraska Uniform Residential Landlord and Tenant Act (76-1401 to 76-1449)
  - Participants are provided with services and supports to help maintain housing and prevent eviction.
  - There is no requirement for sobriety prior to being offered housing and admission shall not be conditioned on credit or background checks. Criminal backgrounds will be considered only to the extent necessary to protect safety and well-being.
  - Participants shall be given choice in their housing subject to program limitations.
  - Participants are not required to participate in services but providers are required to persistently and consistently seek to engage participants.
  - Providers are encouraged to support staff in implementing Evidence Based Practices that support Housing First (Critical Time Intervention, Motivational Interviewing, Stages of Change)
- Projects that are designated as Housing First shall be contractually obligated to follow these principles and will be subject to monitoring.
  - o Payment for rental assistance shall only be made when there is a rental assistance agreement between the agency and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the subrecipient with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period and late payment penalty requirement as the participant’s lease.
  - o Payment of any late payment penalties incurred by the agency shall not be claimed for reimbursement.
  - o Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner.
    - o Payment shall only be made for units that have been inspected for HUD Housing Quality Standards and re-inspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet Housing Quality Standards.

## PARTICIPANT CONTRIBUTION

Individuals and families residing in permanent supportive housing are required to pay rent. Rent charges may not exceed those specified in 578.77.

## PROGRAM FEES

No fee other than rent or occupancy charges as specified above may be charged to program participants. This includes meals, copayments for services, transportation and all other services that may be provided to program participants

**Nebraska Balance of State CoC**  
**WRITTEN STANDARDS FOR ESG/CoC**  
**SERVICE Delivery**

**Adopted by the Nebraska Balance of State CoC on June 10, 2015.**

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Each Emergency Solutions Grant (ESG) and Continuum of Care (CoC) funded service provider shall comply with the minimum written standards established by the Nebraska Balance of State Continuum of Care. Each provider may decide to set standards on their provision of ESG/CoC that exceed these minimum standards, but will at the very least comply with the following:

## GENERAL STANDARDS

### PARTICIPANT ELIGIBILITY:

Minimum standards for evaluating individual and family eligibility for assistance under Emergency Solutions Grant (ESG) and Continuum of Care (CoC) are:

- **Street Outreach** – People who are qualify as ‘unsheltered homeless,’ based on category (1)(i) of the “homeless” definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.101): *engagement, case management, emergency health and mental health services, transportation*

- **Emergency Shelter** – People who qualify as ‘homeless,’ based on categories (1, 2, or 4) of the “homeless” definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.102): *case management; child care; education, employment and life skills services; legal services; health, mental health and substance abuse services; transportation*

**NOT ALLOWABLE: Mortgage and mortgage arrearage payments.**

- **Rapid Re-housing** – CoC and ESG funded rapid rehousing will follow the standards as set forth below. People who qualify as ‘homeless,’ based on categories (1 or 4) of the “homeless” definition found at 24 CFR 576.2 and/or 578.3 and who are moving into a housing unit that meets HUD’s habitability and lead-based paint standards are eligible for the following activities, in compliance with federal ESG and CoC rules (24 CFR 576.104, 576.105, 576.106, 578.37, 578.51 and 578.77,). Persons who meet the ‘category 2’ homeless definition are eligible for CoC funded Rapid Rehousing provided the project was not funded under special NOFA conditions (reallocated projects) that limit eligibility to those living on the streets or in shelters. Additionally persons receiving rapid rehousing through the ESG program must have incomes at or below 30% of the area median income (AMI) at annual recertification:

- **Housing Relocation and Stabilization Services:** *moving costs, rent application fees (ESG only), security deposits, last month’s rent, utility deposits, utility payments,(ESG only) housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management*
- **Rental Assistance:** *short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing*

The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant’s portion of the rent (arrearages covered under ESG only). Rent amount must not exceed HUD’s published Fair Market Rent and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental assistance agreement between the landlord and agency and a written lease between tenant and landlord. Each provider offering rapid rehousing must reevaluate the need for continued assistance every 90 days. Continued assistance will be provided for up to three (3) months at a time. Eligibility and income shall be reviewed no less frequently than annually. Participants in rapid rehousing are required to meet with case managers no less frequently than monthly.

**NOT ALLOWABLE: Mortgage and mortgage arrearage payments.**

- **Homelessness Prevention** – People who qualify as ‘at risk of homelessness,’ based on categories (2 or 4) of the “homeless” definition or based on the “At risk of homelessness” definition found at 24 CFR 576.2 and who reside in a housing unit that meets HUD’s habitability and lead-based paint standards and have an annual income

below 30% of Area Median Income (AMI), are eligible for the following services, in compliance with federal ESG rules (24 CFR 576.103, 576.105, 576.106):

- **Housing Relocation and Stabilization Services:** *moving costs, rent application fees, security deposits, last month's rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management*
- **Rental Assistance:** *short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing*

The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord.

**NOT ALLOWABLE: Mortgage and mortgage arrearage payments.**

- **Transitional Housing.** Transitional housing facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering the housing. Eligible persons for transitional housing meet the homeless definition based on categories 1, 2 and 4. Providers of transitional housing services shall arrange for or make available services to participants to assist them in securing permanent housing within specified time periods. Transitional housing may be provided in scatter site or single site locations. Individuals and families assisted in transitional housing shall be provided housing accommodations as well as a services program intended to address issues that may hinder the household from obtaining or maintaining stable long term housing.
- **Permanent Supportive Housing for Persons with Disabilities.** Eligible households include individuals with disabilities and families in which one adult or child has a disability. To be served households must also meet the definition of homelessness according to category 1 and 4. Supportive services designed to meet the needs of program participants must be made available to participants. Permanent supportive housing may be provided on a scatter site or single site basis using tenant based rental assistance, leasing or operating costs to support the operations of a supportive housing facility as well as supportive services to meet resident needs.

Any permanent support housing developed in the continuum of care is required to follow the Housing First model described in these standards.

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#### COORDINATED ASSESSMENT:

Minimum standards for centralized or coordinated assessment system are:

- Once the Continuum of Care has developed and adopted a centralized or coordinated assessment system in accordance with HUD's requirements (24 CFR Part 578) all providers within the Continuum of Care's area, except for victim service providers, shall use that assessment system.
  - A victim service provider may choose not to use the Continuum of Care's assessment system. However, all victim service providers are required to use a centralized or coordinated assessment system that meets HUD's minimum requirements.
  - This shall include the use of a standardized assessment tool by all providers to determine the appropriate intervention to address the episode of homelessness and the prioritization of individuals and families for assistance based on the severity of their service needs and the length of time homeless.
  - Ongoing training and support will be provided to all CoC and ESG funded providers in the assessment, prioritization and placement process.
- 

#### PROGRAM COORDINATION:

Minimum standards for program coordination consist of on-going system and program coordination and integration of ESG and CoC funded activities to the maximum extent practicable with the following:

- a. Emergency shelter providers, essential services providers, homelessness prevention, transitional housing, permanent supportive housing and rapid rehousing assistance providers;
- b. Other homeless assistance providers, including:
  - HUD-Veterans Affairs Supportive Housing (HUD-VASH);
  - Education for Homeless Children and Youth Grants for State and Local Activities (McKinney-Vento Homeless Assistance Act);
  - Grants for the Benefit of Homeless Individuals;
  - Healthcare for the Homeless;
  - Programs for Runaway and Homeless Youth;
  - Projects for the Assistance in the Transition from Homelessness;
  - Services in Supportive Housing Grants;
  - Emergency Food and Shelter Program;
  - Transitional Housing Assistance Grants for Victims of Sexual Abuse, Domestic Violence, and Stalking Program;
  - Homeless Veterans Reintegration Program;
  - Domiciliary Care for Homeless Veterans Program;
  - VA Homeless Providers Grant and Per Diem Program;
  - Health Care for Homeless Veterans Program;
  - Homeless Veterans Dental Program;
  - Supportive Services for Veterans Families Program; and

- Veterans Justice Outreach Initiative
- c. Mainstream service and housing providers:
- Public housing programs assisted under section 9 of the U.S. Housing Act of 1937;
  - Housing programs receiving Section 8 tenant based or project based assistance;
  - Supportive Housing for Persons with Disabilities;
  - HOME Investment Partnerships Program;
  - Temporary Assistance for Needy Families;
  - Health Center Program;
  - State Children’s Health Insurance Program;
  - Head Start;
  - Mental Health and Substance Abuse Block Grants;
  - Services funded under the Workforce Investment Act; and
  - State Housing Related Assistance Program for Adults with Serious Mental Illness
- d. Continuum of Care (CoC) Networks:
- Local Continuum of Care (CoC) meetings – *Nebraska has seven geographic regions, each has a Local CoC;*
  - Balance of State (BoS) Continuum of Care and BoS Committee meetings – *Each of the five Local CoCs (excluding Omaha & Lincoln) has two voting representatives on the BoS CoC;*
  - Governor’s Commission on Housing and Homelessness (includes provider representatives); and
  - Various other committees, task forces and workgroups.
- 

HMIS:

Minimum standards for ESG data are:

- Providers, except for victim service providers shall actively utilize the Homeless Management Information System (HMIS), to enter data on people served and assistance provided under ESG.
- Victim service providers shall actively utilize a comparable data system that meets HUD’s standards (24 CFR 576.107).
- Every four years, the Balance of State CoC will engage in a procurement process to select the HMIS lead and to manage the HMIS system. The HMIS lead will be responsible for CoC, ESG, and NHAP HMIS activities. Continuity is a critical factor in a well-run HMIS system ; therefore preference in the procurement may be granted to the existing provider.
- The HMIS provider will recommend to the CoC an HMIS software solution for the CoC.
- The HMIS lead is responsible for:
  - Maintaining and updating the HMIS data system

- Providing training and support to all HMIS users
  - Supporting a HMIS coordinator in each of the CoC's regions
  - Generating regular reports based on HMIS data including counts of homeless persons and performance reports on CoC and ESG funded providers.
  - Providing reports to HUD as required including the Annual Homelessness Assessment Report (AHAR).
  - The CoC has also designated the HMIS lead to assist in implementing the system of coordinated access to be used in the CoC.
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#### INCOME DETERMINATION:

Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609. Annual income is defined as:

*Annual income* means all amounts, monetary or not, which:

- (1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- (2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- (3) Which are not specifically excluded in paragraph (c) of 24 CFR 5.609.
- (4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

Individuals and families assisted under ESG are required to have annual incomes at or below 30% of Area Median. There are no income limits for CoC assistance but in all instances in which participants are charged rent or occupancy charges, the amount charged must be based on participant's verified annual income for all sources.

In verifying income, ESG and CoC funded providers are required to obtain third party verification whenever possible. Self-certification or verification is to be accepted only when all efforts have been made to obtain third party verification have not produced results.

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#### CONNECTION WITH OTHER RESOURCES:

Minimum standards for connection with other resources consist of assisting each participant to obtain, if applicable:

- Appropriate support services including:
  - Permanent housing;
  - Medical health treatment;
  - Behavioral health services;
  - Counseling;
  - Supervision; and
  - Other services needed for independent living.
- Other governmental and private assistance available to help with housing stability including:

- Medicaid;
  - Medicare
  - Supplemental Nutrition Assistance Program;
  - Women, Infants and Children (WIC);
  - Federal-State Unemployment Insurance Program;
  - Supplemental Security Income (SSI);
  - Social Security Disability Insurance (SSDI);
  - Child and Adult Care Food Program; and
  - Other available assistance.
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#### TERMINATION OF ASSISTANCE:

Minimum standards for termination of assistance are:

- **In general** – If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases after other remedies have been attempted.
  - **Due process rights for individuals and families facing program termination** – When an ESG or CoC funded homeless assistance program seeks to terminate participation for any household, the required formal process shall minimally consist of:
    - Written notice clearly stating the reasons for termination;
    - Review of the decision that gives the participant opportunity to present objections to the decision and to have representation. Any appeal of a decision shall be heard by an individual different from and not subordinate to the initial decision-maker; and
    - Prompt written notice of the final decision on the appeal.
  - **Ability to provide further assistance** – Termination will not bar the provider from providing later additional assistance to the same family or individual.
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#### LEAD-BASED PAINT:

Minimum standards for all shelters and program participant-occupied housing consist of compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR 576.403, including the Lead-Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4856) and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R.

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#### SAFETY, SANITATION & PRIVACY:

Minimum standards for all shelters and program participant-occupied housing consist of compliance with the safety, sanitation & privacy requirements identified in 24 CFR 576.403 and 578.75, including:

##### **Minimum standards for emergency shelters:**

Any building for which ESG funds were used for conversion, major rehabilitation or other renovation or that receives ESG assistance for shelter operations shall meet state/local government safety and sanitation standards, as well as the following:

- Structure and materials–The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Products and appliances–Any ESG funded renovation, including major rehabilitation and conversion, must use Energy Star and WaterSense products/appliances.
- Access–The shelter must comply with the applicable Rehabilitation, Fair Housing and Americans with Disabilities Acts and implementing regulations.
- Space and security–Unless it is a day shelter, it must provide appropriate places to sleep, adequate space, and security for residents and their belongings.
- Interior air quality–Each shelter room/space must have proper ventilation and be pollutant free.
- Water supply–Must be free of contamination.
- Sanitary facilities–Each participant must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- Thermal environment–The shelter must have the necessary, properly operating heating/cooling facilities.
- Illumination and electricity–The shelter must have adequate and appropriate lighting and safe electrical sources.
- Food preparation–Any food preparation areas must be able to store, prepare, and serve safe and sanitary food.
- Sanitary conditions–The shelter must be in sanitary condition.
- Fire safety–Each occupied unit of the shelter must have at least one working smoke detector and when possible they should be near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas must have at least one working detector and there must be a second means of exiting the building in the event of an emergency.

**Minimum standards for permanent and transitional housing** – Providers shall not use ESG or CoC funding to help someone remain or move into housing if the housing does not meet the following minimum habitability standards.

- Structure and materials–The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Space and security–Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep.
- Interior air quality–Each room or space must have proper ventilation and be pollutant free.
- Water supply–Must be free of contamination.
- Sanitary facilities–Residents must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.

- Thermal environment–The housing must have the necessary, properly operating heating/cooling facilities.
  - Illumination and electricity–The structure must have adequate and appropriate lighting and safe electrical sources.
  - Food preparation–All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food.
  - Sanitary conditions–The housing must be in sanitary condition.
  - Fire safety:
    - There must be a second means of exiting the building in the event of an emergency.
    - Each unit must include at least one properly working smoke detector on each occupied level of the unit, located when possible in a hallway adjacent to a bedroom.
    - If the unit is occupied by a hearing-impaired person, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom he or she occupies.
    - The public areas of the housing must be equipped with a sufficient number of detectors, but not less than one for each area.
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#### CONFLICTS OF INTEREST:

Minimum standards for conflicts of interest are:

##### **Organizational conflicts of interest:**

- ESG and CoC assistance will not be contingent on the individual’s or family’s acceptance or occupancy of emergency shelter or housing owned by the provider or a provider’s subsidiary or parent.
- No provider, with respect to individuals or families occupying housing owned by the provider or a provider’s subsidiary or parent, will carry out the initial evaluation under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.

##### **Individual conflicts of interest:**

- When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 24 CFR 84.42 (private non-profit) or 24 CFR 85.36 (government).

##### **All transactions/activities:**

- No CoC board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.
  - **Conflicts prohibited** – No person involved with the ESG or CoC programs or who is in a position to participate in a decision-making process or gain inside information regarding the program’s activities, shall obtain a financial interest or benefit from an assisted activity; have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity’s proceeds (either himself or herself or those with whom he or she has family or business ties) during his or her tenure or for one year following tenure.
  - **Persons covered** – These conflict of interest provisions apply to any employee, agent, consultant, officer or elected or appointed official of the provider’s agency.

- **Exceptions** – A provider may request an exception to these provisions from HUD, only if he or she meets the threshold requirements identified in 24 CFR 576.404 and/or 578.95(d)(2)
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#### HOMELESS PARTICIPATION:

Minimum standards for homeless participation are:

- Each funded provider of CoC or ESG assistance must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or equivalent policymaking entity of the provider. (24 CFR 578.75(g))
- To the maximum extent possible, the provider shall involve homeless individuals and families in paid or volunteer work on the ESG or CoC funded facilities, in providing services under ESG or CoC and in providing services for occupants of ESG or CoC funded facilities (24 CFR 576.405 and 578.75).

#### FAITH-BASED ACTIVITIES:

Minimum standards for faith-based activities (24 CFR 576.406 and 578.87) are:

- Providers receiving ESG/CoC funding shall not engage in inherently religious activities as part of the ESG/CoC-funded programs or services. Such activities must be offered separately from ESG/CoC-funded programs and services and participation must be voluntary.
  - A religious organization receiving ESG/CoC funding retains independence from government and may continue with its mission provided that ESG/CoC funds are not used to support inherently religious activities. An ESG/CoC-funded organization retains its authority over its internal governance.
  - An organization receiving ESG/CoC funding shall not discriminate against a participant or prospective participant based on religion or religious beliefs.
  - ESG/CoC funding shall not be used for the rehabilitation of structures used specifically for religious activities, but may be used for rehabilitating structures that are used for ESG/CoC-eligible activities.
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**PROHIBITION AGAINST INVOLUNTARY FAMILY SEPARATION.** The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to any housing or shelter receiving funding from either ESG or CoC (578.93(e))

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#### NONDISCRIMINATION/EQUAL OPPORTUNITY/AFFIRMATIVE OUTREACH:

Minimum standards shall comply with the requirements for nondiscrimination, equal opportunity and affirmative outreach identified in §576.407 and 578.93(a-b).

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#### PROGRAM INCOME:

Minimum standards for private non-profit organizations for program income earned during the project period are that the program income shall be retained and used to finance the non-Federal share of the project or program. Records of the receipt and use of program income shall be retained. Program income may not be used to meet matching funding requirements.

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#### RECOVERED MATERIALS:

Minimum standards for the procurement of recovered materials shall comply with the requirements identified in §576.407(f) and 578.99(b), including that the recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

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**DISPLACEMENT:** Minimum standards for minimizing the displacement of persons (families, individuals, businesses, nonprofit organizations and farms) as a result of a project assisted under ESG and/or CoC shall comply with §576.408 and/or 578.83 and consist of:

**Minimizing displacement** – Consistent with ESG/CoC goals and objectives, the providers shall minimize displacing people as a result of ESG/CoC-funded projects.

**Temporary relocation not permitted** - No temporary relocation shall be required for an ESG/CoC-funded project. When a tenant has to move for an ESG/CoC-funded project, the tenant shall be treated as permanently displaced and offered relocation assistance and payments.

**Relocation assistance for displaced persons -**

In general – A displaced person shall be provided relocation assistance and advised of his or her Fair Housing Rights.

Displaced Person - A “displaced person” is defined as any person that moves from a permanent home as a result of ESG/CoC-funded acquisition, rehabilitation, or demolition of a project.

**A person does not qualify as a “displaced person” if the person:**

- Was evicted based on a violation of the lease or occupancy agreement; violation of the law; and the recipient determines that the eviction was not undertaken to evade the obligation to provide relocation assistance.
- Moved into the property after the application was submitted but was provided with written notice that he or she would not qualify as a “displaced person.”
- The person is ineligible under 49 CFR 24.2.
- HUD determines that the person was not displaced as a result of the project.

The State or the provider may request that HUD determine whether or not a displacement would be covered by this rule.

**Real property acquisition requirements** – The acquisition of real property for an ESG/CoC funded project is subject to the URA and Federal government wide regulations.

**Appeals** - A person who disagrees with the recipient's determination concerning whether the person qualifies as a displaced person, or the amount of relocation assistance may file a written appeal. A low-income person who disagrees with the recipient's determination may submit a written request for review of that determination by HUD.

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#### RECORDS & RECORDKEEPING:

Minimum standards shall ensure sufficient written records are established and maintained to enable the State and HUD to determine whether ESG/CoC requirements are being met and comply with §576.500 and 578.103, including the following:

- CoC records shall include the following documentation related to establishing and operating the Continuum of Care:
  - Evidence that the Board selected meets the requirements of 578.5(b);
  - Evidence that the CoC has been established and operated as set forth in subpart B of 24 CFR part 578 including published agendas and meeting minutes, an approved Governance Charter that is reviewed and updated annually, a written process for selecting a board that is reviewed and updated at least every five years, evidence required for designating a single HMIS for the CoC, and monitoring reports of recipients and sub-recipients.
  - Evidence that the CoC has prepared the HUD application for funds in accordance with 578.9
- Program participant records shall include written:
  - Determination and verification/certification that the program participant met the criteria for being Homeless or At Risk of Homelessness and that an effort was made to obtain written third-party verification, when possible and applicable.
  - For CoC funded projects, acceptable evidence of homeless status as set forth in 576.500(b).
  - Determination and verification/certification that the program participant was eligible or ineligible for the particular services and/or financial assistance
  - Determination and verification/certification that the program participant lacked sufficient resources and support networks to provide the assistance
  - Determination and verification/certification that the program participant met income requirements and that an effort was made to obtain written third-party verification, when possible and applicable. This includes annual documentation of income for each program participant who receives housing assistance where rent or an occupancy charge is paid by the program participant.

- Determination and verification/certification that the only households served through permanent supportive housing meet HUD's requirements of having a family member be a person with disabilities.
  - Identification of the specific services and financial assistance amounts that were provided to the program participant
  - When applicable, verification that the services were terminated in compliance with 576.402 and/or 578.91.
  - When adopted by the Continuum of Care, a copy of the CoC-approved centralized or coordinated assessment of the program participant
  - Copies of written leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with fair market rent, rent reasonableness and utility allowance requirements
  - Determination and verification that the housing unit met HUD's habitability and lead-based paint standards
  - Copy of individualized housing stability plan
  - Notes verifying case management services were provided at least monthly, unless exempt from this requirement
  - Notes verifying program participant's eligibility was re-evaluated at least every 3 months for homelessness prevention services or at least annually for rapid rehousing services
  - Notes verifying program participant was assisted to obtain necessary mainstream and other resources
- Program policies and procedures shall indicate:
    - Services are coordinated with Continuum(s) of Care, other homeless assistance/prevention programs and mainstream service and assistance programs
    - Compliance with HUD's ESG (24 CFR 576 and 578) requirements for:
      - Shelter and housing standards
      - Conflict of interest
      - Homeless participation
      - Faith-based activity
      - Nondiscrimination, equal opportunity and affirmative outreach
      - Uniform administrative rules (24 CFR part 84)
      - Environmental review
      - Lobbying and disclosure (24 CFR part 87)
      - Displacement, relocation and acquisition
      - Procurement (24 CFR 84.40-84.48)
    - Program participant records are kept secure and confidential
    - Participation in HMIS or comparable database
- Financial records shall include:
    - Supporting documentation for all costs charged to ESG or CoC grant

- Documentation showing ESG or CoC funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles
  - Documentation of the receipt and use of program income
  - Documentation of the receipt and use of matching funds
  - Copies of procurement contracts
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## STREET OUTREACH STANDARDS

### MINIMUM STANDARDS:

#### **Targeting/Engagement:**

Providers of Street Outreach services shall target unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station airport or camping ground.

#### **Assessment/Service Provision/Referral/Prioritization:**

- Individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered the following Street Outreach services, as needed and appropriate: engagement, case management, emergency health and mental health, transportation services.
- When appropriate based on the individual's needs and wishes, the provision of or referral to rapid rehousing services that can quickly assist individuals to obtain safe, permanent housing shall be prioritized over the provision of or referral to emergency shelter or transitional housing services.

## EMERGENCY SHELTER STANDARDS

### MINIMUM STANDARDS:

- **Admission:**  
Providers of Emergency Shelter services shall admit individuals and families who meet the HUD definition of “homeless,” as specified in 24 CFR 576.2 (1, 2, & 4) and agencies’ eligibility criteria.
- **Assessment:**  
Individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered Emergency Shelter services, as needed and appropriate. Assessment shall be based on the coordinated assessment process employed by the CoC.
- **Prioritization/Diversion/Referral:**  
When appropriate based on the individual’s needs and wishes, the provision of or referral to Homeless Prevention or Rapid Rehousing services that can quickly assist individuals to maintain or obtain safe, permanent housing shall be prioritized over the provision of Emergency Shelter or Transitional Housing services.
- **Reassessment:**  
Program participants will be reassessed as case management progresses, based on the individual service provider’s policies.
- **Discharge/Length of Stay:**  
Program participants shall be discharged from Emergency Shelter services when they choose to leave or when they have successfully obtained safe, permanent housing. Any Length of Stay limitations shall be determined by the individual service provider’s policies and clearly communicated to program participants. Providers of shelter services are strongly encouraged not to discharge individuals and families who have not secured permanent housing and maintain those households in shelter until they can be placed in appropriate permanent housing.
- **Safety and Shelter Safeguards for Special Populations:**  
Safety and Shelter Safeguards shall be determined by the individual Special Population service provider’s policies and clearly communicated to program participants.

## HOMELESSNESS PREVENTION AND RAPID RE-HOUSING STANDARDS

### ELIGIBILITY/PRIORITIZATION:

Minimum standards for determining and prioritizing which eligible families and individuals shall receive homelessness prevention assistance and which eligible families and individuals shall receive rapid rehousing assistance are:

- **Rapid Re-housing (RR)** – To be eligible for RR Housing Relocation and Stabilization Services and Short-term and Medium-term Rental Assistance, people must:
  - Meet the federal criteria under category (1) of the “homeless” definition in 24 CFR 576.2 [ESG funded programs]
  - Meet the criteria under category (4) of the “homeless” definition in 24 CFR 576.2 and live in an emergency shelter or other place described in category (1) of the “homeless” definition. [ESG funded programs]
  - Program participant’s annual income, at annual review must be less than or equal to 30% of the Area Median Income [ESG Funded programs only]
  - Meet the federal requirements under categories 1, 2, or 4. (literally homeless, imminently losing primary nighttime residence, and fleeing domestic violence) for CoC funded projects
  - All participants must lack sufficient resources or support networks to retain housing without ESG or CoC assistance.
- **Homelessness Prevention (HP) ESG** – To be eligible for HP Housing Relocation and Stabilization Services and Short-term and Medium-term Rental Assistance, people must require HP services to prevent moving into an emergency shelter or another place described in category (1) of the “homeless” definition in 24 CFR 576.2, have an annual income below 30% of the median income for the area and:
  - Meet the federal criteria under the “at risk of homelessness” definition in 24 CFR 576.2 OR
  - Meet the criteria in category (2), or (4) of the “homeless” definition in 24 CFR 576.2.
- **Priority populations for Rapid Rehousing.**  
In providing rapid rehousing assistance, providers shall prioritize the following sub-populations:
  - Families with children;
  - Domestic violence survivors;
  - Single persons without long term disabilities; and
  - Veterans, especially those persons who have served in the US military but are not eligible for services from the Department of Veterans Affairs (VA) or who are unable to access services from the VA.

### PARTICIPANT CONTRIBUTION:

Minimum standards for determining what percentage or amount of rent and utilities costs each program participant shall pay while receiving homelessness prevention or rapid re-housing assistance are:

- Participant's income shall be verified prior to approval for initial and additional financial assistance. Documentation of the participant's income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in participant's file. This file shall also contain a plan to sustain housing following the assistance, including either a plan to increase income or decrease expenses or both.
- Participants are not required to contribute rent. Providers funded under ESG or CoC may pay up to 100 percent of the reasonable rent and utility costs for program participants. Providers may, at their discretion, choose to impose rental charges on participants. In the event that providers elect to charge rent or occupancy charges, these charges may not exceed those established in 24 CFR 578.77.
- Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider's policies and clearly communicated to program participants.

#### RENTAL ASSISTANCE DURATION AND ADJUSTMENT:

Minimum standards for determining how long a particular program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time are:

- Participants receive approval for the minimum amount of financial assistance necessary to prevent homelessness. Documentation of financial need shall be kept in the participant's file for each month of financial assistance received. Participants shall not be approved for more rental assistance than can be justified given their income and expenses at a given time.
- Approval for rental assistance shall be granted in three month increments. Providers must re-assess the continuing need for rental assistance before approving an additional three month increment. In no event will assistance under rapid rehousing exceed 24 months in any 36 month period.
- Any additional requirements regarding how long a program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time shall be determined by the individual service provider's policies and clearly communicated to program participants.

#### SERVICE TYPE, AMOUNT & DURATION:

Minimum 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 shall receive, such as the maximum amount of assistance, maximum number of months the program participant may receive assistance; or the maximum number of times the program participant may receive assistance are:

- **Financial Assistance:**

- **Use with other subsidies** – Payment for Financial Assistance costs shall not be provided to a participant who is receiving the same type of financial assistance through other public sources or to a participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.
- **Rental application fees [ESG only]** – Payment shall only be made for fees charged by the owner to all applicants.
- **Security deposits** – Payment shall not exceed two (2) month's rent.
- **Last month's rent** – Payment shall not exceed one (1) month's rent and shall be included in calculating the participant's total rental assistance.
- **Utility deposits [ESG/CoC]** – Payment shall only be made for gas, electric, water and sewage deposits.
- **Utility payments [ESG only]:**
  - Payment shall not exceed 24 months per participant, including no more than 6 months of utility payments in arrears, per service.
  - A partial payment counts as 1 month.
  - Payment shall only be made if the utility account is in the name of the participant or a member of the same household.
  - Payment shall only be made for gas, electric, water and sewage costs.
  - Participants shall not receive more than 24 months of utility assistance within any 3-year period.
- **Moving costs [ESG/CoC]** – reasonable one-time moving expenses are eligible.

- **Housing Relocation and Stabilization Services:**

- **Housing search and placement services** – Payment shall only be made for assisting participants to locate, obtain and retain suitable permanent housing through provision of the following services:
  - Assessment of housing barriers, needs and preferences
  - Development of an action plan for locating housing
  - Housing search
  - Outreach to and negotiation with owners
  - Assistance with submitting rental applications and understanding leases
  - Assessment of housing for compliance with ESG requirements for habitability, lead-based paint and rent reasonableness
  - Assistance with obtaining utilities and making moving arrangements
  - Tenant counseling

Payment for housing search and placement services shall not exceed 24 months during any 3-year period.

- **Housing stability case management** – Payment shall only be made for assessing, arranging, coordinating and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing or

to assist a participant in overcoming immediate barriers to obtaining housing through provision of the following services:

- Using the centralized or coordinated assessment system
- Conducting the initial evaluation, including verifying and documenting participant eligibility
- Counseling
- Developing, securing and coordinating services and obtaining Federal, State and local benefits
- Monitoring and evaluating participant progress
- Providing information and referral to other providers
- Developing an individualized housing and service plan
- Conducting re-evaluations

Payment for housing stability case management services provided while the participant is seeking permanent housing shall not exceed 30 days.

Payment for housing stability case management services provided while the participant is living in permanent housing shall not exceed 24 months.

- **Mediation [ESG only]** – Payment shall only be made for the cost of mediation between the participant and the owner or person with whom the participant is living, if it is necessary to prevent the participant from losing the permanent housing where he/she resides. Payment for mediation services shall not exceed 24 months during any 3-year period.
- **Legal services** – Payment shall only be made for the cost of legal services, if they are necessary to resolve a legal problem that prohibits the participant from obtaining permanent housing or will likely result in the participant losing the permanent housing where he/she resides. Payment for legal services shall not exceed 24 months during any 3-year period. Assistance may NOT be provided for immigration and citizenship matters. Payment arrangements may NOT include retainer or contingency fee agreements. Eligible subject matters for legal services include: child support, guardianship, paternity, emancipation, legal separation, orders of protection for victims of domestic violence, appeal of benefit claim denials, landlord tenant disputes and resolution of outstanding criminal warrants. Only approved Legal Services provider through NHAP can provide ESG legal services.
- **Credit repair [ESG only]** – Payment shall only be made for the cost of assisting the participant in obtaining skills related to household budgeting, managing money, accessing a free personal credit report and resolving personal credit problems. Payment will not be made for a debt or modification of a debt. Payment for credit repair services shall not exceed 24 months during any 3-year period.

- **Rental Assistance:**

- Payment shall not exceed 24 months total during a 3-year period in tenant-based or project-based (ESG only) housing.
- Payment for short-term rental assistance shall not exceed 3 months.
- Payment for medium-term rental assistance shall be for more than 3 months, but shall not exceed 24 months.
- Payment for rent arrears shall not exceed 6 months and shall be a one-time payment, including any late fees [ESG funded projects only – CoC not eligible]
- Except for a one-time payment of rental arrears on the participant’s portion, payment shall not be provided to a participant who is receiving tenant-based rental assistance or living in a unit receiving project-based assistance or to a participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments. [ESG only]
- Payment shall not exceed the Fair Market Rent established by HUD and shall comply with HUD’s standard of rent reasonableness (24 CFR 982.507).
- Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet and late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.
- Payment for shall only be made when there is a rental assistance agreement between the agency and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the subrecipient with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period and late payment penalty requirement as the participant’s lease.
- Payment of any late payment penalties incurred by the agency shall not be claimed for reimbursement.
- Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner, except for payment of rental arrears (ESG only).
- Payment shall only be made for units that have been inspected for HUD Housing Quality Standards and re-inspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet Housing Quality Standards.

- **Tenant-Based Rental Assistance**

The rental assistance agreement with the unit owner shall be terminated without further payment if:

- The participant moves out of the unit
- The lease terminates and is not renewed
- The participant becomes ineligible to receive ESG/CoC rental assistance

- **Project-Based Rental Assistance [ESG only]**

Payment shall only be made under the following conditions:

- The lease has an initial term of one year
- The rental assistance agreement covers one or more permanent housing units in the same building
- Each unit covered by the agreement is only occupied by participants
- Payment will only be made for up to 100% of the first month's rent, if the participant signs a lease and moves into the unit before the end of the month

Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

#### RE-EVALUATIONS:

Minimum standards for completing eligibility re-evaluations of individuals and families are:

##### Timing:

- Homelessness Prevention – participants shall be re-evaluated not less than once every three months
- Rapid Rehousing – participants shall be re-evaluated not less than once annually

##### Eligibility:

- The participant shall have an annual income that is 30 percent of median family income for the area or less, as determined by HUD [ESG only]; and
- The participant shall lack sufficient resources and support networks necessary to retain housing without ESG/CoC assistance.

## TRANSITIONAL HOUSING STANDARDS

#### ELIGIBILITY/PRIORITIZATION:

Minimum standards for determining and prioritizing which eligible families and individuals shall receive transitional housing are:

- To be eligible for transitional housing people must: Meet the federal criteria under category (1), (2) or (4) of the "homeless" definition in 24 CFR 576.2

Transitional housing shall be prioritized to serve the following populations of eligible homeless people:

- Youth
- Persons seeking to continue recovery in recovery-focused housing
- Institutional re-entry (may not be eligible for CoC funding but needed from people leaving criminal justice and mental health facilities)

- Persons fleeing domestic abuse or violence where it is not possible to find units for rapid rehousing

#### LIMITATION ON OCCUPANCY

No individual or family may be assisted in transitional housing for a period in excess of 24 months. No person shall be discharged from transitional housing into homelessness as a result of this limitation. Transitional housing programs are expected to place individuals and families into permanent housing within 12 months. Programs that maintain participants for longer than 24 months or those with over half their participants remaining for over 12 months may have their funding discontinued.

#### PARTICIPANT CONTRIBUTION

Individuals and families residing in transitional housing are not required to pay rent. Providers of transitional housing may impose occupancy charges. If the provider elects to charge rent or occupancy charges, the charges may not exceed those specified in 578.77.

#### PROGRAM FEES

No fee other than rent or occupancy charges as specified above may be charged to program participants. This includes meals, copayments for services, transportation and all other services that may be provided to program participants.

#### OCCUPANCY AGREEMENTS

All individuals and families served in transitional housing must be provided an occupancy agreement for a minimum of a monthly term and which can be renewed provided that the household does not remain in transitional housing for longer than 24 months. The agreement must specify the requirements for program participation. With the exception of programs providing recovery focused services for persons with substance use disorders, residents in transitional housing may not be required to participate in disability related services. Participants may be required to participate in services that are not disability related and may discharge participants for failure to participate in these services. No person may be terminated from transitional housing without first being provided the right to appeal that decision in accordance with the due process provisions at 24 CFR 578.91(b)

## PERMANENT SUPPORTIVE HOUSING STANDARDS

#### ELIGIBILITY/PRIORITIZATION:

Minimum standards for determining and prioritizing which eligible families and individuals shall receive permanent supportive housing are:

- To be eligible for permanent supportive housing people must: Meet the federal criteria under category (1) or (4) of the “homeless” definition in 24 CFR 576.2. Eligible households include individuals with disabilities and families in which one adult or child has a disability.
- **Priority populations for Permanent Supportive Housing.** In providing permanent supportive housing, providers shall prioritize the following populations:
  - Persons who are highly vulnerable with severe service needs;
  - Those who have been homeless for the longest period of time or who have had repeated episodes of homelessness over an extended period.
  - Veterans.
- **Order of priority in CoC program funded permanent supportive housing beds dedicated to persons experiencing chronic homelessness, and PSH beds prioritized for occupancy by persons experiencing chronic homelessness.**
  - First priority: chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs.
  - Second priority: chronically homeless families and individuals with the longest history of homelessness.
  - Third priority: chronically homeless individuals and families with the most severe service needs.
- **Order of priority in permanent supportive housing beds not dedicated or prioritized for persons experiencing chronic homelessness:**
  - First priority: homeless individuals and families with a disability and the most severe service needs;
  - Second priority: homeless individuals and families with a disability with a long period of continuous or episodic homelessness.
  - Third priority: homeless individuals and families with a disability with a long period of continuous or episodic homelessness.
  - Fourth priority: homeless individuals and families with a disability coming from transitional housing.
- **Single, Prioritized Wait List for Permanent Supportive Housing**
  - The Balance of State CoC will establish a single, prioritized wait list for permanent supportive housing. The wait list will be prioritized according to the order of priority identified above. The single priority waitlist and referral process will allow CoC participants to exercise freedom of choice. Participants may be offered access to housing that is not within their home communities but shall not require participants to relocate in order to obtain housing assistance.
- **Housing First.** Providers of permanent supportive housing shall use the Housing First model as outlined below. Any new projects funded by the CoC must use the Housing First model. Any existing permanent supportive housing project that has indicated in application to HUD that it employs the Housing First model must follow the standards as set forth below. Existing permanent supportive housing projects that have not indicated Housing First are ‘grandfathered’ from this policy.

- **Housing First projects:**
  - Housing is not contingent on compliance with services – participants are provided with a standard one year lease agreement. The lease agreement can only be terminated in accordance with the State of Nebraska Uniform Residential Landlord and Tenant Act (76-1401 to 76-1449)
  - Participants are provided with services and supports to help maintain housing and prevent eviction.
  - There is no requirement for sobriety prior to being offered housing and admission shall not be conditioned on credit or background checks. Criminal backgrounds will be considered only to the extent necessary to protect safety and well-being.
  - Participants shall be given choice in their housing subject to program limitations.
  - Participants are not required to participate in services but providers are required to persistently and consistently seek to engage participants.
  - Providers are encouraged to support staff in implementing Evidence Based Practices that support Housing First (Critical Time Intervention, Motivational Interviewing, Stages of Change)
- Projects that are designated as Housing First shall be contractually obligated to follow these principles and will be subject to monitoring.
  - o Payment for rental assistance shall only be made when there is a rental assistance agreement between the agency and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the subrecipient with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period and late payment penalty requirement as the participant’s lease.
  - o Payment of any late payment penalties incurred by the agency shall not be claimed for reimbursement.
  - o Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner.
    - o Payment shall only be made for units that have been inspected for HUD Housing Quality Standards and re-inspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet Housing Quality Standards.

## PARTICIPANT CONTRIBUTION

Individuals and families residing in permanent supportive housing are required to pay rent. Rent charges may not exceed those specified in 578.77.

## PROGRAM FEES

No fee other than rent or occupancy charges as specified above may be charged to program participants. This includes meals, copayments for services, transportation and all other services that may be provided to program participants

***Nebraska Balance of State Homeless Management Information System  
Memorandum of Understanding between  
The Nebraska Balance of State Continuum of Care and the  
University of Nebraska – Lincoln – Center on Children, Families, and the Law***

**A. Purpose and Scope**

The purpose of this Memorandum of Understanding is to confirm agreements between the Nebraska Balance of State Continuum of Care and the University of Nebraska - Lincoln - Center on Children, Families, and the Law in connection with the Homeless Management Information System. As such, the Memorandum of Understanding sets forth the general understandings, and specific responsibilities of each party relating to key aspects of the governance and operation of the Homelessness Management Information System. This agreement is effective on October 12th, 2012.

**B. Background**

The Homeless Management Information System (HMIS) is a collaborative project of the Nebraska Balance of State Continuum of Care, University of Nebraska - Lincoln - Center on Children, Families, and the Law (CCFL), and participating Partner Agencies. HMIS is a computerized data collection application designed to capture information about homeless people and homeless programs over time. HMIS is mandated by the U.S. Department of Housing and Urban Development (HUD) for all communities and agencies receiving HUD Continuum of Care (CoC) homeless assistance funds and Emergency Solutions Grant (ESG) funds. HMIS is essential to efforts to streamline client services and inform public policy. Through HMIS, homeless people benefit from improved coordination in and between agencies, informed advocacy efforts, and policies that result in targeted services. Analysis of information gathered through HMIS is critical to the preparation of a periodic accounting of homelessness in the Balance of State area, which may include measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs. Such an unduplicated accounting of homelessness is necessary to service and systems planning, effective resource allocation, and advocacy. The parties to this Memorandum of Understanding (MOU) share a common interest in collaborating to successfully implement and operate a HMIS in the Balance of State.

Nebraska Balance of State Continuum of Care is a communitywide collaborative that works to provide a range of homeless housing and services. The continuum of care system components includes prevention, emergency shelter, transitional housing, permanent affordable / permanent supportive housing, and supportive services at each stage, specialized programs and outreach for each homeless subpopulations, and integration with “mainstream” programs. HMIS enables homeless service providers to collect uniform client information over time. Analysis of information gathered through HMIS is critical to accurately calculate the size, characteristics, and needs of the homeless population; these data are necessary to service and systems planning, and advocacy.

The University of Nebraska – Lincoln – Center on Children, Families, and the Law, CCFL, was established in 1987 as a home for interdisciplinary research, teaching, and public service on issues related to child and family policy and services. Since 2003 CCFL has administered the Community Services Management Information System (CS-MIS) as part of their public service and research efforts in the City of Lincoln and the State of Nebraska.

CCFL is a charter member in the Nebraska Management Information System, NMIS, a 501c3 in the State of Nebraska. NMIS provides infrastructure and overarching system support including standard policies and procedures for the implementation of the community services management information system, including HMIS. The NMIS is managed and provided direction through the NMIS Board of Directors which is made up of community service agencies and management information system lead agencies that are appointed from each of the three Continua of Care in the State of Nebraska, Lincoln, Balance of State, and Omaha (Metro Area Continuum of Care for the Homeless).

### **C. General Understandings**

#### **1. Homeless Action Partnership Governance**

Nebraska Balance of State Continuum of Care is the lead-planning group for efforts to end homelessness and for implementing and operating a homeless CoC system in the Balance of State area. As such and under HUD policy, the Nebraska Balance of State Continuum of Care is responsible for HMIS implementation and oversight, including planning, software selection, and setting up and managing the HMIS in compliance with HUD’s national HMIS Standards. Nebraska Balance of State Continuum of Care’s oversight and governance responsibilities are carried by the Nebraska Balance of State Continuum of Care Committee and appointed sub-committees, including the HMIS subcommittee. The Balance of State partners with the Nebraska Homeless Management Information System (NMIS), which discusses and approves all statewide HMIS policies and procedures.

#### **2. Lead Agency Designation**

The Nebraska Balance of State Continuum of Care designated CCFL as the HMIS Lead Agency to manage HMIS operations on its behalf and to provide HMIS administrative functions for the Nebraska Balance of State Continuum of Care.

#### **3. Funding**

##### **3a. HUD Grant**

Nebraska Balance of State CoC HMIS activities are covered by a HUD CoC grant and HUD-required matching funds. CCFL has been awarded this grant by HUD. The terms and uses of HUD funds are governed by the HUD CoC grant agreement and applicable rules.

#### 4b. Local Jurisdiction and HMIS Cash Match

The HUD CoC grant comes with a 25% cash match requirement. Continuing match funding is subject to and contingent upon available annual financing from local partner organizations and agencies. CCFL has provided the matching funds for this HUD CoC grant for the FY 2011 and FY2012 awards. In the event there is a shortfall in the cash match, Nebraska Balance of State Continuum of Care, will explore funding options with CCFL.

#### 5. Software and Hosting

Nebraska Balance of State Continuum of Care has selected a single software product—Service Point—to serve as the sole HMIS software application for the CoC. All Partner Agencies agree to use Service Point as configured for the Balance of State and the Nebraska Management Information System, NMIS.

#### 6. Compliance with Homeless Management Information System Standards

The HMIS is operated in compliance with HUD HMIS Data and Technical Standards and other applicable laws. The parties anticipate that HUD will approve revised HMIS Standards in 2013. The parties agree to make changes to this MOU, other HMIS operational documents, and HMIS practices and procedures to comply with the expected revisions, within the HUD-specified timeframe for such changes, expected to be one year after approval of the revised HMIS Standards in spring of 2013.

#### 7. Local Operational Policies and Agreements

The HMIS continues to operate within the framework of agreements, policies, and procedures that have been developed and approved over time by the NMIS and the Balance of State Continuum of Care. These agreements, policies and procedures include but are not limited to the Policies and Procedures Manual, Privacy Policies and Notices, Client Release of Information (ROI) Forms and Procedures, Standardized Information Collection Forms (Intake and Exit), Partner Agency Agreements, and User Agreements. Changes to the policies and procedures may be made from time to time by Nebraska Balance of State Continuum of Care through the NMIS, to comply with the HMIS Standards or otherwise improve HMIS operations.

### **D. Specific Responsibilities of the Parties**

#### 1. Nebraska Balance of State Continuum of Care Responsibilities

Nebraska Balance of State Continuum of Care serves as the lead HMIS governance body, providing oversight, project direction, policy setting, and guidance for the HMIS project. Nebraska Balance of State Continuum of Care exercises all its responsibilities for HMIS governance through Balance of State Continuum of Care Committee and NMIS. These responsibilities include:

- a. Responsibility for ensuring and monitoring compliance with the HUD HMIS Standards.

- b. Designating the HMIS Lead Agency and the software to be used for HMIS, and approving any changes to the HMIS Lead Agency or software.
- c. Conducting outreach to and encouraging participation by all homeless assistance programs and other mainstream programs serving homeless people.
- d. Developing and approving all HMIS operational agreements, policies, and procedures.
- e. Working to inform elected officials, government agencies, the nonprofit community, and the public about the role and importance of HMIS and HMIS data.
- f. Guiding data quality and reporting.
- g. Promoting the effective use of HMIS data, including measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs.
- h. Provide all local information as necessary for compilation of the Continuum of Care Bed Inventory, Point in Time Street Count, and support CCFL in preparing the Annual Homeless Assessment Report (AHAR).

## 2. CCFL Responsibilities

CCFL serves as the lead agency for the HMIS project, managing and administering all HMIS operations and activities. CCFL exercises these responsibilities at the direction of Nebraska Balance of State Continuum of Care Committee and NMIS. These responsibilities are contingent on receipt of the appropriate HUD grant funding and match dollars and include:

### General Responsibilities:

- a. Serving as the liaison with HUD regarding the HUD HMIS grant.
- b. Serving as the liaison with the software vendor.
- c. Attending the Nebraska Balance of State Continuum of Care Committee meetings and regional Continuum of Care meetings.
- d. Providing overall staffing for the HMIS project.
- e. Participating in the success of HMIS.
- f. Complying with HUD HMIS Standards (including anticipated changes to the HMIS Standards) and all other applicable laws.
- g. Maintaining the HUD McKinney-Vento CoC Supportive Housing project grant, applying for renewal funds each year, and administering the HUD HMIS grant.
- i. CCFL shall be responsible for billing Partner Agencies and jurisdictions for cash match in the event of non-receipt of cash match funds.

j. Annually prepare the HUD McKinney-Vento CoC Supportive Housing NOFA application for HMIS funding.

Project Management and System Administration:

I. General

- a. Selecting and procuring server hardware or Server hosting arrangements.
- b. Arranging hosting and executing the hosting facility agreement, if necessary.
- c. Procuring server software and licenses.
- d. Providing and managing end user licenses (per terms of grant agreement with HUD).
- e. Creating project forms and documentation.
- f. Preparing/updating project policies and procedures and work with Nebraska Balance of State Continuum of Care Committee, regional CoCs, to monitor and ensure compliance.
- h. Obtaining and maintaining signed Partner Agency MOU's.
- i. CCFL will invoice partner agencies and jurisdictions. CCFL will collect local match and will provide accounting of match contributions to Nebraska Balance of State Continuum of Care if requested. CCFL will follow-up with Partner Agencies, as needed, to collect funding from Partner Agencies

II. Administering HMIS end users, including:

- a. Add and remove partner agency technical administrators
- b. Manage user licenses

Training:

Provide all training and user guidance needed to ensure appropriate system use, data entry, data reporting, and data security and confidentiality, including:

- a. Training documentation
- b. Confidentiality and Intake/Exit Forms training
- c. Application training for agency administrators and end users
- d. Outreach to users/end user support
- e. Training timetable
- f. Helpdesk

Data Quality:

- a. Ensuring all client and homeless program data are collected in adherence to the HUD HMIS Data Standards and local additional requirements thereto.
- b. Customizing the HMIS application to meet local data requirements.
- c. Monitoring data quality, generating agency exceptions reports,
- d. Ensuring data quality.
- e. Preparing and implementing a data quality plan if required by the revised HUD HMIS Standards.
- f. Carrying out data extraction and reporting including the HMIS data needed for an unduplicated accounting of homelessness, including annual Homeless Point in Time Counts, Annual Homeless Assessment Reporting, and Housing Inventory.
- g. Assist partner agencies with agency-specific data collection and reporting needs, such as the Annual Progress Report and program reports (within reason and within constraints of budget and other duties).

**IV. Satisfactory Assurances Regarding Confidentiality and Security:**

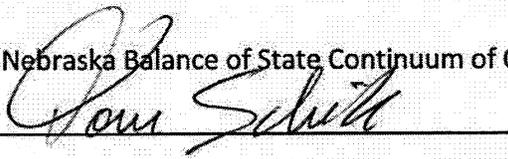
It is understood that CCFL will receive from client information that may be subject to the privacy and security protections and requirements of HUD HMIS Standards, HIPAA Privacy Rule, other law, and local HMIS privacy and security policies and procedures. CCFL hereby agrees that it will use protected client information only for purposes permitted by partnership agreements and as permitted by the applicable law and Standards. Further, CCFL agrees it will make use of all safeguards required by HUD Privacy Standards, HIPAA Privacy Rule, where appropriate, other law, and local HMIS privacy and security policies and procedures in order to prevent any unauthorized disclosure of protected client information.

**E. Period of Agreement and Modification/Termination**

- 1. Period of Operation and Termination: This MOU will become effective upon signature of the parties and shall remain in effect until terminated by the parties. Each party shall have the right to terminate this agreement as to itself only upon 90 days prior written notice to the other party.
- 2. Amendments: Amendments, including additions, deletions, or modifications to this MOU must be agreed to by all parties to this Agreement. The signatures of the parties indicate their agreement with the terms and conditions set forth in this document.

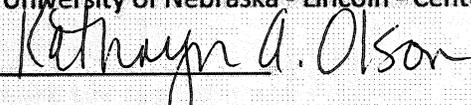
HMIS MOU Signature Page

For Nebraska Balance of State Continuum of Care

By 

Tom Schik, Chair, Nebraska Balance of State Continuum of Care

For University of Nebraska - Lincoln - Center on Children, Families, and the Law

By 

Kathryn A. Olson, J.D., Associate Director

