

NYC Continuum of Care (CoC): The Written Standards



Date Adopted	Changes Made
Sept. 2019	Document reorganized to align with updated HUD regulations
Jan. 2024	Document reorganized to incorporate new project types and to offer more guidance around program operation and spending.
May 2024	Document approved by the Steering Committee

The NYC CoC’s mission is to provide a leadership role in local planning and coordination to prevent and eradicate homelessness in New York City. Last updated in 2019, the written standards synthesize the key HUD regulations for projects funded under New York City’s Continuum of Care Program (NYC CoC). These standards will be updated bi-annually. All updates proposed outside of this period must be presented to the NYC CoC Steering Committee for review and approval prior to adoption.

For more information contact us at nyc.coc@dss.nyc.gov.

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I. Introduction

The U.S. Department of Housing and Urban Development (HUD) promotes a locally specific, community-wide commitment to end homelessness by funding more than 400 individual Continuum of Care Programs across the nation. A Continuum of Care (CoC) is a geographically defined regional or local planning body that coordinates housing and services for families and individuals experiencing homelessness.

The NYC CoC is governed by a [Steering Committee\(SC\)](#) comprised of 17 voting members and three Co-Chairs. While the SC is the primary decision-making body for the NYC CoC, all decisions are made with the consideration of the local NYC community, CoC membership, grantees, committees, sub-committees, and workgroups.

General membership of the NYC CoC is open to all stakeholders interested in its mission, including nonprofit homeless assistance providers, victim service providers, faith-based organizations, government agencies, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, philanthropies, affordable housing developers, law enforcement, and individuals currently or formerly experiencing homelessness in NYC.

The NYC Department of Social Services (DSS) serves as the lead agency (aka collaborative applicant) for both the NYC CoC (NY-600) and the Homeless Management Information System (HMIS) As the lead agency, NYC DSS prepares and submits the HUD Continuum of Care Program Notice of Funding Opportunity (NOFO) annual competition application on behalf of NYC. For more information on the roles and responsibilities of the lead agency visit the [NYC CoC Governance Charter](#).

A. CoC Background and Purpose

In 1987, the U.S. Congress passed the Stewart B. McKinney Homeless Assistance Act, the first federal law specifically addressing homelessness. With this Act, HUD held competitions for federal homeless assistance dollars for which individual organizations throughout the country applied. Beginning in 1994, HUD required organizations within their distinct geographical areas to come together as a community to submit a single competitive, comprehensive CoC application for federal homeless assistance funding. In 2001, Congress again reauthorized the McKinney Education of Homeless Children and Youth Program as the McKinney-Vento Homeless Education Assistance Improvements Act in the No Child Left Behind Act, signed by President George W. Bush on January 8, 2002.

In response to the 2008 financial crisis, Congress passed the McKinney-Vento Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), which codified into law the CoC Program, among other amendments. The overall goal of the HEARTH Act was to make homelessness rare, brief, and non-recurring by reducing the duration of time people spend homeless and enable households to retain permanent housing.

[The CoC Program Interim Rule](#), published in July 2012, detailed the implementation and planning process of the CoC program. The Interim Rule states that the purpose of the CoC Program is to:

- Promote community-wide commitment to the goal of ending homelessness;
- Provide funding to support the CoC structure and process;
- Quickly rehouse homeless individuals and families while minimizing trauma and dislocation;

- Promote access to, and effective utilization of, mainstream programs by homeless individuals and families; and
- Optimize self-sufficiency among individuals and families experiencing homelessness.

The responsibilities of a CoC, outlined in section § 578.7 and § 578.9 of the Interim Rule include, but are not limited to: operating the CoC according to federal regulations; designating and operating HMIS; conducting ongoing CoC planning; and preparing an application for funds.

B. CoC Written Standards

[Section 578.7 \(9\) of the Interim Rule](#) requires CoCs to establish and consistently follow written standards that set programmatic expectations for all CoC-funded providers and outline roles and responsibilities of the CoC when providing assistance and support to providers. At a minimum, these written standards must include:

- Policies and procedures for evaluating households' eligibility for assistance in the CoC Program
- Policies and procedures to guide projects in determining and prioritizing which eligible individuals and families will receive which form of housing assistance.
- Standards for determining what percentage or amount of rent each participant must pay while receiving rapid re-housing assistance.

As directed by HUD regulations and guidelines, the NYC CoC lead agency has the discretion to set local program operating standards for all NYC CoC-funded projects, in conjunction with the Steering Committee (SC). At least bi-annually, the Collaborative Applicant (CA) reviews the Written Standards, and if applicable, makes updates with NYC CoC SC approval. The NYC CoC Written Standards document will be published online and announced to CoC providers when updates occur. For any concerns, complaints, or grievances with the Written Standards, please email correspondences to the NYC CoC at nyc.coc@dss.nyc.gov. For more information on the grievance submission process, [please visit the NYC CoC website](#).

1. Goals of Written Standards

- Establish community-wide expectations on the operations of CoC-funded projects to create consistency and coordination
- Make the local priorities transparent to recipients and sub-recipients of the funds
- Establish a minimum set of quality standards and expectations expected of projects

2. Applicability of Written Standards

For the benefit of all program participants, all projects funded under the CoC Program must comply in full with the standards described in this document, as well as all [HUD regulations](#) and Annual CoC Program Competition requirements established for the CoC Program.

- Recipients and sub-recipients of CoC Program and local funds may

- develop additional standards for administering program assistance
 - propose changes to the standards via written proposal to the NYC CoC SC.
- Recipients and sub-recipients of CoC Program and local funds may not
 - develop standards that conflict with those established by the CoC Program Interim Rule and the NYC CoC Written Standards
 - establish additional eligibility requirements that conflict with those established by HUD and the NYC CoC

II. Continuum of Care (CoC) Program

The CoC Program is intended to provide funding to homeless service providers and State and City governments, increase access to services for individuals and families experiencing homelessness, and cultivate lasting self-sufficiency for Persons with Lived Experience of homelessness or housing insecurity.

A. Program Components

The CoC Program provides funds to support activities within five program components: (1) Permanent Housing (PH), (2) Transitional Housing (TH), (3) Joint Transitional Housing and Rapid Re-Housing (TH-RRH) (4) Supportive Services Only (SSO), and (5) Homeless Management Information System (HMIS). PH has two program components, Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH). For more detail visit HUD’s Community Planning and Development, “[Monitoring Handbook](#)” (2017)

B. Eligible Costs

Under the five program components, CoC recipients and subrecipients may use funds for a variety of eligible costs. The program components describe the nature of the project, while the costs define how the CoC Program funds may be spent. For more detail visit HUD’s Community Planning and Development, “[Monitoring Handbook](#)” (2017).

Continuum of Care Program Components and Eligible Costs						
Eligible Costs	PH: PSH	PH: RRH	TH	TH-RRH	SSO	HMIS
Acquisition	X		X		X	
Rehabilitation	X		X		X	
New Construction	X		X			
Leasing	X		X	X (TH only)	X	
Rental Assistance	X	X (TBRA only)	X	X (TBRA only)		
Supportive Services	X	X	X	X	X	

Continuum of Care Program Components and Eligible Costs						
Eligible Costs	PH: PSH	PH: RRH	TH	TH-RRH	SSO	HMIS
Operating Costs	X		X	X (TH only)		
HMIS	X	X	X	X	X	X
*Project Administration	X	X	X	X	X	X

KEY: PH = Permanent Housing | PSH = Permanent Supportive Housing | RRH = Rapid Re-Housing
 TH = Transitional Housing | TH-RRH = Joint Transitional Housing and Rapid Re-Housing | SSO = Supportive Services Only | HMIS = Housing Management Information System | TBRA = tenant-based rental assistance

Sources for table:
<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-eligible-activities/coc-eligible-activities-overview/list-of-coc-eligible-activities/>
 For a complete list of eligible and ineligible costs by budget line item click here:
http://06472761d4d844f990cd-e08000a6fb874088c6b1d3b8bebbb337_r15_cf2_rackcdn.com/files-BLI-Eligible-Cost-Table-revised-33016.pdf
 For more details about CoC Program Components and Costs, see "Subpart D—Program Components and Eligible Costs" of the Continuum of Care Program [CFR Title 24 Part 578](#).

*Up to 10 percent of any CoC project grant may be used for project administration, unless otherwise specified. This excludes planning grants and Unified Funding Agency (UFA) cost. [Click here for more information.](#)

C. CoC Program Strategic Priorities

CoC-funded projects must abide by project priorities established in their project application submitted in the Annual NOFO (e.g., serve the population, the number of people, and types of services that were specified). In developing your project priorities, please reference [the strategic priorities outlined by HUD](#), along with [HUD’s homelessness definition](#).

D. CoC Requirements for Projects

The following is a snapshot of current minimum requirements for CoC-funded projects:

- Projects must establish and maintain standard operating procedures that adhere to CoC requirements, as outlined in [24 CFR §§ 578.103](#).
- Projects must ensure equal access in housing to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.
- Projects are required to participate in the NYC [Homeless Management Information System \(HMIS\) data warehouse](#). (Victim Service Providers may use an alternative HMIS-comparable data system to meet this requirement.)
- Projects are required to participate in the [Coordinated Entry System](#) and use the prioritization criteria established in this document.

- Projects are required to follow eligibility requirements as defined by CoC funding as the standard for receiving assistance. Project participants can only be rejected for assistance because the eligibility criteria as defined by HUD CoC funding noted in the Written Standards are not met.
- Projects must have a formal procedure for terminating assistance to a project participant that abides by all project funding policies and procedures, and state and federal regulations.

E. HMIS Participation in the NYC Data Warehouse

All providers receiving CoC Program funding are required to comply with HUD’s Homeless Management Information System (HMIS) data standards and participate in the NYC HMIS Data Warehouse. Projects must follow [NYC CoC HMIS Policies and Procedures](#) and remain in good standing with HMIS participation requirements. All projects are required to fully execute the HMIS Participation Agreements, found in appendices of the HMIS Policies and procedures. For a complete overview of all HMIS requirements, see the HMIS section of the CoC website: <https://www.nyc.gov/site/nyccoc/hmis/hmis.page>

***EXCEPTION: HUD designated Victim Service Providers do not upload client-level data to HMIS per the Violence Against Women Act (VAWA). However, they are required to enter data into their own HMIS Comparable Database that conforms with the HMIS Data Standards, collects all required HMIS data elements documented in the Data Standards, and can produce all required HMIS reports, most importantly the Annual Performance Report (APR). For more information, please see HUD’s HMIS Comparable Database Manual: <https://www.hudexchange.info/resource/6305/hmis-comparable-database-manual/>**

NYC DSS uses HMIS data for a variety of HUD-required reports. This data is also reported in the annual NOFO, in which HUD reviews the universal and program-specific data elements. To ensure the CoC receives full points in the NOFO application, the NYC CoC runs data quality reports on an ongoing basis and conducts Quarterly Performance Reviews (QPRs), which helps providers improve the quality of data in their systems and the data that is uploaded into HMIS.

1. **Eligible HMIS Expenses**
Computer hardware or equipment (purchasing or leasing) or furniture; software; obtaining technical support; leasing office space; paying for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to HMIS; paying salaries for operating HMIS (including paying costs of staff to travel and attend HUD sponsored and approved training on HMIS).
2. **Data Quality**
Projects are encouraged to run data quality reports on a regular basis and to examine their data before uploading into the NYC Data Warehouse. Client data must be updated at least once annually (e.g. via annual evaluation or update of housing status). When examining data, check for:
 - Completeness (e.g., missing data)
 - Duplicate client records
 - Data accuracy (e.g., Veterans are 18 and older)

- Timeliness (e.g., all client data should be entered within 3 business days)

3. DV Data Policy

HMIS is mandated by HUD for all agencies receiving HUD CoC funding. The CoC utilizes the vendor Eccovia to serve as the HMIS Data Warehouse for the NYC CoC. **However, providers with projects that exclusively serve survivors of Domestic Violence are excused from uploading data into the NYC Data warehouse.**

Victim services providers that are recipients or subrecipients under the CoC Program are required to keep electronic records that meet the minimum HMIS data quality standards and maintain client-level data in an HMIS-compliant reporting system. They may use CoC Program funds to establish and operate a comparable database.

Information entered into a comparable database must **NOT** be entered directly into or provided to HMIS. To protect clients, victim services providers **MUST ONLY** provide aggregate data to the CoC for reporting purposes.

As required for all CoC-funded projects, victim services providers are expected to regularly upload and report their aggregate data to the CoC.

F. Coordinated Entry

1. Coordinated Entry (CE) Participation

[The CoC Program Interim Rule](#) requires that CoC's establish a centralized or coordinated process designed to coordinate intake assessment and provision of referrals for program participants utilizing housing assistance. In 2017, ["Notice CPD-17-01"](#) established that HUD will use the terms, "Coordinated Entry" and "coordinated entry process" to emphasize the process be easily accessible, identify and assess needs, and prioritize decisions based upon needs. HUD's primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that it be easily accessible no matter where or how people present.

2. New York City's Coordinated Assessment and Placement System (CAPS)

In response to the HUD CoC Program requirement, NYC launched the Coordinated Assessment and Placement System (CAPS) on January 23, 2018 to establish a Coordinated Entry (CE) process. All projects receiving CoC funds are expected to participate in CAPS* (program components not currently setup in CAPS are exempt from this rule). The NYC Human Resources Administration (HRA) oversees CAPS.

The goal of CAPS is to have a standardized assessment that quickly identifies a family's or individual's housing needs and offers potential options based on preliminary eligibility. Based upon the assessment, families and individuals should be referred to the kinds of housing and services most appropriate to their situations and needs.

For more information on the HUD eligibility category criteria please visit the **HUD Exchange**.

The NYC CE process begins with the submission of a CAPS Coordinated Assessment Survey. Surveys are completed by social service providers working with an individual or family experiencing homelessness or at imminent risk of homelessness. The Coordinated Assessment Survey is a brief web based electronic survey of demographic, income, and health questions. The survey also matches with NYC Department of Homeless Service (DHS), HIV/AIDS Services Administration (HASA) and Department of Youth and Community Development (DYCD) shelter stay data, as well as any existing supportive housing application data, to count homeless time (DYCD matching with program data is pending). The survey determines potential eligibility for programs and housing assistance, including supportive housing programs and other federal, state, and city rental subsidies.

If supportive housing is indicated as a result, the case manager can then complete a NYC Supportive Housing Application on behalf of their client. If approved, the client receives a Standardized Vulnerability Assessment (SVA) determination based on administrative data matches and data from the application. Once approved, the client can be referred to available supportive housing vacancies in the CAPS system. If supportive housing is not indicated as a result, the case manager should pursue other options indicated in the survey.

[Click here for more information on CAPS Policy and Procedures.](#)

****Currently, CoC-funded TH, RRH, and TH-RRH programs are not visible housing option results in the CAPS survey. As CAPS expands, these programs will be added to the system. In the meantime, the CoC is working with all RRH providers to coordinate referrals and prioritization for RRH.***

III. Guidelines and Policies for All Project Types

All NYC CoC-funded projects are required to implement and describe the following guidelines and policies in their CoC-funded project Standard Operating Procedures (SOPs). Including them in the “project description” section of their annual NOFO renewal submission is recommended, as it reinforces that the project is adhering to HUD principles, and thus strengthens likelihood of continued funding.

NOTE - The following NYC CoC guidelines and policies will be included in the Federal Homeless Policy and Reporting (FHPR) monitoring process. If a project does not abide by them, they are at risk of being enrolled in Performance and Quality Improvement (PQI), being asked to reallocate funding, and/or being de-funded by the CoC, and/or asked by HUD to return funds.

A. Guiding Principles

This section defines the Guiding Principles for the NYC CoC based on HUD regulations and local priorities.

1. Housing First

The NYC CoC is 100% Housing First. *Housing First does not mean “housing only”,* is a proven method of ending all types of homelessness and is the most effective approach to ending chronic homelessness. A *Housing First* approach quickly connects people experiencing a housing crisis with permanent housing and the supports needed to maintain housing without preconditions (e.g., sobriety, treatment, or service participation requirements). Evidence from communities and programs that follow a *Housing First* approach shows that *Housing First* can reduce the length of time people are homeless, increase consumer choice, and increase housing stability.

Housing First is an alternative to approaches where people experiencing homelessness must demonstrate their readiness for permanent housing or otherwise participate in a linear set of time-limited housing and services before obtaining permanent housing. By contrast, *Housing First* is premised on the understanding that:

- everyone is “housing ready,”
- that people experiencing a wide variety of barriers can successfully find and maintain housing with the right supports,
- and that people are better able to address their self-defined concerns and goals when stably housed.

In line with *Housing First*,

- providers may not establish eligibility requirements that prevent higher-need families and individuals from accessing their programs, especially requirements related to employment, minimum income, rental history, or substance use history.

- providers who do not have the skills or means to serve these families and individuals should work to increase their capacity either internally or through the development of partnerships.
- providers must not attempt to (re)assess a prospective tenant’s clinical eligibility for the unit. Eligibility has already been determined through the CAPS process and the prospective tenant’s “insight” into their mental illness and/or substance use are not relevant to the apartment viewing. For more guidance visit the NYC Department of Health and Mental Hygiene’s [Guidance for DOHMH Contracted Supportive Housing Providers](#)

2. Person-Centered

A person-centered approach is a way of thinking and doing things that sees the people enrolled in the housing project as equal partners in planning, developing, and monitoring services to make sure it meets their needs. This means putting people, their families, and their household at the center of decisions and seeing them as experts working alongside professionals to get the best outcomes.

Person-centered care is not just about giving people whatever they want or providing information. It is about considering people’s desires, values, family situations, household structure, social circumstances, and lifestyles; seeing the person as an individual; and working together to develop appropriate solutions.

The goal of this approach should be to support and enable a person to build and keep control over their life. A person-centered approach:

- Supports the person, at the ‘center of the service’, to be involved in making decisions about their life
- Focuses on the person and what they can do, not their condition or disability
- Takes into account each person’s life experience, age, gender, culture, heritage, language, beliefs and identity
- Requires flexible services and support to suit the person’s wishes and priorities.
- Includes the person’s support networks as partners
- Concentrates on achieving the person’s aspirations and is tailored to their needs and unique circumstances

3. Strength-Based

The strengths-based approach is exactly what it sounds like, according to RRH Author Patrick Buhay: It means to “approach” participants’ “strengths” and “base” the housing process and road to long-term housing stability around them. It asserts that everyone has strengths and takes the approach that an individual’s strengths will get them through challenges and changes.

For more information on the strengths-based approach, including its Core Principles, please read Wayne Hammond and Rob Zimmerman’s paper, “[A Strengths-Based Perspective.](#)”

4. Trauma Informed

A coordinated community response to homelessness, effective service delivery, and effective housing placements can be enhanced by understanding the impact of trauma on individuals, learning how to minimize its effects without causing additional trauma, and understanding how to build resilience in individuals and families, [according to the U.S. Interagency Council on Homelessness](#). Trauma-informed care is centered on individuals and their experiences and ensuring that the voices of people with lived experiences of homelessness are centered and elevated. Trauma-informed practices include establishing opportunity for Persons with Lived Experience in decision-making, which incorporates, but is not limited to Persons with Lived Experience serving on advisory boards.

Service providers working with domestic violence survivors, children, youth, and Veterans are often skilled in trauma-informed care. The NYC CoC encourages and recommends collaboration with these service providers and the trainings they may have in place to facilitate community understanding of trauma-informed practices. Contact the CoC if you are interested in staff training resources on trauma informed care or other evidence-base practices.

For more information visit [HUD’s quick reference guide on trauma informed design](#).

5. Inclusion of Persons with Lived Experience

It is a priority for HUD and the NYC CoC to ensure that agencies are: taking the participation of Persons with Lived Experience into account as part of their decision-making; being responsive to the inquiries and concerns of Persons with Lived Experience; ensuring that Persons with Lived Experience are actively engaged on the agencies Board or other policy making body; and actively avoiding tokenism.

[Click here for more information on how to center Persons with Lived Experience.](#)

6. Mainstream Benefits

Program staff are expected to keep up to date regarding mainstream resources available for program participants (e.g., SNAP, SSI, Cash Assistance, Medicaid Assistance, substance abuse programs, housing subsidies) within the NYC area. The NYC CoC will provide periodic updates trainings offered to social services providers on mainstream benefits in NYC.

7. Equal Access to Housing HUD Policy

On February 3, 2012, HUD published the *Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity* final rule (Equal Access Rule) (77 FR

20 5662). This final rule requires that HUD’s housing programs be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status. The rule defines “gender identity” to mean “actual or perceived gender-related characteristics.” (see 24 CFR 5.100; 77 FR at 5665. The final rule also prohibits owners and administrators of HUD-assisted or HUD-insured housing, approved lenders in an FHA mortgage insurance program, and any other recipients or sub-recipients of HUD funds from inquiring about sexual orientation or gender identity to determine eligibility for HUD-assisted or HUD-insured housing. The rule does not, however, prohibit voluntary self-identification of sexual orientation or gender identity, and it provides a limited exception for inquiries about the sex of an individual to determine eligibility for temporary, emergency shelters with shared sleeping areas or bathrooms, or to determine the number of bedrooms to which a household may be entitled.

****In creating gender-inclusive environments, the CoC recommends that providers document clear standards in personnel handbooks and other policy documents, and publicly post policies where residents, volunteers, visitors and staff can view them.***

8. Affirmatively Furthering Fair Housing

Title VIII of the Civil Rights Act of 1968, known as the [Fair Housing Act](#), requires HUD and recipients of federal funds from HUD to affirmatively further the policies and purposes of the Fair Housing Act, also known as “affirmatively furthering fair housing” or “AFFH.” The obligation to affirmatively further fair housing requires recipients of HUD funds to take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics (race; color; national origin; religion; sex (including sexual orientation and gender identity); familial status; disability).

Generally, in administering programs and activities relating to housing and community development, HUD-funded providers must:

- Determine who lacks access to opportunity and address any inequity among protected class groups
- Promote integration and reduce segregation
- Transform racially or ethnically concentrated areas of poverty into areas of opportunity

NYC CoC abides by [New York City Commission on Human Rights Legal Enforcement Guidance on Discrimination on the Basis of Gender Identity or Expression: Local Law No. 3 \(2002\); N.Y.C. Admin. Code § 8-102\(23\)](#)

9. NYC CoC LGBTQI+ Policy

The NYC CoC Steering Committee adopted the DSS LGBTQI Policy (i.e. DSS Policy Directive #2017-01) in 2018 and requires all CoC-funded programs to comply with the policy, [which is published on the website](#).

10. Terminations, Complaints, Appeals, and Grievance Procedures

- a) All providers are required to have applicant termination and grievance policies. Policies must allow an applicant to formally dispute an organization's decision on eligibility and enrolment to receive assistance. The policy must include the method by which an applicant would be made aware of the provider's grievance procedure and the formal process for review and resolution of the grievance.
- b) If a program participant violates program requirements, the provider may terminate the assistance in accordance with a formal process established by the provider. All providers must have policies that allow a program participant to formally dispute a provider decision to terminate assistance. The policy must include the method that a written notice would be provided containing clear statement of reason(s) for termination; a review of the decision in which the program participant is given the opportunity to present information before someone other than the person who made the termination decision; and a prompt written notice of the final decision to the program participant.
- c) **Organizations must provide participants with written grievance processes that include discrimination.**

11. Reasonable Accommodation and Disability-Related Grievance Procedure

Program participants who are disabled may request an accommodation to the program procedures if they are unable to comply with them due to their disability. In order for the client to receive an accommodation, the NYC CoC recommends following the protocols established by HUD on [reasonable accommodations and modifications](#). The client will be notified in writing whether the accommodation will be made, or not, with the reasons included. Additionally, all clients have a right to file a grievance with their agency.

B. Domestic Violence Policies

Persons experiencing domestic violence, particularly women and children with limited economic resources, are at increased vulnerability to homelessness. In order to best protect the safety and privacy of these program participants, all NYC CoC-funded projects are required to comply with [Violence Against Women Act \(VAWA\)](#) and other safety and security policies outlined below. These policies ensure that survivors of domestic violence, dating violence, sexual assault, and stalking have access to safe housing.

a) VAWA

Beginning in the 2023 NOFO, RRH and PSH projects (both new and renewing) are now able to allocate funds to the *VAWA Costs Budget Line Item*. This also applies not only to DV Bonus projects but to RRH projects primarily serving

populations other than survivors of domestic violence. The creation of this new eligible activity helps ensure that CoC projects comply with the VAWA Reauthorization Act of 2022. For additional information, see [“The Violence Against Women Act Reauthorization Act of 2022: Overview of Applicability to HUD Programs.”](#)

Providers are also expected to comply with the NYC CoC’s [Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking](#).

Eligible VAWA activities fall under two categories, detailed below:

- VAWA Emergency Transfer Facilitation
 - Moving Costs. Assistance with reasonable moving costs to move survivors for an emergency transfer(s).
 - Travel Costs. Assistance with reasonable travel costs for survivors and their families to travel for an emergency transfer(s). This may include travel costs to locations outside of your CoC’s geography.
 - Security Deposits. Grant funds can be used to pay for security deposits of the safe unit the survivor is transferring to via an emergency transfer(s).
 - Utilities. Grant funds can be used to pay for costs of establishing utility assistance in the safe unit the survivor is transferring to.
 - Housing Fees. Grant funds can be used to pay fees associated with getting survivors into a safe unit via emergency transfer(s), including but not limited to application fees, broker fees, holding fees, trash fees, pet fees where the person believes they need their pet to be safe, etc.
 - Case Management. Grant funds can be used to pay staff time necessary to assess, coordinate, and implement emergency transfer(s).
 - Housing Navigation. Grant funds can be used to pay staff time necessary to identify safe units and facilitate moves into housing for survivors through emergency transfer(s).
 - Technology to make an available unit safe. Grant funds can be used to pay for technology that the individual believes is needed to make the unit safe, including but not limited to doorbell cameras, security systems, phone, and internet service when necessary to support security systems for the unit, etc.
- VAWA Confidentiality Requirements
 - Monitoring and evaluating compliance.

- Developing and implementing strategies for corrective actions and remedies to ensure compliance.
- Program evaluation of confidentiality policies, practices, and procedures.
- Training on compliance with VAWA confidentiality requirements.
- Reporting to CoC Collaborative Applicant, HUD, and other interested parties on compliance with VAWA confidentiality requirements.
- Costs for establishing methodology to protect survivor information.
- Staff time associated with maintaining adherence to VAWA confidentiality requirements.

1. Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Per the [Violence Against Women Act \(VAWA\)](#) and [NYC CoC CAPS Policy and Procedures](#), any participant who is a survivor of domestic violence, dating violence, sexual assault, or stalking who expressly requests an emergency transfer and a) against whom a sexual assault occurred on the premises of their HUD-funded housing program during the 90-day calendar period preceding the date of the request for transfer; or b) who reasonably believes that they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking if they remain in their HUD-funded dwelling unit, qualifies for an Emergency Transfer.

The NYC CoC has adopted the HUD model emergency transfer plan that identifies tenants/occupants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance on safety and security. To successfully carry out an emergency transfer notify the NYC CoC and visit [HUD's VAWA webpage](#) for key forms and resources.

All recipients and sub-recipients of CoC funds for transitional housing, permanent supportive housing, and joint transitional housing and rapid re-housing projects must follow the CoC's Emergency Transfer Plan, must make the transfer plan publicly available whenever feasible, and must make the plan available to participants and community partners upon request. The housing provider must also ensure that refusal of a transfer unit is not a basis for terminating a tenant from assistance. Providers are encouraged, when possible, but not required to bear moving costs related to emergency transfers. As necessary, providers are encouraged to work with survivors to identify ways to pay for moves associated with emergency transfers – note that moving costs are an eligible Supportive Service Expense under the CoC Program.

2. Security and Confidentiality Policies

The address or location of any housing or rental units of any program participant, including youth, individuals living with HIV/AIDS, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing will not be made public. The only exception is a preexisting privacy policy of the provider that is consistent with state and local laws regarding privacy and obligations of confidentiality, with written authorization of the person responsible for the operation of the rental unit.

C. Policies for Children and Families

Consistent with the CoC Program Interim Rule 24 CFR §578.23, all CoC recipients and subrecipients assisting families with children or unaccompanied youth must:

- Take the educational needs of children into account when placing families in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education.
- Inform families with children and unaccompanied youth of their educational rights, including providing written materials, help with enrollment, and linkage to McKinney-Vento Liaisons as part of intake procedures.
 - [Students in Temporary Housing \(nyc.gov\)](#)
 - [McKinney-Vento Definition – National Center for Homeless Education](#)
- Not require children and unaccompanied youth to enroll in a new school as a condition of receiving services.
- Allow parents or the youth (if unaccompanied) to make decisions about school placement.
- Not require children and unaccompanied youth to attend after-school or educational programs that would replace/interfere with regular day school or prohibit them from staying enrolled in their original school.
- Post notices of student’s rights at each program site that serves homeless children and families in appropriate languages.
- Designate (at least one) staff person that is designated as the educational liaison that will ensure children are enrolled in school, connected to appropriate services in the community, including early childhood projects such as Head Start, and comply with [Part C of the Individuals with Disabilities Education Act](#) and the [McKinney Vento Homeless Education Subtitle B](#)
- The age and gender of a child under age 18 must not be used as a basis for denying any family’s admission to a project that provides housing for families with children.

****To ensure compliance and to assist providers in meeting these requirements, the CoC will provide training on these issues annually and will include these in the funding competition review and ranking process.***

1. Serving Families in CoC Projects

CoC Program funded projects serving families must ensure they comply with HUD’s Equal Access Rule (explained above). The Equal Access Rule outlines the federal definition of ‘family’ for purposes of receiving assistance from certain programs. For the CoC Program, the definition of ‘family’ is as follows:

“Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.”

This means that any group of people that present together for assistance and identify themselves as a family – regardless of age, marital status, sexual orientation, actual or perceived gender, or other factors – are considered to be a family and must be served together as such. CoC-funded projects cannot discriminate against a group of people presenting as a member of a family based on the composition of the family (e.g., adults and children or just adults), the age of any family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. Involuntarily separating families based on the gender or age of their minor children is a violation of HUD regulations.

2. Family Admission and Separation Policies

Consistent with the CoC Program Interim Rule §578.93, CoC-funded projects may not involuntarily separate families based on the following:

- The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives CoC funds.
- The age, gender, sexual orientation, marital status, etc. (as stated above) of a parent or parents may also not be used as a basis for denying any family’s admission to a project that receives CoC funds.

Any program participant that believes that they or a family member has experienced involuntary separation may report it via a grievance. The CoC will investigate the claim and take appropriate remedial action.

D. Recordkeeping

1. Program Administration

Organizations with CoC-funded projects must keep on file the following information

- Documented homelessness for each participant.
- Amount, source, and use of resources for each match contribution.
- Documented usage of HMIS.
- All eligible expenses charged to the grant.

[Click here for more information on HUD's record keeping requirements.](#)

2. Program Participant

In general, providers must seek eligibility documentation in the following order:

- 1) third-party documentation,
- 2) intake worker observations, and
- 3) certification from the person seeking assistance, self-report.

This means ideally, all documentation would be obtained first through third-party documentation, then intake worker observations, and then lastly through self-report if neither of the other sources are available.

Note: youth aged 24 and under must not be required to provide third-party documentation that they meet the homeless definition as a condition for receiving services. This applies to both YHDP and non-YHDP projects.

Below are examples of acceptable forms of documentation under each homeless category.

Category 1: Literally Homeless

- Written observation by the outreach worker; or
- Written referral by another housing or service provider; or
- Certification by the individual or head of household seeking assistance stating that they were living on the streets or in shelter;
- For individuals exiting an institution—one of the forms of the evidence above and:
 - Discharge paperwork or written/oral referrals, or
 - Written record of intake worker's due diligence to obtain above evidence and certification by the individual that they exited the institution

Category 2: Imminent Risk of Homelessness

- A court order resulting from an eviction action notifying the individual or family that they must leave; or
- For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay; or
- A documented and verified oral statement.
- In addition to meeting one of the above requirements an individual also requires:
 - Certification that no subsequent residence has been identified; and

- Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing

Category 4: Fleeing/Attempting to Flee DV

– *For victim service providers*

- 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.

– *For non-victim service providers*

- 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; and
- Certification by the individual or head of household that no subsequent residence has been identified; and
- Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing

***All records pertaining to CoC funds must be retained for at least five years from the final expenditure of grant funds.**

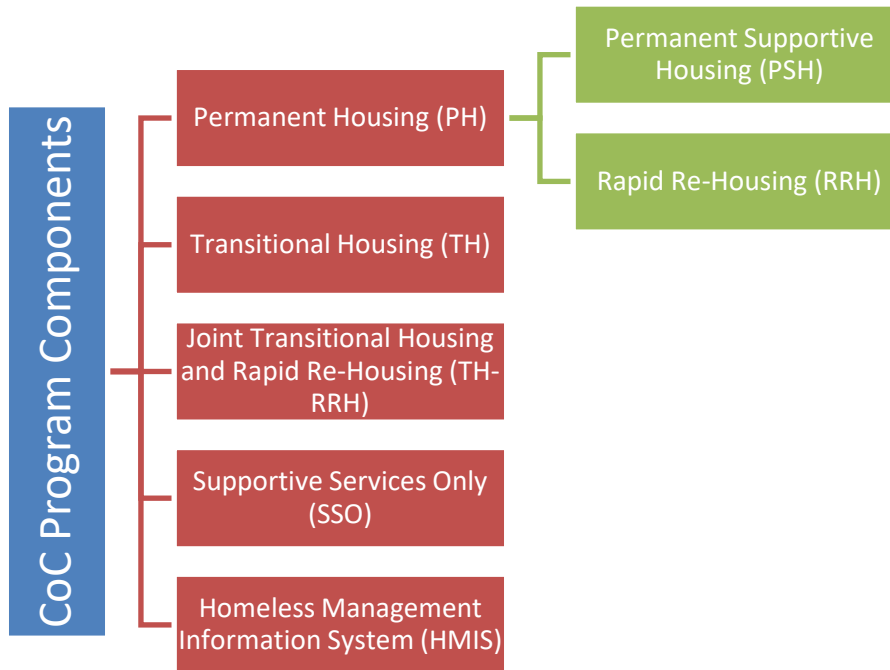
E. Additional HUD Requirements

All CoC Program funded projects are expected to be familiar with and adhere to all HUD requirements for the CoC Program as described in the [CoC Program Interim Rule](#), applicable Notices, and CoC Program NOFO(s) under which the program is funded. This includes, all but is not limited to items listed in [Subpart F - Program Requirement, 24 CFR 578.73 – 578.99](#)

Note: Other applicable federal requirements are explained in the [CoC Program Interim Rule](#).

IV. NYC CoC-Funded Program Components/Project Types

This section describes the purpose, eligibility criteria, prioritization method, and types of assistance of established NYC CoC program components including:



- A. Permanent Housing - Permanent Supportive Housing (PSH)
- B. Permanent Housing - Rapid Rehousing (RRH)
- C. Transitional Housing (TH)
- D. Joint Transitional Housing and Rapid Re-Housing (TH-RRH), and
- E. Supportive Services Only (SSO)

The following framework, which demonstrates HUD requirements and established local priorities, will serve as an outline for the four above NYC CoC program components:

- 1. Purpose
- 2. Participant Eligibility
- 3. Prioritization
- 4. Eligible Costs

A. Permanent Housing - Permanent Supportive Housing (PSH) (§ 578.37(a)(1)(i))

Permanent supportive housing (PSH) is permanent housing with indefinite leasing or rental assistance, paired with supportive services, to assist homeless persons with a disability or families with an adult or child with a disability in achieving housing stability. There can be **no** predetermined length of stay for a PSH program.

1. Purpose

PSH aims to achieve housing stability by offering housing assistance and supportive services to for households in which at least one member of the household is living with a disability. Services offered through PSH are voluntary and are designed to foster independent living, connect individuals to community based healthcare, treatment and employment services.

In NYC, the two primary types of PSH are congregate (also referred to as single-site) and scattered-site. Congregate PSH involves a designated building where each individual or family has private living quarters and may share kitchens and/or common recreational rooms or other facilities. Scattered site PSH involves designated units in apartment buildings spread throughout a neighborhood or community. Both types are accompanied by wrap-around supportive services that are focused on ensuring housing stability while maximizing participant independence.

2. Participant Eligibility

CoC Program-funded PSH projects within the NYC CoC are expected to abide by the following eligibility criteria.

- To determine eligibility based on immigration status refer to HUD’s [Restrictions on Assistance to Non-citizens](#)
- All NYC CoC-funded PSH projects are required to dedicate 100 percent of their beds to people who meet [HUD’s definition of chronic homelessness](#).
- Households served in PSH must have documentation on file verifying their status of homelessness and disability, including any necessary [third-Party or self-certification documentation as required by HUD](#).
- All PSH projects must adhere to Housing First requirements and work to minimize any barriers to an applicant’s entry into their project (including by resolving eligibility issues presented by braided funding). Therefore, PSH projects may **not**:
 - Establish service participation requirements beyond demonstrating meeting basic eligibility; or
 - Screen out participants based on having too little or no income, active or history of substance abuse, a criminal record, a history of domestic violence, mental health and/or substance use history.
 - Include any requirements that are not in a standard lease. (e.g., preconditions such as income or sobriety)
- PSH projects may not terminate participants from the project for any of the following reasons:
 - Failure to participate in supportive services.
 - Failure to make progress on a service plan.
 - Loss of income or failure to improve income.

- Being a survivor of Domestic Violence.
- Any other activity not covered in a customary and enforceable lease agreement.

3. **Prioritization**

When selecting participants for housing, PSH providers are required to use the following order of priority, established by the NYC CoC Steering Committee and consistent with [HUD Notice CPD-16-11](#). Persons eligible for PSH will be prioritized for available units based on the following criteria (applying the definition of chronically homeless set by HUD in its December 2015 Final Rule). The prioritization process listed below is based on New York City’s Standardized Vulnerability Assessment “Levels,” which considers length of time homeless, multi-system contact, and functional impairment/high utilization of Medicaid.

Priority #1:

Eligible participants must be determined as Level I (high vulnerability).

Priority #2:

Eligible participants must be determined as Level II (medium vulnerability).

Priority #3:

Eligible participants must be determined as Level III (low vulnerability).

Within each priority group described, applicants will be prioritized based on the cumulative number of days homelessness during the past three years. For example, applicants in priority group #1 with more cumulative days of homelessness will be prioritized over other applicants in priority group #2 with fewer cumulative days of homelessness. Only as necessary to break a tie, applicants within each priority group will be further prioritized based on date of application, with earlier application dates being prioritized over later application dates.

As noted in the [NYC CoC CAPS Policies and Procedures](#), exceptions to the order specified above may be considered in extraordinary circumstances and must be coordinated among the placement entity, housing provider, and the CoC.

CoC-funded projects must first adhere to the prioritization guidelines set by HUD above. Second to this, projects may consider target populations identified in their respective project application submitted to HUD.

4. **Eligible Costs**

Eligible costs under PSH include the categories below. Providers should refer to their contracts for clarity regarding which costs were approved in their contract budget and consult their HUD Field Office representative with any questions.

Grant funds may be used for:

- Up to 100 percent of the cost of acquiring property for the provision of one or more structures for housing or the delivery of supportive services;
- Up to 100 percent of the cost of rehabilitation of structures to provide housing or the delivery of supportive services;
- Up to 100 percent of the cost of new construction to be used as housing, including the building of a new structure or construction of an addition to an existing structure that increases the floor area by 100 percent or more, and the cost of land associated with that construction.

Funds may also be used for the following:

a) Rental Assistance

Rental assistance under the PSH model may be tenant-based, project-based, or sponsor-based. Regardless of rental assistance type, supported units must meet Housing Quality Standards and are subject to rent reasonableness.

Tenant-based Rental Assistance (TBRA)

- Under TBRA, the program participants locate housing in the private rental market and enter into a lease with the property owner.
- Recipients/subrecipients may require participants to live in a specific structure for the first year, or a specific geographic area for the remainder of their participation in order to facilitate services.

Project-based Rental Assistance (PBRA)

- Under PBRA, the recipient or subrecipient contracts for a particular unit or property and the participant then enters a lease with the landlord. If the participant moves, the PBRA stays with the unit for the next eligible participant.

Sponsor-based Rental Assistance (SBRA)

- In SBRA, sponsor agencies rent units in the private market and then sublet the units to program participants. Sponsors may be private nonprofit organizations or community mental health agencies established as nonprofit organizations. If the participant moves, the sponsor may sublease to a different participant or use the SBRA in a different unit with the current participant. SBRA stays with the sponsor.

The following requirements apply to all forms of rental assistance.

- All participants must have a signed agreement outlining the terms of their housing. Two individuals in a shared housing situation must have their own lease and their own bedroom unless the two individuals are present together as a household.

- Rent for the CoC Program-assisted unit may exceed FMR but must always meet rent reasonableness standards.
- Program participants in permanent housing must enter into a lease agreement for a term of at least one year, which is terminable for cause. The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party. The agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.

Note: Projects receiving rental assistance funds (all forms) are ineligible to receive leasing or operating funds. In addition, a housing structure/unit receiving TBRA cannot also receive acquisition, rehabilitation, or new construction funds.

b) Leasing

The costs of leasing a structure or part of a structure in which supportive services or housing are provided to persons experiencing homelessness.

- Leasing projects are required to have occupancy agreements and/or subleases.
- When leasing funds are used to pay rents on individual units, the lease must be between the recipient/subrecipient and the landlord/owner, with a sublease or occupancy agreement with the program participant.
- Units approved for leasing assistance must conform to the Housing Quality Standards (HQS)
 - The recipient/subrecipient may charge the program participant an occupancy charge, within the parameters of the interim rule.

c) Supportive Services

PSH projects must provide supportive services to participants that ensure their ability to remain stably housed while enabling them to live as independently as is practical. However, participation is voluntary.

Eligible supportive services are listed below. For a full description of eligible activities under each type of supportive service, see [§ 578.53](#).

- Annual assessment of services
- Moving costs
- Case management
- Childcare
- Education services
- Employment assistance and job training
- Food

- Housing search and counseling services
- Legal services
- Life skills training
- Mental health services
- Outreach services
- Substance abuse treatment services
- Transportation
- Utility deposits

Case management includes the costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participants. Allowable sub-activities include:

- (i) Counseling;
- (ii) Developing, securing, and coordinating services;
- (iii) Using the centralized or coordinated assessment system as required under § 578.23(c)(9).
- (iv) Obtaining federal, State, and local benefits;
- (v) Monitoring and evaluating program participant progress;
- (vi) Providing information and referrals to other providers;
- (vii) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- (viii) Developing an individualized housing and service plan, including planning a path to permanent housing stability.”

Note: Any supportive service not listed in the CoC Interim Rule is NOT an eligible cost. Participation in supportive services is voluntary.

d) *Operating*

In general, the following costs are considered eligible:

- The costs of maintenance and repair of housing **not included in the lease**
- Property taxes and insurance
- Scheduled payments to a reserve fund for the future replacement of **major buildings systems**. Major building systems include structural support, roofing, cladding, weatherproofing, plumbing, electrical, heating, ventilation, and air conditioning
- Security for a housing program if more than 50 percent of the units or building area are CoC-funded
- Utilities including electricity, gas, heating oil or other heating/cooling costs, water, sewer, and trash removal

- Furniture (office/apartment) that remains with the project. **Mattresses are also eligible costs, even if they remain with the program participant**
- Equipment, including office equipment, appliances such as microwaves, refrigerators, stoves, washers and dryers, etc. **that remain with the project**
- Staff time spent carrying out the above eligible operating activities that are part of the approved grant.

B. Permanent Housing - Rapid Re-Housing (§ 578.37(a)(1)(ii))

Rapid Re-Housing (RRH) quickly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that includes housing search support, move-in/rental assistance and individualized supportive services. RRH is a flexible model that can be paired with non-CoC housing subsidies and is designed to be adapted to the unique needs of each participant. RRH projects in NYC currently serve a range of populations including youth and young adults, survivors of domestic violence, and formerly incarcerated individuals. RRH program managers and direct service staff across all CoC RRH programs are expected to attend and complete RRH best practice trainings offered by the NYC CoC.

1. Purpose

RRH projects include the three core components listed below, which must be offered to all participants and are typically provided using CoC funds. The descriptions below are drawn from the [National Alliance to End Homelessness' Rapid Re-housing Toolkit](#), with some modifications based on local conditions in NYC.

a) *Housing Search/Identification*

Housing identification is the first core component of Rapid Re-Housing, the goal of which is to quickly find housing for program participants. RRH uses a Housing First approach to assist people in identifying and obtaining permanent housing options immediately, regardless of their tenancy barriers. These barriers may include lack of income, poor rental history, criminal justice involvement, disabilities, or other challenges that make it difficult to obtain housing.

Program activities include continuous recruitment of landlords with units in communities and neighborhoods; identification of a variety of permanent housing options such as single room occupancy units (SROs), shared housing, and rooms for rent; and negotiation with landlords to help program participants access housing.

Beyond landlord recruitment, programs must also match households to appropriate housing that meets Housing Quality Standards outlined below and is safe, with a particular focus on safety needs when working with survivors of domestic violence. It is critical that households are matched to housing that can be realistically maintained by paying the rent after financial assistance ends. Effective programs accomplish this by identifying a variety of housing options

and by serving as a resource to households during the housing search and application process.

Staff also must be knowledgeable about landlord responsibilities to help households served by the program obtain and sustain appropriate housing. Programs should help households understand tenant and landlord rights and responsibilities and should not knowingly place households with negligent landlords.

b) Move-in and Rental Assistance

Rent and move-in assistance is the second core component of Rapid Re-Housing (RRH). Its goal is to provide short- and medium-term assistance to households to pay for housing. Activities under this core component may include paying for security deposits, move-in expenses, rent, utilities, brokers fees, or other costs that may help a participant obtain and sustain housing.

Utilizing a [progressive engagement](#) approach to rental assistance allows for programs to be attentive to the ability of a household to maintain housing once the subsidy ends. Once housed, RRH households will be much better positioned to increase their incomes and address their other needs.

Additionally, by providing assistance in an individualized, flexible, and progressive manner, programs can maximize the ability of available resources to serve the largest number of people possible. The flexible nature of the RRH program model allows agencies to be responsive to the varied and changing needs of both program participants and the community.

c) Housing-Focused Case Management

Rapid Re-Housing (RRH) case management and services is the third core component of RRH. The goal of RRH case management is to help participants obtain and move into permanent housing; support participants to stabilize in housing; connect them to community and mainstream services and supports that can help participants to build community and achieve long-term housing stability; and successfully exit households from the program in as short a time as necessary.

RRH is a short- to medium-term crisis intervention. As such, the intent of RRH case management is not to build a long-term services relationship, but instead to assist a household in accessing and stabilizing in a housing unit. Because of that, RRH case management focuses on navigating barriers to stable tenancy and helping participants to build an ongoing support system. It does the latter by identifying and connecting participants with community supports – including services and mainstream resources, family and friend networks, and faith-based and cultural-based networks – so they have support to attain their own personal goals. Programs should not initially assume all participants need multiple services, instead the NYC CoC recommends actively engaging participants in identifying and assessing their sustainability needs.

Programs can then utilize this information to tailor supports and services to the household. RRH case managers should be proactive and prepared to inform participants about services and resources that are available in the community, including those that will help the household stabilize within their new home and improve economic and overall well-being. This may include connections to quality childcare and child development programs, employment services, education, and recreational programs, as well as health and behavioral health resources.

Staff should increase supports as needed to help program participants. When household situations are more complex and they want longer-term supports to retain their housing, a program must be able to connect them to appropriate community and mainstream services. Programs that utilize a [progressive engagement](#) approach to increasing supports and services increase their success in tailoring their programs to the unique needs of their participants.

2. Participants Eligibility

RRH program participants must always meet the eligibility requirements set forth in the NOFO under which the project was most recently funded.

RRH projects funded through the annual NOFO that were *not originally funded under the DV Bonus* may serve persons who qualify as homeless under the following homeless categories:

Category 1) Literally Homeless

Category 2) Imminent Risk of Homelessness

Category 4) Fleeing/Attempting to Flee DV

RRH projects funded under the DV Bonus, as well as renewal projects originally funded under the DV Bonus, must ONLY serve persons who qualify under Category 4.

RRH projects funded under the Youth Homelessness Demonstration Program (YHDP) must ONLY serve participants aged 18-24 at the date of project entry (age limit no longer applies after enrollment). YHDP projects may serve participants who qualify as homeless under the following homeless categories:

Category 1) Literally Homeless

Category 2) Imminent Risk of Homelessness

Category 4) Fleeing/Attempting to Flee DV

Additionally, any youth-serving provider may serve unaccompanied youth aged 24 and under and families headed by youth aged 24 and under who are living in unsafe situations. HUD interprets “youth-serving provider” as a private

nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under. HUD interprets “living in unsafe situations” as having an unsafe primary nighttime residence and no safe alternative to that residence.

Past participation in RRH *does not* disqualify an individual or family from future RRH eligibility. However, providers should make every effort to ensure that participants are not at risk of returning to homelessness upon the conclusion of RRH assistance.

To determine eligibility based on immigration status refer to HUD’s [Restrictions on Assistance to Non-citizens](#)

3. **Prioritization**

In order to make best use of limited housing resources, HUD expects all CoC’s to establish standards for prioritizing which eligible families and individuals will receive RRH assistance and to implement those standards through a Coordinated Entry system.

With the exception of DV Bonus projects (both new and renewal), the NYC CoC generally expects RRH projects to prioritize enrollment for households experiencing literal homelessness (Category 1: Literally Homeless). This policy derives from the large number of households experiencing literal homelessness in NYC, which far exceeds the supply of affordable/subsidized housing units. Providers may enroll participants under other homeless categories under special circumstances, including when a former RRH participant is deemed at imminent risk of homelessness.

In partnership with government and non-profit partners as well as Persons with Lived Experience of homelessness, the NYC CoC is currently developing sub-population-specific prioritization approaches in conjunction with new referral processes through CAPS. Providers should consult the NYC CoC for more details and to participate in the development of those approaches.

4. **Eligible Costs**

Eligible costs under RRH include the following categories:

a) **Rental Assistance**

Rental assistance provided through RRH projects must be *Tenant-based Rental Assistance* (TBRA). Under TBRA, participants work with program staff to locate housing in the private rental market and sign a lease directly with the property owner. Participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party. TBRA follows the participant, meaning a participant may continue to receive TBRA even if they move to a different apartment.

- (1) [Eligible Uses of TBRA](#)¹
 - Monthly rent payments
 - Security deposit (up to the value of two months' rent)
 - First and last month's rent
 - Brokers fees²
 - Utilities (either included in monthly rent or separately)³
- (2) [Duration of Assistance](#)

TBRA is typically limited to a maximum duration of 24 months, although YHDP projects may have additional flexibility (all YHDP projects should refer to their contracts for confirmation).
- (3) [Determining Maximum Allowable Rent](#)

Under TBRA, rent may exceed [fair market rent \(FMR\)](#) but must be at or below rent reasonableness. The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not exceed rents currently being charged by the owner for comparable unassisted units. Recipients and subrecipients must establish their own written policies and procedures for documenting comparable rents to establish transparency and consistency across all projects. Written policies and procedures should include:

 - A methodology for documenting comparable rents
 - Case file checklists and forms
 - Standards for certifying comparable rents as reasonable
 - Staffing assignments, and
 - Strategies for addressing special circumstances

Determination must be supported by documentation in the case file. See the *Additional Tools and Resources* section for more information.
- (4) [Determining Provider and Participant Rent Contributions](#)

RRH providers are expected to use their discretion to determine each participant's level of contribution to monthly rent payments. Providers should work closely with participants to develop a contribution plan that balances the participant's current financial situation with the need

¹ For more information regarding eligible costs review the [Rapid Re-Housing Brief](#)

² Brokers fees are subject to reasonableness standards and should be considered holistically alongside other upfront costs required to secure a unit. Providers should document their process to determine that brokers fees are reasonable in relation to those being charged for comparable units in the market.

³ [Determining a Program Participant's Rent Contribution, Occupancy Charge or Utility Reimbursement in the Continuum of Care \(CoC\) Program when the Program Participant is Responsible for the Utilities](#)

to prepare for longer-term housing stability beyond the conclusion of RRH assistance.

Providers are encouraged to structure financial assistance using a [progressive engagement](#) approach, which helps ensure that households maintain their housing while avoiding the “cliff effect” when the subsidy ends.

(5) [Housing Quality Standards](#)

All units paid for with CoC leasing or rental assistance funds must meet certain basic Housing Quality Standards (HQS) ([§ 578.75\(b\)](#)) prior to expending CoC funds on that unit. All units must additionally meet state and local codes.

- Providers must physically inspect all units prior to expending CoC funds and must continue to do so annually throughout the grant period (see [HUD Inspection Checklist](#)). The annual review can take place during lease renewal.
- Inspectors do not need to be certified.
- The owner of the unit has 30 days to address and correct any deficiencies in the unit.
- The recipient or subrecipient must maintain documentation of compliance with HQS, including inspection reports.

Note: RRH projects funded through YHDP may have approval to use Habitability Standards in [24 CFR 576.403©](#) rather than HQS but should refer to their contracts for confirmation. Providers implementing this special YHDP activity must keep documentation of which standards are applied to the units and proof that the units complied with the standards before assistance is provided for every unit funded by YHDP.

(6) [Fair Housing/Equal Access/Landlord-Tenant Laws](#)

RRH providers must adhere to the [Fair Housing Act](#), which prohibits housing discrimination on the basis of any “protected class.” Protected classes include race, color, religion, sex, sexual orientation, gender identity, disability, familial status, and national origin. The Act applies to all housing, regardless of the type of funding or ownership, including housing owned by private individuals or organizations. All CoC- assisted programs must have updated policies and procedures that reflect fair housing requirements.

Providers should also be familiar with [state and local tenant protection laws](#).

b) Supportive Services

Supportive services are a vital component of RRH and must be made available to every program participant throughout the duration of their enrollment, including after housing placement. RRH staff are expected to engage participants in case management on at least a monthly basis. All supportive services provided must help program participants obtain and maintain housing. Supportive services may continue for up to six months following the end of rental assistance, although YHDP projects may have the flexibility to continue services for 24 months following the end of rental assistance.

Eligible supportive services are listed below. For a full description of eligible activities under each type of supportive service, see [§ 578.53](#).

- Annual assessment of services
- Moving costs
- Case management
- Childcare
- Education services
- Employment assistance and job training
- Food
- Housing search and counseling services
- Legal services
- Life skills training
- Mental health services
- Outreach services
- Substance abuse treatment services
- Transportation
- Utility deposits

Case management includes the costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participants. Allowable sub-activities include:

- (i) Counseling;
- (ii) Developing, securing, and coordinating services;
- (iii) Using the centralized or coordinated assessment system as required under § 578.23(c)(9).
- (iv) Obtaining federal, State, and local benefits;
- (v) Monitoring and evaluating program participant progress;
- (vi) Providing information and referrals to other providers;
- (vii) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and

(viii) Developing an individualized housing and service plan, including planning a path to permanent housing stability.”

Note: Any supportive service not listed in the CoC Interim Rule is NOT an eligible cost.

In particular, the NYC CoC encourages RRH providers to use the [Critical Time Intervention](#) model in case management practice.

5. Additional Tools and Resources
 - [HUD Exchange - Rental Assistance and Rent Reasonableness Requirements](#)
 - [HUD Rent Reasonableness Checklist](#)
 - [National Alliance to End Homelessness - Rapid Re-housing Toolkit](#)
 - [Point Source Youth - Rapid Re-housing Toolkit](#)
 - [Safe Housing Partnerships – RRH: Considerations for Homeless Service Providers Supporting Families Impacted by Domestic Violence](#)
 - [Critical Time Intervention Model](#)
 - [HUD Exchange – Fair Housing and Equal Access](#)

C. Transitional Housing (§ 578.37(a)(2))

Transitional housing (TH) is designed to provide homeless individuals and families with the interim stability and support to successfully move to and maintain permanent housing. Transitional housing may be used to cover the costs of up to 24 months of housing and accompanying supportive services. Program participants must have a signed lease (or sublease) or occupancy agreement in place when residing in transitional housing.

1. Purpose

Within the New York City homeless services system, the CoC seeks to ensure that CoC-funded transitional housing is targeted to homeless families and individuals who most need and desire such assistance to address their health and safety needs and move to permanent housing. At the same time, the CoC seeks to minimize time people spend in transitional housing versus their own permanent housing in order to reduce overall length of time people spend literally homeless and ensure efficient use of limited transitional housing assistance.
2. Participant Eligibility

Eligibility is restricted to families and individuals who meet Category 1: Literally Homeless or Category 4: Fleeing/Attempting to Flee DV definitions of homeless. Please read the [following criteria for HUD’s categories of homelessness](#). Transitional housing

projects are subject to the participant eligibility criteria established in the NOFO under which they were funded.

- To determine eligibility based on immigration status refer to HUD’s [Restrictions on Assistance to Non-citizens](#)

Note for Transitional housing projects that target youth under age 25 or victims of domestic violence: Transitional housing projects are encouraged to serve youth and DV victims under Category 1. Such projects may also serve people who are imminently at-risk of homelessness, including those fleeing or attempting to flee domestic violence and that are not also presently literally homeless (homeless definition Categories 2 and 4).

A Note for Transitional Housing projects Serving People with Substance Use Disorders: Projects serving persons with substance use disorders should keep in mind that their primary goal, as with all transitional housing, is to meet the service needs of program participants AND place program participants into permanent housing as quickly as possible. This means that treatment-related services should be offered to clients on a voluntary basis (unless required by another funder), and they should focus on treatment-related issues that are serving as immediate barriers to securing and maintaining housing. Unless required by another funder, projects should not terminate a client because of a relapse in substance use.

Note for all Transitional Housing projects: Projects should be aware that placing a household in transitional housing can affect their eligibility for other programs. Specifically, a household does not retain Chronic Homelessness (CH) status following their TH participation, meaning they will no longer be eligible for additional CoC-funded programs that require CH (i.e., PSH). However, a household may still be eligible for non-supportive CoC-funded programs such as RRH.

3. [Prioritization](#)

Transitional housing projects should first target and prioritize assistance for families and individuals who have been literally homeless for the longest amount of time. In addition, projects should target and prioritize people experiencing homelessness who:

- Desire and make an informed decision choice to enter transitional housing;
- Have health and/or safety needs that are best addressed in a transitional housing environment and by the services offered by the project. Examples include transition age youth with no prior independent living experience, people in early recovery from substance abuse, and victims of domestic violence and trauma;
- Have no other available permanent housing options with financial and service supports they need and want that is readily available (e.g., rapid re-housing,

permanent supportive housing, or transitional financial assistance to obtain permanent housing while accessing other homeless system or community-based supports).

4. Eligible Costs

a) *Acquisition, Rehabilitation, and New Construction*

Projects can utilize funding for acquiring, paying for staff/overhead related to acquiring property for the purpose of housing or supporting services to transitional housing participants, or rehabilitation of the property provided it is not a leased property.

b) *Leasing Funds*

Projects may lease individual units or housing structures for the purpose of housing participants or carrying out supportive services. In these cases:

- Rent reasonableness must be assessed (if rents are being paid with other, non-CoC program funds above FMR, rent reasonableness must be shown)
- Housing Quality Standards must be met (anytime rents are charged to program participants)
- Costs above FMR are not eligible to be paid with CoC funds

Projects may require participants in housing assisted with leasing funds to pay an occupancy charge (which is then collected as program income):

- According to 24 CFR 578.77 charges must not exceed the highest of:
 - 30% of family's monthly adjusted income;
 - 10% of family's monthly gross income; or
 - or – Portion of family's welfare assistance, if any, designated for housing costs

c) *Operating Costs*

Operating costs can be used for the maintenance and repair of housing, property taxes and insurance, utilities, furniture, building security, and more. For the complete extensive list of supportive services, [please view the CoC Program Interim Rule § 578.55](#).

d) *Rental Assistance*

- Projects may provide rental assistance (TBRA, PBA, SBA), security deposits, first/last months' rent, vacancy payments, and damages (one time, not exceeding one month's rent)
- Participants must enter a lease agreement for a term of at least one month eligible for renewal upon expiration up to 24 months.

- Rent and occupancy charges may be collected from TH residents and reserved (in whole or in part) to assist the resident from whom they are collected to move into permanent housing (see leasing funds above).

e) Supportive Services

- Costs related to the day-to-day operation of a facility not contained in a housing structure (repair, building security, furniture, utilities, equipment necessary to provide supportive services).
- Services that help program participants obtain permanent housing including but not limited to: annual assessments, one time moving costs, case management, childcare, education services, housing search and counseling, legal services, life skills training, transportation (gas, insurance, taxes, maintenance for staff serving participants).
- Supportive services must be offered throughout the duration of a participant’s stay in TH and may be provided for up to 6 months after leaving TH to assist with adjustment to independent living.
- Assess the needs of the individual or family experiencing homelessness immediately upon entry to ensure appropriate transitional housing arrangements and participant safety.
- Assist all participants with establishing a permanent housing plan within two weeks after project entry.
- Provide access to permanent housing placement assistance (whether such assistance is provided directly or through a partnership) without preconditions, such as length of time in program or demonstrated progress on clinical goals.
- Offer supportive services to program participants on a voluntary basis. However, projects may require program participants to meet with a case manager on a regular basis for purposes of evaluating the extent to which a participant has ongoing need for assistance from the project.

D. Joint Transitional Housing and Rapid Re-Housing (TH-RRH) (§ 578.37(a)(2))

The Joint Transitional Housing (TH) and Rapid Re-Housing (RRH) program component, commonly referred to as “TH-RRH,” combines two existing program components – transitional housing and permanent housing-rapid rehousing – in a single project type to serve individuals and families experiencing homelessness. Program participants can receive up to 24 months of total assistance with the goal of obtaining or maintaining permanent housing.

1. Purpose

Joint TH-RRH is intended to provide ‘crisis housing’ with financial assistance and supportive services that enables quick moves to affordable permanent housing. These projects are intended to address crisis housing needs of populations experiencing homelessness in (1) communities with large numbers of unsheltered homelessness, allowing households to move into a temporary, low-barrier housing option and quickly moving to permanent housing; (2) communities with lack of crisis housing for households fleeing domestic violence, these projects can provide safe housing and

connect participants to permanent housing; and (3) communities with high rates of unsheltered youth, this project type provides youth a safe place to stay that helps them access appropriate resources and develop a connection to services as they quickly move into permanent housing.

2. Participant Eligibility

TH-RRH projects are expected to serve populations that meet [HUD's defined categories 1, 2, and 4 of homelessness](#) and target and prioritize individuals experiencing homelessness with higher needs and who are most vulnerable.

- To determine eligibility based on immigration status refer to HUD's [Restrictions on Assistance to Non-citizens](#)

3. Prioritization

The following section explains the prioritization process that NYC CoC-funded TH-RRH projects are expected to abide by for program participants.

a) *Prioritizing Youth*

[Prioritization principles](#) must be consistently applied and may reflect the following vulnerability factors:

- Significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing;
- High utilization of crisis or emergency services, including emergency rooms, jails, and psychiatric facilities to meet basic needs;
- The extent to which people, especially youth and children, are unsheltered;
- Vulnerability to illness or death;
- Risk of continued homelessness;
- Vulnerability to victimization, including physical assault, trafficking, or sex work; or other factors determined by the community and based on severity of needs.

b) *Prioritizing Survivors of Domestic Violence*

- Emergency Transferers - VAWA

4. Eligible Costs

TH-RRH recipients and subrecipients must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the RRH component, to all program participants for up to 24 months as needed by the program participants. For example, a program participant may only need a temporary stay in a transitional housing unit, but the recipient or subrecipient must be able to make available the financial assistance and supportive services that traditionally comes with rapid re-housing assistance available to that program participant. This does not mean, however,

that the applicant is required to request funding from the CoC Program for both portions of the project (e.g., the applicant may leverage other resources to pay for the transitional housing portion of the project). The following types of assistance are eligible under the TH-RRH project type:

a) *Leasing Funds*

Projects may lease individual units or housing structures for the purpose of housing participants or carrying out supportive services. The following additional standards apply when using Leasing Funds:

- Rent reasonableness must be assessed; if rents are being paid with other, non-CoC program funds above FMR, rent reasonableness must be shown
- Housing Quality Standards must be met (anytime rents are charged program participants)
- Costs above FMR are not eligible to be paid with CoC funds.

Projects may require participants in housing assisted with leasing funds to pay an occupancy charge (which is then collected as program income):

- According to 24 CFR 578.77 charges must not exceed the highest of:
 - 30% of family's monthly adjusted income;
 - 10% of family's monthly gross income; or
 - Portion of family's welfare assistance, if any, designated for housing costs

b) *Operating Costs*

Operating costs are eligible to provide **transitional housing**. Operations can be used for the maintenance and repair of housing, property taxes and insurance, utilities, furniture, building security, and more. For the complete extensive list of supportive services, [please view the CoC Program Interim Rule § 578.55](#).

c) *Rental Assistance*

Short- or medium-term tenant-based rental assistance on behalf of program participants in the **rapid re-housing portion of the project (see RRH Program component for more information)**.

Rapid re-housing programs offer financial assistance to cover move-in costs, deposits, and the rental and/or utility assistance (typically for six months or less) necessary to allow individuals and families to move immediately out of homelessness and stabilize in permanent housing. Expenditure of rental assistance funds must adhere to the following standards:

- Providers may provide a program participant with up to 24 months of rental assistance. The Grantee can taper down rental assistance for a participant after the first three months and at a rate agreed upon by both parties through the end of the 24 months. Participants may be eligible for rapid re-housing assistance for multiple instances based on their need. However, if a program participant needs assistance more than once, the participant will be subject to a re-assessment process for a different level of service intervention.
- Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the Fair Market Rent limit, established by HUD. A complete listing of Fair Market Rents for New York counties can be found on [the HUD User website](#).
- The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.
- There must be a lease between the landlord and the tenant, and the leases must be for at least one-year, renewable for at least one year, and terminable only for cause.
- Providers may use funds for rental assistance costs and eligible services, including the following: security deposits (up to 2 months), first month's rent and/or last month's rent, eligible supportive services, one-time moving costs and one-time utility deposits ([see 24 CFR 578.37\(a\)\(1\)\(ii\)\(B\) for more information](#)).

d) Supportive Services

- Costs related to the day-to-day operation of a facility not contained in a housing structure (repair, building security, furniture, utilities, equipment necessary to supportive services).
- Services that help program participants obtain permanent housing including but not limited to: annual assessments, one time moving costs, case management, childcare, education services, housing search and counseling, legal services, life skills training, transportation (gas, insurance, taxes, maintenance for staff serving participants)
- Supportive services must be offered throughout the duration of a participants stay in TH and may be provided for up to 6 months after leaving TH to assist with adjustment to independent living
- Assess the needs of the individual or family experiencing homelessness immediately upon entry to ensure appropriate transitional housing arrangements and participant safety.

- Assist all participants with establishing a permanent housing plan within two weeks after project entry.
- Provide access to permanent housing placement assistance (whether such assistance is provided directly or through a partnership) without preconditions, such as length of time in program or demonstrated progress on clinical goals.
- Offer supportive services to program participants on a voluntary basis. However, projects may require program participants to meet with a case manager on a regular basis for purposes of evaluating the extent to which a participant has ongoing need for assistance from the project.

A HMIS Note About Joint TH-RRH Projects:

Joint TH-RRH projects:

- *Must be set-up in data system as two-different programs:*
 - *One TH program and one RRH program*
 - *Clients will have one entry if they remain in TH or RRH*
 - *Clients will have two entries if they begin in TH and move to RRH*
- *Agencies must submit an APR for each program in SAGE HMIS annually*

E. Supportive Services Only (SSO) (§ 578.37(a)(3))

1. Purpose

Supportive Services Only (SSO) projects are designed to provide supportive services to sheltered and unsheltered homeless persons and families. Households at risk of homelessness who do not meet the definition of homelessness may not be served. SSO projects can also provide youth with a place to live in an unrelated adult’s home for a temporary period of time through a [Host Homes](#) housing model.

SSO - Coordinated Entry (SSO-CE) grant may be used for a range of supportive services that directly relate to carrying out CE activities, such as conducting outreach to sheltered and unsheltered homeless persons and families (including initial assessment, crisis counseling, and addressing urgent physical needs) and connecting persons experiencing homeless to housing and other resources.

To determine if a project meets the definition of an SSO Project, consult the HUD tool available here: Is my project an SSO? [Click here to determine if your project is an SSO](#)

2. Participant Eligibility

SSO projects are expected to serve populations that meet [HUD’s defined categories 1, 2, and 4 of homelessness](#) and target and prioritize individuals experiencing homelessness.

- To determine eligibility based on immigration status refer to HUD’s [Restrictions on Assistance to Non-citizens](#)

3. Eligible Costs

SSO Projects may only assist program participants for whom the recipient or subrecipient of the funds is not providing housing or housing assistance.

Funds may be used for acquisition, rehabilitation, relocation costs, or leasing of a facility from which supportive services will be provided. SSO includes street outreach.

The following types of assistance are eligible under the SSO project type:

a) Supportive Services

Supportive services to SSO participants are available for every program participant and may be provided until program exit. SSO projects can provide a range of services directly or through collaboration with other agencies, activities which help people access resources and services. Supportive service include:

- Street outreach and education
- Assessment of needs
- Access to emergency housing
- Information and referrals to programs that provide additional services
- Case management: costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participants. This includes:
 - Helping individuals and families select among various permanent housing options based on their unique needs, preferences, and financial resources;
 - Addressing issues that may impede access to housing (such as credit history, arrears, and legal issues);
 - Providing assistance in obtaining medical treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living;
 - Connecting households with community-based services that already exist;
 - Negotiating manageable and appropriate lease agreements with landlords; and
 - Making appropriate and time-limited services and supports available to families and individuals—and to the landlords who are partnering with the rapid re-housing program (e.g., federal, state, local, or private assistance).

b) Supportive Services Only – Coordinated Entry (SSO-CE)

Funds from this grant are used for support services only to assist housing specialists and clients in creating a housing plan using the CAPS system,

completing various housing applications, making appropriate referrals, and then reporting on placements and retention. Expansion and further program development of NYC's existing coordinated entry system through data interface with multiple systems is crucial to support continued efforts central to achieving the goals of [USICH's Opening Doors plan](#) to end homelessness.

(1) [Domestic Violence \(CE-DV\)](#)

The project is in the process of incorporating domestic violence and gender-based violence (DV/GBV) survivors into NYC's existing coordinated entry system. This SSO project aims to create an online survey used to connect the homeless and those at risk of homelessness to the most appropriate housing options, while protecting their personal identifying information (PII), to ensure that DV/GBV survivors have equal access to housing and shelter resources thereby meeting HUD & VAWA mandates. This will require collaboration between the NYC Human Resources Administration (HRA), which oversees the DV shelters and existing CAPS system; the Mayor's Office to End Domestic and Gender-Based Violence (ENDGBV), which operates the Family Justice Centers (FJs), a key entry point for survivors to have shelter and housing needs met; and community-based organizations that provide shelter and housing services to DV/GBV survivors. The project will include three components: program development, site implementation, and program evaluation.

V. [Project Monitoring Process and Funding Prioritization](#)

One of the main responsibilities of the NYC Department of Social Services (DSS), as the NYC CoC Collaborative Applicant, is to monitor the performance of CoC-funded projects. The NYC DSS Federal Homeless Policy & Reporting (FHPR) Unit monitors several performance areas year-round. These include compliance with regulatory requirements, project funding spend-down, Annual Performance Report (APR) submission, Persons with Lived Experience participation and engagement, participation in the NYC Data Warehouse and quality of HMIS data entries.

The CoC monitors and evaluates projects funded with HUD CoC Program dollars and will conduct site visits as part of regular qualitative project performance monitoring.

A. Annual Evaluation

A central part of CoC project monitoring is an Annual Evaluation, which incorporates locally developed objective criteria and priorities in conjunction with those established by HUD in the CoC Program Interim Rule. The Annual Evaluation helps the CoC to identify performance improvements and more systemic challenges projects are facing. Performance of each CoC-funded project on the annual evaluation is used as a factor in determining rank order in the list of renewing application for projects in each HUD CoC NOFO. The HMIS and COC teams at DSS provide up to date information on each annual evaluation on the CoC website. [Please visit the CoC website to learn more.](#)

B. Consequences of Not Meeting Project-Performance Standards

Failure to meet established performance standards may trigger a review by the NYC CoC Lead Agency (DSS), Steering Committee, and/or Performance and Quality Improvement (PQI) Sub-Committee. This review will involve providing technical support and guidance to improve performance, and organizations must show their ongoing efforts during this process.

C. Policy on Project Selection and Prioritization for CoC Funding

Projects that are enrolled in PQI more than once over a three year period, and have persistent performance issues, including problems related to compliance with NYC CoC Written Standards and chronic underspending, are at serious risk of being placed at the bottom of the CoC Project Priority Listing in the Annual NOFO and therefore are at risk of funding reductions and/or being de-funded by HUD.

VI. Annual Competition Funding, Reallocation, and Project Closure

This section reviews how organizations may apply for CoC funding, as well as how projects may make changes to their grant, renew their grant, reallocate funds, or close.

A. New and Renewal Project Funding Application

The CoC is designed to promote community-wide planning and resource use in order to address homelessness in a given community with a coordinated approach. Organizations interested in HUD CoC Program funding are encouraged to apply during the NYC CoC Local competition as a part of the annual CoC Program Notice of Funding Opportunity (NOFO) Competition. The annual CoC Program Competition Notice dictates what types of projects may be created through reallocation and Bonus funding. Existing CoC-funded projects requesting renewal funds are directed to work with NYC CoC on the application process. To be informed of important dates related to the NOFO, organizations should access the NYC CoC's [website](#) and sign up for the mailing list.

New and Renewal projects are reviewed by the Independent Review Team (IRT) and recommended for inclusion in the “Consolidated Application”. New projects not recommended for inclusion will be informed in writing no less than 15 days before the NOFO due date to HUD. In general, and with consideration of performance, renewal projects are prioritized over new project applications when the CoC ranks projects for the “priority listing” as a component of the NOFO application.

Under the HEARTH Act, HUD allows CoC’s to fund new projects by transferring all or part of funds from any existing CoC renewal eligible grant back to the CoC. As ranking and prioritization is a part of the process for the annual CoC Program Competition (the NOFO process), consideration of whether funding should be reallocated from existing projects occurs at this time. Reallocation is one of two ways new projects may be funded in the annual competition. The other is HUD Bonus project funds, which may vary year by year according to HUD priorities.

B. Reallocation

CoC’s may reallocate project funds to meet HUD priorities and local needs by improving outcomes and more effectively reducing homelessness. Reallocation of CoC program funds may occur voluntarily or at the direction of the NYC COC (e.g., if the program is consistently under-performing, failing to meet the standards laid out in the NOFO or the written standards, or not meeting local needs). Frequently, projects voluntarily reallocate underutilized grant funds. Sometimes projects choose to voluntarily reallocate their entire grant if they no longer wish to receive HUD CoC funding. Projects with unsatisfactory project outcomes or a history of low performance may have their funding reallocated and made available to new projects as part of the competitive process.

C. Grant Amendments

Grantees are required to report deviations from financial plans (approved budget) and to request approvals for revisions. When requesting changes to CoC-funded projects, which are considered grant amendments, agencies are required to inform the CoC Lead Agency before requesting changes with the local HUD field office. Major funding changes requested by the organization will be made in writing in the grant amendment request. Although minor changes do not require HUD approval, CoC-funded projects must notify the lead agency and Field Office of these changes. Significant changes include change of project site, additions or deletions in the types of eligible activities approved for a project, a shift of more than 10 percent of funds from one approved eligible activity to another, and/or change in population served.

D. Voluntary Relocation Due to Closure

When CoC-funded organizations decide to close their project, they are asked to follow the steps outlined here:

1. Develop a plan for shutting down the project.
2. Notify the CoC via the NYC DSS FHPR Team to receive some initial guidance.
3. Contact the local HUD field office.

Entities work together to execute on a project shutdown plan for impacted participants into other permanent housing. HUD expects project closures are to be completed in partnership with the participant, the CoC and other local or state agencies involved, and expects all parties to take a client-

centered, proactive approach to ensure consistency of appropriate housing for program participants after the program closes.

Please note: Program participants that are receiving assistance through programs such as the Emergency Solutions Grants (ESG) Program, the Continuum of Care (CoC) Program, the Supportive Services for Veterans Families (SSVF) Program, or the Veterans Homelessness Prevention Demonstration Program (VHPD) maintain their homeless status for the purpose of eligibility for other permanent housing programs, such as HUD-VASH and CoC-funded permanent supportive housing (so long as they meet any other additional eligibility criteria for these programs).