

POLICY TITLE: Permanent Supportive Housing Eligibility Requirements & Prioritization Policy

POLICY ADMINISTRATION: The Homeless Clearinghouse, Cincinnati/Hamilton County Continuum of Care Board

EFFECTIVE DATE: 8/19/2016

POLICY: Permanent Supportive Housing (PSH) projects provide housing and supportive services to assist homeless persons with a disability to live independently. The goal of this policy is to ensure that chronically homeless individuals and families are prioritized for placement into PSH projects.

ELIGIBILITY CRITERIA: In order to be served in a PSH program the individual or family must:

- be literally homeless; and
- be a member of a household that contains at least one documented disabled adult or minor living with an adult legal guardian; and
- be a member of a zero to low-income household

Congregate living facilities may include additional eligibility criteria including gender and family composition.

COORDINATED ENTRY: All literally homeless clients are prioritized based on completion of a standardized assessment. The CoC has adopted the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT). All CoC-funded PSH projects will accept referrals *only* through a single community-wide prioritization list that is generated in the HMIS.

PRIORITIZATION: All PSH units that are not dedicated to serving the chronically homeless will prioritize the chronically homeless upon turnover. The Coordinated Entry System is required to follow this order of priority when making referrals to PSH projects. This policy follows the recommended orders of priority as established in HUD's Notice CPD-16-11.

- **First Priority**-Chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs
- **Second Priority**-Homeless individuals and families with a disability with long periods of episodic homelessness and severe service needs
- **Third Priority**- Homeless individuals and families with a disability with severe service needs
- **Fourth Priority**-Homeless individuals and families with a disability without severe service need
- **Fifth Priority**-Homeless Individuals and families with a disability coming from transitional housing (and resided on the street or in shelter prior to entering transitional housing)

DEFINITIONS:

Literally Homeless (Category 1): An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
- An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Disabled:

- A person shall be considered to have a disability if he or she has a disability that:
 - Is expected to be long-continuing or of indefinite duration;
 - Substantially impedes the individual's ability to live independently;
 - Could be improved by the provision of more suitable housing conditions; and
 - Is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, posttraumatic stress disorder, or brain injury.
- A person will also be considered to have a disability if he or she has a developmental disability, as defined by HUD.
- A person will also be considered to have a disability if he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).
- Documentation of disability must be maintained with client records.

Chronically Homeless:

- A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), and by this document who:
 - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - Has been homeless and living as described in bullet 1 of this listed definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in bullet 1 of this definition. Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;
 - An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in bullet 1 of this listed definition, before entering that facility; or
 - A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in bullet 1 or 2 of this listed definition, including a family whose composition has fluctuated while the head of household has been homeless.
 - Documentation of Chronic Homelessness must be maintained with client records and meet the following criteria, following HUD's established order of priority for obtaining evidence:
 - **1st Priority- Third Party Documentation**
 - **2nd Priority- Intake worker observation**
 - **3rd Priority- Certification from the individual seeking assistance**
 - Documentation includes a letter signed by the individual seeking assistance

- A single encounter in a month is sufficient to consider household homeless for entire month unless evidence of a break.
 - “**Break**” is defined as at least 7 nights not residing in an emergency shelter, safe haven, or residing in a place meant for human habitation
 - Acceptable documentation of a break includes: Third party evidence or a self-report of the individual seeking assistance
- Attempts to obtain third-party documentation and if necessary, reasons for why third-party documentation was not obtained must be thoroughly documented in each client record.
 - For all clients, up to 3 months can be documented through self-certification
 - If third-party documentation cannot be obtained, a written record of intake workers due diligence to obtain, the intake worker’s documentation of the living situation, AND the individual’s self-certification of the living situation is required in client file.
 - In limited circumstances (no more than 25% of households served in an operating year), up to the full 12 months can be obtained through self-certification
 - Documentation requires previous approval from the CoC – approval must be maintained in client record, if applicable.
- Institutional Stays – acceptable documentation:
 - Discharge paperwork or written/oral referral from a social worker, case manager, or other appropriate official stating the beginning and end dates of the time residing in the institutional care facility
 - Where the above is not attainable, a written record of intake workers due diligence to obtain AND the individual’s self-certification that he or she is exiting an institutional care facility where resided less than 90 days

Severity of Service Needs:

- History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; or
- Significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing; or
- For youth and victims of domestic violence, high-risk of continued trauma or high risk of harm or exposure to very dangerous living situations.