

**PERMANENT SUPPORTIVE HOUSING (PSH)  
PROGRAM STANDARDS**

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## RATIONALE

Permanent Supportive Housing (PSH) is service-enhanced housing in a safe environment that encourages maximum independence for persons who do not need 24-hour care. PSH programs are designed to increase clients' ability to live independently, promote community integration, and support recovery and wellness. PSH helps individuals and families to maintain stable residency in the community, develop personal support systems, and live as independently as possible. PSH programs are expected to provide decent, safe, affordable housing for homeless, disabled persons and to help such individuals maintain long-term, stable, and successful tenancies.

Program Standards serve as a common policy framework for Sonoma County's Permanent Supportive Housing Programs. These policies have been developed through a working consensus process. Ultimately the intent is to bring the policy to the Continuum of Care Board for adoption system-wide. While the Permanent Supportive Housing Program standards are not policies and procedures, they may be used as an outline for local agency policies and procedures and adopted policies should be incorporated into local manuals.

## TARGET GROUPS FOR PERMANENT SUPPORTIVE HOUSING

Individual agency missions or funding may designate eligibility of specific disabled homeless subpopulations (for example, transition-aged youth, persons with mental illness, etc.). To the extent potential residents are otherwise eligible for a project, and consistent with Fair Housing law, all PSH providers are expected to establish preferences for persons who are chronically homeless and/or medically vulnerable per the VI-SPDAT screening tool or other written medical assessment. *Please refer to HUD Notice CPD-14-102, issued July 28, 2014 at <http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf>.*

## 1. Evaluating eligibility for assistance

### *a. Homeless per federal definitions*

- i. Continuum of Care-funded PSH projects may not serve Category 2 homeless (“imminent risk”) or Category 3 homeless persons per the tool attached at page 15, until and unless HUD agrees to a Continuum-wide request to include them. Continuum of Care-funded PSH projects may not serve persons defined as “at risk of homelessness.”

### *b. Documents required at intake*

- i. *Documentation should not constitute a barrier to housing.* Sonoma County Permanent Supportive Housing providers will request the documents listed below; but if any are not available, the housing provider will work to obtain all documents within 45 days.
- ii. One (1) form of identification (see list of acceptable forms of identification, which includes temporary identification, page 18). Assisting residents to access other services requires obtaining a form of official identification.
- iii. Documentation of Homelessness (or At Risk status where funding allows): Please see the chart on p. 16 for acceptable documentation. PSH providers should make every effort to meet federal standards of documentation. The preference is for 3rd party documentation; 2nd party documentation (observation by a homeless services provider) is acceptable if 3rd party documentation is not available. At a minimum, client self-certification will be accepted. The full text of HUD’s homeless definition and record-keeping requirement is located at [https://www.hudexchange.info/resources/documents/HEARTH\\_HomelessDefinition\\_FinalRule.pdf](https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf).
  1. Lack of 3rd-party documentation must not prevent an individual or family from being admitted to a permanent supportive housing program. Records contained in an HMIS or comparable database used by a victim service or legal service provider are acceptable evidence of 3rd-party documentation and intake worker observations.
- iv. Disability documentation:
  1. Required documentation includes one of the following:
    - a. Verification of disability benefits;
    - b. Written statement from a qualified source that:
      - i. Identifies the physical, mental or emotional impairment, why it is expected to be of long-continued or indefinite duration, how it impedes

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the individual's ability to live independently, and how the individual's ability to live independently could be improved by more suitable housing conditions; or

- ii. Identifies a developmental disability; or
- iii. Identifies AIDS or related conditions.

The statement must be signed by a state licensed qualified source: medical service provider, certified substance abuse counselor, physician or treating health care provider. See page 20 for a listing of credentials required to diagnose, followed by a sample disability certification form for agency use.

- 2. Lack of disability documentation must not prevent an individual or family from being admitted to a permanent supportive housing program. Housing programs may enroll the person in a permanent supportive housing program without such documentation, but documentation must be obtained *within 45 days*. To document disability, it is not necessary for the nature of the disability to be disclosed: a disability benefit check is adequate documentation. Per guidance from HUD staff, permanent supportive housing can serve households in which either an adult, or a child, has a disability.
- 3. Chronically homeless documentation: In addition to disability documentation as above, providers must gather evidence of length of homelessness or number of times homeless. HMIS provides an official 3rd party record of homelessness that can be used for this purpose.
- v. Income verification: At the time of initial application, permanent supportive housing program staff will collect information on the client's income, including obtaining third-party documentation from all sources (SSI letters, W2s, etc.).
  - 1. Most programs have no income requirement at entry: the Continuum of Care has a preference for *no income requirement* to enter PSH programs. Income should be established as soon as possible.
  - 2. As a group, Permanent Supportive Housing projects have no minimum or maximum income levels per se. There is no maximum amount of income to reside in permanent supportive housing in Sonoma County. Depending on the funding that supports the housing, housing providers may establish maximum incomes to be eligible for a specific unit.
  - 3. Most residents will have or establish disability income, and are unlikely to have income above the extremely low-income level (30% of AMI). Income increases are part of the annual assessment of service needs that may contribute to a

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discussion of moving to more independent housing. Providers should note: this requires a mid-term update in HMIS.

4. Income level must be documented at the time of admission in order to calculate the participant's share of the rent. The following are acceptable forms of documentation:
  - a. Bank Statements
  - b. If employed, three most recent pay stubs (both spouses if applicable)
  - c. Social Security Statements (or Award Letter if SS recently awarded)
  - d. VA Award Letter (if applicable)
  - e. General Assistance Paperwork (if applicable)
  - f. Child Support documentation (if applicable)
  - g. Documentation of Legal Cash Income (e.g., letters)
  - h. 3rd party verification of other regular legal income
  - i. Zero Income Affidavit (see sample on p. 22)
1. Forms of income that do not count toward income documentation: lump sum payments (with few exceptions); student financial assistance. If there is a question, consult with Sonoma County Housing Authority staff.

### *c. Eligibility screening*

- i. Initial screening will be done in partnership with Coordinated Intake (CI), using the VI-SPDAT screening tool for families or individuals as appropriate. In consultation with CI, local providers will be able to conduct the VI-SPDAT screening with individuals and families seeking services on site, and will be empowered to schedule appointments for deeper assessment for such persons seeking assistance. Through initial screening and deeper assessment, CI will determine the client's eligibility for specific Sonoma County programs, including subpopulation or disability-specific eligibility requirements.
- ii. Criminal background checks are often conducted by housing providers, typically only if the funding for the housing requires it (for example, certain offenses may be required to be screened out). The CoC preference is to screen according to funding requirements only, and that criminal background not become a barrier to housing. Therefore criminal background should be reviewed case by case, primarily as a case management tool.

- iii. A credit report may be required for certain affordable housing projects if property management requires it. Otherwise, the primary use of credit reporting is in case management. Again, preference is for problematic credit not to be a barrier, but it is part of understanding the participant's situation.

## *d. Comprehensive Assessment*

- i. Coordinated Intake (CI) will conduct comprehensive assessment at intake using the SPDAT (Service Prioritization Decision Assistance Tool). Exceptions will be Permanent Supportive Housing programs with an exclusive referral source (such as Sonoma County Behavioral Health), where such assessment will be conducted by the referral source. One task of Coordinated Intake will be to clarify what value may be added to those referral relationships via CI assessment.

## *e. Changes to forms and procedures*

The Permanent Supportive Housing Program Standards Group will meet quarterly. Proposed changes to forms will be brought to this quarterly meeting. Changes will be considered and agreed to by working consensus. Any conflicts will be discussed and resolved in person. The relevant regulations will rule first. On other issues working consensus will be the required process for resolving disputes. If no consensus can be found within a reasonable length of time, the majority will rule.

## **2. Coordination with other providers**

### *a. Coordinated intake (CI)*

- i. Universal prescreening and referral by Coordinated Intake agency (Catholic Charities)
- ii. Permanent Supportive Housing programs will receive prescreened referrals as appropriate from Coordinated Intake.
  - a. Some Permanent Supportive Housing providers receive referrals exclusively from a single source, most commonly Sonoma County Behavioral Health's Linkage program for its enrolled clients. During the Coordinated Intake *beta* test period, an exploration will be undertaken to identify what value CI can add to exclusive referral processes, and procedures will be developed.
- iii. If a referral is turned away or no slots are available, the person should be routed back to Coordinated Intake for follow-up. See "Inappropriate Referrals" below on page 9.
- iv. Grievance procedure: A standard grievance form is attached at page 23, for providers to put on their own letterhead and customize for specific agency practice. If a common pattern of grievance emerges, the Program Standards Group will take up possible changes of policy.

### *b. Street Outreach*

- i. Outreach workers will refer people on the street into Coordinated Intake as quickly as possible, prescreen them for Permanent Supportive Housing as possible, and assist them to connect with PSH staff. On occasion this may mean accompanying PSH staff in visits on the street.

### *c. Prevention & One-time Financial Assistance providers*

- i. Permanent Supportive Housing providers will collaborate with agencies providing one-time assistance, for one-time assistance or deposit assistance as appropriate (e.g., SOS, HCA, SSVF).
- ii. Because Prevention providers serve people who are at-risk of homelessness, it bears noting that CoC-funded permanent supportive housing providers cannot accept persons who meet the federal definition of “at risk,” shown on page 17.

### *d. Shelter providers*

- i. Shelters will assess resident appropriateness for permanent supportive housing with the Coordinated Intake screening tool, refer as appropriate, support resident until PSH placement is identified, and facilitate the placement as possible.

### *e. Transitional Housing providers*

- i. Persons qualifying for permanent supportive housing may be referred into transitional housing programs if a permanent supportive housing unit is not available. This referral may originate with a shelter or permanent supportive housing provider, but should be made via Coordinated Intake.
  - a. In making such placements for chronically homeless persons, please note that CoC-funded permanent supportive housing projects (about 20% of Sonoma County’s PSH stock as of November 2014) *cannot consider a person even temporarily housed in transitional housing to be chronically homeless.*

## **3. Determining and prioritizing accepted clients vs. other forms of assistance**

### *a. Assessment by Coordinated Intake provider*

As noted above, each adult referred will be assessed by the Coordinated Intake using the Service Prioritization Decision Assistance Tool (SPDAT). The housing needs and acuity indicated by this tool will establish the priority for any given client to be housed, in relation to other clients and within the eligibility requirements for any given Permanent Supportive Housing program. Permanent Supportive Housing providers should note HUD guidance on establishing priorities for chronically homeless persons

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at <https://www.hudexchange.info/resources/documents/Notice-CPD-14-012-Prioritizing-Persons-Experiencing-Chronic-Homelessness-in-PSH-and-Recordkeeping-Requirements.pdf>.

### *b. Agency assessment & admission documents*

In addition, each local Permanent Supportive Housing provider may utilize its own assessment tools and admission documents to be administered at, or shortly after, intake.

### *c. Screening people in*

Sonoma County permanent supportive housing providers will operate from the viewpoint of screening people in rather than out. In doing so they commit to being good stewards of the funds, acting in the best interest of the client, and with transparency regarding the limits of the program.

### *d. Housing First*

“Housing First” is a philosophy that homelessness can be most efficiently ended by providing someone with access to safe, decent and affordable housing. Although an individual experiencing homelessness may benefit from supportive services such as mental health or substance abuse counseling, participation in these services is not a prerequisite to access housing, nor a condition of maintaining it. In fact, the stability that a housing unit provides bolsters a tenant’s ability to participate in these services. The Housing First philosophy focuses on simplifying the process of accessing housing through streamlining the application process and removing unnecessary documentation or site visits. It also ensures that supportive housing tenants are not subject to conditions of tenancy exceeding that of a normal leaseholder, including participation in treatment or other services. Research has demonstrated that this approach is effective in promoting housing stability, particularly among people who have been homeless for long periods of time and have serious psychiatric disabilities, substance use disorders and/or other disabilities

### *e. Inappropriate referrals*

Families and individuals who cannot be assisted due to inappropriate fit or lack of beds, will be routed back to Coordinated Intake for follow-up. As possible (e.g., funding available), permanent supportive housing providers will provide ongoing support in accessing appropriate services. Even if not funded for such services, all permanent supportive housing providers will aim to assess the most critical needs and perform a “warm handoff” with appropriate services.

If the referral might be qualified in the future (for example, they are at risk but not literally homeless), permanent supportive housing providers will offer phone or other support while helping to research other options.

### *f. Sex offenders*

Registered sex offenders cannot be housed in HUD-funded facilities. If the charge does not meet the threshold for the sex offender registry, the participant can be served. Providers should check both state and national registries.

HUD recently released Notice PIH 2012-28 "State Registered Lifetime Sex Offenders in Federally Assisted Housing." Although this notice was released under the Public and Indian Housing Department, it still applies to many multifamily programs. The notice supersedes Notice H 2009-11 and Notice PIH 2009-35.

The guidance reiterates owners' and agents' and public housing agencies' (PHAs) statutory- and regulatory-based responsibilities to prohibit admission to individuals subject to a lifetime registration requirement under a state sex offender registration program. If a participant who is subject to such a lifetime registration requirement was erroneously admitted into a federal housing program and is found to be receiving housing assistance, owners, agents, and PHAs must pursue eviction or termination of assistance for these participants.

In addition, this notice clarifies regulations concerning admissions, and strongly recommends additional steps to prevent individuals subject to a lifetime registration requirement under a state sex offender registration program from receiving federal housing assistance.

## **4. Percentage or amount of rent and utilities costs each participant pays**

### *a. 30% of Monthly Income*

Rent shall be set at 30% of the participant's current monthly income per HUD guidelines, adjusted annually. There shall be no set rental fees or program fees in permanent supportive housing projects. A rent calculation form is attached at pages 24-27. For purposes of calculating the participant contribution, "rent" refers to both the occupancy charge and utilities.

### *b. Utilities*

Utilities include water, garbage, heat and electricity. As a matter of general policy to keep the unit habitable, permanent supportive housing projects should ensure that all utilities are paid for, either as part of the rent (preferred) or directly paid by the provider. Agencies may make a local decision to pay utilities to ensure the unit remains habitable; this may also be accomplished through a representative payee service.

For cases where utilities are not included in the rent, the Sonoma County Housing Authority determines utility allowances annually based on consumption data, tariff rates and information from the municipalities in Sonoma County. Allowances vary

based on bedroom size of unit, type of utility (gas, propane, electricity), and whether the unit is attached to another unit or a detached unit. Current utility allowances are listed at <http://www.sonoma-county.org/cdc/s8utilityallow.htm>.

Utilities may include a basic telephone for individuals affected by domestic violence or individuals with disabilities. A reasonable accommodation may be requested.

## 5. How long program participants will be provided with assistance

### a. *Typical length of assistance*

Because Permanent Supportive Housing is *permanent*, there is no time limit to assistance.

### b. *Limit on time to locate rental housing*

Where a program provides rental assistance, extensions to the standard 90-day period to locate housing may be approved, up to 180 days. If housing cannot be located within 180 days, a case conference should be convened by the service provider and Coordinated Intake, and an alternate strategy developed.

### c. *If the disabled person leaves the household*

If the qualifying disabled person leaves the household, and other household members do not have a qualifying disability, assistance must end within the contract year or when they move out of the unit.<sup>1</sup>

### d. *Number of times a person may exit and re-enter*

There is no limit to the number of times a person may exit and re-enter a program. Readmission is by evaluation by the program clinical director or similar senior management staff. Re-entry must be thoughtful in assessing the client's needs at time of re-entry and whether the person will be more successful in program this time. In congregate or shared housing programs, the peaceful enjoyment of the premises by other occupants or neighbors must also be considered.

### e. *Eviction*

Eviction should be a last resort if a program participant is disturbing a shared living situation. Case managers should engage collaboratively with such clients on how to resolve the situation. If necessary, a case conference with all relevant providers can come up with a new strategy.

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<sup>1</sup> The following language appears in 24 CFR 582.5 (3) (Definitions – Persons with Disabilities):

... with respect to the surviving member or members of a household, the right to rental assistance under this part will terminate at the end of the grant period under which the deceased member was a participant.

CoC staff are inquiring whether this provision remains under the CoC Interim Rule.

A program may issue a no-cause eviction (90 day notice) if the resident is no longer appropriate for services. Every effort should be made to ensure there is the appropriate level of supportive services if the resident leaves.

### *f. Annual Assessments*

Appropriate and individualized services should be provided as identified through needs assessment on intake and updated annually. Housing is never to be conditioned on participation in services. Fair Housing rules apply: if the resident refuses to participate in services, a program cannot evict on that basis. Services must be voluntary; in this, motivational interviewing is a critical strategy.

The one exception is a program serving only people with chronic substance abuse; such a program may require participation in substance abuse treatment services.

### *g. Graduation to Independent Subsidized Housing*

The CoC recommends that all permanent supportive housing providers sign up all participants for independent subsidized housing (e.g., the Housing Choice Voucher program and other low income housing waiting lists). If and when a time comes that the participant no longer needs the services provided, this will establish an option to move out of the project with continued rental assistance.

## **6. Whether & how the amount of assistance will be adjusted over time**

### *a. Annual Assessments*

Income assessments must be done at least annually, and adjustments may be made once income is established or increases significantly, at agency discretion. If income drops, adjustments must be made within a month.

Service needs must be assessed at least annually.

### *b. Limits on assistance*

Other than the requirement that the resident pay 30% of their monthly income, there is no maximum length of assistance. Housing assistance is provided without any maximum amount of time, or number of times the program participant may receive assistance. For this reason, no extensions are necessary.

See note at 5(g) above, on Graduation to Independent Subsidized Housing.

## **7. Occupancy standards**

### *a. Shared housing*

Single adults will not share bedrooms: each resident shall have their own bedroom. In shared housing, common areas may be shared with the other residents in the unit.

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Coordinated Intake staff and/or permanent supportive housing program staff will screen each client to assess whether he or she has the skills needed to live in a shared situation. Where possible, permanent supportive housing program staff will provide an opportunity for potential housemates to meet each other and assess compatibility before a shared household is formed or when a new housemate is being added to an existing household. Residents may be assigned to rooms by the permanent supportive housing provider and may not have a choice of housemates.

SHARED HOUSING		
Unit Size	Minimum Occupancy	Maximum Occupancy
Two Bedroom	2 people	2 people
Three Bedroom	3 people	3 people

## *b. Rental Assistance units*

The Sonoma County Housing Authority assigns one bedroom to two people within the following guidelines: One bedroom will be allowed for adult(s) Head of Household. Foster children will be included in determining unit size. Live-In Aides who reside in the unit full-time will be provided a separate bedroom. This must be their only residence. No additional bedrooms are provided for the Aide's family. Aides who reside in the unit part-time and who maintain a separate residence will not be provided a separate bedroom. At the discretion of the Housing Authority, a child who is away at school but who lives with the family during school recesses, up to age 22, may be counted as part of the family in determining unit size. Verification must be provided to document that they are residing in the residence during school breaks.

UNITS OCCUPIED BY ONE HOUSEHOLD (NOT SHARED)		
Unit Size	Minimum Occupancy	Maximum Occupancy
One Bedroom	1 person	4 people
Two Bedroom	2 people	6 people
Three Bedroom	3 people	8 people

To access FMR information on an annual basis, the following link can be utilized:  
<http://www.huduser.org/portal/datasets/fmr.html>

Rental assistance provided by the City of Santa Rosa Housing Authority (e.g., VA Supportive Housing) must follow that housing authority's occupancy standards.

## **8. Habitability Standards**

### *a. Inspections*

Program staff will conduct a habitability inspection of each SHP unit:

- Prior to signing the initial master-lease agreement with the landlord; and

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- Annually at the time of each client’s recertification; and
- Each time a unit is vacated, before being leased to a new client.

Program staff and/or a designated Housing Inspector will conduct the inspection using either a “primary” or “secondary” method of inspection (as described in the Habitability Standards Guide at page 28) and complete the Habitability Standards Worksheet. The worksheet must be signed by the person conducting the inspection. A copy must be kept in the client file. Certified Housing Inspectors are available through the Housing Authority and/or a non-profit Housing Development and Management organization.

The Universal Inspection Checklist from HUD can be accessed at:  
<http://portal.hud.gov/hudportal/documents/huddoc?id=52580.pdf>

9. Attachments

a. Federal Definitions of Homelessness & At Risk Status



# Homeless Definition

<b>CRITERIA FOR DEFINING HOMELESS</b>	<b>Category 1</b>	Literally Homeless	(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: <ul style="list-style-type: none"> <li>(i) Has a primary nighttime residence that is a public or private place not meant for human habitation;</li> <li>(ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u></li> <li>(iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution</li> </ul>
	<b>Category 2</b>	Imminent Risk of Homelessness	(2) Individual or family who will imminently lose their primary nighttime residence, provided that: <ul style="list-style-type: none"> <li>(i) Residence will be lost within 14 days of the date of application for homeless assistance;</li> <li>(ii) No subsequent residence has been identified; <u>and</u></li> <li>(iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing</li> </ul>
	<b>Category 3</b>	Homeless under other Federal statutes	(3) 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: <ul style="list-style-type: none"> <li>(i) Are defined as homeless under the other listed federal statutes;</li> <li>(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;</li> <li>(iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u></li> <li>(iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers</li> </ul>
	<b>Category 4</b>	Fleeing/ Attempting to Flee DV	(4) Any individual or family who: <ul style="list-style-type: none"> <li>(i) Is fleeing, or is attempting to flee, domestic violence;</li> <li>(ii) Has no other residence; <u>and</u></li> <li>(iii) Lacks the resources or support networks to obtain other permanent housing</li> </ul>



# Homeless Definition

<b>RECORDKEEPING REQUIREMENTS</b>  	<b>Category 1</b>	Literally Homeless	<ul style="list-style-type: none"> <li>• Written observation by the outreach worker; <u>or</u></li> <li>• Written referral by another housing or service provider; <u>or</u></li> <li>• Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;</li>   <li>• For individuals exiting an institution—one of the forms of evidence above <u>and</u>:                         <ul style="list-style-type: none"> <li>○ discharge paperwork <u>or</u> written/oral referral, <u>or</u></li> <li>○ written record of intake worker’s due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution</li> </ul> </li> </ul>
	<b>Category 2</b>	Imminent Risk of Homelessness	<ul style="list-style-type: none"> <li>• A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u></li> <li>• For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay; <u>or</u></li> <li>• A documented and verified oral statement; <u>and</u></li>   <li>• Certification that no subsequent residence has been identified; <u>and</u></li> <li>• Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing</li> </ul>
	<b>Category 3</b>	Homeless under other Federal statutes	<ul style="list-style-type: none"> <li>• 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; <u>and</u></li> <li>• Certification of no PH in last 60 days; <u>and</u></li> <li>• Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; <u>and</u></li> <li>• Documentation of special needs <u>or</u> 2 or more barriers</li> </ul>
	<b>Category 4</b>	Fleeing/ Attempting to Flee DV	<ul style="list-style-type: none"> <li>• <i>For victim service providers:</i> <ul style="list-style-type: none"> <li>○ 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.</li> </ul> </li> <li>• <i>For non-victim service providers:</i> <ul style="list-style-type: none"> <li>○ 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; <u>and</u></li> <li>○ Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u></li> <li>○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.</li> </ul> </li> </ul>



# At Risk of Homelessness

<b>CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS</b>	<b>Category 1</b>	Individuals and Families	An individual or family who: <ul style="list-style-type: none"> <li>(i) Has an annual income below <u>30%</u> of median family income for the area; <u>AND</u></li> <li>(ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; <u>AND</u></li> <li>(iii) Meets one of the following conditions:                         <ul style="list-style-type: none"> <li>(A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u></li> <li>(B) Is living in the home of another because of economic hardship; <u>OR</u></li> <li>(C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <u>OR</u></li> <li>(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <u>OR</u></li> <li>(E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; <u>OR</u></li> <li>(F) Is exiting a publicly funded institution or system of care; <u>OR</u></li> <li>(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Con Plan</li> </ul> </li> </ul>
	<b>Category 2</b>	Unaccompanied Children and Youth	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute
	<b>Category 3</b>	Families with Children and Youth	An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

## Sonoma County Continuum of Care \* Program Standards

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### *b. Acceptable Forms of Identification for Permanent Supportive Housing Programs*

*Developed by the Permanent Supportive Housing Program Standards Group*

- Valid driver's license or identification card issued by DMV. Discounts for ID can be obtained by contacting Gerry LaLonde-Berg at Sonoma County Economic Assistance:  
[glalondeberg@schsd.org](mailto:glalondeberg@schsd.org)
- Valid driver's license or identification card from the state or country of origin
- Birth Certificate
- United States Passport
- Foreign passport
- Verification of citizenship, alienage, or immigration status
  - Permanent Resident Card or Alien Registration Receipt Card
  - Employment Authorization Document (Card) that contains a photograph
  - Green Card
  - Work Visa
- Certificate of Naturalization or Citizenship
- American Indian Card
- Voter's registration card
- US military card
- Military dependent's ID card
- Social Security Card or Tax ID number

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- State Benefits Card
- Veterans Administration DD-214

On a temporary basis the following may be accepted:

- Behavioral Health Medical Record number (Avatar)
- Hospital identification bracelet
- Student ID
- Identification by local law enforcement.

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### *c. Credentials for Certifying Disability in the State of California*

A person shall be considered to have a disability if such person (1) has a mental or emotional impairment 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) has AIDS or conditions arising from its etiological effects.

The person who verifies the disability must:

- (a) be trained to make such a diagnosis or determination
- (b) have part of their ongoing job responsibilities to make such determinations which they also do so for all their clients, not just S+C
- (c) hold any required license or certification for a person who makes these determinations

#### Acceptable Credentials

- Licensed Medical Doctor
- Licensed Nurse Practitioner
- Licensed Psychiatrist
- Licensed Psychologist
- Licensed Clinical Social Worker (LCSW)
- Licensed Marriage Family Therapist (LMFT)
- County Mental Health Clinician
- Psychiatric Social Worker (PSW)
- Marriage Family Therapist (MFT)
- Master Social Worker (MSW)
- County Alcohol and Drug Clinician
- Certified Alcohol and Drug Counselor (CAADAC Certified)
- PHD in appropriate field
- Resident Nurse (RN)

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*d. Disability Verification Form (Sample per So. Co. Housing Authority)*

To: \_\_\_\_\_  
*Name of Medical Practitioner*

\_\_\_\_\_

\_\_\_\_\_

*Address*

\_\_\_\_\_

H.A. \_\_\_\_\_

Case: \_\_\_\_\_

RE: \_\_\_\_\_

I authorize you to complete the appropriate lower portions of this form. Please return this form directly to [permanent supportive housing provider name].

\_\_\_\_\_  
Tenant's Signature

\_\_\_\_\_  
Date

\*\*\*\*\*

**DISABILITY VERIFICATION**

I certify that the above-named individual meets the HUD definition of a disabled person (See below for definition.)

YES

NO

**Person with disabilities:**

(1) Means a person who:

(ii) Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that:

(A) Is expected to be of long-continued and indefinite duration;

(B) Substantially impedes his or her ability to live independently, and

(C) Is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or

(2) Does not exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome;

(3) For purposes of qualifying for low-income housing, does not include a person whose disability is based solely on any drug or alcohol dependence.

\_\_\_\_\_  
Signature of professional verifying disability status

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

\_\_\_\_\_  
Telephone number

DISABILITY VERIFICATION 0311.DO

# Sonoma County Continuum of Care \* Program Standards

## e. Zero Income Affidavit (sample per Buckelew Programs)

**ZERO-INCOME AFFIDAVIT**

**NAME:** \_\_\_\_\_ **DATE:** \_\_\_\_\_

**ADDRESS:** \_\_\_\_\_ **PROJECT:** \_\_\_\_\_

This form is required only if an adult member of the household has no income from any source. **THIS IS A STATEMENT OF NON-INCOME FOR A HOUSEHOLD MEMBER 18 YEARS OF AGE OR OLDER.**

I, \_\_\_\_\_, do hereby certify that **I DO NOT** receive income from any source.

I understand sources of income may include, but are not limited to:

EMPLOYMENT INCOME	SOCIAL SECURITY INCOME
SOCIAL SERVICES, INCLUDING: TANF - TEMPORARY ASSISTANCE TO NEEDY FAMILIES GENERAL ASSISTANCE DISABILITY BENEFITS	S.S.I. (SUPPLEMENT SOC. SEC.) V.A. PENSION RETIREMENT INCOME
INCOME FROM ASSETS	SPOUSAL SUPPORT
SCHOOL GRANTS	FAMILY SUPPORT (PARENTS, ETC.)
SELF EMPLOYMENT, INCLUDING: CHILD CARE HOUSEWORK ANY WORK DONE FROM HOME	INTEREST FROM SAVINGS ACCOUNTS INTEREST FROM CHECKING A/C'S ANY OTHER INTEREST RECEIVED
UNEMPLOYMENT BENEFITS	

I further understand that, should I become employed or begin receiving income from any other source, the income must be reported to the owner or property manager.

\_\_\_\_\_  
NAME (PLEASE PRINT)

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
DATE

\_\_\_\_\_  
PHONE

**NOTE: Failure to fully disclose all income could result in the loss of a restricted rent level or the ability to continue occupying the unit.**

# Sonoma County Continuum of Care \* Program Standards

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## *f. Sonoma County CoC Client Grievance Procedure*

*Sample developed by CoC program standards groups*

### **DEFINITIONS:**

**Complaint** – When a client or community member doesn't like particular procedures, the outcome of a process, style differences between staff, time frame of staff responses, or behavioral styles that may feel abrupt or too direct when compared to other staff styles. A complaint may be handled in an informal conversation with staff person or supervisor, if necessary.

**Grievance** – When a client or community member states that they have been harmed by staff behavior and that behavior significantly deviates from appropriate, professional behavior or when a client's complaint is not resolvable with the staff person's supervisor. Filing a grievance is a formal procedure that will include management involvement and possible oversight from the relevant agency's Executive Director.

### **POLICY:**

It is important to have a mechanism for clients to address grievances or complaints promptly. Clients need to feel that their concerns are well heard, that they are treated respectfully, and that the agency makes every effort to formally investigate complaints in a fair and thorough manner. Client needs to know that we are engaged in continuous improvement of our services.

### **PROCEDURE:**

1. In the instance of every complaint or grievance we learn of, the client must be encouraged to first try to work out the issue with the staff person involved or the staff person in charge of the client program.
2. If the grievance cannot be resolved by informal discussion between the client and the staff member, the client may submit the grievance in writing to the staff member's supervisor. If the grievance cannot be resolved by the staff member's supervisor, the client may request the grievance be submitted to the Executive Office.
3. The Executive Office will review all the information presented by the client, the staff member, and the supervisor and may collect additional information to resolve the grievance. The decision of the Executive Office is final.
4. The client may request a written response to the grievance. The final decision with regard to the grievance shall be made a part of the client's files.

\_\_\_\_\_  
Client Name

\_\_\_\_\_  
Client Signature

\_\_\_\_\_  
Witness Name

\_\_\_\_\_  
Witness Signature

\_\_\_\_\_  
Date

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### *g. Rent Calculation Worksheet (sample per COTS)*

Supportive Housing Program:					
Name of Resident/Household:					
Address of Unit:					
Date Prepared:					
Prepared by: (Print/Sign)					
	Effective Date:				
		<b>Household Member</b>	<b>Household Member</b>	<b>Household Member</b>	<b>Household Member</b>
	Name:				
<b>ANTICIPATED ANNUAL INCOME</b>					
1	Wages, Salaries	\$0.00	\$0.00	\$0.00	\$0.00
2	Social Security/Pensions (Periodic Payments)	\$0.00	\$0.00	\$0.00	\$0.00
3	Payments in Lieu of Earnings	\$0.00	\$0.00	\$0.00	\$0.00
4	Public Assistance	\$0.00	\$0.00	\$0.00	\$0.00
5	Periodic Allowances	\$0.00	\$0.00	\$0.00	\$0.00
6	Business Income- Net	\$0.00	\$0.00	\$0.00	\$0.00
7	Net Income-Real/Personal Property	\$0.00	\$0.00	\$0.00	\$0.00
8	Armed Forces Pay	\$0.00	\$0.00	\$0.00	\$0.00
9	Subtotal by Family Member	\$0.00	\$0.00	\$0.00	\$0.00
10	TOTAL ANNUAL INCOME (Add all subtotals from Line 9)	\$0.00			
<b>DEPENDENT ALLOWANCE (N/A for Single Adults)</b>					
11	Number of Dependents				

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12	DEPENDENT ALLOWANCE (Multiply Line 11 by \$480)	\$0.00
<b>CHILD CARE ALLOWANCE (N/A for Single Adults)</b>		
13	Expense to enable family member to work	
	Household member enabled:	
14	Expense to enable family member to further education	
	Household member enabled:	
15	Total child care reimbursed by another agency (i.e. TANF (called CalWORKS in California), etc.) to permit <u>work</u>	
	Name of agency:	
16	Total child care reimbursed by another agency (i.e. TANF (called CalWORKS in California), etc.) to permit <u>education</u>	
	Name of agency:	
17	Family Member Earnings from work which are dependent on the child care	
18	CHILD CARE ALLOWANCE - (a) if child care allows household to work only, Line 15 from Line 13, but not higher than line 17; (b) if child care allows household to further education, Line 16 from Line 14; if child care allows both, sum of (a) and (b)	\$0.00
<b>DISABLED (OR HANDICAPPED) ASSISTANCE ALLOWANCE</b>		
19	Disabled Assistance Expenses (attendant care plus auxiliary apparatus)	
20	Total Amount of Disabled Assistance Expenses Reimbursed	
21	Net Disabled Assistance Expenses (Subtract Line 20 from Line 19)	\$0.00

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22	(Multiply Line 10 (Total Annual Income) by 0.03)	\$0.00
23	(Subtract Line 22 from Line 21)	\$0.00
24	Family Member Earnings which are dependent on the disabled assistance expenses	
25	DISABLED ASSISTANCE/ADJUSTED INCOME SUBTOTAL (Lesser of Lines 23 or 24)	\$0.00
<b>MEDICAL EXPENSES OF ELDERLY OR DISABLED ALLOWANCE</b>		
26	Medical Expenses	
27	Total Amount of Medical Expenses Reimbursed	\$0.00
28	Net Medical Expenses (Subtract Line 27 from Line 26)	\$0.00
29	MEDICAL EXPENSES/ADJUSTED INCOME SUBTOTAL (If Line 23 is more than 0, enter the amount from Line 28, otherwise add Lines 21 and 28 and subtract Line 22)	\$0.00
<b>ELDERLY OR DISABLED PERSONS HOUSEHOLD (FAMILY) ALLOWANCE</b>		
30	ELDERLY OR DISABLED ALLOWANCE (\$400 if applicable)	
<b>ADJUSTED INCOME</b>		
31	Total Income Adjustments (Add Lines 12, 18, 25, 29, and 30)	\$0.00
32	Annual Adjusted Income (Subtract Line 31 from Line 10)	\$0.00
<b>RESIDENT RENT DETERMINATION</b>		
33	30% of Monthly Adjusted Income (Divide Line 32 by 12 and multiply by 0.3)	\$0.00
34	10% of Monthly Income (Divide Line 10 by 12 and multiply by 0.1)	\$0.00

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35	For SHP Programs ONLY if applicable: lesser amount of rent the program has chosen to charge- Insert Monthly Rental Amount calculated per your programs' formula [See Guide Responsibility 2, Step 7]	
36	AMOUNT PER MONTH TO BE CHARGED FOR RESIDENT RENT (Larger of Lines 33 or 34 except for SHP programs which choose to charge less, then Line 35)	\$0.00
<b>DETERMINING RESIDENT RENTS FOR UNITS IN WHICH UTILITIES ARE NOT INCLUDED IN RENT</b>		
37	Utility Allowance	
38	Resident Rent (Subtract Line 37 from Line 36). THIS IS THE MAXIMUM AMOUNT PER MONTH THAT CAN BE CHARGED FOR RESIDENT RENT	\$0.00
39	Utility Reimbursement (Only if Line 38 is less than 0). THIS IS THE AMOUNT THAT MUST BE <u>PAID TO</u> THE RESIDENT AS A UTILITY REIMBURSEMENT.	\$0.00
<b>IF RESIDENT WILL PAY RENT AND WILL NOT RECEIVE A UTILITY REIMBURSEMENT</b>		
40	Annual Rental Amount	\$0.00
41	Daily Rental Amount	\$0.00

# Sonoma County Continuum of Care \* Program Standards

## *h. Habitability Standards Guide*

Habitability Standard	Primary method of Inspection	Secondary method of Inspection
<b>Structure and Materials</b>	Review of current local building and occupancy permits, housing/health code inspection certifications.	Walk-through inspection by program staff and observations whether structure appears sound and poses no threat to health and safety of residents and protects residents from the elements.
<b>Access</b>	Observations by program staff whether space is accessible (including accessible to handicapped), is not able to be utilized by unauthorized persons, and has alternate means of egress in case of fire.	
<b>Space and Security</b>	Review of current building and occupancy permits, housing/public health code inspection certifications.	Observation by program staff whether residents are afforded adequate space and security (i.e., residents and their property are reasonably safe from harm), and are provided adequate places to sleep.
<b>Interior Air Quality</b>	Review of current building and occupancy permits, housing/public health code inspection certifications, plus results of any air testing that has occurred (to measure levels of pollutants).	Observations by program staff that all individual rooms and common areas have natural or mechanical ventilation that appear to allow for adequate air circulation.
<b>Water Supply</b>	Review of current building and occupancy permits, housing/public health code inspection certifications, plus results of any water testing that has occurred.	Observations by program staff regarding use of filtration systems, and the nature of circulation/distribution systems used for potable water.
<b>Sanitary Facilities</b>	Review of current building and occupancy permits, housing/public health code inspection certifications.	Observations by program staff whether sanitary facilities are clean, in working order, and may be used in privacy.
<b>Thermal Environment</b>	Review of current building and occupancy permits, housing/public health code inspection certifications, plus any records of inspections, tune-ups, repairs, or replacement of heating/cooling systems.	Observations by program staff regarding temperature being maintained throughout the facility.
<b>Illumination and Electricity</b>	Review of current building and occupancy permits, housing/public health code inspection certifications.	Observations by program staff regarding the quality of illumination and the availability (and condition) of electrical outlets throughout the facility.
<b>Food Preparation</b>	Review of current building and occupancy permits, housing/public health code inspection certifications.	Observations by program staff regarding the cleanliness of food preparation areas, adequacy of food storage area, and whether there are any indications of infestation.
<b>Sanitary Conditions</b>	Review of housing/public health code inspection certifications.	General observations by assessment team.
<b>Fire Safety – Individual Units</b>	Observations by program staff of smoke detectors in each unit, and testing of said equipment by program staff. (Note: in units occupied by hearing-impaired persons, smoke detectors must have an alarm designed for hearing-impaired persons.)	
<b>Fire Safety – Common Areas</b>	Observations by program staff of at least one smoke detector in each public space, and testing of said equipment by the program staff.	

*From HUD's Supportive Housing Program (SHP) Self-Monitoring Tools, which can be found at <https://www.hudexchange.info/resources/documents/SHPSelfMonitoring.pdf>.*

## *i. Written Standards for Order of Priority*

### **Sonoma County Continuum of Care Written Standards on Notice of Priority for Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing**

On October 27<sup>th</sup>, 2015, the Continuum of Care Board formally adopted Notice CPD-14-012 from HUD, “Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status” for all CoC funded projects. The following guidelines will be utilized for all CoC funded projects in these revised standards in a manner consistent with each project’s current grant agreements.

***These written standards are incorporated into the CoC’s Governance Charter on pages 48-50.***

#### **Order of Priority in CoC Program-funded Permanent Supportive Housing Beds Dedicated to Persons Experiencing Chronic Homelessness and Permanent Supportive Housing Prioritized for Occupancy by Persons Experiencing Chronic Homelessness**

For CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness, the following order of priority will be followed:

- a.) First Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.** A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:
  - i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and
  - ii. The CoC or CoC Program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of his definition for chronically homeless, of the family as having severe service needs).
  
- b.) Second Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness.** A chronically homeless individual or head of household, as defined in 24 CFR 578.3, for which both of the following are true:
  - i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,

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ii. The CoC or CoC program recipient has **not** identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

**c.) Third Priority – Chronically Homeless Individuals and Families with the Most Severe Service Needs. A chronically homeless individual or head of the household as defined in 24 CFR 578.3 for whom both the following are true:**

i. The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than one year; and

ii. The CoC or CoC program recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

**d.) Fourth Priority - All Other Chronically Homeless Individuals and Families.** A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least four separate occasions in the last 3 years, where the cumulative total length of the 4 occasions is less than 12 months; and

ii. The CoC or CoC Program has not identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph 1) of the definition for chronically homeless, of the family as having severe service needs.

### **Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness**

For CoC-Program-funded PSH projects, the following priorities will be followed for non-dedicated and non-prioritized PSH beds. Chronically homeless individuals and families will be offered housing first for available beds in CoC funded PSH projects:

**a.) First Priority – Homeless Individuals and Families with a Disability with the Most Severe Service Needs.**

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

**b.) Second Priority – Homeless Individuals and Families with a Disability with A Long Period of Continuous or Episodic Homelessness**

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

**c.) Third Priority – Homeless Individuals and Families with Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters.**

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

**d.) Fourth Priority – Homeless Individuals and Families with a Disability Coming from Transitional Housing**

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