

Ohio Balance of State Continuum of Care

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

May 2, 2018



Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

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

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Purpose of the Webinar

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

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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

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Poll:

What is your experience level with Permanent Supportive Housing?

- Expert
- Intermediate
- Beginner
- Unfamiliar

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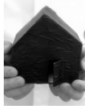
General PSH Overview

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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

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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

Substance Abuse and Mental Health Services Administration. Permanent Supportive Housing: Building Your Program
HHS Pub. No. SMA-10-4509, Rockville, MD: Center for Mental Health Services, Substance Abuse and Mental Health Services Administration, U.S. Department of Health and Human Services, 2010.

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PSH Eligibility

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Poll:

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

- I am very familiar
- I am familiar
- I know of them
- I don't know them

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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.

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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

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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

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PSH Eligibility

ELIGIBLE	INELIGIBLE
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

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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

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Documenting Chronic Homeless Status

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Poll:

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

- a. Agree
- b. Somewhat Agree
- c. Disagree
- d. Never Documented It

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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-rule-webinar/>

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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

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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

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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

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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 but client reports they have been homeless for the last 12 months without breaks, identify third-party source

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Documenting A Homeless History (12 months *cumulative*)

- Start by looking in HMIS to determine if there are 12 months of cumulative homelessness over the last 3 years.
- 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

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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 and no more than 25 percent of households served in an operating year.

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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 individuals 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

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Match Requirements for PSH Projects

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Poll:

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

- 10%
- 25%
- 50%
- 100%
- 150%

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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.

<https://services.geolearning.com/courseware/show/1040/526711/v2.zip/file/index.html#>

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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, Rental 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

<https://services.geolearning.com/courseware/show/1040/526711/v2.zip/file/index.html#>

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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

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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

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Administering Rental Assistance

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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

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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

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PSH Prioritization

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PSH Prioritization in the BoSCoC

- 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

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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.

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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

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Chronically Homeless Order of Priority

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

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Chronically Homeless Order of Priority

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

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Chronically Homeless Order of Priority

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

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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.

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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

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Non-Chronically Homeless Order of Priority

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 in 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

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Non-Chronically Homeless Order of Priority

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

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Non-Chronically Homeless Order of Priority

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

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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.

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Housing First in PSH

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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 (& 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

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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/if the participant desires
 - Standard Lease Agreement

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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

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PSH and Coordinated Entry

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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

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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

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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

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Management of Centralized Prioritization List

- **Standard 8D** - Ohio BoSCoC 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 uses 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

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Management of Centralized Prioritization List

- **Standard 8E** - The PSH Prioritization Workgroup reviews the HMIS PSH and RRH Prioritization Report monthly in advance of the PSH Prioritization Workgroup meeting to ensure it is current and accurate

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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

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Utilization of Centralized Prioritization List

- **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

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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>

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Questions?

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Thank You!!

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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>
- The United States Department of Housing and Urban Development. Homeless Emergency Assistance and Rapid Transition to Housing: Defining "Chronically Homeless" Final Rule.
<https://www.hudexchange.info/trainings/courses/defining-chronically-homeless-final-rule-webinar/>
- The United States Department of Housing and Urban Development. Examining the Parts: Advanced Financial Management for CPD Programs.
<https://services.geolearning.com/courseware/show/1040/526711/v2.zip/file/index.html#>

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