Ohio Balance of State Continuum of Care

Permanent Supportive Housing: Compliance, Coordinated Entry, and More!

May 2, 2018

Webinar Information

- All participants' lines are muted
- Submit questions using the questions or chat feature in your GoToWebinar control panel
- This presentation will be posted to COHHIO’s website
- We are recording the presentation

Purpose of the Webinar

- Provide a refresher on key requirements and expectations for Permanent Supportive Housing (PSH) Providers

Agenda

- PSH Overview/Key Elements
- PSH Eligibility
- Documenting Chronic Homeless Status
- Match Requirements for PSH Projects
- Administering Rental Assistance
- PSH Prioritization
- Housing First in PSH
- PSH and Coordinated Entry

Poll:

What is your experience level with Permanent Supportive Housing?

a. Expert
b. Intermediate
c. Beginner
d. Unfamiliar

General PSH Overview
What is Permanent Supportive Housing (PSH)?

• “Supportive housing is an evidence-based housing intervention that combines non-time-limited affordable housing assistance with wrap-around supportive services for people experiencing homelessness with disabilities” (USICH, 2017).
• When used correctly, PSH is successful, cost-effective, and beneficial (CSH, 2007).

Decent AFFORDABLE SAFE

Key Elements of PSH

• Tenants have full rights of tenancy under landlord-tenant law
• Leases do not have any provisions that would not be found in leases held by someone who does not have a disability
• Participation in services is voluntary
• As needs change over time, supportive services do too
• Housing is not time-limited
• Tenants pay no more than 30% of their income toward rent and utilities

Poll:

How familiar are you with the Ohio BoSCoC Homeless Program Standards?

a. I am very familiar
b. I am familiar
c. I know of them
d. I don’t know them

Who is Eligible for PSH in the BoSCoC?

• All Ohio BoSCoC PSH projects must serve persons who meet category 1 of HUD’s homeless definition AND are diagnosed with a disability.
  • Category 1 – “Literally homeless”, meaning individuals/families who lack a fixed, regular, and adequate nighttime residence
  • Sleeping in a place not meant for human habitation
  • Living in emergency shelter or transitional housing designated to provide temporary living arrangements for people experiencing homelessness
  • Exiting an institution where the individual resided for less than 90 days & where the individual entered the institution immediately from emergency shelter or an unsheltered location
  • Agencies cannot preference one disability over another.

PSH Eligibility When Fleeing DV

• Category 4 of the homeless definition
• Ohio BoSCoC PSH projects can serve disabled individuals/households fleeing DV
• Those fleeing DV must reside in shelter or TH immediately prior entering the PSH project
PSH Eligibility for Chronically Homeless

- All PSH projects in the Ohio BoSCoC MUST prioritize chronically homeless for PSH AND follow the orders of priority listed in the Ohio BoSCoC Homeless Program Standards
- Remember, persons living in TH projects lose their chronically homeless status, therefore they are the last prioritized group
- Chronic homeless status must be documented in accordance with HUD’s requirements

PSH Eligibility

| Category 1: Literally Homeless (must serve) | Category 2: Imminent Risk of Homelessness |
| Category 4: Fleeing/Attempting to Flee DV –AND- residing in a shelter or TH | Category 4: Fleeing/Attempting to Flee DV –AND- coming directly from housed situation |

**and must have a disability**

PSH Eligible?

1. Leonard has been living on the streets for the last 13 months. He was just released from a one month substance abuse treatment facility.
   - Yes! (Category 1)
2. Nora has been living on the land and in and out of shelter for the past year. She recently came back to the shelter after fleeing a domestic violence situation while couch surfing.
   - Yes! (Category 4)
3. Carl lost his job 3 weeks ago and does not have enough money to pay rent. He knows his landlord will evict him soon.
   - No. (Category 2)
4. Max and Susie have been living in shelter together for the last two months. Max does not have a disability but has been homeless for over 12 months in the last two years, and Susie has a documented disability but has only been homeless for two months.
   - Yes, they appear to be eligible if Susie is HOH (Category 1)  
   - However, it is unlikely that they would be prioritized for PSH due to Susie’s length of time homeless

Documenting Chronic Homeless Status

Poll:

I feel confident in my ability to properly document an individual’s chronic homeless status.

- Agree
- Somewhat Agree
- Disagree
- Never Documented It

Documenting Chronic Homeless Status: Written Intake Procedures

- Required for all PSH projects that dedicate or prioritize beds for chronically homeless individuals or families
- Programs must maintain and follow written intake procedures that:
  - Require documentation at intake of evidence relied on to verify status
  - Establish the following order of priority for obtaining evidence:
    - Third-party
    - Intake worker observation
    - Certification from the person seeking assistance

https://www.hudexchange.info/trainings/courses/defining-chronically-homeless-final/role-webinar/
Documenting Chronic Homeless Status:
Third Party Documentation
- Third party documentation is the preferred way to document an individual's time in a place not meant for human habitation, emergency shelter, or safe haven. However:
  - For all clients, up to 3 months can be documented through self certification
  - Single encounter in a month is sufficient to consider a household homeless for entire month unless evidence of a break
  - If third-party documentation cannot be obtained, a written record of intake workers due diligence to obtain, the intake worker’s documentation of the living situation, AND the individual's self-certification of the living situation would be sufficient

Documenting Breaks in Chronic Homeless Status
- A break is defined as seven nights or more living in a place meant for habitation
- Evidence of a break can be documented by:
  - Third party evidence
  - The self-report of the individual seeking assistance
  - 100% of the breaks can be documented by self-report

Documenting Chronic Homeless Status:
Institutional Stays
- Discharge paperwork or written or oral referral from social worker, case manager, or other appropriate official stating the beginning and end dates of the time residing in institutional care facility
- Where the above is not attainable, a written record of intake workers due diligence to obtain AND the individual's self-certification that he or she is exiting an institutional care facility where resided less than 90 days

Documenting A Homeless History
(12 months continuous)
- Start by looking into HMIS to determine if there are 12 months of continuous homelessness and no evidence of break
- If there are not 12 months in HMIS, identify other third-party sources (i.e. outreach worker, other professional source)
- Next, identify any documented breaks in HMIS
- If there are fewer than three breaks in HMIS, work with client to find out where the breaks were

Documenting A Homeless History
(can’t obtain third party verification)
- If at least 9 months of homelessness cannot be obtained by third-party documentation, up to the full 12 months can be documented via self-certification only:
  - Intake worker must thoroughly document attempts to obtain third-party documentation and why documentation was not obtained
  - Must obtain a written certification from individual or HOH of the living situation of the undocumented time period
  - Limited to rare and extreme cases an no more than 25 percent of households served in an operating year
Documenting Chronic Homeless Status: Disability

- Verification must be from a third-party (cannot be self-certified) and include:
  - Written verification from a professional licensed by the State to diagnose and treat the disability and certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual’s ability to live independently
  - Written verification from SSA
  - The receipt of a disability check
  - Intake staff-recorded observation of a disability that is confirmed and accompanied by evidence above within 45 days

Match Requirements for PSH Projects

Match Requirements

- Match is actual cash or in-kind resources contributed and expended on eligible CoC program costs for eligible CoC program populations.
  - According to the CoC Program interim rule, CoC Program recipients must match all grant funds (except for leasing funds) with no less than 25% of funds or in-kind contributions from other sources.
  - So, for example, if a project is requesting $100,000 from HUD (without leasing), the required match would be $25,000 ($100,000 x .25).
  - The CoC must contribute $1 for cash or in-kind contributions for every $4 awarded.

Match Documentation

- The CoC Recipient must keep source documentation to substantiate cash and in-kind match for each match source.
  - Written documentation of cash contributions should, at minimum, include:
    - Amount of cash to be provided to recipient for the project
    - Specific date the cash will be made available
    - The actual grant and fiscal year to which the cash match will be contributed
    - Time period during which funding will be available
    - Allowable activities to be funded by the cash match

Poll:

CoC Program recipients must match all grant funds (except leasing) with no less than _____% of funds or in-kind contributions from other sources.

a. 10%
b. 25%
c. 50%
d. 100%
e. 150%

Match Requirements Continued

- Match Sources:
  - Local, state, federal or private sources
  - Program income (resident rent)
  - Cannot use sources specifically prohibited from use as CoC match
  - CoC Program funds cannot match CoC Program funds
- Uses of Match Funds:
  - Planning, Acquisition, Rehabilitation, New construction, Leasing, Renal Assistance, Supportive Services, Operating expenses, HMIS, Program administration
- Recipients must ensure that any funds used to satisfy the matching requirements are eligible under the interim rule and not prohibited from use as match

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https://services.geolearning.com/courseware/show/1040/526711/v2.zip/file/index.html#
Match Documentation Continued

- Written documentation of in-kind contributions should include:
  - Value of donated goods or services
  - Date the goods will be made available
  - The actual grant and fiscal year to which the cash match will be contributed
  - Time period during which the donation will be available
  - Allowable activities to be provided by the donation

- In order to document the value of In-Kind Contributions there must be:
  - A consistent system to document the actual value of services provided
  - Use typical rates in organization or labor market
  - Ensure that goods and services are CoC eligible

Administering Rental Assistance

- CoC Program funded PSH projects with Rental Assistance budgets may use those funds for the following activities:
  - Unit rent
  - First and/or last months rent
  - Security deposits (up to 2 months rent equivalent)
  - Vacancy payments (up to 30 days)
  - Staff costs carrying out eligible activities

Administering Rental Assistance

- Staff costs carrying out eligible activities:
  - Administering rental assistance includes: 
    - Contracting for and making rental assistance payments
    - Conducting Housing Quality Inspections (HQS)
  - These are all considered service delivery costs and are eligible as rental assistance costs
  - You should NOT use your administrative funds to pay for these costs

PSH Prioritization

- All Ohio BoSCoC PSH projects must prioritize chronically homeless individuals/families first, in all cases, and must follow the order of priority
- When multiple chronically homeless are identified, those individuals/families with the longest histories of homelessness and with the most severe service needs should be prioritized over those with less severe needs and shorter histories
- Additionally, eligible chronically homeless Veterans not eligible for VA programs should be prioritized by PSH providers
Chronically Homeless Order of Priority Overview

- All Ohio BoSCoC PSH projects must use the following order of priority for identifying who should be served.
- In order to properly utilize the order of priority, PSH projects would first seek to identify a homeless person who meets the First Priority. If no one meets that priority then the PSH project may move to the second priority, and on down from there.

Chronically Homeless Order of Priority

1. **First Priority** – Chronically Homeless Individuals and Families with the Longest History of Homelessness AND the Most Severe Service Needs
   a) Have been homeless for at least 12 months (continuously or cumulatively)
   b) Have been identified as having the most severe service needs as evidenced by history of high utilization of services (emergency rooms, jails, psychiatric facilities, or significant health/behavioral health challenges or functional impairments)
   i. PSH projects should use their regional coordinated entry assessment tools to determine service needs. Results of assessment may be combined with knowledge of crisis services to determine prioritization
   ii. And meet all other elements of chronically homeless definition

2. **Second Priority** – Chronically Homeless Individuals and Families with the Longest History of Homelessness
   a) Have been homeless for at least 12 months (continuously or cumulatively)
   i. And meet all other elements of the chronically homeless definition

3. **Third Priority** – Chronically Homeless Individuals and Families with the Most Severe Service Needs
   a. Have been identified as having the most severe service needs (evidenced by a history of high utilization of crisis services or a significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing)
   i. And meet all other elements of the chronically homeless definition

4. **Fourth Priority** – All Other Chronically Homeless Individuals and Families
   a. Have been homeless for at least 12 months either continuously or cumulative
   i. And meet all other elements of the chronically homeless definition

Non-Chronically Homeless Order of Priority

- If no chronically homeless persons are identified within a PSH project’s self-defined service area, then those projects should use the following order of priority to determine who should be prioritized for PSH.
- In cases where where an eligible non-chronically homeless veteran has been identified, and that veteran is not eligible for VA programs, PSH providers should prioritize the homeless veteran.

• If no chronically homeless persons are identified within a PSH project’s self-defined service area, then those projects should use the following order of priority to determine who should be prioritized for PSH.
Non-Chronically Homeless Order of Priority

1. First Priority – Homeless Individuals and Families with the Most Severe Service Needs
   a. Have been identified as having the most severe service needs
      i. And meet all other PSH eligibility criteria

2. Second Priority – Homeless Individuals and Families with a Long Period of Continuous or Episodic Homelessness
   a. Have been living in a place not meant for human habitation, a safe haven, or an emergency shelter continuously for at least 6 months or on at least three separate occasions in the last three years where the cumulative total was at least 6 months
      i. And meet all other PSH eligibility criteria

3. Third Priority – Homeless Individuals and Families Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters
   a. Have been living in a place not meant for human habitation, a safe haven, or an emergency shelter
      i. And meet all other PSH eligibility criteria

4. Fourth Priority – Homeless Individuals and Families Coming from Transitional Housing
   a. Coming from transitional housing (TH), where prior to residing in the TH they lived on the streets, an emergency shelter, or a safe haven. The priority also includes homeless individuals and families with a qualifying disability who were fleeing domestic violence or sexual assault and are living in TH, even if they did not live on the streets or in a shelter prior to entry into the TH project.
      i. And meet all other PSH eligibility criteria

Assessing Severity of Need

- PSH projects should use the VI-SPDAT to help determine the severity of service needs of people experiencing homelessness in their community
- If information about the homeless persons’ use of local crisis services is available, this information may supplement the assessment information in order to get a better understanding of severity of need.

Housing First in PSH
### Housing First at Program Entry

- Reducing barriers at Program Entry
  - Projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility (and any prioritization) requirements. At minimum, PSH projects CANNOT require:
    - Minimum income level and/or employment or ability to obtain income/employment
    - Completion of a drug test
    - Participation in TH program prior to entering PSH
    - Participation in local behavioral health services/being a current client of the PSH grantee agency or other local mental health services agency
  - PSH projects must assess people to identify those with greater vulnerabilities to prioritize for assistance, based on the order of priority

### Housing First in Program Design

- Voluntary Supportive Services
  - PSH projects must offer supportive services to program participants on a voluntary basis.
  - PSH projects should work with program participants regularly to identify a plan for assessing for reduced supportive services needs and possible movement into non-PSH affordable housing option when the participant desires

- Standard Lease Agreement

### Housing Focused Assistance

- PSH projects’ primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns.
- Not only are supportive services voluntary, they are tailored to the client’s needs as they pertain to obtaining and retaining permanent housing

### PSH and Coordinated Entry

- All Ohio BoSCoC PSH projects must prioritize chronically homeless individuals and families first in all cases
- In order to comply with the Chronically Homeless Order of Priority, Ohio BoSCoC providers should use the PSH and RRH Prioritization report
- Ohio BoSCoC PSH projects with common service areas collaboratively determine who should be prioritized for PSH units

### Creation of Centralized Prioritization List

- Standard No. 8A: All PSH providers with a common service area create one centralized PSH prioritization list using the HMIS PSH and RRH Prioritization Report as the initial data source
- These reports are run out of HMIS on an as needed basis as units become available in the service area
- These reports also include:
  - Client ID for homeless persons eligible for PSH in selected counties
  - Project in which they are currently residing
  - Household type and size
  - Disability Status
  - # of past homeless episodes and duration of past homelessness
  - Chronic homeless status
  - VI-SPDAT Score
Creation of Centralized Prioritization List

- **Standard No. 8B** - Non-HMIS providers must add unsheltered persons and other literally homeless, disabled persons/households to the centralized prioritization list by hand

- **Standard No. 8C** - Homeless persons/households are removed from consideration for PSH when they are housed or when:
  - A person/household asks to no longer be considered for services
  - A person/household has a data error that once reconciled, would make the client ineligible for PSH

Management of Centralized Prioritization List

- **Standard 8D** - Ohio BoScCoC Homeless Planning Regions have PSH Prioritization Workgroups to manage the centralized PSH Prioritization List
  - These workgroups identify all members, and at minimum, all local PSH providers and local shelter providers participate
  - All workgroup members have been given consent to discuss clients and prioritization for PSH
  - The workgroups meet monthly and use the most current HMIS PSH and RRH Prioritization Report to address the following:
    - Add any newly identified eligible persons who are unsheltered or in a non-HMIS shelter
    - Discuss any current or upcoming PSH openings and prioritize households on the HMIS PSH and RRH Prioritization Report

Utilization of Centralized Prioritization List

- **Standard No. 8F** - The PSH Prioritization Workgroup follows the PSH Order of Priority to ensure persons/households in greatest need are prioritized for local PSH
  - If two identically prioritized households present for the next available unit, and each is eligible for the unit, the Workgroup selects the household that first presented for assistance to receive a referral to that unit

- **Standard No. 8G** - The PSH Prioritization Workgroup must establish a goal of offering households housing within 60 days of being placed on the PSH Prioritization List
  - Once a household is matched with a PSH unit, local providers should immediately notify the client and prepare client documentation to ensure the household is housed as quickly as possible
  - Participants are allowed to refuse housing and service options without retribution and retain consideration for PSH, so long as they remain literally homeless, should they reject options
  - The PSH Prioritization Workgroup should attempt to contact households at least 3 times before removing them from consideration for PSH

PSH and RRH Prioritization Report

- For detailed written guidance on how to utilize the PSH and RRH Prioritization report, go to:
  
  http://hmis.cohhio.org/index.php?pg=kb.page&id=128
Questions?

Thank You!!

Sources:

• Substance Abuse and Mental Health Services Administration. Permanent Supportive Housing: Building Your Program. https://store.samhsa.gov/shin/content/SMA10-4510/SMA10-4510-06-BuildingYourProgram-PSH.pdf


COHHIO
175 South Third Street, Suite 580
Columbus, Ohio 43215
(614) 280-1984