



**Sonoma County Continuum of Care Coordinated Entry Advisory
Committee**

**Agenda for January 18, 2023
12:00 -1:30pm Pacific Time**

Zoom Link:

<https://sonomacounty.zoom.us/j/97231969388?pwd=VWdYWmpHWjJsSFZ6WVlxVW1rZE5lZz09>

Passcode: 505387

	Agenda Item	Packet Item	Presenter	Time
1.	Welcome and introductions		Chair	12:00pm
2.	Approval on minutes and agenda (Action Item)	1,2	Staff	12:05pm
3.	Updates from HomeFirst	3	HomeFirst	12:10pm
4.	Standing agenda item: update to CES policies and procedures (Action Item)	4	HomeFirst Staff	12:15pm
5.	Updates to Emergency Shelter Standards. (Action Item)	5	Staff/HomeFirst staff	12:20pm
6.	Public comment on non-agendized items		Public	1:25pm

PUBLIC COMMENT:

Public Comment may be made via email or during the live zoom meeting. To submit an emailed public comment to the CE committee email Thai.Hilton@sonoma-county.org. Please provide your name, the agenda number(s) on which you wish to speak, and your comment. These comments will be emailed to all Board members. Public comment during the meeting can be made live by joining the Zoom meeting using the above provided information. Available time for comments is determined by the Board Chair based on agenda scheduling demands and total number of speakers.



Sonoma County Continuum of Care Coordinated Entry Advisory Committee (CEA)

November 16th, 2022, 12:00pm. – 1:30pm.

Meeting Recording:

<https://sonomacounty.zoom.us/rec/share/35nyrMPgDU4XNr7GDknsU8A7lx4VIOPMEvilDPjMTydAMrtHdUbthld4kY6fGg73.Ml7o3W3TzVqJnS8e?startTime=1668628680000>

Passcode: @Yo6Dp+&

1. **Welcome and Introductions:** Committee Chair Matthew Verscheure called Meeting to order at 12:03pm; Thai Hilton, Coordinated Entry Coordinator, went over Zoom rules around public comment and Brown Act guidelines.

Roll Call:

Present: Eileen Morris proxy for Robin Phoenix, Mary Haynes, Margaret Sluyk, Ben Leroi, Matthew Verscheure, Susan Pierce, Heather Jackson

Absent: Justin Milligan, and Kathleen Pozzi. Ashlyn Artis

2. **Approval of Minutes and agenda:** Approval of meeting minutes form 10/19 and agenda for 11/16.

Public comment: none at this time

Motion: Ben Leroi motions to approve agenda and minutes ben Susan Pierce seconds.

Vote:

Ayes: Mary Haynes, Margaret Sluyk, Ben Leroi, Matthew Verscheure, Susan Pierce, Heather Jackson

Nays:

Abstain: Eileen Morris proxy for Robin Phoenix

Absent: Justin Milligan, and Kathleen Pozzi. Ashlyn Artis

Motion Passes

3. **Standing agenda item: Updates to Coordinated Entry Policies and Procedures.** Hunter Scott, Homefirst shared screen and presented recommended changes to CEA Policies and Procedures, items below.

Change: Transition Aged Youth eligibility for CES will now include Category 2 homelessness, those immanently at risk of losing their housing. These referrals will be sent to Rapid Rehousing programs



that can accept Category 2 referrals outside of case conferencing due to the timely nature of the need.

Reasoning: The TAY By-Name-List has been depleted to near zero participants who have not received a referral with current eligibility and prioritization standards. The Operator is working on several action items to increase outreach to the TAY population to bring in more TAY that meet Category 1 and 4, but also proposes expanding CES eligibility for this population. TAY services often include Category 2 when defining homelessness for that population; the Point In Time count likely included some Category 2 or “couch surfing” TAY as reported by staff who participated in the TAY count. There are currently 3 Rapid Rehousing programs that can accept Category 2 referrals, so this change will also help those programs utilize their funds.

Public Comment: None at this time

Motion: Margaret Sluyk moves to accept changes to accept category two for Transitional Aged Youth, Ben Leroi seconds.

Vote:

Ayes: Eileen Morris proxy for Robin Phoenix, Mary Haynes, Margaret Sluyk, Ben Leroi, Matthew Verscheure, Susan Pierce, Heather Jackson

Nays:

Abstain:

Absent: Justin Milligan, and Kathleen Pozzi. Ashlyn Artis

Motion Passes

4. Redevelopment of prioritization and assessment:

Thai Hilton, Coordinated Entry Coordinator reviewed information on CDC and HomeFirst staff believing that the community should redesign the assessment and prioritization processes for the Sonoma County CE system. CDC and HomeFirst staff have recently attended technical assistance trainings on innovative assessment and prioritization processes, including a way to incorporate some level of local preference.

Hunter Scott Homefirst shared PowerPoint that went over assessment vs. prioritization, issues with current assessment and prioritization, lessons learned from Coordinated Entry Prioritization and Assessment Community Workshop and possible solutions.

Recommendation: That a working group be formed to develop a plan for redesigning the community’s assessment and prioritization processes.

Committee Feedback/Group Discussion: the need to explore options to redesign tool, gathering input from various groups (Providers, individuals with lived experience, NAACP, Tribal Partners, Corazon), and then forming a Workgroup to create an implementation plan.



Public Comment: Danielle Danforth

Motion: Ben Leroi motions to direct that the CE operator HomeFirst and CDC staff develop working group to create an implementation plan with community stakeholders for redesigning the Coordinated Entry Prioritization and Assessment processes, Susan Pierce seconds.

Vote:

- **Ayes:** Eileen Morris proxy for Robin Phoenix, Mary Haynes, Margaret Sluyk, Ben Leroi, Matthew Verscheure, Susan Pierce, Heather Jackson
- **Nays:**
- **Abstain:**
- **Absent:** Justin Milligan, and Kathleen Pozzi. Ashlyn Artis

Motion passes

5. Local Preferences in CE referrals for HHAP-funded programs: Thai Hilton, Coordinated Entry Coordinator reviewed October 19th, CEA Committee meeting, where service providers discussed whether to maintain a local preference system for HHAP-funded (Homelessness Housing Advocacy and Prevention) projects. With a local preference, Coordinated Entry would refer a client in a specific geographic area to housing operated by a service provider in that area in addition also shared feedback for providers who advocate for the retention of local preference and those who advocate against the local preference. Also shared, vulnerability impact of west county and north county preference data.

Motion: Ben Leroi motions to allow providers who have had regional preference in their contracts in the past specifically for HHAP funding that allows it to continue, and that preference needs to be the client's choice on which region of the county they wish to live in. one third of referrals to be made for those which have no preference selected on region. Margaret Sluyk seconds motion.

Public Comment: none at this time

Vote:

- **Ayes:** Eileen Morris proxy for Robin Phoenix, Mary Haynes, Margaret Sluyk, Ben Leroi, Matthew Verscheure, Susan Pierce
- **Nays:**
- **Abstain:**
- **Absent:** Justin Milligan, and Kathleen Pozzi, Ashlyn Artis, Heather Jackson

Motion passes

6. Public Comment on non-agendized items: none at this time

Meeting adjourned at 1:34pm



**Sonoma County Continuum of Care Board
Agenda Report**

Item No: 3. Updates from HomeFirst

Subject: Updates on new project prioritization and CES performance Evaluation Summary

Meeting Date: January 18, 2023

Staff Contact: Hunter Scott HScott@homefirstscc.org

SUMMARY

HomeFirst will be providing an update on a new project's scoring range. Also, HomeFirst will provide a brief overview of their first quarterly performance evaluation.

RECOMMENDED ACTION(S)

None. Information only.

CEA Committee HomeFirst Updates

Prioritization for Other Housing Projects Notification

The CES Policies and Procedures include a section titled “Prioritization for Other Housing Projects” that describes a need to inform the CEA committee whenever the Total Prioritization Score referral range is agreed upon for a new project in this category. The following project ranges have been set and agreed upon by the Housing Authority, the service provider Reach for Home, and the Property Manager Burbank Housing:

Piper Street: will receive referrals in the TPS range 25 and below, starting with the highest score first.

Monte Vina: will receive referrals in the TPS range 15 and below, starting with the highest score first.

CES Performance Evaluation Summary

HomeFirst completes a quarterly performance evaluation of the Coordinated Entry System that is provided to this committee and presented in a separate public feedback and input session for CES cooperating agencies.

HomeFirst completed the evaluation of the first quarter of the current fiscal year, July 1-Sept 30, and hosted this presentation and feedback session on December 16th, 2022. Given that the following quarter’s evaluation will occur soon, HomeFirst will skip the full presentation of the results to the CEA Committee for Q1 and instead provide the below summary of findings. The full report can be found here: <https://share.sonoma-county.org/link/7maS641jSW0/> Operator action items can be found in the report itself.

Q1 Findings:

- Low rates of housing placement (262 housed) compared to system inflow (385 assessments) illustrates the need for more housing resources.
- In all geographic regions, enrollment in CES is low compared to the PIT count.
- In Q1, Transition Aged Youth in particular moved quickest (128 days) from Assessment to Referral.
- Initial findings suggest people move into permanent housing with family faster than any other destination across all populations, supporting the potential of Housing Problem Solving/Diversion.
- Several groups are underrepresented in CES compared to the PIT count:
 - Hispanic/Latinx people
 - Black Families

- Mixed Race or Other
- Males
- The referral acceptance rate disparity between Hispanic/Latinx (23%) and non-Hispanic/Latinx people (39%) in Q1 is drastic, though continued monitoring is needed.
- 70% of people in CES ranked between PSH and RRH ranges are not likely to receive housing support and are more vulnerable than those in RRH receiving housing support, indicating that the system overall does not prioritize the most vulnerable as we are required to.
- Within the Individuals By Name List, American Indian, Alaskan Native, or Indigenous AND Hispanic/Latinx people are significantly underrepresented in the PSH scoring range
 - As a result vulnerable Hispanic/Latinx people in particular have less access to PSH resources than other vulnerable groups.

Feedback session summary:

- Positive feedback:
 - Perception that the system is always seeking to improve;
 - New CES Case Conference has high participation and is very collaborative.
- Improvement feedback:
 - There was an ask to create a list of all the contact info for CES Case Conference POCs at each agency;
 - Concerns and general discussion about TAY being referred equally when there are far more individuals in the system and TAY could do better in TAY specific services;
 - A suggestion to standardize how long a referral should be kept open if an individual is not able to be contacted before moving on.



Sonoma County Continuum of Care Coordinated Entry Advisory Committee Executive Summary

Item: 4 Updates to Coordinated Entry Policies and Procedures

Date: January 18, 2023

Staff Contact: Hunter Scott Hscott@homefirstsc.org Thai Hilton thai.hilton@sonoma-county.org

Agenda Item Overview

HomeFirst will regularly provide updates to the Coordinated Entry policies and procedures. Attached is a description of the changes and the rationale for the change.

Recommendation

Approve the updates to the CE polices and procedures.

CES Policy and Procedure Changes December 2022

Change: CES will now have a new category of CES Cooperating Agency called an “Information Sharing Partner” which is an agency that is part of the CES/HMIS release structure but does not provide any part of the CES Assessment. In many cases they will not have HMIS access. This change includes the minimum standards to add such an agency: a new form and training for this category alone.

Reason: To support new partners who are part of the BFZ process but do not meet the standards/description of an existing category of CES Cooperating Agency.

Additional minor changes: Clarified the procedure for adding new CES Cooperating Agencies, the trainings required for some categories. and that all Cooperating Agencies must be a legal entity.

*all additions highlighted, removals crossed out.

Types of CES Cooperating Agencies:

Type	Description	Minimum Standards
Information Sharing Partner	<p>An agency that is part of the CES/HMIS release of information for coordination purposes, but does not complete assessments.</p> <p>Examples: A government agency supporting or coordinating regional case conferencing or By-Name-List efforts.</p>	<p>Signs the Information Sharing Partner Agreement and completes the Information Sharing Partner Ethics and Confidentiality Training with the Lead Agency.</p> <p>Completes the CES Overview Training.</p> <p>Must be a legal entity.</p>
Access Partner	<p>An agency that can provide initial assessment, housing problem solving, and crisis support, and direct a person experiencing a housing crisis to a Coordinated Entry System Access Point. Able to access HMIS CES programs in most cases. May participate in CES Case Conference.</p> <p>Examples: An Access Partner may include some County Agencies, homeless service providers with limited capacity for screening, medical providers/FQHC's, and law</p>	<p>Provides an initial diversion/housing problem solving screening, assessing homeless status and immediate needs (not CE Assessment Tool; stages 1-2 of the CE Assessment)</p> <p>Possesses working knowledge of other CES Access Points and provides warm hand-off (phone call, email) to participants who</p>

Type	Description	Minimum Standards
	<p>enforcement volunteer organizations, homeless service providers, or medical providers with limited capacity for full screening but who encounter people experiencing homelessness regularly.</p>	<p>are seeking the CES Assessment to the appropriate Access Point.</p> <p>MOU not required. When CES HMIS access is granted, must complete HMIS Ethics and Confidentiality Training with Lead Agency and submit HMIS User Agreement.</p> <p>Completes CES Access Partner Training with CES Operator.</p> <p>Must be a legal entity.</p>
External Access Point	<p>External Access Points provide the full CES Assessment to ALL participants who present to them seeking CES Access within their “catchment” area, regardless of location that individual spends most of their time in, enrollment status in the Access Point provider’s programs, or population type. External Access Points that are dedicated to one of the 5 HUD allowable subpopulations (see HUD Subpopulation Access below) may conduct a warm handoff to connect the individual to an appropriate External Access Point. CES Assessment can occur over the phone or in person. It may be provided by appointment only or as drop-in capacity.</p> <p><i>Examples:</i> An Access Point may include a homeless services drop in center, outreach team, or shelter that has the capacity to offer CES Assessment to non-shelter-stayers who present to them seeking it.</p>	<p>Provides the CE Assessment to all participants seeking it within 3 business days of the request:</p> <ol style="list-style-type: none"> 1) Housing problem solving 2) Crisis navigation and connection 3) Standardized Assessment Tool 4) HMIS Data Entry responses into HMIS 5) Collection of potential eligibility documents 6) Enhanced Assessment <p>Participates in CES Case Conferencing. Must sign MOU with Community Development Commission.</p> <p>Must complete CES Access Point Trainings Part 1 and 2 with the CES Operator, the HMIS Ethics and Confidentiality Training with the Lead Agency, and submit the HMIS User Agreement.</p> <p>Must be a legal entity.</p>
Internal Access Point	<p>Internal Access Points are only required to provide the CES Assessment to their own served participants.</p> <p><i>Examples:</i> An emergency shelter that is not able to support walk-ins, or a street outreach</p>	<p>Offers and completes the CES Assessment to participants they serve within 5 business days of contact:</p>

Type	Description	Minimum Standards
	<p>team whose geographic “catchment” area changes day-by-day and is not able to respond to individual CES Assessment requests.</p>	<ol style="list-style-type: none"> 1) Housing Problem Solving Conversation 2) Crisis Navigation and Connection 3) Standardized Assessment Tool 4) HMIS Data Entry 5) Collection of Potential Eligibility Documents 6) Enhanced Assessment <p>Refers households who present seeking the CES Assessment and cannot be enrolled by the Internal Access Point to External Access Points.</p> <p>Participates in CES Case Conference.</p> <p>Must sign MOU with the Lead Agency Community Development Commission.</p> <p>Must complete CES Access Point Trainings Part 1 and 2 with the CES Operator, the HMIS Ethics and Confidentiality Training with the Lead Agency, and submit the HMIS User Agreement.</p> <p>Must complete all basic CES trainings and have HMIS access.</p> <p>Must be a legal entity.</p>
<p>Housing Program</p>	<p>CES Housing Programs are required to provide the CES Assessment to participants they are exiting into homelessness. They are required to participate fully in the CES process as outlined in the MOU, including attending Case Conferencing.</p>	<p>Provides the CES Assessment to participants exiting into homelessness:</p> <ol style="list-style-type: none"> 1) Diversion/housing problem solving 2) Crisis navigation and connection 3) Standardized Assessment Tool 4) HMIS Data Entry 5) Collection of Potential Eligibility Documents 6) Gather Additional Evidence and Case Conference

Type	Description	Minimum Standards
		<p>Must sign MOU with the Lead Agency Community Development Commission.</p> <p>Must complete all basic CES trainings and have HMIS access.</p> <p>Must complete Housing Provider Training and CES Access Point Trainings Part 1 and 2 with the CES Operator, the HMIS Ethics and Confidentiality Training with the Lead Agency, and submit the HMIS User Agreement.</p> <p>Must be a legal entity.</p>

Procedure for Adding New CES Cooperating Agencies

1. The entity seeking CES Cooperating Agency status (the “entity”) shall submit the request to the CES Operator or Lead Agency.
2. The entity shall complete all required trainings and forms as outlined in the Types of CES Cooperating Agencies Minimum Standards above.
3. The Lead Agency shall have final approval of any new CES Cooperating Agencies, including adding them to the CES/HMIS Release of Information partner list.



Sonoma County Continuum of Care Coordinated Entry Advisory Committee Executive Summary

Item: 5. Updates to Emergency Shelter Standards

Date: January 18, 2023

Staff Contact: Thai Hilton thai.hilton@sonoma-county.org

Agenda Item Overview

The emergency shelter standards were approved before the change in CE operators. The proposed changes are intended to bring the shelter standards in line with the CES policies and procedures. Additionally, information was added regarding serving undocumented individuals in homeless service programs due to questions from providers around this topic. The attached document describes the proposed changes and the rationale behind them. A copy of the current standards can be found [here](#).

Recommendation

Approve the proposed changes to the Emergency shelter standards.



Edits

1) **Program Elements: Housing focused pg. 5**

- a. **Change:** “Participants should be referred to Coordinated Entry within 5 days of entering a shelter program. When able, shelter providers will enroll client into Coordinated Entry.” See changes below

For all permanent shelters, participants should be enrolled in Coordinated Entry within 3 days of entering a shelter program. For winter or temporary shelters, shelters will refer a participant to a CE access site within 3 days of entering the shelter program.

Rationale: the change of 5 days to 3 days: To align with CES Policies and procedures

The addition of “For winter or temporary shelters, shelters will refer a participant to a CE access site within 3 days of entering the shelter program.”: To clarify that temporary and winter shelters are not required to enroll participants into CE. Permanent shelters are required to be access points.

2) **Shelter intake policy pg. 7:**

- a. **Remove:** “Additionally, individuals who are at the top of the by names list who are waiting on imminent placement into a permanent supportive housing project may be referred by CES to this 25% set aside.”
- b. **Rationale:** CE only refers to housing programs, not shelter. This policy should be added to the Outreach standards as those teams can already refer to the 25% set-aside beds. If an individual is in this situation, outreach teams or other emergency-service providers can refer the individual to the set-aside beds.

3) **Coordination with other providers: Coordinated Entry System policy pg.10, 11**

- a. **Change:** Individuals who access shelters, must be able to enroll eligible participants directly and into HMIS and the shelter project within ~~5~~ 3 business days or make a referral to an access point within the same period of time
- i. **Rationale:** Change needed to align with CES policies and procedures.
- b. **Change:** To the extent possible, a shelter representative should attempt to attend the ~~monthly~~ weekly CES case conferences.
- i. **Rationale:** Case conference meetings are now held weekly.



Serving undocumented individuals in homeless service programs

I. PRWORA Restrictions and Exceptions

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (“PRWORA”) restricted undocumented individuals from accessing a number of public benefits, including housing and homeless services. However, the PRWORA also created exceptions that allow access, regardless of the recipients’ immigration status, to programs and services that:

- i. deliver in-kind services at the community level;
- ii. do not condition the provision of assistance on the program participants’ income or resources; and
- iii. are necessary for the protection of life or safety.¹

II. Guidance from the U.S. Attorney General and HUD

The U.S. Department of Justice (DOJ) interpreted the above three-prong test to mean that all individuals, regardless of immigration status, should be given access to:

- “Short-term shelter or housing assistance for the homeless, for victims of domestic violence, or for runaway, abused or abandoned children,” and
- “Programs, services, or assistance to help individuals during periods of heat, cold, or other adverse weather conditions.”²

To date, U.S. Department of Housing and Urban Development (HUD) has not issued any similar guidance clarifying which of its homeless assistance programs are subject to PRWORA’s noncitizen eligibility restrictions.³ However, in 2016, HUD, DOJ and the U.S. Department of Health and Human Services (HHS) issued guidance specifying that the following programs and services shall remain accessible to all eligible individuals, regardless of immigration status:

- Transitional Housing (for up to two years, where the recipients or sub-recipients of government funds own or lease the housing)⁴
- Street Outreach Services
- Emergency Shelters
- Safe Havens
- Rapid Re-housing⁵

III. Exceptions to Verification Requirements for “Nonprofit Charitable Organizations”

¹ 8 U.S.C.A. § 1611(b)(1)(D).

² U.S. Dept. Justice, Final Specification of Community Programs Necessary for Protection of Life or Safety Under Welfare Reform Legislation, 66 Fed. Reg. 3613-02 (January 16, 2001).

³ Congressional Research Service, Noncitizen Eligibility for Federal Housing Programs (updated Nov. 20, 2022) (“CRS Report”), at pp. 13-14.

⁴ HUD notes that Transitional Housing must be provided to all persons regardless of immigration status when recipients or sub-recipients of government funding own or lease the buildings used to provide the transitional housing. However, the PRWORA restricts access based on immigration status to transitional housing in which the recipients or sub-recipients of government funds provide rental assistance payments to program participants based on the participants’ income. See U.S. Dept. Hous. & Urban Dev., The Personal Responsibility and Work Opportunity Act of 1996 and HUD’s Homeless Assistance Programs (Aug. 16, 2016) (“HUD Fact Sheet”)

⁵ See HUD Fact Sheet; U.S. Dept. Hous. & Urban Dev., U.S. Dept. Health & Human Serv., U.S. Dept. Justice, interpretive letter (Aug. 5, 2016) (“Joint Letter”), at pp. 2-3.



While the PRWORA generally requires government agencies to verify the immigration status of applicants for public benefit programs, “nonprofit charitable organizations” are **not** required to verify the immigration status of applicants for federal, state or local public benefits, including for Permanent Supportive Housing programs.⁶

IV. Other Applicable Restrictions

Notwithstanding the PRWORA’s immigration-related restrictions, organizations or agencies that receive federal funding must not discriminate against individuals on the basis of race, national origin or any basis protected under the following:

- Title VI of the Civil Rights Act of 1964
- Fair Housing Act
- Violence Against Women Act
- Family Violence Prevention and Services Act
- Section 109 of Title I of the Housing and Community Development Act of 1974
- Any other applicable nondiscrimination law⁷

In addition, HUD, HHS and DOJ have advised that:

*“Denying an individual a public benefit or treating an individual differently because of that individual's race or national origin would violate one or more of these statutes. For example, a recipient of federal financial assistance may not deny benefits to applicants because they have ethnic surnames or origins outside the United States. Nor may the recipient single out individuals who look or sound “foreign” for closer scrutiny or require them to provide additional documentation of citizenship or immigration status. Also, because individuals might come from families with mixed immigration status, there may be some family members who are eligible for all benefits and others who are not eligible or who can receive only a more limited subset of those benefits. Therefore, benefits providers must ensure that they do not engage in practices that deter eligible family members from accessing benefits based on their national origin”.*⁸

Useful links:

- Full text of the PRWORA: <https://www.congress.gov/104/plaws/publ193/PLAW-104publ193.pdf>
- Joint Letter: <https://files.hudexchange.info/resources/documents/HUD-HHS-DOJ-Letter-Regarding-Immigrant-Access-to-Housing-and-Services.pdf>
- HUD Fact Sheet: <https://files.hudexchange.info/resources/documents/PRWORA-Fact-Sheet.pdf>
- DOJ Interim Guidance: <https://www.govinfo.gov/content/pkg/FR-1997-11-17/pdf/97-29851.pdf>
- CRS Report: <https://crsreports.congress.gov/product/pdf/R/R46462>

⁶ 8 U.S.C.A. § 1642. A nonprofit charitable organization that chooses not to verify an applicant’s immigration status cannot be penalized (e.g., through cancellation of its grant or denial of reimbursement for benefit expenditures) for providing federal public benefits to an individual who is not a U.S. citizen, U.S. noncitizen national or qualified alien, except when it does so either in violation of independent program verification requirements or in the face of a verification determination made by a non-exempt entity. However, if a nonprofit charitable organization chooses to verify, even though it is not required to do so under the PRWORA, it must comply with the procedures set forth by the Attorney General pursuant to the DOJ Interim Guidance and provide benefits only to verified to U.S. citizens, U.S. non-citizen nationals or qualified aliens. U.S. Dept. Justice, Interim Guidance on Verification of Citizenship, Qualified Alien Status and Eligibility Under Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, 62 Fed. Reg. 61344-02 (Nov. 17, 1997) (“DOJ Interim Guidance”).

⁷ Joint Letter, at p. 4.

⁸ *Ibid.*