



Montgomery County Continuum of Care
Written Standards
Policy and Procedures for the Delivery of
Housing Interventions



Completed by:

**The Montgomery County Continuum of Care
Operations Committee**

Completed for:

The Montgomery County Continuum of Care

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Regulatory Requirement and Background

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 reauthorized the McKinney-Vento Homeless Assistance programs. Through the enactment of the HEARTH Act, the Department of Housing and Urban Development (HUD) published the new Continuum of Care (CoC) Program interim rule.¹ The CoC Program interim rule requires that the CoC must establish and consistently follow written standards for providing CoC assistance, in consultation with recipients of the Emergency Solutions Grant program. At a minimum, these written standards must include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance in the CoC Program
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive assistance for permanent supportive housing assistance, transitional housing assistance, and rapid re-housing assistance

The goals of the written standards are to:

- Establish community-wide expectations on the operations of projects within the community
- Ensure that the system is transparent to users and operators
- Establish a minimum set of standards and expectations in terms of the quality expected of projects
- Make the local priorities transparent to recipients and subrecipients of funds
- Create consistency and coordination between recipients' and subrecipients' projects within the Montgomery County CoC

The Montgomery County CoC agrees that these standards must be applied consistently across the entire Montgomery County CoC's defined geographic area. Additionally, Montgomery County CoC members agree to administer their assistance in compliance with the CoC's written standards on awarding CoC funds.² Recipients and sub recipients of CoC and local funds may develop additional standards for administering program assistance, but these additional standards cannot be in conflict with those established by the Montgomery County CoC or the CoC Program interim rule.

¹ US Department of Housing and Urban Development. (2012). *Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program*. (HUD 24 CFR Part 578 [Docket No. FR-5476-I-01] RIN 2506-AC29). Washington, DC. Retrieved from https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf

² US Department of Housing and Urban Development. (2012). *Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program*. (HUD 24 CFR Part 578 [Docket No. FR-5476-I-01] RIN 2506-AC29). Washington, DC. Retrieved from https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf

Themes of the Montgomery County Coordinated Entry System

Over the last ten years, the Montgomery County CoC has implemented a *Housing First* model that provides a range of housing services to persons experiencing or at-risk of homelessness, including outreach and engagement, emergency and transitional housing, safe havens, rapid re-housing, and permanent supportive housing. The CoC has incorporated the *Housing First* model as well as non-discrimination policies into the coordinated entry system.

Housing First

- *Housing First* is a programmatic and systems approach that centers on providing people who are homeless with housing quickly and then providing services as needed.
- Housing is not contingent on compliance with services.
- Participants are expected to comply with a standard lease agreement and are provided with services and supports to help maintain housing and prevent eviction.
- Services are provided post-housing to promote housing stability and well-being.
- All programs are expected to ensure low barriers to program entry for program participants.

Non-discrimination

- Providers must have non-discrimination policies in place and assertively outreach to people least likely to engage in the homeless system.
- Providers must comply with all federal statutes including the Fair Housing Act³ and the Americans with Disabilities Act⁴.
- Montgomery County CoC practices a person-centered model that strongly incorporates participant choice and inclusion of subpopulations present in Montgomery County, including, but not limited to, homeless veterans, youth, families with children, and victims of domestic violence.

Components of the Coordinated Entry System

Access Points

The Montgomery County CoC coordinated entry system serves the entire geographic area of Montgomery County through multiple access points for families and individuals seeking homeless services for permanent supportive housing, rapid re-housing, and transitional housing.

³ US Department of Justice. The Fair Housing Act. Accessed May 2015. <http://www.justice.gov/crt/about/hce/title8.php>.

⁴ US Department of Housing and Urban Development. Section 504 of the Rehabilitation Act of 1973. Accessed May 2015. <http://portal.hud.gov/hudportal/HUD?src=/programdescription/sec504>.

The current access points within the Montgomery County CoC coordinated entry system are provided in the following chart.

Agencies and Shelters Where Assessments can be performed

Access Points for Single Adults			
Program Name and Address	Phone Number	Outreach Area Served	Services
Bethesda Cares 7728 Woodmont Avenue Bethesda, MD 20814	301-907-9244	Bethesda	Monday, Wednesday and Friday: 9:00am-12:30pm and 2:00-5:00pm Thursday: 9:00am-12:30pm and 3:00-5:00pm Street outreach and case management provided
City of Gaithersburg 31 S Summit Avenue Gaithersburg, MD 20877	301-258-3690	Gaithersburg	Street outreach in the City of Gaithersburg; Case management provided
Community Vision 8210 Dixon Avenue Silver Spring, MD 20910	301-585-4471	Silver Spring	Monday-Friday: 8:00am–5:00pm Monday-Friday: Breakfast 8:00am Monday, Thursday and Friday: 9:00am sign up for showers, laundry, and case management services Classes and groups per monthly calendar
People Encouraging People – Homeless Outreach 251 N. Stonestreet Avenue Rockville, MD 20850	301-637-6700	Montgomery County	Monday-Friday: 9:00am–4:00pm drop in hours Provide street outreach and case management.

Access Points for Families with Minor Children		
DHHS Office	Phone Number	Services
Housing Stabilization Services 1301 Piccard Drive, 2 nd Fl. Rockville, MD 20850	240-777-4550	8:30am–5:00p.m. provides emergency assistance on a first-come first served basis, for homeless prevention, utility assistance, and homeless assessment. Tuesday evening hours are available from 5:00–7:00p.m.
Housing Stabilization Services 12900 Middlebrook Lane 2 nd Fl. Germantown, MD 20874	240-777-4448	8:30am–5:00p.m. provides emergency assistance on a first-come first served basis, for homeless prevention, utility assistance, and homeless assessment. Tuesday evening hours are available from 5:00–7:00p.m.
Housing Stabilization Services 8818 Georgia Avenue Silver Spring, MD 20910	240-777-3075	8:30am–5:00p.m. provides emergency assistance on a first-come first served basis, for homeless prevention, utility assistance, and homeless assessment. Tuesday evening hours are available from 5:00–7:00p.m.
Crisis Center 1301 Piccard Drive, 1 st Fl. Rockville, MD 20850	240-777-4000	After 5:00p.m. The Crisis Center which is 24 Hours / 7 days a week, utilized for providing information regarding the homeless system for Single Adults and Families with Minor Children

The coordinated entry system is publically advertised through the Montgomery County’s Department of Health and Human Services (DHHS) website, through the County’s 3-1-1 system, and community events. Entry points are also advertised through trainings for service providers and information is passed along from emergency shelter and street outreach workers

directly to people sleeping on the street. The broad advertisement of the system ensures that all people within Montgomery County in need of homeless services will have fair and equal access to the system regardless of where or how the household presents at any entry point. Outreach conducted by emergency shelter and street outreach workers ensures that people who are sleeping on the streets are equally prioritized for assistance as anyone else presenting with service needs.

Assessments

In the Montgomery County CoC, all coordinated entry locations offer the same assessment approach and referrals using transparent and uniform decision-making process. The Montgomery County CoC currently uses two different assessment tools to measure vulnerability and need for a housing intervention; one tool for individuals, and another tool for families. The Vulnerability Index-Service Prioritization and Decision Assessment Tool (VI-SPDAT) is used to assess individuals who are in need of housing intervention(s) and the locally-developed Housing Options Targeting Tool is used to assess families. Coordinated entry access points use the tools in order to initially prioritize the needs of each presenting household. The tools are short in nature and are used to collect the minimum amount of information necessary to initially assess individuals or families who enter the coordinated entry system. The following table shows the scores needed for various housing considerations for each tool.

Home Assessment Tool Results	
Consideration	Household Score Needed
Prioritization for Permanent Supportive Housing	15 and up
Prioritization for Transitional Housing	7 to 15
Prioritization for Rapid Re-Housing	7 to 15

VI-SPDAT	
Consideration	Household Score Needed
Prioritization for Permanent Supportive Housing	10 or above
Prioritization for Transitional Housing	5 to 9
Prioritization for Rapid Re-Housing	5 to 9

Referrals

All housing programs will report vacancies to the County Coordinator within five business days of unit/bed availability. The County Coordinator will be responsible for ensuring that appropriate referrals are made for vacancies based on prioritization as determined by the Housing Priority Committee.

Within 30 days of an intake interview and receipt of a complete intake packet, the housing provider will determine eligibility and acceptance or rejection into the program.

Provider Decline Policy

Rapid re-housing, transitional housing, and permanent supportive housing providers may only decline households found eligible for their programs under limited circumstances—such as when:

- There is no actual vacancy available
- The household presents with more people than referred by the coordinated entry system
- The provider has determined, based on their individual program policies and procedures, that the household cannot be safely accommodated or cannot meet tenancy obligations with the supports provided by the program

Providers are allowed one household denial per vacancy.

An intake decision notification will include, at a minimum, the following details, if applicable:

- The first available move-in date
- The reason the client cannot enter the program, including the reason for rejection by the client or program
- Instructions for appealing the decision, including the contact information for the person to whom and under what time frame the appeal should be submitted

If the household is accepted, the provider must document that acceptance and notify the household within two business days.

Client Decline Policy

Consumers may decline one referral per housing intervention because of program requirements that are inconsistent with their needs or preferences. Client choice is an important theme of the coordinated entry system in Montgomery County. Therefore, households should only be referred to housing interventions they are eligible for and have an interest in living/participating in.

At their discretion, the Housing Priority Committee will request a case conference to review and resolve rejection decisions by consumers. The purpose of the case conference will be to resolve barriers to the client receiving the indicated and desired level of service.

Permanent Supportive Housing: Eligibility and Prioritization

Eligible Households⁵

For permanent supportive housing programs, households must meet both the HUD definition of homelessness under Category I, and have a disability. Once meeting the Category I eligibility requirements, households are then prioritized by Montgomery County's target populations. Programs may not establish additional eligibility requirements beyond those specified in Category I and those required by funders.

Category I: Literally Homeless⁶

Households qualify as Category I if they are:

- Sleeping in a place not designed for or used as a regular sleeping accommodation, including the street, a car, park, abandoned building, bus or train station, airport, camping ground etc.
- Living in a shelter designed to provide temporary living arrangements (including emergency shelter, congregate shelters, transitional housing, hotels and motels paid for by charitable organizations or by government programs)
- Exiting an institution where they resided for ≤ 90 days, and were residing in an emergency shelter or place not meant or human habitation immediately prior to entering the institution

Prioritizing Eligible Households for Permanent Supportive Housing⁷

Of those eligible households the populations must be prioritized in accordance with:

- Montgomery County's *Strategic Plan to End Homelessness*
- The U.S. Interagency Council on Homelessness (USICH) plan, *Opening Doors*
- HUD's guidance on prioritization of chronically homeless households and policy brief on coordinated entry systems

Montgomery County CoC has established the following priority populations for permanent supportive housing for individuals and families. These priorities have been established because

⁵ Households may include people presenting as individuals or as families with children.

⁶ US Department of Housing and Urban Development. Federal Register. Vol. 76, No. 233. Accessed May 2015. https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf

⁷ In accordance with program/agency funding sources and applicable Fair Housing Laws, individual programs may set additional standards as long they do not contradict the CoC Program Interim Rule or the Montgomery County CoC written standards.

solving homelessness for Montgomery County CoC's most vulnerable people and highest users of resources will enhance the CoC's goal of quickly transitioning people who are homeless to permanent supportive housing, and ultimately eradicating homelessness throughout the entire geographic area. This prioritization encompasses Montgomery County CoC's coordinated entry system:

1. Chronically homeless individuals and families with the most severe service needs
2. Chronically homeless individuals and families with the longest history of homelessness
3. All other chronically homeless individuals and families
4. Homeless individuals and families with a disability with the most severe service needs
5. Homeless individuals and families with long period of continuous or episodic homelessness
6. Homeless individuals and families coming from places not meant for human habitation (such as emergency shelters, streets, safe havens, etc.)

The most severe service needs will be determined by the household's score on the VI-SPDAT or the Homeless Assessment Tool, and projects will prioritize those with the highest scores within each category first.

As a part of Montgomery County's Strategic Plan to End Homelessness, the CoC is dedicated to eradicating veteran homelessness by 2015. The CoC will prioritize veterans over non-veterans in each prioritization category listed above. Essentially, this means that if two households present for assistance and both fall under the same order of priority (e.g. both chronically homeless and fall under Priority 1), but one is a veteran household and the other is not, the veteran household should be prioritized first. In general, the CoC will prioritize veteran households that are not eligible for VA housing or services.

Minimum Standards for Permanent Supportive Housing Programs

All referrals to permanent supportive housing will be made through the coordinated entry system. The following minimum standards will be applied to all permanent housing programs:

- Support services must be provided throughout the duration of stay in housing.
- Program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.
- There is no designated length of stay for program participants

Rapid Re-Housing Programs: Eligibility and Prioritization

For rapid re-housing programs, households must meet the HUD's definition of homelessness under Category I, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements. Once meeting the rapid re-

housing eligibility requirements, households are then prioritized by Montgomery County's target populations.⁸

Prioritizing Eligible Households for Rapid Re-Housing Programs

Of those eligible households, the following populations must be prioritized in accordance with:

- Montgomery County's *Strategic Plan to End Homelessness*
- The USICH plan, *Opening Doors*
- HUD's guidance on prioritization of chronically homeless households and policy brief on coordinated entry systems.

Programs may not establish additional eligibility requirements beyond those required by funders.

Montgomery County CoC has established the following priority populations for rapid re-housing programs for individuals and families. These priorities have been established because solving homelessness for Montgomery County CoC's most vulnerable people and highest users of resources will enhance the CoC's goal of quickly transitioning people who are homeless to rapid re-housing and ultimately eradicating homelessness throughout all the entire geographic area. This prioritization encompasses Montgomery County CoC's coordinated entry system.

Montgomery County CoC has several different rapid re-housing program models based on national and local proven success. The coordinated entry system is design to ensure that households with the most needs are referred to the appropriate model of rapid re-housing first. The process for prioritizing participants for rapid re-housing resources will first include that eligible participants are referred to the rapid re-housing program which they are eligible for, and then secondly be based the following prioritization:

1. Families with a score of 7 and 15 on the Homeless Assessment Tool and individuals with a score of 5-9 on the VI-SPDAT
2. Households with the ability to increase their income and pay the entire rent by the end of the assistance period
3. Households with the longest history of homelessness
4. Households expected to sustain housing once they have addressed housing barriers through case management

⁸ Recipients and subrecipients of CoC and local funds may develop additional standards for administering program assistance, but these additional standards cannot be in conflict with those established by the Montgomery County CoC or the CoC Program interim rule.

Rent Limits for Rapid Re-Housing Programs⁹

Depending on the program model rental assistance will be either a fixed rate (e.g. \$400 per month) or based on household income (e.g. 30% of the household's monthly adjusted income).

Minimum Standards for Rapid Re-Housing Programs

All referrals to rapid re-housing will be made through the coordinated entry system. The following minimum standards will be applied to all rapid re-housing programs:¹⁰

- Maximum participation in a rapid re-housing program cannot exceed 24 months.
- Support services must be provided throughout the duration of stay in housing.
- Program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.

Transitional Housing: Eligibility and Prioritization

Eligible Households¹¹

For transitional housing programs in the Montgomery County CoC, households must meet both the HUD definition of homelessness, under Categories I or IV. Once meeting the following eligibility requirements, households are then prioritized by Montgomery County's target populations based on the unique criteria for the CoC's transitional housing programs. Programs may not establish additional eligibility requirements beyond those specified below and those required by funders.

Category I: Literally Homeless¹²

Households qualify as Category I if they are:

- Sleeping in a place not designed for or used as a regular sleeping accommodation, including the street, a car, park, abandoned building, bus or train station, airport, camping ground etc.

⁹ Currently the CoC does not have any HUD funded CoC RRH programs, but in the future, if awarded CoC RRH projects the CoC will set a max. limit on rent contribution

¹⁰ US Department of Housing and Urban Development. (2012). *Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program*. (HUD 24 CFR Part 578 [Docket No. FR-5476-I-01] RIN 2506-AC29). Washington, D.C. Retrieved from https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf

¹¹ Households may include people presenting as individuals or as families with children

¹² US Department of Housing and Urban Development. Federal Register. Vol. 76, No. 233. Accessed May 2015. https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf

- Living in a shelter designed to provide temporary living arrangements (including emergency shelter, congregate shelters, transitional housing, hotels and motels paid for by charitable organizations or by government programs)
- Exiting an institution where they resided for ≤ 90 days, and were residing in an emergency shelter or place not meant or human habitation immediately prior to entering the institution

Category IV: Fleeing/Attempting to Flee Domestic Violence

Households qualify as Category IV if they meet the following requirements:

- They are fleeing, or attempting to flee domestic violence
- No subsequent residence has been identified
- They have no resources or support networks to obtain permanent housing

Prioritizing Eligible Households for Transitional Housing Programs

The process for prioritizing households for transitional housing first includes eligible households based on HUD's homeless definition, and then secondly based on the below prioritization. Transitional Housing facilitates the movement of homeless households to permanent housing within 24 months of entering transitional housing.

In Montgomery County, each transitional housing program has its own eligibility criteria. At entry, this may be based on the sub-population served—such as age, gender, family composition, severity of behavioral health issues, etc. If multiple households meet the transitional housing programs individualized eligibility criteria, then prioritization will take place in the following order:

1. Families with a score of 7 and 15 on the Homeless Assessment Tool and individuals with a score of 5-9 on the VI-SPDAT—based on their score, households with the highest service needs will be prioritized first
2. Length of time homeless
3. Falling under one of the target populations for transitional housing:
 - a. Family with head of household between the ages of 18-24 years old
 - b. Households with behavioral health needs
 - c. Households fleeing domestic violence

Minimum Standards for Transitional Housing Programs

All referrals to transitional housing must come through the coordinated entry system. The following minimum standards will be applied to all transitional housing programs:

- Maximum length of stay cannot exceed 24 months.
- Assistance in transitioning to permanent housing must be made available/provided.
- Support services must be provided throughout the duration of stay in transitional housing.

- Program participants in transitional housing must enter into a lease, sublease or occupancy agreement for a term of at least one month. The lease, sublease or occupancy agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.

Appendix I: HUD Definitions

Chronically Homeless¹³

The term “chronically homeless” means, with respect to an individual or family, that the individual or family— (i) is homeless and lives or resides in a place not meant for human habitation, a safe haven, or in an emergency shelter; (ii) has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 1 year or on at least 4 separate occasions in the last 3 years; and (iii) has an adult head of household (or a minor head of household if no adult is present in the household) with a diagnosable substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002)), post traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability, including the co-occurrence of 2 or more of those conditions. For a family to be defined as chronically homeless, the family must have an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the above criteria, including a family whose composition has fluctuated while the head of household has been homeless.

Homeless Individual with a Disability¹⁴

The term “homeless individual with a disability” means an individual who is homeless, as defined in section 103, and has a disability that— (i)(I) is expected to be long-continuing or of indefinite duration; (II) substantially impedes the individual’s ability to live independently; (III) could be improved by the provision of more suitable housing conditions; and (IV) is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post traumatic stress disorder, or brain injury; (ii) is a developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002); or (iii) is the disease of acquired immunodeficiency syndrome or any condition arising from the etiologic agency for acquired immunodeficiency syndrome.

¹³ Department of Housing and Urban Development. (2007) *Defining Chronic Homelessness: A Technical Guide for HUD Programs*. Washington, D.C. Office of Community Planning and Development, Special Needs Programs. Retrieved from <https://www.hudexchange.info/resources/documents/DefiningChronicHomeless.pdf>

¹⁴ US Department of Housing and Urban Development. Federal Register. Vol. 76, No. 233. Accessed May 2015. https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf