

Hudson County Alliance to End Homelessness Continuum of Care Program Policies and Procedures

Purpose

The Continuum of Care program is implemented by the U.S. Department of Housing and Urban Development and is regulated through the Homeless Emergency and Rapid Transition to Housing Act of 2009 (HEARTH Act). This manual provides the outline for which the program will be implemented throughout the Hudson County Alliance to End Homelessness (the Continuum of Care for Hudson County). This manual is a combination of standards and regulations set forward by HUD in the HEARTH Act, as well as local standards the Alliance has set. This manual will be reviewed and updated, if necessary, annually. While this manual will outline many items required under the CoC program, it is the responsibility of all Continuum of Care funded agencies to ensure compliance with these policies and procedures as well as the HEARTH Act.

Overview

The Collaborative Applicant (CoC Lead) for the Hudson County Alliance to End Homelessness (the Alliance), which is the agency designated to submit the Continuum of Care Application to HUD, is the Hudson County Division of Housing and Community Development. The structure for the Alliance is outlined and governed by the Hudson County Alliance to End Homelessness Continuum of Care Bylaws, which were adopted by the HCAEH on December 14, 2011.

It is the responsibility of the Collaborative Application to ensure all projects receiving Continuum of Care funding provided by HUD are in compliance with the standards outlined both in this manual and through the HEARTH Act and to submit the annual application that is required to receive CoC funding. The following items will outline the specific details of the CoC funding as administered through the Hudson County Alliance.

Eligible CoC Program Components

The Continuum of Care funds in Hudson County may be used to provide funding for the following project types:

Permanent Supportive Housing (PSH)

Permanent Supportive Housing is provided through the Continuum of Care as long term assistance through either rental assistance or leasing funds for individual permanent housing units in the community, or funding for a single permanent housing structure using operating funds. Projects may also apply for acquisition, rehabilitation, or new construction funds for creating new permanent housing within the County. PSH programs will be utilized, in Hudson County, for the hardest to serve population and for those with the most barriers to housing and highest level of need. All PSH projects funded through the Hudson County Alliance will make services available to all PSH participants. All services should be individualized and should relate directly to the household's specific level of need.

Hudson County has a Housing First focus, so it prioritizes projects that utilize a Housing First approach. The Housing First approach focuses on providing low barrier permanent housing to the hardest to serve populations, without putting contingencies, such as service provision, on the ability of the household to remain in the permanent housing project.

Rapid Rehousing (RRH)

Continuum of Care funds may be used to provide Rapid Rehousing services to homeless individuals and families through the use of short or medium term rental assistance. Services related to the household's need, including employment and education services, are provided to the household during the time they are receiving the rental assistance. This project model allows households with moderate barriers or needs to obtain permanent housing and receive the services needed that will enable them to maintain housing after the monetary assistance has ended.

While the Hudson County Alliance to End Homelessness is working to focus and prioritize the Continuum of Care funding on permanent solutions to ending homelessness, the following project types are still eligible and currently funded under the Continuum of Care:

Transitional Housing (TH)

Transitional housing projects funded under the Continuum of Care in Hudson County are structured to facilitate the movement of homeless individuals and families to permanent housing within 24 months of entering the project. Grant funds provided for transitional housing can be used for the operating or leasing costs associated with maintaining the structure or services provided to the participants of the project. Transitional Housing in Hudson County is geared towards populations that are harder to find permanent destinations for but that may not be at a high enough level to receive a permanent supportive housing voucher.

While the Continuum does have transitional housing projects currently funded through the CoC, it is not the intention of the Alliance to fund new transitional housing projects using the Continuum of Care funding.

Supportive Service Only (SSO)

A Supportive Service Only project in the Hudson County Alliance can be used to provide services to unsheltered and sheltered homeless persons, without the recipient providing housing or housing assistance. The Alliance is working to focus the SSO funds available in the community for the Coordinated Assessment System for the CoC, which will assist sheltered and unsheltered households in finding appropriate housing placements based on their needs.

While the Continuum does have supportive service only projects currently funded through the CoC, it is not the intention of the Alliance to fund new SSO project, outside of Coordinated Assessment, using this funding.

Homeless Management Information System (HMIS)

Since entering data into the Homeless Management Information System is a requirement of the Continuum of Care funding, the Hudson County Alliance to End Homelessness does fund an HMIS dedicated grant to assist the HMIS Lead in operating the HMIS for the Continuum of Care.

Continuum of Care Planning Grant

To assist the CoC Lead, the Hudson County Division of Housing and Community Development, in completing all responsibilities associated with CoC funding, as outlined in HEARTH, the Continuum of Care applies for planning funds annually to supplement the funding already provided by the County for these activities.

All projects that receive funding for a project type listed above must utilize the funding for eligible activities and items as outlined in the CoC Guidelines in the HEARTH Act.

Eligible Applicants for Continuum of Care Funding

The following groups may apply for Continuum of Care funding:

- Nonprofit Organizations
- States
- Local Governments, and
- Instrumentalities of State or local governments

Under the current regulations, nonprofit organizations are prohibited from administering rental assistance projects. While this is true, HUD has made an adjustment that will carry for FY2015, which allows nonprofits to administer rental assistance projects, and they are working to create a more permanent fix which will continue to allow this CoC Policies and Procedures revised May 2016

administration through nonprofits. As long as it is allowable as released by HUD, the Hudson County Alliance will allow nonprofit organizations to administer rental assistance projects.

As a note, prior to the implementation of the HEARTH Act, Public Housing Authorities were allowed to apply for and administer Continuum of Care projects. While no new CoC projects will be awarded to Public Housing Authorities, projects already being administered by PHAs will be allowed to continue to apply and receive renewal funding for their CoC project.

Funding Projects through the Continuum of Care

In order to award Continuum of Care funding, the Hudson County Alliance to End Homelessness has established the Performance and Evaluation Committee. This Committee is responsible for monitoring, evaluating and prioritizing the projects, which will receive funding through the Hudson County Continuum of Care. The Performance and Evaluation Committee will make funding decisions for the Continuum of Care utilizing a local application, performance review and monitoring process. The process for awarding funding under the Continuum of Care is outlined in the Monitoring Policy of the Performance and Evaluation Committee.

Eligible Project Participants and Prioritization

In late 2011, HUD released the final rule to define “homeless” under HEARTH. They established 4 categories of homeless:

Category 1 – Literally Homeless

Category 1 includes an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- i. Has a primary nighttime residence that is a public or private place not meant for human habitation;
- ii. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels or motels paid for by charitable organizations or federal, state and local government programs); or
- iii. Is exiting an institution where she/he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 2 – Imminent Risk of Homelessness

Category 2 includes an individual or family, who will imminently lose their primary nighttime residence, provided that:

- i. Residence will be lost within 14 days of the date of application for homeless assistance;
- ii. No subsequent residence has been identified; and
- iii. The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 3 – Homeless under Other Federal Statutes

Category 3 includes unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- i. Are defined as homeless under the other listed federal statutes;
- ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- iii. Have experience persistent instability as measured by two moves or more during the preceding 60 days; and

- iv. Can be expected to continue in such status for an extended period of time due to special needs or barriers

Category 4 – Fleeing/Attempting to Flee Domestic Violence

Category 4 includes any individual or family who:

- i. Is fleeing, or is attempting to flee, domestic violence;
- ii. Has no other residence; and
- iii. Lacks the resources or support networks to obtain other permanent housing

Chronically Homeless

In addition, HUD released the final definition of Chronically Homeless on December X, 2015, which states that a chronically homeless person is defined as:

- a) An individual who:
 - i. Is homeless and lives in a place not meant for human habitation, a safe haven, in an emergency shelter or an institutional care facility where they resided fewer than 90 days and also were living in the previously described situations prior to entering the facility; and who
 - ii. Have lived in the described above situations continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months.
 - a. Each period separating the occasions must include at least 7 nights of living in a situation other than the situations described above
 - b. Stays in institutions for 90 days or less is not considered a break but included in the cumulative total of time spent homeless; and who
 - i. Can be diagnosed with one of more of the following conditions: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability
- b) A family with an adult head of household (or if there is no adults in the family, a minor head of household) who meets all of the criteria in paragraph (a) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

For projects funded through the Hudson County Continuum of Care the following categories of homeless are eligible for the following project types:

| Program Type | Homeless Definition Category | | | |
|---|------------------------------|------------|------------|------------|
| | Category 1 | Category 2 | Category 3 | Category 4 |
| Permanent Housing <i>includes Permanent Supportive Housing and Rapid Rehousing</i> | X | | | X |
| Transitional Housing | X | X | | X |
| Supportive Services Only | X | X | | X |

While this is the general guideline for eligible participants, all Continuum of Care projects must serve the target population designated in their original or amended Notice of Funding Availability (NOFA) application. In addition, all projects must adhere to the NOFA limitations on eligibility based on the year they were funded. This includes all projects that were funded to exclusively serve the chronically homeless.

The only time a project may serve a population that differs from the population that has been approved by HUD is by submitting a request to the Continuum of Care with a description explaining why there is a need to change the target population. Once approved by the Continuum, the agency must receive an approved grant amendment from HUD for the change in target population.

Prioritization

While HUD has defined the eligible populations for projects funded under the Continuum of Care, the Hudson County Alliance has placed a prioritization on households that fall under Category 1 of the homeless definition. In addition, the Alliance has placed a further prioritization for households that have the highest level of need and have the greatest number of barriers to obtaining permanent housing. The implementation of this prioritization will follow HUD’s Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Persons in Permanent Supportive Housing (Notice: CPD-16-11).

In order to assist projects with prioritization, the Hudson County Alliance to End Homelessness has created a Coordinated Assessment system to establish prioritization in the Continuum and provide appropriate referrals and housing placements to households based on their service level identified. All projects funded through the Continuum of Care will adhere to the prioritization outlined through the Policies and Procedures for the Coordinated Assessment and will utilize the Coordinated Assessment system for referrals for project vacancies.

Finally, because projects are being funded through the Continuum of Care funding available for Hudson County, the Alliance expects all projects to place a priority on households that are homeless in Hudson County.

Documentation

All projects must maintain documents detailing eligibility of households based on the homeless categories listed above. The documentation to be collected for Homeless Categories 1 – 4 is as follows:

Category 1 – Literally Homeless:

- Written observation by the outreach worker; or
- Written referral by another housing or service provider; or

- Certification by the individual or head of household seeking assistance stating that she/he was living on the streets or in shelter;
- For individuals exiting an institution-one of the forms of evidence above and:
 - Discharge paperwork or written/oral referral, or
 - Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

Category 2 – Imminent Risk of Homelessness:

- A court order resulting from an eviction action notifying the individual or family that they must leave; or
- For individual and families leaving a hotel or motel-evidence that they lack the financial resources to stay; or
- A documented and verified oral statement and
- Certification that no subsequent residence has been identified; and
- Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing

Category 3 – Homeless under Other Federal Statutes

- Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and
- Certification of no permanent housing in the last 60 days; and
- Certification by the individual or head of household, and any available supporting documentation, that she/he has moved two or more times in the past 60 days; and
- Documentation of special needs or two or more barriers

Category 4 – Fleeing/Attempting to Flee Domestic Violence

- For victim service providers:
 - An oral statement by the individual or head of household seeking assistance, which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.
- For non-victim service providers:
 - Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
 - Certification by the individual or head of household that no subsequent residence has been identified; and
 - Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

For projects that are providing housing that is dedicated or prioritized for the chronically homeless population, the Hudson Alliance requires that the projects follow the recordkeeping requirements as outlined in the HUD Notice CPD-16-11 titled 'Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing'.

Length of Assistance and Participants Contribution

Housing projects funded through the Continuum of Care must comply with the following standards for length of assistance and participant contribution:

Permanent Supportive Housing (PSH)

Permanent supportive housing projects that provide rental assistance or leasing funds to pay for a portion of participant's rent can provide housing assistance for as long as the eligible household member remains a participant in the project. While this is true, it is the responsibility of the agency to complete an annual assessment of needs with the households to ensure all households receiving long-term permanent housing assistance are still in need of the assistance. If, after an assessment, it is determined that a household does not need the level of services provided in a permanent supportive housing project, the agency should work with and encourage the household to explore other permanent housing options in the community to provide turnover for households that are in greater need.

All participants receiving housing assistance through a permanent supportive housing project will pay 30% of their monthly income towards the rent of their apartment. When calculating this percentage, all projects should adhere to the HEARTH regulations and should ensure that utilities are either included in the rent or that a utility allowance is calculated and included in the rent calculation to ensure the household has enough funding to cover the utilities and rent portion for the unit. A new rent calculation must be done at least annually for the household, or interim if the household's income decreases before their next rent calculation is set to be evaluated.

Rapid Rehousing (RRH)

Based on the nature of Rapid Rehousing projects, participants receiving assistance through a rapid rehousing project will receive medium-term rental assistance and supportive services while participating in the project. For Hudson County Rapid Rehousing projects, the household will start with a minimum of 4 months' worth of rental assistance. During this four month time frame, case managers will meet with households at least monthly to assist them in finding employment or education opportunities that will improve their ability to maintain their permanent housing unit after monetary assistance has ended. After four months, the agency will evaluate monthly, the household's need for continued rental assistance. No household will receive more than 24 months of rental assistance in a rapid rehousing project.

Because the goal of the rapid rehousing project is to work with clients to enable them to maintain their permanent housing after the rental assistance has ended, the Hudson County Alliance has decided that the amount of rent household's pay will be determined on a case-by-case basis. This enables agencies to allow household's to save their income for when they are not receiving rental assistance, or to pay less towards their rent based on the household's expenses. The amount of household pays toward rent should be based on the household's total income and total expenses required to maintain the household. Case managers should work with the household to establish a budget and the amount of rent contributed by the household should be established and updated based on this budget. While the agencies have some discretion as to the amount households are contributing for rent, at no point should a household be paying more than 30% of their income towards rent while a participant in a rapid rehousing project.

When calculating a participant's rent, all agencies must remain in compliance with the HEARTH standards and should ensure the rent either includes utilities or that a utility allowance is included in the rent calculation and budget for the household.

Transitional Housing (TH)

Participants may remain in a transitional housing project for up to 24 months. While this is the case, it is the view of the Alliance that all transitional housing projects should be working with households from when they enter into the project to establish a permanent housing plan and move households into permanent housing as quickly as possible.

Transitional housing projects have the ability to decide whether they will charge occupancy charges for participants to remain in their transitional housing project. If the agency does decide to enforce occupancy charges, the charge must be based on the household's income and cannot exceed 30% of the household's monthly income.

Any exception that needs to be made to these standards for PSH, RRH or TH must be submitted and approved by the Hudson County Alliance before implementation.

Termination of Assistance for Participants

All Continuum of Care projects must have a specific termination of service policy that is followed when assistance for a household will be ended. All households must be aware at project entry about this process and what factors could have an impact on their ability to remain in the project. Because the Alliance is looking to ensure households are not being discharged due to restrictions put in place by the project, it is expected that all Continuum of Care projects will have a low number of terminations due to non-compliance or disagreements with rules or staff in the project. This aspect will be evaluated in the performance review and monitoring done by the Performance and Evaluation Committee.

Responsibilities of Continuum of Care Funded Agencies

All projects funded through the Continuum of Care have responsibilities and requirements in order to continue to receive funding. All of these requirements are monitored through the Hudson County Alliance to End Homelessness monitoring process for CoC projects.

Project Level Reporting Requirements

- Annual Performance Report (APR) – All projects funded through the Continuum of Care are required to submit an Annual Performance Report using the ESNAPS portal within 90 days of the end of the project’s operating year. The APR is used to report information to HUD about the participants in the project, the amount of assistance that has been used from the project grant, as well as other services and funding that has been used throughout the operating year to supplement the HUD funding. The APR is also a way for the agency to demonstrate to HUD the effectiveness of the project.
- Local CoC Application – As outlined in the Monitoring Process of the Performance and Evaluation Committee all CoC-funded projects are required to participate in the Local Funding Selection Process of the Hudson County Alliance to End Homelessness.
- HUD Project Application – In addition to adhering to the local application process for receiving Continuum of Care funding, all CoC projects must complete and submit their individual Project Application annually for continued funding under the CoC program. The submission of this application must be in accordance with the timeframe that is established by the CoC Lead to ensure all project applications are submitted in a timely manner for review before final submission to HUD.

CoC Level Reporting Requirements

- *Point in Time Count* – The Point in Time (PIT) count is an annual one-day count of the sheltered and unsheltered homeless throughout the Continuum of Care. The PIT is not only a HUD requirement, but also an essential tool for generating local data, specifically on the unsheltered homeless population in the community. As part of receiving Continuum of Care funding, all projects that are applicable to participate in the Point in Time, must provide data through the appropriate means as defined by the County for that PIT year.
- *Housing Inventory Chart* - The Housing Inventory Chart (HIC) provides HUD with a complete list of the homeless projects, not only those funded through the Continuum of Care, for Hudson County. The HIC includes information about target populations, unit configuration, and number of persons served on the night of the PIT Count for all emergency shelter, transitional housing and permanent housing projects. As with the PIT, all projects that get CoC funding must provide the CoC lead with the information needed to complete the Housing Inventory Chart.
- *Annual Homeless Assessment Report* – Every year, HUD requires all Continuums of Care to submit an Annual Homeless Assessment Report (AHAR), which provides information from HMIS participating emergency shelter, transitional housing and permanent housing projects about the population that was served over a year time frame. While this information is pulled from HMIS, there are sometimes questions or data entry errors that need

to be updated for accurate submission to HUD. All CoC-funded projects are required to answer questions and assist the Continuum in the completion and submission of the Annual Homeless Assessment Report.

Participation in HMIS

All projects that receive Continuum of Care funding must enter all client level information into the Homeless Management Information System of the Hudson County Continuum of Care. Entering information into this system not only lets the agency use the system for its reporting requirements to HUD, but also allows the Alliance to gather information about the populations being served throughout the community and to evaluate the performance and compliance with project specific standards and regulations for funding purposes. All agencies must adhere to the HMIS policies and procedures for the Hudson County Alliance to End Homelessness.

Participation in the Coordinated Assessment System

All projects that receive Continuum of Care and Emergency Solutions Grant funding must take part and accept referrals from the Coordinated Assessment System for the Hudson County Alliance to End Homelessness. Additionally, all local individual and family shelters are also urged to provide intensive housing placement and planning prior to discharging residents with a referral to coordinated assessment. The Coordinated Assessment System was created to assist households in a more efficient way and to ensure prioritization of the hardest to serve and most in need households. The full prioritization process and role of the agencies in the Coordinated Assessment System are outlined in the Coordinated Assessment System Policies and Procedures for the Alliance.

Participation in Planning Meetings

The only true way for the Alliance to achieve its goal of ending homelessness is through the collaboration and effective homeless planning by the agencies throughout the County. This is especially important for projects that are receiving funding through the Continuum of Care. For this reason, all agencies that receive Continuum of Care funding must attend full and subcommittee meetings of the Hudson County Alliance to End Homelessness as described in the Continuum of Care Bylaws. It is only through these meetings and discussions that the Continuum is able to fully understand and plan for the needs of the homeless throughout the community.

Recordkeeping Requirements

In order to ensure projects are in compliance with HUD regulations, all Continuum of Care projects must maintain the following records for all project participants:

- Homeless eligibility documentation (as outlined above)
- Disability documentation
- Annual income
- Services provided to the participant
- HMIS Consent Form
- Termination documentation (when applicable)
- Documentation demonstrating compliance with Housing Quality Standards
- Backup documentation to substantiate drawdowns for all funds, including timesheets for administrative funding drawdowns

Sample forms are included in Appendix A.

Commitment to Creating LGBTQ Inclusive Facilities and Programming

All agencies that receive Continuum of Care funding must comply with HUD's Equal Access Rule which states HUD supported housing programs remain open to all eligible individuals regardless of marital status and actual or perceived sexual orientation or gender identity. Due to the increased risk for homelessness among the lesbian, gay, bisexual and transgender and questioning (LGBTQ) community all CoC agencies must meet the following requirements to help ensure all agencies within the continuum provide LGBTQ inclusive facilities and programming:

Policy, Staff, and Residents

- All providers must publicly post information stating they are a HUD equal access program and information about their Fair housing and Anti-Discrimination policies. Such policies must clearly state LGBTQ and gender non-conforming residents as a protected class under these policies.
- All providers must publicly post how a resident may seek redress under the Law Against Discrimination and to develop a system for reporting discrimination.
- All providers must use appropriate transgender and LGBTQ inclusive language in communications, publications, and training. This includes, but is not limited to, addressing residents by their appropriate name and pronoun.
- Policies and procedures relating to healthcare must not discriminate against transgender, non-conforming clients and must also incorporate information on local resources available for LGBTQ specific healthcare resources.
- All agencies must establish and enforce inclusive standards for staff and residents.
- Shelter intake workers must provide clients seeking services with an overview of the protection of residents based on actual or perceived orientation, gender identity, and gender expression, as well as the opportunity to disclose whether an individual requires particular accommodations due to this.
- All programs must offer clients seeking services the opportunity to voluntarily disclose his or her sexual orientation, gender identity, or gender expression only after there is a discussion about the programs policies, accommodations for LGBTQ populations, and the ability to safeguard confidential information.

Confidentiality

Agency confidentiality policies and procedures must include a client's sex assigned at birth on their list of confidential information.

Inclusive space/Facilities

All agencies that receive Continuum of Care funding that manage housing facilities, including emergency shelters, must to their best ability, adapt strategies that result in creating inclusive physical spaces, meeting resident privacy and safety needs. Agencies should ensure policies do not isolate or segregate residents based on actual or perceived gender identity.

Training

- Agency representation is required at the annual LGBTQ cultural competency and HUD Equal Access training held by the CoC. Furthermore, agencies are expected to provide on-going training, based on the CoC LGBTQ training or other HUD approved resources, to staff unable to attend this training.
- All shelters within the continuum must also participate in additional facility-based LGBTQ training as provided by the CoC.

Monitoring

HUD's Equal Access assessment tool will be added to the monitoring list of required documents. Each CoC-funded program will be required to submit the Equal Access assessment as of the Calendar Year 2017 Monitoring process. Thereafter, only new projects will be required to submit this during their first year of programming. However, ongoing CoC funded agencies must be able to supply their proof of annual training attendance.

Homeless Youth Education and Development

All CoC-funded agencies that service families or youth up to 24 years of age must designate a staff person as their agency's "Youth Advocate" to ensure that:

- All school-aged youth remain enrolled in school during periods of homelessness and/or during the transition into permanent housing.
- All Youth Advocates gather the names of homeless school-aged youth and report the names to Essex Regional Educational Services Commission, at least quarterly.
- All Youth Advocates inform homeless families of their children's educational rights under the McKinney-Vento Act and connect children with community services, including early childhood programs such as Head Start.
- All Youth Advocates connect homeless families to their LEA McKinney-Vento Homeless Liaison or other designated staff person identified by the LEA.
- All Youth Advocates participate in the HCAEH Youth and Education committee.

Housing Quality Standards

Housing leased with Continuum of Care program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the applicable housing quality standards (HQS) under 24 CFS 982.401, except that 24 CFR 982.401(j) applied only to housing occupied by project participants receiving tenant-based rental assistance. For housing rehabilitated with funds under the CoC, the lead-based paint requirements in 24 CFR part 35, subparts A, B, J and R apply. For housing that receives project-based or sponsor-based rental assistance, 24 CFR part 35, subparts A, B, H, and R apply. For residential property for which funds under the CoC are used for acquisition, leasing, services or operating costs, 24 CFR part 35, subparts A, B, K, and R apply. All projects must retain documentation of compliance with the housing standards in 578.75(b) as detailed above, including inspection reports.

Participation of Homeless Individuals

Each agency that receives Continuum of Care funding, must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or sub-recipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services or assistance provided under the project. This requirement is waived if a recipient or sub-recipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.

Match and Leveraging Requirements

All Continuum of Care projects must match all grant funds, except for leasing funds, with no less than 25% of funds or in-kind contributions from other sources.

In addition, the Hudson County Alliance to End Homelessness expects the project to provide some level of leveraging funds for all projects. Leveraging includes any cash or in-kind contributions to the project that exceed the 25% match requirement.

When calculating or documenting cash or in-kind contributions for match and leveraging, all projects must adhere to the regulations outlined in 578.73 of the HEARTH Act.

As a note, any services that would be provided by a third party, the recipient or subrecipient must have a signed memorandum of understanding (MOU) with the third party that specifies the services, and monetary value of the services being provided by the third party in order to use third party services as documentation for match or leveraging. This MOU should follow the specifics listed in 578.73 of the HEARTH Act.

Monitoring Policy of the Performance and Evaluation Committee

The Performance and Evaluation Committee (the “Committee”) is responsible for monitoring, evaluating, and prioritizing the projects, which receive funding through the Jersey City/Hudson County Continuum of Care (CoC) application. The Committee is also responsible for Hudson County’s Homeless Management Information System (HMIS), including its implementation, the ongoing assessment of data collected and reporting of the use and quality of HMIS, in order to evaluate whether the CoC’s programs are effectively and efficiently meeting the needs of the community and producing the desired outcome of ending homelessness. All funding recommendations made by the Committee are presented to the Executive Board for final approval. In addition, the Committee will monitor and review Emergency Solutions Grant (ESG) programs funded through Hudson County Division of Housing and Community Development (the “Division”). The Committee will provide input to the Division’s ESG Funding recommendations, although ultimate approval is decided by the Division and Board of Chosen Freeholders of the County of Hudson.

The Performance and Evaluation Committee of the Hudson County Alliance to End Homelessness will conduct monitoring and performance review for all projects that receive funding through the Continuum of Care. The monitoring will occur annually and will be used in conjunction with the local application to determine whether the project will continue to receive Continuum of Care Funding. Monitoring will be used to ensure projects are in compliance with the standards set in this document as well as with regulations outlined in the HEARTH Act and through HUD Notices. The monitoring will include, but is not limited to a review of:

- Participant’s eligibility documentation
- Documents required under the Recordkeeping section of these policies
- The timeliness and accuracy of drawdowns completed by the agency for the project
- Effectiveness of agencies in utilizing the CoC funding awarded
- HUD’s Equal Access Assessment Tool.
- HMIS and reporting requirement compliance

Committee Members

The Chair and Vice Chair of the HCAEH will serve as Chair and Vice Chair of the Performance and Evaluation Committee and the remaining members will be comprised of staff from various departments within Hudson County and Jersey City Government. Every member of the Committee must sign a statement declaring that they have no actual or perceived conflict of interest. Members must also be able to dedicate time for application review and committee meetings.

The Chair and Vice Chair of the HCAEH will appoint Committee members annually and verify their eligibility.

Committee members will be trained on the following:

- Homeless assistance activities, community needs, available services, definitions relevant to the application process and other issues pertinent to the HCAEH
- The McKinney Vento/HEARTH Act and the local application process
- The role of the Committee
- Scoring tools (including HMIS), performance standards, prioritizing policies, and all relevant applications

Overview of Monitoring Process

Each year the Committee will monitor CoC and ESG-funded programs. Funded agencies will be required to complete a monitoring and evaluation questionnaire and provide copies of relevant agency and program documents. These documents will be reviewed to demonstrate the agency’s compliance with federal regulations as well as their ability to perform the financial and service related activities of the grant. In addition, the Committee will review select client files for eligibility and completeness. Program performance and HMIS data quality will also be measured using the HCAEH Performance Standards. Physical site visits will occur every other year unless specific issues have been identified that

warrant yearly visits. In addition, random, unannounced site visits may be performed by Committee members if deemed necessary.

Overview of Application Process

The Committee will release a request for proposals for new and renewal homeless assistance projects prior to HUD's release of the Continuum of Care application. Included in the request for proposals will be the funding priorities for that year. Interested nonprofit organizations will have at least two (2) weeks to submit their proposals to the Committee. Applications submitted after the due date will NOT be considered for funding.

The Committee will score each application based on the program's alignment with HCAEH goals, priorities and needs, the program's performance compliance with HUD requirements, and any other information gathered from the monitoring process or performance review. Eligible proposals will then be prioritized by the Committee for inclusion in the County's coordinated application. Applications scoring below 70% of the total possible points may not be recommended for funding.

CoC Review and Ranking Procedures

Committee members will receive all eligible application proposals and scoring materials for review and comment. If the Chair and Vice Chair have any information and/or knowledge that might cause HUD to deny funding for a project, they will provide that information to the Committee. The Committee will then take the following steps in order to determine ranking:

- The Committee meets to review, discuss and individually score each application. (The Committee may hold meetings with applicants as necessary to answer questions).
- Once outstanding questions have been addressed with the applicants, each Committee member records his/her score and any comments/ recommendations for the applicants.
- The Committee provides a preliminary ranking of all applicants.
- The Committee considers adjustments for such issues as HUD priorities, incentives or requirements.
- The Committee considers proposal changes or project budget adjustments that may be required to meet community needs.
- The Committee determines the recommended rank and funding levels of all projects considering all available information.
- The Committee presents final recommended ranking and funding levels to the HCAEH Executive Board for approval.
 - *If there are more new applications than the CoC can fund, the lowest-scoring applications will not be recommended for funding.*
- Once the Executive Board approves the recommendation, the applicants are notified.

The following is a list of items that may cause the Committee to recommend a project not be funded or to be funded at a lower level.

- Failure to submit a timely application
- Insufficient information provided in application
- Project consistently fails to meet performance standards
- Sponsor /Applicant fails to actively participate in HCAEH meetings and initiatives
- Sponsor/Applicant shows an unwillingness to adapt their program to the changing needs of the community and the HEARTH Act
- Sponsor/Applicant applying for a new project has an existing CoC-funded project with poor performance
- Lack of sufficient HUD funding to fund all projects applications received.

Process for Appeals of Ranking/Funding Level

Applicants must appeal any funding decisions within two weeks of funding notification. The appeal must be in writing and addressed to the Executive Board. All unranked applicants and applicants receiving decreased funding are entitled to appeal (e.g. applicants receiving a decrease in renewal funding). On appeal, applicants must show:

- Their score is not reflective of the application information provided; or
- Bias and/or unfairness in the application review process

All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered. Applicants that have been found not to meet the threshold requirements (e.g. ineligible applicant or activity) are not entitled to appeal.

Submitting the Continuum of Care Application

The Hudson County Division of Housing and Community Development is the agency responsible for completing and submitting the Collaborative Application for the Continuum of Care. The Alliance has two separate processes that relate to completing the full HUD required Continuum of Care Application:

Individual Project Applications

The individual project applications must be completed and submitted by the individual agencies that receive the CoC funding. All decisions on who can apply and the level of funding for each agency are outlined above in the Monitoring Process of the Performance and Evaluation policies and procedures section.

During the time of the local Continuum of Care application, the CoC Lead will notify all agencies via email and meeting announcement what the timeframe will be for completing and submitting applications for review. The CoC Lead will work with agencies to ensure project applications depict accurate budgets and project information.

CoC Consolidated Application

In order to complete the Project Listing of the Continuum of Care, the Performance and Evaluation Committee utilizes the procedures outlined in the Monitoring Process of the Performance and Evaluation Committee.

To complete the CoC Application, the CoC Lead will use information it has gathered through a number of sources including the PIT, HIC, AHAR, HMIS, APRs, Continuum of Care and subcommittee meetings to draft responses to the sections of the CoC Application. The Division will then make the responses public and welcome feedback, as well as get additional information for specific sections that may need further clarification. After all feedback is received the CoC Lead will review all comments and update appropriate sections. the CoC Lead will do a final review of all project budgets and applications as well as the responses put together for the CoC Application and will submit the completed Consolidated Application by the date specified in the NOFA released by HUD.

Process for Requesting Letter of Support from the Hudson County Alliance to End Homelessness

Requesting a Letter of Support

Agencies requesting a letter of support from the Hudson County Alliance to End Homelessness (HCAEH) should be able and willing to attend monthly HCAEH meetings and participate in other CoC activities.

All requests for a letter of support from the HCAEH must be submitted electronically to both HCAEH Co-Chairs (csainthilaire@hcnj.us and arusso@icnj.org) via email at least 2 business days before a regularly scheduled HCAEH meeting. To request a letter of support from the HCAEH, the enclosed form must be completed and should accompany a draft of the support letter being sought.

The HCAEH recommends that all agencies seeking a letter of support present their request to the entire HCAEH during a membership meeting. After the presentation, the HCAEH membership will have the opportunity to ask questions of the requesting agency. If a formal presentation to the committee is not possible, the HCAEH Chair or Vice-Chair will present your request to the membership.

Multiple Requests

In general the HCAEH can provide letters of support to multiple agencies applying for the same funding opportunity. However, from time to time it may be in the best interest of the HCAEH to provide support letters to a limited number of agencies for a specific opportunity. The HCAEH co-chairs will work to identify such instances, "Selective Opportunities", in advance and present to the HCAEH membership for a final decision on how to handle. Additional information may be requested for agencies seeking a support letter through a Selective Opportunity.

Voting

Voting on routine support letters will follow the regular process outlined in the HCAEH Policies and Procedures. In the event that a regularly scheduled HCAEH will not occur before the deadline to submit a grant opportunity, the HCAEH Co-Chairs may organize an electronic vote.

All votes of letters of support for Selective Opportunities will be conducted electronically. Following the regular HCAEH membership meeting, the HCAEH Co-Chairs will email the authorized voting members of the HCAEH a copy of the Letter of Request form and a link where they can submit one (1) vote approving or denying the letter of request. Voting members will have 2 business days to submit their vote.

Individuals participating in the vote must disclose any actual or perceived conflict of interest as early as possible. Any member with a conflict shall abstain from voting on a matter for which he/she or his/her member organization has a financial or other vested interest.

Approval

If approved, the letter will be formatted on CoC letterhead and signed by at least one HCAEH Chair. The signed letter will be returned to the agency within 5 business days of HCAEH approval.

If the Alliance does not approve a letter of support for the agency, the agency has the ability to appeal under the general appeal policies for the Continuum as listed in the CoC Policies and Procedures.

Form for Requesting a Letter of Support from the Hudson County Alliance to End Homelessness

Please complete the form below and email to the Co-Chairs of the HCAEH along with a draft letter of support in Word format.

1. Provide a brief summary of the project (250 word limit).

2. How much funding is the agency requesting in this application? \$ _____

3. When is the application due? / /

4. Briefly detail how the project fits within the CoC's mission (250 word limit).

5. Is the agency requesting the letter as member of the HCAEH? **Yes** **No**

- a. If not, can your agency commit to being a member of the HCAEH? This requires attending at least seven (7) of the twelve (12) HCAEH meetings and participation in relevant committees (if requested and reasonable)

- c. If a member of the HCAEH, is the agency in good standing (i.e. has attended at least seven (7) of the twelve (12) HCAEH meetings)? ___**Yes** ___**No**

CERTIFICATION

I _____ on behalf of _____ am requesting a letter of
Full Name Requesting Agency

support from the Hudson County Alliance to End Homelessness for a project being proposed to

Funding Agency

**APPENDIX A
DOCUMENTATION OF DISABILITY**

All permanent housing programs funded under the Continuum of Care program must maintain and follow written intake procedures to ensure that the assistance benefits persons with disabilities.

“Persons with Disabilities” is defined as a household composed of one or more persons, at least one of whom has a disability.

A person shall be considered to have a disability if such person has a:

1. A physical, mental, or emotional impairment (including Substance Abuse, PTSD or brain injury) which is expected to be of long-continued and indefinite duration; substantially impedes his or her ability to live independently; and is of such nature that such ability could be improved by more suitable housing conditions.

OR

2. A severe, chronic developmental disability which:

1. Is attributable to mental or physical impairment or combination of mental and physical impairments;
2. Is manifested before the person attains age twenty-two;
3. Is likely to continue indefinitely;
4. Results in substantial functional limitations in three or more of the following areas of major life activity: (i) self-care, (ii) receptive and expressive language, (iii) learning, (iv) mobility, (v) self-direction, (vi) capacity for independent living, and (vii) economic self-sufficiency; and
5. Reflects the person’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are lifelong or extended duration and are individually planned and coordinated

OR

3. HIV/AIDS

Acceptable forms of verification:

- Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long- continuing or of indefinite duration and substantially impedes the individual’s ability to live independently; (suggested form attached); or
- Written verification from the Social Security Administration; or
- The receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation); or
- Intake staff-recorded observation of disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence in paragraph (c)(1), (2), (3), or (4) of this section; or
- Other documentation approved by HUD.

**APPENDIX B
VERIFICATION OF DISABILITY**

The above-named person is applying for participation in a federally-assisted housing program operated by [AGENCY NAME]. To determine the applicant's eligibility, we must verify that he/she is disabled as defined by the U.S. Department of Housing and Urban Development (HUD). A person shall be considered to have a disability if such person has a:

1. A physical, mental, or emotional impairment (including Substance Abuse, PTSD or brain injury) which is expected to be of long-continued and indefinite duration; substantially impedes his or her ability to live independently; and is of such nature that such ability could be improved by more suitable housing conditions.

OR

2. A severe, chronic developmental disability which:

6. Is attributable to mental or physical impairment or combination of mental and physical impairments;
7. Is manifested before the person attains age twenty-two;
8. Is likely to continue indefinitely;
9. Results in substantial functional limitations in three or more of the following areas of major life activity: (i) self-care, (ii) receptive and expressive language, (iii) learning, (iv) mobility, (v) self-direction, (vi) capacity for independent living, and (vii) economic self-sufficiency; and
10. Reflects the person's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are lifelong or extended duration and are individually planned and coordinated

OR

3. HIV/AIDS

Key to the definition is determining that the impairment is of long-continued and indefinite duration AND substantially impedes the person's ability to live independently.

I have read the above definition of "persons with disabilities" and I hereby certify that the above named individual is disabled. I further certify that I am authorized by the State of New Jersey to make this determination.

Description of Condition:

Name and Title of Licensed Professional: _____

License Number: _____

Address: _____

Telephone Number: _____

Signature: _____ Date: _____

**APPENDIX C
LACK OF RESOURCES CERTIFICATION**

Head of Household: _____

LACK OF RESOURCES CERTIFICATION:

(Must be completed by the head of household)

I certify that my household lacks sufficient resources and support networks necessary to prevent homelessness or to end my current homeless episode and no other housing has been identified. (Supportive documentation should be provided when practical)

Head of Household Signature: _____

Date: _____

INTAKE STAFF VERIFICATION FOR SELF CERTIFICATION

(To be completed for each applicant)

I understand that third-party verification is the preferred method of certifying available resources for homeless assistance. I understand self-declaration is only permitted when I have attempted to but cannot obtain third party verification. Below is a description of the attempt made for third-party verification:

Staff Signature: _____ **Date:** _____

**APPENDIX C
SELF-CERTIFICATION OF HOMELESSNESS**

Instructions: This form is to be completed by applicants when they are unable to provide required verifications or documents and self-certification is the only way the agency is able to verify information related to program eligibility. Certification must show that applicant was homeless immediately prior to CoC program entry date.

Applicant Name/Head of Household: _____ **Intake Date:** _____

Program Entry Date: _____

Check only one:

I [and my children] am/are currently homeless and living in a place not meant for human habitation (i.e. the street, a car, park, abandoned building or train station).

I [and my children] am/are the victim(s) of domestic violence and am/are fleeing from abuse.

Please explain:

(Include specific dates when you were homeless and locations where you stayed.)

I certify that the information above is true, accurate and complete.

Applicant Signature: _____ Date: _____

Recertification as of Program Entry Date, if applicable:

Applicant Signature: _____ Date: _____

INTAKE STAFF VERIFICATION FOR SELF CERTIFICATION

I understand that third-party verification is the preferred method of certifying housing status for homeless. I understand self-declaration is only permitted when I have attempted to but cannot obtain third party verification. Below is a description of the attempt made for third-party verification:

Print Staff Name: _____ Staff Signature: _____

Date: _____

Recertification as of Program Entry Date, if applicable:

Staff Signature: _____ Date: _____



APPENDIX D

**HUDSON COUNTY ALLIANCE TO END HOMELESSNESS
830 BERGEN AVE, SUITE 5B, JERSEY CITY, NJ 07306
CONSENT FOR RELEASE OR EXCHANGE OF INFORMATION**

The HCAEH is a consortium of agencies that work together to coordinate services and housing for homeless individuals and families throughout Hudson County. From time to time, agencies must collaborate to provide the most effective services to an individual or family.

This document, as executed by the individual below, authorizes the following agencies (“Agencies”) to release, exchange and discuss medical, housing, social, psychological, employment, education, progress and other information among each other concerning the participant named below for the purpose of shelter, housing and making appropriate referrals for other services. The sharing of this information will enable the Agencies to effectively work together in order to better assist you. *Services provided by the Hudson County Alliance to End Homelessness are not conditioned on you signing this authorization.*

Agencies involved in the Release or Exchange of Information:

- | | |
|---|--|
| Care Point Hospitals | Garden State Episcopal Community Development Corporation |
| Catholic Charities Archdiocese of Newark | Hudson County Division of Housing and Community Development |
| Community Hope | Hudson County Department of Health and Human Services |
| Collaborative Support Programs of New Jersey | Hudson County Department of Corrections |
| Department of Veteran Affairs | Hudson County Prisoner Reentry Program |
| Hoboken Shelter | Superior Court of New Jersey Criminal Division Hudson Vicinage |
| Jersey City Medical Center, a Barnabas Health affiliate | North Hudson Community Action Corporation – SSVF Program |
| Metropolitan Family Health Network | Soldier On |
| PERC Shelter | |

List other agencies individual is involved with:

I understand that all the information will be handled confidentially in compliance with the Federal Privacy Act (PL 930575). I understand I may revoke this consent at any time, except to the extent action has been taken in reliance thereon. I also understand that the above consent may be revoked at any time with my written communication to any of the listed agencies. This consent will expire in two years from the date of my signature as dated below or on the date of _____ if sooner.

I understand that this consent allows all the above-listed Agencies, their employees and agents, to release and exchange any and all of my health information contained in my medical records under their control and in their possession. If my medical record contains information relating to HIV infection, AIDS or AIDS-related conditions, this disclosure will permit that information to be included. I acknowledge and am aware that New Jersey has a statutory privilege accorded to confidential communication between a patient and a licensed physician and that my signing this form waives this privilege. I also acknowledge that any information used or disclosed under the authorization may also be re-disclosed and no longer protected by the Final Rule.

The above listed Agencies shall treat all information with the utmost confidentiality, as previously.

Name (Print): _____

Signature: _____

HMIS PIN #: _____

Date: _____

Witness (Print): _____

Signature: _____

Name of Agency: _____

Date: _____