



Baltimore City Continuum of Care Providers Meeting

December 17, 2015

Agenda

- I. Provider Announcements
- II. Journey Home
- III. Code Blue
- IV. Housing Authority
- V. Coordinated Access
- VI. Training on New HUD Policies
- VII. Consolidated Funding Application
- VIII. Data & Evaluation

PROVIDER ANNOUNCEMENTS

Journey Home Updates



□ **Executive Director Search**

- Several candidates were interviewed
- CoC not moving forward with hiring any candidates at this time
- Search will continue in early 2016 in alignment with new CoC governance planning

Journey Home Updates



□ **CoC Governance Planning**

- Cloudburst provides regular technical assistance to the CoC and MOHS
- Starting in January, Cloudburst will assist with updating the governance charter and the workgroup structure of the CoC to align more closely with the HEARTH Act and the [Opening Doors](#) goals
- This work will NOT replace the Journey Home 10-Year Plan or the Strategic Priorities

Code Blue/Winter Shelter

The City's Code Blue plan is on the [Health Department's website](#) (scroll to bottom to download the full version of the plan)

MOHS-HSP released a [draft winter shelter plan](#) on December 23. MOHS-HSP is currently accepting proposals from nonprofit organizations to operate the shelter until March 15. Organizations can [review the RFP](#) for full details and submit questions to mohs.hsp.application@baltimorecity.gov.

HOUSING AUTHORITY UPDATES

Housing Authority

- Current openings for families in project-based voucher housing
- HABC Board approved 100 new set-aside vouchers for people experiencing homelessness
- All openings and instructions on how to help clients apply can be found on the [PSH Opening Bulletin Board](#)

COORDINATED ACCESS

Coordinated Access

December 2015 Update

Coordinated Access is a citywide assessment and referral process to assist individuals and families experiencing homelessness access appropriate housing and support services.

- Enables client to apply for many programs through one process.
- Ensures that scarce housing resources are prioritized in the most fair and equitable way possible.
- Produces more complete system-level data on the need for more housing resources.
- Required by HUD
- Is overseen by the Coordinated Access Workgroup, which reports to the Continuum of Care and Journey Home board.

Coordinated Access

Workgroup Members

- | | |
|---|---|
| <ul style="list-style-type: none">• Achike Oranye, People Encouraging People• Amy Kleine, Weinberg Foundation• Andrew Timleck, AIRS• Brandi Nieland, 2-1-1 Maryland• Caroline Coffill, St. Vincent de Paul• Carolyn Johnson, HPRP• Colleen Velez, CSH• Danielle Meister, MOHS-HSP• David Smith, GEDCO• Dudley Greer, HCAM• Gabby Knighton, MOHS-HSP• Irvin Moore, BHSB | <ul style="list-style-type: none">• Jackie Adams, VAMHCS• Janice Miller, House of Ruth• Jaquetta Henson, Mercy Supportive Housing• Katie League, HCH• Lametra Pendergrass, Mercy Supportive Housing• Leroy Fowlkes, Mercy Supportive Housing• Lin Romano, GEDCO• Meaghan Messner, Community Solutions• Sandra Eaddy, Mercy Supportive Housing• Sara Hoffman, Bon Secours• Vidia Dhanraj, MOHS-HSP |
|---|---|

Coordinated Access

December 2015 Update

- 247 households have been housed since October 2014.
- An additional 170 were matched through the BDAT system and are still gathering documentation and working through intake and lease-up processes (152 or 89% are Housing First Vouchers).
- Since the Interim Match Process started on 9/29/15, there have been 31 PSH vacancies (9 announcements) and 79 referrals sent.
- The workgroup is developing the new Coordinated Homeless Response System (CHRS) in HMIS, expected to be implemented in 2016. The draft workflows will be submitted to the CoC in the first quarter of 2016.

NEW CHRONIC HOMELESS DEFINITION

Understanding the New Chronic Homeless Definition

Timeline

- Statutory definition was established by the HEARTH Act of 2009 in the McKinney-Vento Homeless Assistance Act.
- HUD proposed regulatory definitions and requested comments in 2011, 2012, and 2013.
- [Final Rule](#) released December 4, 2015.
- **Effective date January 15, 2016**: Documentation for all clients entering PSH with chronic homeless status on or after 1/15/16 must conform to new requirements.

Understanding the New Chronic Homeless Definition

Changes

1. A “homeless individual **with a disability**,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - a. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - a. Has been homeless and living as described in paragraph (a) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, **as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;**

(cont'd)

Understanding the New Chronic Homeless Definition

Changes

2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

How to Determine PSH-Eligible and Chronic Status

What is their current living location?	HUD Category	PSH-Eligible?	Chronic?
<p>STREET/SHELTER LOCATIONS</p> <ul style="list-style-type: none"> Place not meant for habitation Emergency shelter, including hotel or motel paid by a provider Safe Haven 	Category 1	PSH eligible	May be chronic if add'l conditions met.
<p>INSTITUTION LOCATIONS</p> <ul style="list-style-type: none"> Foster care Hospital or other residential medical facility Jail, prison or juvenile detention Long-term care or nursing home Psychiatric hospital or facility Substance abuse treatment facility or detox 	Category 1 if resided there for fewer than 90 days AND resided in emergency shelter or on the street immediately prior.	PSH eligible if Category 1 conditions are met	May be chronic if add'l conditions met.
Transitional housing for homeless persons	Category 1	PSH eligible if resided in shelter or on the street immediately prior.	Not chronic unless client is offered and accepts a PSH unit prior to entry.
<p>OTHER LOCATIONS</p> <ul style="list-style-type: none"> Hotel or motel not paid by a service provider Housing owned or rented by client Residential project or halfway house w/o homeless eligibility criteria Living with friends or family 	Category 2 if additional conditions are met.	Not eligible for PSH.	Not chronic
Currently fleeing or attempting to flee Domestic Violence	Category 4 if client has no subsequent residence and lacks the financial resources and/or support network to obtain a residence	PSH eligible if Category 4 conditions are met.	Not chronic

How to Determine Chronic Status

- Client must have stayed in street or shelter locations for 12 months **continuously** or have experienced at least 4 episodes in 3 yrs totalling 12 **cumulative** months.
- If client was homeless at least one day in a month, assume they were homeless the entire month, unless there is evidence of a **break in chronic homelessness**:
(1) A stay of 7+ days in a place other than the street or a shelter or (2) A stay of 90+ days in an institution.
- **Stays in an institution for fewer than 90 days** do not count as a break and are included in the cumulative 12 month total, as long as the client was in a street or shelter location immediately prior.
- To **estimate episode start/end dates** when unknown, ask if the client remembers the month and default to the first day of the month. If they can't remember the month, ask if they remember the season and default to the first month of the season (Spring = March, Summer = June, Fall = Sept, Winter = Dec.)

How to Determine PSH-Eligible and Chronic Status (Cont'd)

Type of Episode	Location(s) of Episode or Break <i>Name of each shelter or institution, and for each street location, the closest landmark or intersection.</i>	Start/End Dates	Number of Months in Episode
<p>Eligible Episode Types <i>(Check all that apply.)</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> Street <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Hotel/Motel paid by provider <input type="checkbox"/> Stay in institution of 90 days or fewer immediately after street/shelter episode (another box must also be checked). 		Start: _____ (mm/dd/yyyy) End: _____	
<p>Break between Episodes: At least 7 days where client was not in one of the types of episodes listed above, or 90+ days in institution.</p>	<p>State location type for break:</p>	Start: _____ (mm/dd/yyyy) End: _____	
<p>Eligible Episode Types <i>(Check all that apply.)</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> Street <input type="checkbox"/> Shelter <input type="checkbox"/> Safe Haven <input type="checkbox"/> Hotel/Motel paid by provider <input type="checkbox"/> Stay in institution of 90 days or fewer immediately after street/shelter episode (another box must also be checked). 		Start: _____ (mm/dd/yyyy) End: _____	
<p>Break between Episodes: At least 7 days where client was not in one of the types of episodes listed above, or 90+ days in institution.</p>	<p>State location type for break:</p>	Start: _____ (mm/dd/yyyy) End: _____	

Documentation Requirements

- For both **eligible episodes** and **breaks**, recordkeeping standards are: 3rd-party evidence, intake worker observation, then self-certification.
- 3rd-party evidence must come from someone who is not a friend or family member to the client and state the location and dates where the client stayed or is staying. **No requirement for them to have physically witnessed the episode!**
- Clients w/o **3rd-party verification of their current episode** can only be accepted in rare cases when (1) provider unsuccessfully attempted several times to verify, (2) verification is not possible, and (3) there is other evidence that client's stated living environment is accurate (e.g. intake worker observations).
- At least **75% of clients in each PSH project** must have **3rd party verification for at least 9 months** of the 12 (continuous or cumulative) months.
- If a client presents as living in a place not intended for human habitation and your agency does not provide mobile services to verify this, contact a homeless outreach team for assistance with verification. Note: This may take time.

Understanding the New Chronic Homeless Definition

Rationale and Background

- [Final Rule](#) Comments/HUD Responses
 - Primary intent is to align the period of time of occasional homelessness w/ continuous homelessness.
 - HUD acknowledges there are other factors that correlate to need, but the statutory definition is intentionally narrow to ensure limited resources targeted to this population are used to serve persons w/ a disability and the longest histories of homelessness.
- [Anne Oliva, HUD SNAPS In Focus Blog, “Final Rule on Defining “Chronically Homeless” Part I: How We Got Here”](#) - 1990s assumed chronic meant long periods of continuous homelessness, by 2012 realized most were episodic, multiple definitions examined to define episodic

Rationale and Background (Cont'd)

- [Marcy Thompson, HUD SNAPS In Focus Blog, “SNAPS In Focus: Final Rule on Defining ‘Chronically Homeless’ Part II: Policy and Practical Implications of the New Definition”](#) HUD’s intent is to prioritize households who have been homeless for very long periods of time and require more consistent engagement and assistance to exit homelessness. This will require communities to truly adopt a Housing First orientation and increase outreach and engagement efforts.
- [Dennis Culhane, USICH Blog, "Final Chronic Definition Adds Flexibility, Inclusiveness, and Specificity"](#) - Fixes ambiguity & inconsistencies (under the old definition, one could have been homeless only 4 nights), A [recently published paper](#), compares the statutory definition, final definition, and two alternatives suggested by an expert panel.
- [Richard Cho, USICH Blog “Achieving an End to Chronic Homelessness: How the Final Definition Will Help”](#) - Gets us closer to the originally intended target population: people likely to remain homeless w/o PSH

Ongoing Issues

- Differences between Transitional Housing and Institutions
 - Clients in Transitional Housing are not Chronic unless the client was offered and accepted a PSH unit prior to their TH stay
 - Transitional stays are not included in eligible episodes
 - Meaning of “institutional care facility” - HUD intends to issue guidance rather than establishing a fixed set of facilities in the final rule
- Consistency with simpler definitions used in PIT and HMIS
 - HUD will continue to issue separate guidance for PIT, HMIS, and eligibility
 - Baltimore is programming a tool in HMIS to resolve this inconsistency for data tracking and to facilitate Coordinated Access referrals.
- Prioritized & Dedicated Beds - When have you completed due diligence for finding a CH client to fill a bed? HUD will be issuing updated guidance.

EQUAL ACCESS RULE

Equal Access Rule

- The [Equal Access Rule \(2012\)](#) required that HUD-assisted and HUD-insured housing be made available without regard to actual or perceived sexual orientation, gender identity, or marital status, and which generally prohibits inquiries into sexual orientation or gender identity for the purpose of determining eligibility for such housing or otherwise making such housing available
- In February, HUD released [Notice CPD-15-02](#), which provides guidance to recipients and sub-recipients receiving ESG, CoC, HOPWA funds regarding how best to provide shelter to transgender persons in a single-sex facility. The notice also provides guidance on appropriate and inappropriate inquiries related to a potential or current client's sex for the purposes of placing transgender persons in temporary, emergency shelters, or other facilities with shared sleeping areas or bathrooms.

Equal Access Rule

- The CoC reviewed this guidance at the March meeting and [sent out a policy guidance document](#), which noted that ALL programs receiving funding through MOHS-HSP must comply with the new guidance, regardless of funding source
- On November 20, 2015, HUD published [FR-5863-P-01: Equal Access in Accordance With an Individual's Gender Identity in Community Planning and Development Programs](#), which proposes to codify into law the non-discrimination practices that HUD first introduced in February 2015. The deadline for submitting comments is January 19, 2016. Your feedback is important in helping HUD to ensure that all persons experiencing homelessness have access to inclusive and nondiscriminatory shelter environments. We encourage you to [read the new Proposed Rule](#) thoroughly and submit your comments by the deadline. The instructions for submitting comments are outlined in the beginning of the Proposed Rule, and we encourage you to [submit comments electronically](#), as this ensures that HUD receives and considers your comments in a timely manner.

CRIMINAL BACKGROUND

Criminal Background Guidance

- On November 2, HUD released [Notice PIH 2015-19](#), “Guidance for Public Housing Agencies (PHAs) and Owners of Federally-Assisted Housing on Excluding the Use of Arrest Records in Housing Decisions”

- **Programs the guidance applies to:**
 - Public Housing
 - Voucher Programs (both project-based and tenant-based)
 - Homeless programs that are funded by vouchers/PHA
 - Owners of Federally-Assisted Housing (includes Section 811)

Criminal Background Guidance

Arrest records may not be the basis for denying admission, terminating assistance or evicting tenants

- The fact that an individual was arrested is not evidence that he or she has engaged in criminal activity.
- In many cases, arrests do not result in criminal charges, and even where they do, such charges can be and often are dismissed or the person is not convicted of the crime alleged.
- Arrest records are often inaccurate or incomplete

Criminal Background Guidance

Reminder that HUD does not require adoption of “One Strike” policies.

■ **Considerations:**

- The seriousness of the crime
- The time elapsed since the crime
- The effect an eviction would have on family members not involved in the criminal activity
- Whether the leaseholder has taken all reasonable steps to "prevent or mitigate" the criminal activity

Criminal Background Guidance

Reminder that programs have an obligation to safeguard the due process rights of applicants and tenants, which includes providing clients the opportunity to appeal decisions and have informal hearings.

- Through Coordinated Access and the Standards of Care, procedures will be developed for all permanent supportive housing programs that will meet the requirements of the guidance in January 2016

Standards of Care

- First draft currently being developed
- Provider workgroups will have final meetings in January to review
- Draft anticipated to be released to community for public comment/feedback in first quarter of 2016
- Implementation Date: July 1, 2016

Consolidated Funding Application

- RFP will be released in the first or second week of January
- Performance outcomes will be 75% of the overall score for renewal projects. The narrative sections describing your program model and best practices will be 25% of the overall score.
- This process implements the performance metrics adopted by the Journey Home in early 2015
- The performance report will be pulled directly from HMIS. Start reviewing your calendar year 2015 data now! You will have an opportunity to review your performance report prior to it being scored in February. More information about this process will be in the RFP.

Consolidated Funding Application

- The application and budget templates have been streamlined to make contract and grant processes more efficient
- The budget template will have accompanying detailed instructions to assist you
- MOHS-HSP will hold a webinar bidder's conference in mid-January to review the RFP and take questions

Upcoming Events

- Point-in-Time Count and Housing Inventory Count
 - Reminder: no unsheltered count in 2016 – planning for 2017 will start over the summer
 - Your program will be contacted by MOHS-HSP in January with more information about the data you need to collect and how to report your information

NEXT CONTINUUM OF CARE MEETING

February 25, 2016 – 2pm-4pm

NEW LOCATION!

Helping Up Mission

1029 E Baltimore St

Baltimore, MD 21202

Parking information will be sent out with
the agenda prior to the meeting