

NEBRASKA BALANCE OF STATE CONTINUUM OF CARE
WRITTEN STANDARDS

Continuum of Care Service Delivery
May 2026

Table of Contents

INTRODUCTION	4
Purpose	4
Programs Overview	5
STANDARDS FOR ALL PROGRAM TYPES	6
Fair Housing and Equal Opportunity	6
HMIS Participation	8
Violence Against Women Act (VAWA)	9
Participant Inclusion	9
Access to Mainstream Resources	9
Program Coordination	9
Participant Income Determination	10
Program Income	11
Access to Educational Resources	12
Conflicts of Interest	12
Termination of Assistance	13
Displacement	14
Recovered Materials	15
Faith-Based Organizations and Activities	15
Prohibited Use of Funds Related to Illicit Drugs and Illegal Drug Activity	16
Records and Recordkeeping	16
GUIDING PRINCIPLES	20
Nebraska Balance of State Continuum of Care Policy Statement on Program Models, Supportive Services, and Evidence-Based Practice	20
AVAILABLE HOMELESS ASSISTANCE SERVICES	22
Homeless Prevention Standards	24
Street Outreach Standards	24
Emergency Shelter Standards	31
Transitional Housing Standards	33
Rapid Rehousing Standards	38
Joint Transitional Housing-Rapid Rehousing Standards	46
Permanent Supportive Housing Standards	50

APPENDIX I 53

 Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking53

APPENDIX II 58

 Nebraska Balance of State CoC Substance Use and Recovery Housing Policy.....58

INTRODUCTION

Purpose

The U.S. Department of Housing and Urban Development Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) was signed into law on May 20, 2009. The HEARTH Act reauthorized the McKinney-Vento Homeless Assistance Act of 1987. The overall goal is to make homelessness rare, brief, and non-recurring by reducing the duration of time people spend homeless and reducing recidivism back into homelessness.

The Continuum of Care Interim Rule was published on July 31, 2012, and took effect on August 30, 2012. The purpose of the regulation is to:

- Return households who experience homelessness to permanent housing in less than 30 days;
- Consolidate the Supportive Housing Program, Shelter Plus Care Program, and the Section 8 Moderate Rehabilitation Program;
- Promote a community-wide commitment to the goal of ending homelessness;
- Provide funding to quickly rehouse homeless individuals and families while minimizing trauma and dislocation;
- Promote access to mainstream benefits;
- Optimize self-sufficiency;
- Provide funding to support the CoC structure and process; and
- Solidify the CoC structure and process.

The Interim Rule requires CoCs to establish and consistently follow written standards for providing CoC assistance. Each Continuum of Care (CoC) funded service provider shall comply with the minimum written standards established and approved by the BoS Continuum of Care. Each provider will at the very least comply with the standards established in this document.

Programs Overview

Continuum of Care Program

A Continuum of Care System is a community and regional-based process that provides a comprehensive and coordinated housing and service delivery system. The U.S. Department of Housing and Urban Development (HUD) initiated the Continuum of Care process in 1994. The process promotes a coordinated, strategic planning approach for programs that assist families and individuals who are homeless or at risk of homelessness.

A Continuum of Care System has the goal of stably housing all persons who are homeless or at risk of homelessness in appropriate housing. This means identifying all homeless and at risk of homeless populations in communities, understanding their needs, and building a comprehensive and responsive system which encompasses homeless prevention, outreach, intake and assessment, emergency shelter, transitional programs, supportive housing, permanent housing, and all appropriate support services.

The University of Nebraska-Lincoln, Center on Children, Families, and the Law (CCFL) has been designated by the Nebraska Balance of State (BoS) CoC as the Collaborative Applicant.

STANDARDS FOR ALL PROGRAM TYPES

The Nebraska Balance of State CoC practices a person-centered approach that incorporates participant choice and recognizes subpopulations present in the Nebraska Balance of State, including but not limited to persons experiencing chronic homelessness, veterans, unaccompanied youth, youth ages 18-24, households with children, and victims of domestic violence or other life-threatening interpersonal violence.

Fair Housing and Equal Opportunity

The Continuum of Care (CoC) does not tolerate discrimination, harassment, or exclusion from ESG- or CoC-funded housing or services on any basis prohibited by applicable federal, state, or local law. Discriminatory conduct, prejudice-motivated comments, or behavior that creates a hostile environment shall not be tolerated from staff, volunteers, contractors, or program participants. Any staff, contractor, or volunteer who refuses to work with an individual or household on the basis of protected status or other unlawful criteria shall be subject to disciplinary action consistent with the provider's policies.

The CoC and all recipients and subrecipients receiving ESG or CoC Program funds shall comply with applicable federal, state, and local fair housing, civil rights, nondiscrimination, disability, accessibility, VAWA, and equal opportunity requirements, including 24 CFR 5.105(a), as applicable. These requirements include, but are not limited to:

Fair Housing Act (42 U.S.C. 3601-19)

Section 504 of the Rehabilitation Act

Title VI of the Civil Rights Act

Title II of the Americans with Disabilities Act

HUD Equal Access requirements, to the extent applicable under current law and HUD guidance

Projects shall not use ESG or CoC funds to support unlawful discrimination, illegal preferences, or selection criteria based on race or intentional proxies for race, except where specifically permitted or required by applicable law.

Affirmatively Furthering Fair Housing

Providers must have comprehensive nondiscrimination policies in place and conduct outreach in a manner that is lawful, broadly accessible, and reasonably designed to reach eligible persons least likely to engage in the homeless response system. Organizations receiving CoC Program funding shall market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability. Organizations shall also provide program applicants and participants with information, in writing, on their rights and remedies under applicable federal, state, and local fair housing and civil rights laws. (24 CFR 578.93)

Integration and Accessibility

Housing and supportive services must be offered in an integrated manner, such that persons with disabilities may live and receive services in the most integrated setting appropriate to their needs.

Organizations shall offer housing and supportive services to enable individuals with disabilities to interact with nondisabled persons to the fullest extent possible. (24 CFR 578.93)

Reasonable Accommodations and Modifications for Persons with Disabilities

Organizations are required to provide reasonable accommodations and modifications for persons with disabilities. For federally funded housing, the recipient is responsible for paying for the modification when required by applicable law. Organizations must inform applicants during intake of their right to request reasonable accommodations or modifications. A reasonable modification is a structural change, and a reasonable accommodation is a change to rules, policies, practices, or services so that a person with a disability has equal opportunity to use and enjoy a dwelling unit, common space, housing assistance, or supportive services.

Discrimination Based on Household Composition

Organizations cannot discriminate against a group of persons presenting as a family based on the composition of the family, the age of any member of the family, the disability status of any member of the family, or marital status. The people who present together for assistance, regardless of age or relationship, are considered a household and are eligible for assistance as a household unless a different treatment is required by applicable HUD requirements or necessary for participant safety.

Projects that serve families with children must serve all types of families with children. If a project targets a specific eligible population, such as homeless veterans, these projects must serve all families with children that are otherwise eligible for assistance, including families with children that are headed by a single adult or consist of multiple adults who reside together.

Prohibition Against Involuntary Family Separation

In accordance with HUD CoC Program regulations and Nebraska Balance of State CoC policy, involuntary family separation is prohibited in all projects, including but not limited to separation based on:

The age or gender of a child under the age of 18;

The marital status of a parent or parents; or

The composition of the family or household, except where required by law or necessary for participant safety and consistent with applicable HUD requirements.

Prioritized Subpopulations and Fair Housing Implications

Organizations shall comply with applicable civil rights laws, including the Fair Housing Act. Within this framework, these standards establish subpopulations to be prioritized for housing and services that align with the identified needs of the local community and the goals of the CoC. Subpopulations may be prioritized as long as doing so does not discriminate against any protected class under federal nondiscrimination laws. Subpopulations may also be prioritized according to who needs the specialized supportive services offered by the project, such as substance use disorder treatment, domestic violence services, or a high-intensity package of services designed to meet the needs of hard-to-reach homeless persons.

Dedicated versus Prioritized: Projects and/or beds that are dedicated to serving a specific subpopulation must continue serving only this subpopulation. For example, a Permanent Supportive Housing project dedicated to serving households experiencing chronic homelessness

must continue serving those households. This means that if two otherwise eligible households are seeking admission into the program, one that falls within the designated prioritized subpopulation and one that does not, the household in the designated prioritized subpopulation must be given priority for admission.

If there are no persons on a waiting list or applying for entrance to the program who fall within the dedicated or first priority subpopulation, organizations should not hold the unit vacant. They should instead serve the next prioritized subpopulation who may benefit from the services being provided.

Fair Housing Implications: The Local Standards establish priority subpopulations by project type. Organizations may not set more restrictive priorities unless permitted by HUD requirements, the approved project application, the project's grant agreement, or formally adopted CoC policy. Beds may not be reserved for persons with a specific disability unless permitted by applicable law and project funding requirements. Organizations may reserve beds for persons with HIV/AIDS if the housing also receives funding from the Housing Opportunities for Persons With AIDS program (HOPWA).

HMIS Participation

Providers, except for victim service providers, shall actively utilize the Homeless Management Information System (HMIS) to enter data on people served and assistance provided under CoC or ESG, as applicable. Victim service providers shall actively utilize a comparable data system that meets HUD's standards.

Every four years, the Nebraska Balance of State CoC will engage in a procurement process to select the HMIS lead and to manage the HMIS system. The HMIS lead will be responsible for CoC, ESG, and NHAP HMIS activities, as applicable. Continuity is a critical factor in a well-run HMIS system. Therefore, preference in the procurement may be granted to the existing provider. The HMIS provider will recommend to the CoC an HMIS software solution for the CoC.

The Nebraska Balance of State CoC has designated the University of Nebraska-Lincoln as the HMIS lead entity. The HMIS lead entity is responsible for:

- Maintaining and updating the HMIS data system
- Providing training and support to all HMIS users
- Supporting a HMIS coordinator in each of the CoC's regions
- Generating regular reports based on HMIS data including counts of homeless persons and performance reports on CoC funded providers.
- Providing reports to HUD as required including the Annual Homelessness Assessment Report (AHAR).

Violence Against Women Act (VAWA)

VAWA protections are available to all eligible survivors of domestic violence, dating violence, sexual assault, and stalking, consistent with VAWA, 24 CFR part 5, subpart L, applicable HUD requirements, and this Written Standards document. CoC programs must provide participants with the Notice of Occupancy Rights under VAWA (form HUD-5380) and Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (form HUD-5382) when required, use applicable VAWA lease addenda or occupancy protections, and allow participants to request emergency transfers when safety is a concern. See Appendix I for the CoC Emergency Transfer Plan.

Participant Inclusion

Each CoC-funded project is expected to engage participants in ongoing program evaluation and quality improvement processes. Toward that end, at a minimum, each project is required to survey or interview participants at least annually to obtain feedback on program service quality, the housing and service environment, and opportunities for improvement.

Each CoC-funded organization must have the opportunity to have participant representation on a governing or decision-making body.

Access to Mainstream Resources

Minimum standards for connection with other resources consist of assisting each participant to obtain, if applicable:

- Appropriate support services including permanent housing, medical health treatment, behavioral health services, counseling, supervision, and other services needed for independent living.
- Other governmental and private assistance available to help with housing stability, including Medicaid, Medicare, Supplemental Nutrition Assistance Program (SNAP), Women Infants and Children (WIC), Federal-State Unemployment Insurance Program; Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI); child and adult care food programs, and other available assistance.

Program Coordination

Minimum standards for program coordination consist of on-going system and program coordination and integration of CoC funded activities to the maximum extent practicable with the following:

- Emergency shelter providers, essential services providers, homelessness prevention, transitional housing, permanent supportive housing and rapid rehousing assistance providers;
- Other homeless assistance providers, including: HUD-Veterans Affairs Supportive Housing (HUD-VASH); Education for Homeless Children and Youth Grants for State and Local Activities (McKinney-Vento Homeless Assistance Act); Grants for the Benefit of Homeless Individuals; Healthcare for the Homeless; Programs for Runaway and Homeless Youth; Projects for the Assistance in the Transition from Homelessness; Services in Supportive Housing Grants; Emergency Food and Shelter Program; Transitional Housing Assistance Grants for Victims of Sexual Abuse, Domestic Violence, and Stalking Program; Homeless Veterans Reintegration Program; Domiciliary Care for Homeless Veterans Program; VA Homeless Providers Grant and Per Diem Program; Health Care for Homeless Veterans Program; Homeless Veterans Dental Program; Supportive Services for Veterans Families Program; and Veterans Justice Outreach Initiative
- Mainstream service and housing providers: Public housing programs assisted under section 9 of the U.S. Housing Act of 1937; Housing programs receiving Section 8 tenant based or project based assistance; Supportive Housing for Persons with Disabilities; HOME Investment Partnerships Program; Temporary Assistance for Needy Families; Health Center Program; State Children's Health Insurance Program; Head Start; Mental Health and Substance Abuse Block Grants; Services funded under the Workforce Investment Act; and State Housing Related Assistance Program for Adults with Serious Mental Illness

Participant Income Determination

Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609. Annual income, all amounts (monetary or not) is defined as:

- Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- Which are not specifically excluded in paragraph (c) of 24 CFR 5.609.
- Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

Individuals and families assisted under ESG are required to have annual incomes at or below 30% of Area Median. There are no income limits for CoC assistance but in all instances in which participants are charged rent or occupancy charges, the amount charged must be based on participant's verified annual income for all sources.

In verifying income, CoC funded providers are required to obtain third party verification whenever possible. Self-certification or verification is to be accepted only when all efforts have been made to obtain third party verification have not produced results.

Program Income

Minimum standards for private non-profit organizations for program income earned during the project period are that the program income shall be retained and used to finance the non-Federal share of the project or program. Records of the receipt and use of program income shall be retained. Program income may be used to meet matching funding requirements.

Access to Educational Resources

All BoS CoC providers are responsible for coordinating with local school district(s) in the following way (Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.)):

- Helping to identify children and young adults who are eligible for educational services. If a child or young adult does not have a fixed, regular, and adequate place to sleep at night, they are eligible. This includes those living in places not meant for human habitation, emergency shelters, transitional housing, motels/hotels, campgrounds, in doubled-up situations, or in housing that lacks utilities, is infested, or has other dangerous conditions.
- Helping to ensure that all families with children and young adults who qualify in are informed about their educational rights and their eligibility for educational services and they receive those services.
- Ensuring that the local school districts' homeless liaisons are aware the All Doors Lead Home Coordinated Entry processes for connecting homeless families and young adults to CoC resources, as well as helping to resolve any issues that might arise in linking eligible households to those resources.
- Helping to ensure that when placing families in emergency, transitional, or permanent housing, consideration is given to the educational needs of children, including placing children as close as possible to schools of origin and early childhood education programs.

Conflicts of Interest

Minimum standards for conflicts of interest are:

Organizational conflicts of interest

- CoC assistance will not be contingent on the individual's or family's acceptance or occupancy of emergency shelter or housing owned by the provider or a provider's subsidiary or parent.
- No provider, with respect to individuals or families occupying housing owned by the provider or a provider's subsidiary or parent, will carry out the initial evaluation under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.

Individual conflicts of interest: When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 24 CFR 84.42 (private non-profit) or 24 CFR 85.36 (government).

All transactions/activities:

- No CoC board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.
- Conflicts prohibited: No person involved with the CoC programs or who is in a position to participate in a decision-making process or gain inside information regarding the program's activities, shall obtain a financial interest or benefit from an assisted activity; have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity's proceeds (either themselves or those with whom they have family or business ties) during their tenure or for one year following tenure.
- Persons covered: These conflict-of-interest provisions apply to any employee, agent, consultant, officer or elected or appointed official of the provider's agency.
- Exceptions: A provider may request an exception to these provisions from HUD, only if they meet the threshold requirements identified in 24 CFR 576.404 and/or 578.95(d)(2).

Termination of Assistance

If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases after other remedies have been attempted.

Due process rights for individuals and families facing program termination: When a CoC funded homeless assistance program seeks to terminate participation for any household, the required formal process shall minimally consist of:

- Written notice clearly stating the reasons for termination;
- Review of the decision that gives the participant opportunity to present objections to the decision and to have representation. Any appeal of a decision shall be heard by an individual different from and not subordinate to the initial decision-maker; and
- Prompt written notice of the final decision on the appeal.

Ability to provide further assistance: Termination will not bar the provider from providing additional assistance to the same family or individual later.

Displacement

A “displaced person” is defined as any person that moves from a permanent home as a result of CoC-funded acquisition, rehabilitation, or demolition of a project. Minimum standards for minimizing the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of a project assisted under CoC shall comply with §576.408 and/or 578.83 and consist of:

- Minimizing displacement: Consistent with CoC goals and objectives, the providers shall minimize displacement as a result of CoC-funded projects.
- Temporary relocation not permitted: No temporary relocation shall be required for a CoC-funded project. When a tenant must move for a CoC-funded project, the tenant shall be treated as permanently displaced and offered relocation assistance and payments.

Relocation assistance for displaced persons: Generally, displaced person shall be provided relocation assistance and advised of their Fair Housing Rights.

A person does not qualify as a “displaced person” if the person:

- Was evicted based on a violation of the lease or occupancy agreement or violation of the law and the recipient determines that the eviction was not undertaken to evade the obligation to provide relocation assistance.
- Moved into the property after the application was submitted but was provided with written notice that they would not qualify as a “displaced person.”
- The person is ineligible under 49 CFR 24.2.
- HUD determines that the person was not displaced as a result of the project. The State or the provider may request that HUD determine whether a displacement would be covered by this rule.

Real property acquisition requirements: The acquisition of real property for a CoC funded project is subject to the URA and Federal government-wide regulations.

Appeals: A person who disagrees with the recipient’s determination concerning whether the person qualifies as a displaced person, or the amount of relocation assistance may file a written appeal. A low-income person who disagrees with the recipient’s determination may submit a written request for review of that determination by HUD.

Recovered Materials

Minimum standards for the procurement of recovered materials shall comply with the requirements identified in §576.407(f) and 578.99(b), including that the recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

Faith-Based Organizations and Activities

Minimum standards for faith-based organizations and activities, consistent with 24 CFR 5.109, 24 CFR 576.406, and 24 CFR 578.87, are as follows:

- Faith-based organizations are eligible, on the same basis as any other eligible organization, to participate in ESG- and CoC-funded programs. The CoC, recipients, subrecipients, and any entity administering ESG or CoC funds shall not discriminate for or against an organization on the basis of the organization's religious character, affiliation, motives, or lack thereof.
- A faith-based organization receiving ESG or CoC funds retains its independence, autonomy, religious character, authority over internal governance, and right to carry out its mission, provided that ESG or CoC funds are not used to support or engage in explicitly religious activities, including worship, religious instruction, or proselytization.
- Providers receiving ESG or CoC funds shall not conduct explicitly religious activities as part of ESG- or CoC-funded programs or services. If a provider offers explicitly religious activities, those activities must be offered separately, in time or location, from the federally funded program or service, and participation must be voluntary for program participants.
- ESG- and CoC-funded services, outreach, eligibility determinations, and program participation shall not discriminate against a participant or prospective participant on the basis of religion, religious belief, refusal to hold a religious belief, or refusal to attend or participate in a religious practice.
- Recipients and subrecipients responsible for determining eligibility for ESG- or CoC-funded assistance shall provide written notice to beneficiaries and prospective beneficiaries of their protections under applicable HUD faith-based organization requirements, in the manner required by HUD.
- ESG or CoC funds may be used for acquisition, construction, or rehabilitation of structures only to the extent that those structures are used for eligible ESG or CoC activities. Where a structure

is used for both eligible program activities and explicitly religious activities, ESG or CoC funds may not exceed the share of costs attributable to eligible program activities. ESG or CoC funds shall not be used for acquisition, construction, or rehabilitation of sanctuaries, chapels, or other rooms used as a principal place of worship.

[Prohibited Use of Funds Related to Illicit Drugs and Illegal Drug Activity](#)

ESG and CoC funds shall not be used to operate illegal drug injection sites or safe consumption sites, or to fund, promote, encourage, subsidize, or facilitate the use or distribution of illicit drugs. Projects shall administer outreach, health, behavioral health, treatment, recovery, and overdose-prevention activities in a manner consistent with applicable federal, state, and local law, HUD requirements, the approved project application, and the project's grant agreement. See Appendix II for the Nebraska Balance of State CoC Substance Use and Recovery Housing Policy.

[Records and Recordkeeping](#)

Minimum standards shall ensure sufficient written records are established and maintained to enable the State and HUD to determine whether CoC requirements are being met and comply with §576.500 and 578.103, including the following:

- CoC records shall include the following documentation related to establishing and operating the Continuum of Care:
 - Evidence that the Board selected meets the requirements of 578.5(b);
 - Evidence that the CoC has been established and operated as set forth in subpart B of 24 CFR part 578 including published agendas and meeting minutes, an approved Governance Charter that is reviewed and updated annually, a written process for selecting a board that is reviewed and updated at least every five years, evidence required for designating a single HMIS for the CoC, and monitoring reports of recipients and subrecipients.
 - Evidence that the CoC has prepared the HUD application for funds in accordance with 578.9.
- Program participant records shall include written:
 - Determination and verification/certification that the program participant met the criteria for being Homeless or At Risk of Homelessness and that an effort was made to obtain written third-party verification, when possible and applicable.
 - For CoC funded projects, acceptable evidence of homeless status as set forth in applicable HUD recordkeeping requirements, including 24 CFR 578.103 and 24 CFR 576.500 when applicable.

- Determination and verification/certification that the program participant was eligible or ineligible for the particular services and/or financial assistance.
- Determination and verification/certification that the program participant lacked sufficient resources and support networks to provide the assistance.
- Determination and verification/certification that the program participant met income requirements and that an effort was made to obtain written third- party verification, when possible and applicable. This includes annual documentation of income for each program participant who receives housing assistance where rent or an occupancy charge is paid by the program participant.
- Determination and verification/certification that the only households served through permanent supportive housing meet HUD's requirements of having a family member be a person with disabilities.
- Identification of the specific services and financial assistance amounts that were provided to the program participant.
- When applicable, verification that the services were terminated in compliance with 576.402 and/or 578.91.
- When adopted by the Continuum of Care, a copy of the CoC-approved coordinated entry assessment or Common Assessment of the program participant.
- Copies of written leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with fair market rent, rent reasonableness and utility allowance requirements.
- Determination and verification that the housing unit met HUD's habitability and lead-based paint standards.
- Copy of individualized housing stability plan.
- Notes verifying case management services were provided at least monthly, unless exempt from this requirement.
- Notes verifying program participant's eligibility was re-evaluated at least every 3 months for homelessness prevention services or at least annually for rapid rehousing services.
- Notes verifying program participant was assisted to obtain necessary mainstream and other resources.

The order of priority for obtaining evidence of homelessness and/or at risk of homelessness are: 1) third-party documentation, 2) intake worker observations and 3) self-certification.

Program policies and procedures shall indicate:

- Services are coordinated with Continuum(s) of Care, other homeless assistance/prevention programs and mainstream service and assistance programs.
- Compliance with HUD's ESG/CoC requirements, including 24 CFR parts 576 and 578, as applicable, for:
 - Shelter and housing standards
 - Conflict of interest
 - Homeless participation
 - Faith-based activity
 - Nondiscrimination, equal opportunity, and affirmative outreach
 - Uniform administrative requirements, cost principles, and audit requirements (24 CFR part 200), as applicable
 - Environmental review
 - Lobbying and disclosure (24 CFR part 87)
 - Displacement, relocation, and acquisition
 - Procurement requirements under 24 CFR part 200, as applicable
- Program participant records are kept secure and confidential.
- Participation in HMIS or comparable database.

Financial records shall include:

- Supporting documentation for all costs charged to CoC grant.
- Documentation showing CoC funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles.
- Documentation of the receipt and use of program income.
- Documentation of the receipt and use of matching funds.

- Copies of procurement contracts.

GUIDING PRINCIPLES

Nebraska Balance of State Continuum of Care Policy Statement on Program Models, Supportive Services, and Evidence-Based Practice

I. Purpose

The Nebraska Balance of State Continuum of Care is committed to a homelessness response system that helps individuals and families obtain safe shelter, move toward permanent housing, maintain housing stability, increase access to appropriate services, and improve long-term self-sufficiency.

This policy establishes the CoC's guiding principles for ESG- and CoC-funded program models, supportive services, service participation requirements, written service agreements, Coordinated Entry participation, and performance monitoring. The CoC supports eligible, evidence-based, and evidence-informed approaches that are responsive to regional and local need, compliant with HUD requirements, and capable of demonstrating measurable progress in reducing homelessness across the Balance of State geography.

II. Program Model Flexibility and Evidence-Based Practice

The CoC does not establish a single local program model as the exclusive model for all ESG- or CoC-funded projects unless required by federal regulation, HUD notice, the applicable NOFO, the approved project application, the project's grant agreement, or formally adopted CoC policy.

Projects may use different eligible models, including Permanent Supportive Housing, Rapid Re-Housing, Transitional Housing, Joint Transitional Housing and Rapid Re-Housing, Supportive Services Only, Street Outreach, Emergency Shelter, recovery-oriented models, treatment-connected models, employment-focused models, low-barrier models, and other approaches, provided the model is eligible under the applicable funding source and complies with all federal, state, and local requirements.

Projects shall be able to describe the model being used, the population to be served, eligibility criteria, referral pathway, services offered, participant expectations, evidence base or evidence-informed rationale, staffing approach, intended outcomes, and how the model will support housing stability, self-sufficiency, recovery, employment, safety, or exit to permanent housing.

The CoC may consider the strength of a project's evidence base, local performance, population served, service design, cost effectiveness, compliance history, and alignment with adopted CoC priorities when reviewing, ranking, monitoring, or approving ESG- or CoC-funded projects.

III. Supportive Services and Service Participation Requirements

Supportive services funded through ESG or CoC resources shall be designed to address the needs of program participants and to assist participants in obtaining or maintaining housing. Projects shall assess participant service needs, coordinate appropriate services, and adjust services as needed to support housing stability and other project outcomes, consistent with applicable HUD requirements and the approved project design.

Projects shall include service participation requirements and written supportive service agreements when required by HUD regulation, the applicable NOFO, the approved project application, the project's grant agreement, or these Written Standards.

For CoC-funded Transitional Housing projects, supportive service agreements shall be used when required by HUD and shall clearly describe the required supportive services, participant expectations, any consequences for non-participation, and the relationship of the required services to the project's purpose, housing stability, self-sufficiency, recovery, employment, or exit to permanent housing. The agreement may be incorporated into a supportive service agreement, contract, occupancy agreement, lease, or equivalent project document, provided the participant receives clear written notice of the requirements.

Service participation requirements shall be reasonably related to the purpose of the project, applied consistently, and administered in compliance with 24 CFR 578.75(h), fair housing, civil rights, disability, VAWA, and other applicable participant protections.

Projects shall not require participation in disability-related services as a condition of continued participation, except where permitted under 24 CFR 578.75(h) for projects whose purpose is to provide substance use disorder treatment services. Projects shall not use service participation requirements in a manner that unlawfully excludes persons on the basis of disability, substance use disorder, mental health condition, family status, domestic violence history, race, color, national origin, religion, sex, age, or other protected status.

IV. Coordinated Entry and Referral Alignment

The All Doors Lead Home Coordinated Entry System shall continue to serve as the CoC's primary process for access, assessment, prioritization, and referral to CoC- and ESG-funded housing and services, except where an exception is permitted by HUD requirements or formally adopted CoC policy.

Projects with eligibility criteria, service participation requirements, treatment components, recovery supports, employment components, regional service limitations, or other structured program expectations must provide this information to the Coordinated Entry Lead. Project criteria and requirements must be documented clearly enough to support appropriate referrals, fair access, and consistent application across the Balance of State geography.

Coordinated Entry referrals shall be made in accordance with the CoC's written standards, prioritization policies, project eligibility requirements, applicable HUD requirements, and the approved project design. A project's service model shall not exempt the project from Coordinated Entry participation unless such exemption is allowed by HUD requirements or formally adopted CoC policy.

V. Fair Access, Participant Protections, and Legal Compliance

All program models shall comply with federal, state, and local nondiscrimination requirements, including fair housing, civil rights, disability, VAWA, and other applicable participant protections. Projects shall ensure that eligibility criteria, service expectations, program rules, termination policies, and participant agreements are clear, consistently applied, and compliant with applicable requirements. Program rules and service expectations shall be designed to support project purpose, participant stability, safety, and movement toward permanent housing or other approved project outcomes.

Projects shall maintain written policies and participant-facing documents sufficient to demonstrate compliance with applicable HUD requirements, the approved project application, the project's grant agreement, and these Written Standards.

VI. Data Monitoring and Outcome Evaluation

The CoC shall monitor and evaluate project performance based on project type, population served, eligibility requirements, service model, participant needs, regional context, and measurable outcomes.

Evaluation may include, but is not limited to, housing placement, housing retention, exits to permanent housing, returns to homelessness, length of time homeless, connection to mainstream benefits, earned income or employment gains where applicable, service engagement, participant safety, utilization, HMIS or comparable database data quality, Coordinated Entry participation, and compliance with applicable HUD requirements.

The CoC may use performance data, monitoring results, participant outcomes, local and regional system needs, and HUD priorities to inform project ranking, technical assistance, corrective action, reallocation decisions, and future system planning.

VII. Implementation and Review

This policy shall take effect upon approval by the CoC and shall remain in effect until revised or rescinded.

The CoC shall review this policy at least annually and may revise it as needed to remain aligned with HUD regulations, NOFO requirements, grant agreements, local and regional system needs, and emerging evidence regarding effective responses to homelessness.

Where HUD requirements, the applicable NOFO, the approved project application, or the project's grant agreement impose more specific requirements than this policy, the more specific requirement shall control.

AVAILABLE HOMELESS ASSISTANCE SERVICES

ELIGIBILITY BY COMPONENT				
COMPONENT	FUNDING	HOMELESS STATUS CATEGORY	TARGET POPULATION	INCOME
HOMELESSNESS PREVENTION	ESG	At-risk: 1, 2, 3 Homeless: 2, 4	See "ESG Homeless Prevention" Section for further eligibility criteria.	
EMERGENCY SHELTER	ESG	1, 2, 4	N/A	N/A

TRANSITIONAL HOUSING	CoC	1, 4	1. Youth aged 18-24. 2. Households fleeing Domestic Violence. 3. Households in recovery from substance use disorder.	N/A
RAPID REHOUSING	ESG	1, 4	1. Common Assessment Priority score of 5 -10. 2. Households with the longest history of homelessness. 3. People with Common Assessment Priority scores 11+ who do not qualify for PSH.	30% or below of AMI
RAPID REHOUSING	CoC	1, 4	1. Common Assessment Priority score of 5-10. 2. Households with the longest history of homelessness. 3. People with Common Assessment Priority scores 11+ who do not qualify for PSH. 4. Categories 1 and 4 are prioritized over Category 2	No income requirement at entry.

		2	4. Categories 1 and 4 are prioritized over Category 2	
PERMANENT SUPPORTIVE HOUSING	CoC	1, 4	Dedicated or prioritized to households experiencing chronic homelessness, as defined by HUD.	

Homeless Prevention Standards

Participant Eligibility and Service Provision

People who qualify as ‘at risk of homelessness,’ based on categories (2) or (4) of the “homeless” definition or based on the “At risk of homelessness” definition found at 24 CFR 576.2 and who reside in a housing unit that meets HUD’s habitability and lead-based paint standards and have an annual income below 30% of Area Median Income (AMI), are eligible for the following services, in compliance with federal ESG rules (24 CFR 576.103, 576.105, 576.106):

- Housing Relocation and Stabilization Services: moving costs, rent application fees, security deposits, last month’s rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management.
- Rental Assistance: short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing. The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant’s portion of the rent. The rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord. (NOT ALLOWABLE: mortgage and mortgage arrearage payments)

Street Outreach Standards

Objectives

- Reduce the number of unsheltered individuals and families without a fixed, regular, and adequate nighttime residence.
- Provide unsheltered homeless people with key services to address their immediate needs.
- Actively engage with and develop trusting relationships with unsheltered homeless individuals and families.
- Provide immediate support, interventions, and connections with appropriate homeless assistance programs and/or social services to unsheltered homeless individuals and families.
- Reduce the risk of mortality among people living without shelter.

Core Principles

- Street outreach efforts are systemic, coordinated between service providers, and comprehensive regarding the unsheltered individual's or family's needs.
- Street outreach staff always use a person-centered, trauma-informed, and culturally sensitive approach.
- Staff emphasize the client's personal strengths and resources. Outreach efforts shall never make assumptions regarding what services a client may require or want to participate in.
- Street outreach efforts prioritize participant and staff safety, lawful overdose prevention, connection to emergency health and behavioral health services, treatment and recovery resources where appropriate, and other lawful health and safety practices for unsheltered persons.
- Street outreach programs shall use evidence-based/informed practices and programs.

Participant Eligibility

Those who qualify as 'unsheltered homeless,' based on category (1)(i) of the "homeless" definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.101): engagement, case management, emergency health and mental health services, and transportation. CoC funding may impose additional eligibility requirements. Street outreach activities funded under CoC programs must comply with both regulatory requirements and program requirements.

Standards for Documenting Eligibility

The documentation requirements detailed below are listed in order of preference. Service providers and/or referring agencies must provide documentation to prove eligibility for CoC-funded homelessness support services:

- Written observation by the outreach worker; OR
- Written referral by another service/housing provider

Service Provision

Street outreach staff are often the initial point of contact and can maintain contact with unsheltered homeless clients throughout the support process. Street outreach staff can also connect unsheltered individuals and families with mainstream resources and community-based services as needed. Therefore, street outreach staff must:

- Be educated and trained in the process of Coordinated Entry, how to perform the initial standardized assessment, and how to make referrals.
- Meet clients where they are geographically. This includes meeting unsheltered homeless people in locations and times that are convenient for them and working to maintain both the street outreach staff's and clients' safety.
- Meet clients where they are emotionally. This includes developing trusting and respectful relationships through active listening, persistence, consistency, and working to understand the client's situation and perspective without judgement.
- Be familiar with known local homeless locations.
- Maintain contact and open communication regarding housing status and resources utilized for unsheltered homeless clients.
- Collect client engagement data and document each client's progress toward securing permanent housing.
- Aid unsheltered homeless clients and/or connect them to additional support services.

Standards for Engagement

The goals of engagement are to locate, identify, provide support to, and build relationships with clients that are focused on trust, respect, and client self-efficacy. Client engagement efforts should:

- Incorporate flexibility to meet and support clients based on their comfort level.
- Continue regularly engaging clients until they secure housing.
- Provide assessments to unsheltered homeless individuals and families with the purpose of identifying the most appropriate services to meet each client's needs, as well as prioritize service allocation based on the immediacy and severity of clients' needs.
- Explain to clients the services available to them and encourage clients to participate in said services while emphasizing client choice and any service participation requirements that apply under the approved project design, applicable HUD requirements, or these Written Standards.
- Connect individuals who do not meet the definition of 'unsheltered' to the Coordinated Entry System to provide access to appropriate services, such as overdose prevention and treatment services. These clients should not be enrolled for expanded street outreach services.
- Make repeated offers of appropriate services as necessary throughout engagement, as well as provide clients with multiple opportunities to decline services with which they are uncomfortable.

Standards for Case Management

Street outreach services shall provide unsheltered homeless clients access to appropriate case management services based on the client's needs and desires. Case management efforts shall:

- Include regular and consistent case management services.
- Build respectful, trusting, and lasting relationships with unsheltered individuals and families.
- Identify, coordinate, implement, and assess the services available to and/or delivered to clients. Staff will engage participants in creating an individualized plan for clients to secure appropriate services and housing.
- Provide information on and access to essential services (e.g., emergency health and mental health services, overdose prevention and treatment services, or transportation to appropriate and available services).

- Assist clients in community participation and help them cultivate strong support networks, based on the client's desires and comfort level.
- Provide information on emergency shelters, encourage unsheltered clients to seek emergency shelter services, and advocate with local shelter providers to provide aid to unsheltered clients.

Standards for Referral to Services

The goal of referring services is to connect unsheltered homeless individuals and families to appropriate assistance to support their health and safety, as well as to aid clients in securing permanent housing. Clients are not required to participate in the referred services to continue receiving street outreach assistance. Standards for referring clients to appropriate services include:

- Street outreach staff should be familiar with appropriate service providers, have sufficient knowledge of services available to unsheltered homeless clients, and understand how clients can be connected to said services.
- Street outreach staff will assess each client's needs and provide the appropriate referrals to address the client's needs and desires.
- Referrals to appropriate programs shall be made to eligible clients, without pre-conditions.
- Street outreach staff will follow the Coordinated Entry Policy regarding referrals, as well as adequately document referrals and referral outcomes.

Referrals are intended to help clients obtain the following services, if appropriate:

- Emergency medical and mental health treatment
- Housing opportunities
- Medical services
- Behavioral health services and counseling
- Veteran's benefits
- Medicaid/Medicare
- Food stability programs
- Supplemental Security Income (SSI)/Social Security Disability Insurance (SSDI)

- Supervision and other services to support independent living
- Transportation to services

Standards for Termination

Termination from services shall be restricted to the most severe cases. Specifically, programs shall only terminate assistance when a participant has presented a severe risk to staff or other clients. If a previously terminated client requests assistance later, programs shall review their case to decide if the client will be provided with a chance to receive further assistance. Programs shall exercise sound judgement and consider all extenuating circumstances when deciding whether violations warrant termination from the program (24 CFR 576.402).

Generally, the program may terminate assistance through a formal process that is established by the program and recognizes the rights of affected individuals and families. The program is responsible for providing evidence that: 1) all extenuating circumstances were adequately considered, and 2) significant attempts were made to resolve challenges and help the individual or family continue program participation. Programs shall also include an established formal grievance procedure for program participants who believe their assistance was wrongly terminated.

Standards for Exiting

Clients exiting street outreach programs shall be aided in securing housing and services that address their needs, while prioritizing access to permanent housing, to the extent possible. Exiting participants may also include those entering treatment facilities addressing needs related to mental health, physical health, or substance use. In such cases, recipients shall coordinate with treatment providers to facilitate a successful transition into the treatment program for the client. Whenever feasible, information regarding housing opportunities and additional appropriate resources shall be given to the client upon exiting the program.

When a client exits street outreach into a housing program: Based on the client's unique circumstances and to the degree practical, street outreach staff with a relationship to the client shall be involved in the client's transition process into a housing program for up to 90 days after the client has been enrolled in a housing program. During this transition time:

- Street outreach staff shall act in a support capacity as the client transitions into the new housing program.
- The case manager shall act as the primary advocate for the client under the housing program.

- The coordinated entry system will continue to be used to connect a client's specific needs to available services.

The goal of providing clients with this transition process is to ensure the client feels prepared to enter a housing program, as well as provide consistency in the support staff they engage with as the client forms relationships with staff in the new program.

When a client no longer has contact with street outreach staff: If a client no longer has contact with street outreach staff, it is recommended that their HMIS status remains active for 90 days. If a client does not have contact with street outreach staff for more than 90 days, it is recommended that the client be exited. However, a client's status may remain active for longer than 90 days without contact if service providers deem it appropriate. If a client re-establishes contact with street outreach staff after a prolonged period, it is recommended that reengagement efforts attempt to connect the client to staff members with whom they previously had a strong relationship.

Data and Documentation Requirements for Street Outreach

Staff on street outreach projects may first create a client record with limited information (e.g., the project start date and a de-identified name for the client). Street outreach staff can then improve the data quality and completeness after the relationship with a client is established and as the client feels more comfortable disclosing personal information to staff.

Street Outreach Project Specific Data Elements: ESG-funded street outreach components are required to collect the information listed below to create the CSV-CAPER Report:

- Income and Sources
- Non-Cash Benefits
- Health Insurance
- Physical Disability
- Developmental Disability
- Chronic Health Condition
- HIV/AIDS Status
- Mental Health Disorder
- Substance Use Disorder
- Domestic Violence

- Current Living Situation
- Date of Engagement
- Coordinated Entry Activity (see HMIS Documentation Requirements for Street Outreach)
- Translation Assistance

For more information on program-specific data requirements, refer to the [ESG Program HMIS Manual](#) or the [HMIS Data Standards Manual](#).

HMIS Documentation Requirements for Street Outreach: Below provides a summary of the street outreach component item types to be recorded in the HMIS. Refer to the [CoC Program HMIS Manuals](#) for detailed information on HMIS documentation. Although HUD does not require all items listed below be in HMIS, collecting as many of the items as is practical is encouraged:

- Entry and Enrollment – Housing status must be entered for each client at the time of Entry. Enrollment shall be completed for all eligible participants.
- Current Living Situation – Generally, contacts between staff and a participant shall be recorded through the Current Living Situation Program Assessment. However, if street outreach staff are frequently engaging with clients (i.e., more than once a week), the Current Living Situation Program Assessment can be recorded weekly.
- Engagement – Engagement dates may be on or after the client’s enrollment date and shall be prior to the client’s exit date.
- Services – Record all eligible services for the dates on which the services occur.
- Exit – To the extent possible, staff shall complete the exit assessment, record the reason for exiting, and record the client’s destination when they exit.

Emergency Shelter Standards

Participant Eligibility

People who qualify as ‘homeless,’ based on categories (1), (2), or (4) of the “homeless” definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.102): case management, childcare, education, employment and life skills services, legal services (not allowable: mortgage and mortgage arrearage payments), health, mental health and substance abuse services, and transportation.

Minimum Standards

Admission: Providers of Emergency Shelter services shall admit individuals and families who meet the HUD definition of “homeless,” as specified in 24 CFR 576.2 (1, 2, & 4) and agencies’ eligibility criteria.

Assessment: Individuals and families shall be offered an initial evaluation to determine the eligibility of each individual’s or family’s eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.

The following Emergency Shelter services, as needed and appropriate, can be provided: Case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance use disorder treatment services, transportation, and services for special populations.

Prioritization/Diversion/Referral: When appropriate based on the individual’s needs and wishes, the provision of or referral to Rapid Rehousing services that can quickly assist individuals to maintain or obtain safe, permanent housing shall be prioritized for individuals who are literally homeless. Referrals to Transitional Housing shall be made for individuals who either meet special populations (TAY, individuals fleeing domestic violence, institutional re-entry, and substance abuse recovery housing) or other populations for which transitional housing meets the needs of the homeless individual.

Reassessment: Program participants will be reassessed as case management progresses, based on the individual service provider’s policies.

Discharge/Length of Stay: Program participants shall be discharged from Emergency Shelter services when they choose to leave or when they have successfully obtained safe, permanent housing. Any Length of Stay limitations shall be determined by the individual service provider’s policies and clearly communicated to program participants. Providers of shelter services are strongly encouraged not to discharge individuals and families who have not secured permanent housing and maintain those households in shelter until they can be placed in appropriate permanent housing.

Safety and Shelter Safeguards for Special Populations: Safety and Shelter Safeguards shall be determined by the individual Special Population service provider’s policies and clearly communicated to program participants.

Transitional Housing Standards

Purpose

Transitional Housing provides time-limited housing and supportive services to help individuals and families experiencing homelessness move toward permanent housing, increase stability, address barriers to housing retention, and improve self-sufficiency. Transitional Housing may be appropriate for households that need a structured, service-connected housing intervention before entering or sustaining permanent housing.

Transitional Housing projects funded through the CoC Program shall operate in accordance with 24 CFR part 578, the applicable HUD Notice of Funding Opportunity, the approved project application, the project's grant agreement, these Written Standards, the All Doors Lead Home Coordinated Entry policies, and all applicable federal, state, and local requirements.

Eligible Participants

Eligible participants for CoC-funded Transitional Housing must meet the applicable HUD definition of homelessness and any additional eligibility requirements contained in the applicable NOFO, approved project application, grant agreement, or formally adopted CoC policy.

Unless otherwise permitted or required by the applicable NOFO, approved project application, grant agreement, or funding source, Transitional Housing projects may serve individuals and families who qualify as homeless under categories 1 and 4 of the HUD homeless definition. Category 2 households may be served only when permitted by HUD requirements, the applicable NOFO, the approved project application, the project's grant agreement, or formally adopted CoC policy.

Transitional Housing projects may be designed to serve specific eligible subpopulations when the project addresses a need identified by the CoC and complies with 24 CFR 578.93 and applicable civil rights requirements. Such subpopulations may include, but are not limited to, youth and young adults, households fleeing domestic violence, dating violence, sexual assault, or stalking, persons in recovery from substance use disorder, persons exiting institutions, veterans, families with children, or other populations for whom Transitional Housing is an appropriate intervention. Eligibility criteria must be clearly documented, consistently applied, and provided to the Coordinated Entry Lead to support appropriate referrals and fair access.

Referral and Prioritization

All CoC-funded Transitional Housing projects shall participate in the All Doors Lead Home Coordinated Entry System unless an exception is permitted by HUD requirements or formally adopted CoC policy.

The CoC shall prioritize referrals to Transitional Housing based on eligibility, project design, household need, safety considerations, service needs, regional availability, and the likelihood that the household would benefit from a time-limited, service-connected housing intervention. Prioritization shall follow the applicable All Doors Lead Home Coordinated Entry policies and any additional prioritization criteria adopted by the Nebraska Balance of State CoC.

Persons eligible for an emergency transfer under VAWA shall receive the emergency transfer priority required by HUD and the CoC's Emergency Transfer Plan.

Projects shall not use eligibility criteria, screening practices, or referral decisions in a manner that unlawfully excludes persons based on protected status, disability, substance use disorder, mental health condition, domestic violence history, family composition, or other characteristics protected by applicable law.

Program Design

Transitional Housing projects shall maintain a written program model that describes the population to be served, eligibility criteria, referral process, housing model, supportive services provided directly or through formal partnerships, required and voluntary services, participant expectations, staffing approach, service intensity, connection to mainstream benefits and community resources, approach to permanent housing placement, performance outcomes, and procedures for participant rights, grievances, reasonable accommodations, and termination.

Projects shall be able to demonstrate that the program model is evidence-based or evidence-informed, reasonably related to the needs of the population served, and designed to help participants obtain and maintain permanent housing.

Supportive Services

Transitional Housing projects shall arrange for or make available supportive services throughout the duration of the participant's residence in the project. Services must be designed to assist participants in obtaining and maintaining housing, increasing stability, improving self-sufficiency, and addressing barriers to successful exit to permanent housing.

Supportive services may include, as appropriate and eligible under the funding source: case management; housing search and placement; landlord engagement; employment services and job training; education services; life skills support; budgeting and financial counseling; connection to mainstream benefits; behavioral health service coordination; substance use disorder treatment or recovery supports; medical service coordination; legal services where eligible; transportation; childcare; family support services; survivor services; reentry supports; peer support; and other eligible services necessary to support housing stability and movement to permanent housing.

Projects shall conduct an assessment of service needs at program entry and at least annually for participants who remain in the project for more than one year. Projects shall adjust services as needed based on participant circumstances, housing goals, safety needs, and progress toward permanent housing.

Supportive Service Agreements and Service Participation Requirements

CoC-funded Transitional Housing projects shall use a written supportive service agreement, occupancy agreement, lease, contract, or equivalent participant-facing document when required by HUD regulation, the applicable NOFO, the approved project application, the project's grant agreement, or these Written Standards.

The agreement shall clearly describe housing terms and occupancy requirements; required supportive services, if any; voluntary supportive services available to the participant; participant expectations; project responsibilities; service schedule or participation expectations; procedures for requesting reasonable accommodations; consequences for failure to meet program requirements; grievance and appeal procedures; termination process; and the relationship

between services and the project's purpose, including housing stability, self-sufficiency, recovery, employment, safety, or exit to permanent housing.

Consistent with 24 CFR 578.75(h), recipients and subrecipients may require participants to take part in supportive services that are not disability-related services as a condition of continued participation. Disability-related services include, but are not limited to, mental health services, outpatient health services, and medication provided to a person with a disability to address a condition caused by the disability. Where the purpose of the project is to provide substance use disorder treatment services, the project may require participation in such treatment services as a condition of continued participation, to the extent permitted by 24 CFR 578.75(h), the approved project design, and applicable law.

Service participation requirements shall be reasonable, clearly stated, related to the purpose of the project, consistently applied, and administered in compliance with fair housing, civil rights, disability, VAWA, confidentiality, and participant protection requirements.

Where the applicable NOFO, project application, or grant agreement requires a specified level of customized supportive services, employment services, treatment services, recovery supports, or other services, the project shall document its capacity to provide or arrange those services. If HUD requires a specific service-intensity threshold, including a weekly service-hour standard, the project shall apply that requirement consistent with HUD instructions, approved exceptions, and participant-specific circumstances.

Occupancy Agreements, Leases, and Housing Requirements

All participants residing in CoC-funded Transitional Housing must have a signed lease, sublease, occupancy agreement, or equivalent written agreement before or at the time they begin residing in the housing. The agreement shall be for a minimum monthly term and may be renewed, provided the participant remains eligible and the household does not exceed applicable program duration limits unless an extension is permitted under HUD requirements and documented in the participant file.

The housing must meet applicable HUD housing quality, habitability, environmental review, lead-based paint, rent reasonableness, accessibility, and other requirements applicable to the project's funding structure and approved budget.

Length of Stay

Transitional Housing is time-limited housing. Projects shall assist participants in moving to permanent housing as quickly as appropriate based on participant need, project design, housing availability, and the participant's housing plan.

Participants are generally expected to move from Transitional Housing to permanent housing within 24 months of program entry. A participant may remain in Transitional Housing longer than 24 months only when permitted by HUD requirements and when the extension is documented in the participant file, including the reason permanent housing has not been located or why the participant requires additional time to prepare for independent living.

Projects shall not terminate or discharge a participant into homelessness solely because the participant reaches a local target length of stay or the 24-month benchmark when an extension is permitted and necessary under HUD requirements. Projects with a pattern of extended stays

shall be subject to CoC monitoring, performance review, and corrective action. HUD may discontinue assistance for a Transitional Housing project if more than half of participants remain in the project longer than 24 months.

Participant Contribution, Rent, and Occupancy Charges

Participants residing in Transitional Housing are not required by these Written Standards to pay rent or occupancy charges unless required by the project's approved funding structure, lease, occupancy agreement, or provider policy. If a project imposes occupancy charges, the charges must comply with 24 CFR 578.77 and may not exceed the maximum amount permitted by HUD. Income must be calculated in accordance with applicable HUD requirements. The participant file shall include documentation of income review, calculation of any occupancy charge, and any adjustments made due to changes in income or household composition.

Occupancy charges and rent collected from participants are program income and must be recorded and used in accordance with HUD requirements.

Program Fees

Projects shall not charge program participants program fees. This prohibition includes fees for meals, supportive services, transportation, case management, service coordination, or other services provided as part of the CoC-funded project, except for rent or occupancy charges permitted under HUD requirements.

Housing and Service Planning

Each participant shall be offered an individualized housing and service plan that identifies housing goals, service needs, income and benefits needs, employment goals where applicable, safety needs, and steps toward exit to permanent housing. The plan shall be developed with the participant and updated as needed. Projects shall begin permanent housing planning as early as practicable after program entry.

Mainstream Benefits, Employment, and Self-Sufficiency

Transitional Housing projects shall assist participants, as appropriate, with connection to mainstream benefits, health coverage, employment services, education, workforce development, income supports, and other resources that support long-term housing stability. Projects serving participants who are able to work shall include a documented strategy for employment, earned income, education, vocational training, or other lawful self-sufficiency activities, consistent with participant needs and the approved project model.

Projects shall not require employment, income, sobriety, treatment completion, or other conditions as prerequisites to entry unless such criteria are permitted by HUD requirements, the applicable NOFO, the approved project application, the project's grant agreement, and applicable civil rights laws.

Treatment, Recovery, and Sober Housing

Transitional Housing projects may include treatment-connected, recovery-oriented, sober housing, or other structured service models when permitted by HUD requirements, the applicable NOFO, the approved project application, the project's grant agreement, and applicable law. Sober housing may require participants to sign an occupancy agreement or lease prohibiting

possession, use, or being under the influence of illegal substances or alcohol on the premises, consistent with 24 CFR 578.93(b)(5).

Projects providing recovery-focused or treatment-connected services shall maintain written policies describing the service model, eligibility criteria, participant expectations, relapse response, reasonable accommodation process, grievance process, termination process, and coordination with treatment or recovery partners.

Safety, Crisis Response, and Participant Conduct

Transitional Housing projects shall maintain written procedures for responding to immediate threats to participant, staff, or public safety. Procedures may include contact with emergency medical services, behavioral health crisis response, law enforcement, Adult Protective Services, child welfare authorities, victim service providers, or other legally authorized entities when required by law or necessary to address an imminent risk of serious harm.

Program rules shall be clearly communicated to participants before or at program entry. Rules shall be reasonably related to participant safety, housing stability, project operation, service participation requirements, and movement toward permanent housing. Nothing in these Written Standards authorizes a provider to initiate involuntary commitment, law enforcement action, or other legal intervention except through applicable legal processes and authorized public systems.

Termination of Assistance

Termination from Transitional Housing may occur only when a participant violates program requirements or conditions of occupancy and the project follows the due process requirements in 24 CFR 578.91. Before terminating assistance, the project shall consider the seriousness of the violation, extenuating circumstances, participant safety needs, disability-related considerations, reasonable accommodation obligations, VAWA protections, and whether less severe interventions could resolve the issue.

At minimum, the termination process shall include written program rules and termination procedures provided before the participant begins receiving assistance; written notice stating the reasons for termination; opportunity for the participant to present written or oral objections before a person other than the person who made or approved the termination decision, and who is not subordinate to that person; and prompt written notice of the final decision. Termination does not bar the project from providing additional assistance to the same individual or family at a later date.

Exit Planning and Follow-Up Services

Projects shall assist participants in exiting to permanent housing whenever feasible. Exit planning shall begin early in the participant's residence and shall include housing search, landlord engagement, application support, connection to rental assistance or subsidies where available, income and benefits support, and coordination with receiving housing or service providers. Projects may provide supportive services to former Transitional Housing residents for up to six months after exit, when permitted by HUD requirements and when such services assist the household's adjustment to independent living.

Data, Documentation, and Performance Monitoring

Transitional Housing projects shall maintain records sufficient to demonstrate compliance with HUD requirements, the approved project application, the grant agreement, these Written Standards, Coordinated Entry requirements, HMIS requirements, and applicable participant protections. Participant files shall include, as applicable, documentation of homeless status and project eligibility; Coordinated Entry referral documentation; lease, sublease, occupancy agreement, supportive service agreement, or equivalent document; documentation of services offered, required, and provided; housing and service plan; income documentation where rent or occupancy charges are imposed; documentation of reasonable accommodations requested and provided; VAWA notices, certifications, emergency transfer requests, and related documentation where applicable; documentation of service reassessments; documentation of exits and exit destination; termination notices and appeal documentation, if applicable; and HMIS or comparable database records required by HUD.

The CoC shall monitor Transitional Housing projects based on project type, population served, service model, utilization, data quality, participant outcomes, compliance history, cost effectiveness, regional context, and alignment with HUD and CoC priorities. Performance measures may include exits to permanent housing; length of stay; returns to homelessness; earned income gains where applicable; connection to mainstream benefits; service participation and engagement; housing placement after exit; exits to treatment or recovery housing where appropriate; HMIS data quality; Coordinated Entry participation; utilization; and compliance with supportive service agreement requirements.

[Rapid Rehousing Standards](#)

Participant Eligibility

CoC funded rapid rehousing will follow the standards as set forth below. People who qualify as 'homeless,' based on categories (1) or (4) of the "homeless" definition found at 24 CFR 576.2 and/or 578.3 and who are moving into a housing unit that meets HUD's habitability and lead-based paint standards are eligible for the following activities, in compliance with federal ESG and CoC rules (24 CFR 576.104, 576.105, 576.106, 578.37, 578.51, and 578.77). Persons who meet the 'category 2' homeless definition are eligible for CoC funded Rapid Rehousing provided the project was not funded under special NOFO conditions (reallocated projects) that limit eligibility to those living on the streets or in shelters. Participants are those who demonstrate a lack of sufficient resources and support networks necessary to retain housing without CoC assistance. Additionally, persons receiving rapid rehousing through the ESG program must have incomes at or below 30% of the area median income (AMI) at annual recertification:

- Housing Relocation and Stabilization Services: moving costs, rent application fees (ESG only), security deposits, last month's rent, utility deposits, utility payments (ESG only), housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management.

- Rental Assistance: short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant- based or project-based housing. The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent (arrearages covered under ESG only). The rent amount must not exceed HUD's published Fair Market Rent and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental assistance agreement between the landlord and agency and a written lease between tenant and landlord. Each provider offering rapid rehousing must reevaluate the need for continued assistance every 90 days. Continued assistance will be provided for up to three (3) months at a time. Eligibility and income shall be reviewed no less frequently than annually. Participants in rapid rehousing are required to meet with case managers no less frequently than monthly (NOT ALLOWABLE: Mortgage and mortgage arrearage payments.)

Prioritization

All Doors Lead Home Coordinated Entry Prioritization Formula:

1. Chronic Status (after Documented up) – 10 points.
2. Common Assessment score (which captures service need, history, vulnerability, etc.)
3. Fleeing Domestic Violence – 1 point
4. Veteran – 1 point
5. TAY – 1 point
6. 0-3 months homeless – 0 points
7. 4-6 months – 2 points
8. 7-9 months – 4 points
9. 10-12 months – 6 points

Participant Contribution

Minimum standards for determining what percentage or amount of rent and utilities costs each program participant shall pay while receiving homelessness prevention or rapid rehousing assistance are:

- Participant's income shall be verified prior to approval for initial and additional financial assistance. Documentation of the participant's income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in participant's file. This file shall also contain a plan to sustain housing following the assistance, including either a plan to increase income or decrease expenses or both.
- Participants are not required to contribute rent. Providers funded under CoC may pay up to 100 percent of the reasonable rent and utility costs for program participants. Providers may, at their discretion, choose to impose rental charges on participants. If providers elect to charge rent or occupancy charges, these charges may not exceed those established in 24 CFR 578.77.
- Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider's policies and clearly communicated to program participants.

Rental Assistance Duration and Adjustment

Minimum standards for determining how long a particular program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time are:

- Participants receive approval for the minimum amount of financial assistance necessary to prevent homelessness. Documentation of financial need shall be kept in the participant's file for each month of financial assistance received. Participants shall not be approved for more rental assistance than can be justified given their income and expenses at a given time.
- Approval for initial rental assistance shall be granted per the individual service provider's written policy and protocols. Providers must re-assess the continuing need for rental assistance not less than once every 3 months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance. Any additional requirements regarding how long a program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time shall be determined by the individual service provider's policies and clearly communicated to program participants.

In no event will assistance under rapid rehousing or homelessness prevention exceed 24 months in any 36-month period.

Service Type, Amount, and Duration

Minimum standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid rehousing assistance that each program participant shall receive, such as the maximum amount of assistance, maximum number of months the program participant may receive assistance; or the maximum number of times the program participant may receive assistance are:

Financial Assistance: Financial assistance shall be used with other subsidies – Payment for financial assistance costs shall not be provided to a participant who is receiving the same type of financial assistance through other public sources or to a participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments, except for a one-time payment of rental arrears on the tenant's portion of the rental payment or deposit for subsidized housing. Financial assistance includes:

- Rental application fees [ESG only] – Payment shall only be made for fees charged by the owner to all applicants.
- Security deposits – Payment shall not exceed two (2) months' rent.
- Last month's rent – Payment shall not exceed one (1) month's rent and shall be included in calculating the participant's total rental assistance.
- Utility deposits [CoC] – Payment shall only be made for gas, electric, water and sewage deposits.
- Utility payments [ESG only]:
 - Payment shall not exceed 24 months per participant, including no more than 6 months of utility payments in arrears, per service.
 - A partial payment counts as 1 month.
 - Payment shall only be made if the utility account is in the name of the participant or a member of the same household.
 - Payment shall only be made for gas, electric, water and sewage costs.
 - Participants shall not receive more than 24 months of utility assistance within any 3-year period.
- Moving costs [CoC] – reasonable one-time moving expenses are eligible.

Housing Relocation and Stabilization Services: Housing search and placement services – Payment shall only be made for assisting participants to locate, obtain and retain suitable permanent housing through provision of the following services:

- Assessment of housing barriers, needs, and preferences.
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with owners
- Assistance with submitting rental applications and understanding leases.
- Assessment of housing for compliance with ESG requirements for habitability, lead-based paint and rent reasonableness.
- Assistance with obtaining utilities and making moving arrangements.
- Tenant counseling.

Payment for housing search and placement services shall not exceed 24 months during any 3-year period.

Housing stability case management: Payment shall only be made for assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing or to assist a participant in overcoming immediate barriers to obtaining housing through provision of the following services:

- Using the centralized or coordinated assessment system.
- Conducting the initial evaluation, including verifying and documenting participant eligibility
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating participant progress.
- Providing information and referral to other providers
- Developing an individualized housing and service plan
- Conducting re-evaluations

Payment for housing stability case management services provided while the participant is seeking permanent housing shall not exceed 30 days. Payment for housing stability case management services provided while the participant is living in permanent housing shall not exceed 24 months.

Mediation, Legal Services, and Credit Repair:

- Mediation [ESG only] – Payment shall only be made for the cost of mediation between the participant and the owner or person with whom the participant is living, if it is necessary to prevent the participant from losing the permanent housing where they reside. Payment for mediation services shall not exceed 24 months during any 3-year period.
- Legal services – Payment shall only be made for the cost of legal services if they are necessary to resolve a legal problem that prohibits the participant from obtaining permanent housing or will likely result in the participant losing the permanent housing where they reside. Payment for legal services shall not exceed 24 months during any 3-year period. Assistance may not be provided for immigration, citizenship, or mortgage related matters. Payment arrangements may not include retainer or contingency fee agreements. Eligible subject matters for legal services include child support, guardianship, paternity, emancipation, legal separation, orders of protection for victims of domestic violence, appeal of benefit claim denials, landlord tenant disputes and resolution of outstanding criminal warrants. Only approved Legal Services provider through NHAP can provide ESG legal services.
- Credit repair [ESG only] – Payment shall only be made for the cost of assisting the participant in obtaining skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. Payment will not be made for a debt or modification of a debt. Payment for credit repair services shall not exceed 24 months during any 3-year period.

Rental Assistance:

- Payment shall not exceed 24 months total during a 3-year period in tenant-based or project-based (ESG only) housing.
- Payment for short-term rental assistance shall not exceed 3 months.
- Payment for medium-term rental assistance shall be for more than 3 months but shall not exceed 24 months.
- Payment for rent arrears shall not exceed 6 months and shall be a one-time payment, including any late fees [ESG funded projects only – CoC not eligible]
- Except for a one-time payment of rental arrears on the participant's portion, payment shall not be provided to a participant who is receiving tenant-based rental assistance or living in a unit receiving project-based assistance or to a participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments. [ESG only]

- Payment shall not exceed the Fair Market Rent established by HUD and shall comply with HUD's standard of rent reasonableness (24 CFR 982.507).
- Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet and late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.
- Payment for shall only be made when there is a rental assistance agreement between the agency and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements, a requirement that the owner provide the subrecipient with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action, and the same payment due date, grace period and late payment penalty requirement as the participant's lease.
- Payment of any late payment penalties incurred by the agency shall not be claimed for reimbursement.
- Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner, except for payment of rental arrears (ESG only).
- Payment shall only be made for units that have been inspected for HUD Housing Quality Standards and re-inspected no less frequently than annually. Rental assistance shall not be paid on behalf of any unit that does not meet Housing Quality Standards.

Tenant-Based Rental Assistance: The rental assistance agreement with the unit owner shall be terminated without further payment if:

- The participant moves out of the unit.
- The lease terminates and is not renewed.
- The participant becomes ineligible to receive CoC rental assistance.

Project-Based Rental Assistance [ESG only]: Payment shall only be made under the following conditions:

- The lease has an initial term of one year.
- The rental assistance agreement covers one or more permanent housing units in the same building.
- Each unit covered by the agreement is only occupied by participants.

- Payment will only be made for up to 100% of the first month's rent, if the participant signs a lease and moves into the unit before the end of the month.

Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

Joint Transitional Housing-Rapid Rehousing Standards

A Joint Transitional Housing-Rapid Rehousing (Joint TH-RRH) component project contains a transitional housing (TH) and a rapid rehousing (RRH) component within a single project. Joint TH-RRH projects provide those experiencing homelessness access to low-barrier temporary housing and the support needed to quickly move into and maintain permanent housing.

Participant Eligibility

Eligible persons for Joint TH-RRH programs shall meet the homeless definition based on categories (1), (2), and (4), have an annual income that is 30% of the AMI as determined by HUD (ESG only), and lack sufficient resources and support networks necessary to retain housing without CoC assistance.

TH Component Limitation on Occupancy

Individuals and families in TH shall be moved into permanent housing as soon as possible, based on funding allowances, the client's unique circumstances, and RRH unit availability. Ideally, clients shall transition into permanent housing within 90 days of entering the Joint TH-RRH program. However, no person shall be discharged from transitional housing into homelessness because of this limitation. Transitional housing programs that maintain participants for an extended time may have their funding discontinued.

Participant Contribution

Transitional Housing component:

Those residing in TH are not required to pay rent. Transitional housing providers may impose occupancy charges. If the TH provider chooses to charge rent or occupancy charges, the charges may not exceed those specified in 24 CFR 578.77.

Rapid Rehousing component:

The minimum standards for determining what percentage or amount of rent and utilities costs each participant shall pay while receiving Joint TH-RRH assistance are:

- Project participant's income shall be verified prior to approval for initial and additional financial assistance. Documentation of the participant's income and expenses (including how the participant is contributing to housing costs, if applicable), shall be maintained in participant's file. This file shall also contain a plan to sustain housing following assistance, including either a plan to increase income, a plan to decrease expenses, or both.
- Participants are not required to contribute rent payments. Service providers funded under CoC may pay up to 100 percent of the reasonable rent and utility costs for a program participant. At their discretion, providers may choose to impose rental charges on participants. If providers elect to charge rent or occupancy charges, these charges may not exceed those established in 24 CFR 578.77.

Additional requirements regarding the percentage or amount of rent and utilities costs each program participant pays shall be determined by the individual service provider's policies and shall be clearly communicated to program participants.

TH Component Program Fees

Other than rent or occupancy charges detailed above, no fees may be charged to TH program participants. This includes meals, copayments for services, transportation, and any additional services that may be provided to program participants.

TH Component Occupancy Agreements and Supportive Service Agreements

All project participants served in the Transitional Housing component must be provided with an occupancy agreement for a minimum monthly term, renewable provided that the household does not remain in the Transitional Housing component beyond the time period allowed by HUD requirements, the approved project design, and available RRH transition resources. The agreement must specify the requirements for program participation.

Joint TH-RRH projects shall use a written supportive service agreement, occupancy agreement, lease, contract, or equivalent document for the Transitional Housing component when required by HUD regulation, the applicable NOFO, the approved project application, the project's grant agreement, or these Written Standards. The agreement shall clearly describe required supportive services, participant expectations, any consequences for non-participation, and the relationship of the required services to the project's purpose, housing stability, self-sufficiency, recovery, employment, or exit to permanent housing.

Participants may be required to participate in supportive services that are not disability-related services, consistent with 24 CFR 578.75(h). Projects shall not require participation in disability-related services as a condition of continued participation, except where permitted under 24 CFR 578.75(h) for projects whose purpose is to provide substance use disorder treatment services. No person may be terminated from the Transitional Housing component without first being provided the right to appeal the decision in accordance with 24 CFR 578.91(b).

Services Offered

Transitional Housing Component: TH service providers will give clients options for services and arrange for services to aid program participants in securing permanent housing as quickly, effectively, and efficiently as possible. Services offered to clients may include but are not limited to diversion strategies, housing vouchers, and SOAR referrals. Services for the TH component can be provided in scatter site or single site locations. Those assisted in TH shall be provided housing accommodations and a services program to address challenges that may impede the household from securing or maintaining stable long-term housing.

Rapid Rehousing Component: CoC funded rapid rehousing will follow the standards set forth below. Those currently in TH as part of the TH-RRH project who are moving into a housing unit that meets HUD's habitability and lead-based paint standards are eligible for the following activities, in compliance with federal ESG and CoC rules (24 CFR 576.104, 576.105, 576.106, 578.37, 578.51 and 578.77):

- Housing Relocation and Stabilization Services: moving costs, rent application fees (ESG only), security deposits, last month's rent, utility deposits, utility payments (ESG only), housing search/placement, housing stability case management, mediation and legal services, and credit repair/budgeting/money management.
- Rental Assistance: short-term (up to 3 months) and medium-term (4-24 months) rental assistance, with no more than 24 months total assistance during a 3-year period in tenant- or project-based housing. The 24 months of assistance may include a one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent (arrearages covered under ESG only). The rent amount must not exceed HUD's published Fair Market Rent and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental assistance agreement between the landlord and service agency, as well as a written lease between the tenant and landlord. Each service provider offering rapid rehousing must reevaluate the need for continued assistance every 90 days. Assistance will continue to be provided for up to 3 months at a time. Program participant eligibility and income shall be reviewed at least annually. Participants in the rapid rehousing component are required to meet with case managers at least once a month (Not Allowable: Mortgage and mortgage arrearage payments.)

Rental Assistance Duration and Adjustment

See *Rapid Rehousing Standards – Rental Assistance Duration and Adjustment* for minimum standards to determine how long a program participant in the RRH component shall be provided with rental assistance and whether/how the amount of that assistance shall be adjusted over time.

Eligibility Re-evaluations for RRH component

Individuals and families within the rapid rehousing component of the TH-RRH program shall be re-evaluated at least once annually. The participants shall have an annual income that is 30% of the AMI, as determined by HUD (ESG only), and lack sufficient resources and support networks necessary to retain housing without CoC assistance.

Service Types, Amount, and Duration

See *Rapid Rehousing—Service Type, Amount, and Duration* for minimum standards to determine the type, amount, and duration of housing stabilization and/or relocation services to provide a participant within a TH-RRH program, such as the maximum amount of assistance, maximum number of months and the maximum number of months the participant may receive assistance.

Permanent Supportive Housing Standards

Participant Eligibility

Eligible households include individuals with disabilities and families in which one adult or child has a disability. To be served households must also meet the definition of homelessness according to categories (1) and (4). Supportive services designed to meet the needs of program participants must be made available to participants. Permanent supportive housing may be provided on a scatter site or single site basis using tenant based rental assistance, leasing, or operating costs to support the operations of a supportive housing facility as well as supportive services to meet resident needs.

Order of Priority for Permanent Supportive Housing

Order of priority in CoC Program-funded Permanent Supportive Housing beds dedicated to persons experiencing chronic homelessness, and PSH beds prioritized for occupancy by persons experiencing chronic homelessness:

- First priority: chronically homeless individuals and families with the longest history of homelessness and the most severe service needs.
- Second priority: chronically homeless individuals and families with the longest history of homelessness.
- Third priority: chronically homeless individuals and families with the most severe service needs.
- Fourth priority: all other chronically homeless individuals and families.

Where there are no chronically homeless individuals and families within the CoC's geographic area, organizations are encouraged to follow the order of priority for Permanent Supportive Housing beds that are not dedicated or prioritized for persons experiencing chronic homelessness, consistent with HUD requirements and adopted CoC policy.

Recipients of CoC Program-funded PSH beds should also consider the goals and any identified target populations served by the project. Recipients must practice due diligence when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs. CoC Program-funded PSH providers are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. Chronically homeless persons shall continue to be prioritized for PSH until they are housed.

Order of priority in Permanent Supportive Housing beds not dedicated or prioritized for persons experiencing chronic homelessness:

- First priority: homeless individuals and families with a disability, a long period of continuous or episodic homelessness, and the most severe service needs.
- Second priority: homeless individuals and families with a disability and the most severe service needs.
- Third priority: homeless individuals and families with a disability and a long period of continuous or episodic homelessness.
- Fourth priority: homeless individuals and families with a disability coming from Transitional Housing.

Participant Contribution

Individuals and families residing in permanent supportive housing are required to pay rent. Rent charges may not exceed those specified in 24 CFR 578.77.

Program Fees

No fee other than rent or occupancy charges as specified above may be charged to program participants. This includes meals, copayments for services, transportation and all other services that may be provided to program participants.

APPENDIX I

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

Introduction to Emergency Transfers

In accordance with the Violence Against Women Act (VAWA), programs allow tenants who are survivors of domestic violence, dating violence, sexual assault, or stalking (herein DV) to request an emergency transfer from the tenant's current unit to a different unit that is deemed safer for the survivor. VAWA protections, including emergency transfers, are available to all eligible survivors consistent with VAWA, 24 CFR part 5, subpart L, applicable HUD requirements, and this Written Standards document. The ability of programs to honor emergency transfer requests for tenants currently receiving assistance, however, may depend on 1) a preliminary determination that the tenant is or has been a survivor of DV, and 2) whether the program has a safe and available unit to offer the tenant for temporary or more permanent housing.

This plan identifies eligibility criteria for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and resources for tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), which is the federal agency that oversees VAWA compliance for CoC projects. In addition, this plan applies to other homeless-designated programs funded by the State of Nebraska.

Emergency Transfer Eligibility

A tenant who is a DV survivor, as specified in HUD's regulations at 24 CFR part 5, subpart L, is eligible for an emergency transfer if the tenant reasonably believes there is a threat of imminent harm from further violence if they remain within the same unit. If the tenant is a survivor of sexual assault, the tenant may also be eligible for an emergency transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding an emergency transfer request. A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Tenants who are not in good standing within the program may still request an emergency transfer if they meet the eligibility requirements detailed in this section.

Emergency Transfer Request Documentation

Every housing provider must have a procedure that complies with the requirements in this plan to request an emergency transfer. Housing providers' emergency transfer procedures must be written into their policies and procedures. Further, all housing providers must inform all tenants of their ability to request an emergency transfer and of the documentation required.

Housing providers do not need to require third-party documentation of DV incidents to approve an emergency transfer. However, housing providers may require a verbal or written self-certification from the tenant. To request an emergency transfer, the tenant shall notify their housing provider's management office and submit a written transfer request, if one is required. All housing providers will provide reasonable accommodations to this policy for individuals with disabilities.

If a housing provider requires a written emergency transfer request, the written request should include:

1. A statement expressing that the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant were to remain in the same unit assisted under the housing program, OR
2. A statement that the tenant is a sexual assault survivor and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's emergency transfer request.

If a housing provider requires written documentation to approve an emergency transfer, they must allow a tenant to use any of the following forms of documentation to certify their need for an emergency transfer:

1. A complete VAWA certification form (Form HUD-5382), OR
2. A record from a Federal, State, tribal, territorial, local law enforcement, or administrative agency, or a court that documents the DV incident, OR
3. A statement signed by the tenant and signed by an employee, agent, advocate or volunteer of a victim service provider, an attorney, or a medical or mental health professional (herein "professional"), from whom the tenant sought assistance in addressing DV or the effects of abuse. The professional must attest under penalty of perjury that they believe the DV incident(s) are grounds for protection.

Housing providers may also choose to accept other forms of documentation, provided they also accept the three forms of documentation listed above.

Housing providers cannot require tenants to submit more than one form of documentation. If a housing provider receives documentation that contains conflicting information, the housing provider can 1) obtain verbal verification from a DV advocate or 2) require an applicant or tenant to submit third-party documentation, as detailed above, within 30 calendar days of the date for the third-party documentation request.

Confidentiality

Any housing provider that receives an emergency transfer request will keep all information the tenant submits regarding an emergency transfer request and all information about the emergency transfer confidential. The housing provider may only release information about the emergency transfer if:

1. The tenant signs an additional release of information for a specific timeframe, OR
2. Disclosure of the information is required by written law, OR
3. Disclosure is required by a court, or by official court documents signed by a judge for use in an eviction proceeding, OR
4. Disclosure is required by federal, state, or local law or regulation for hearings regarding termination of assistance from the covered program.

If a tenant gives written permission to share information on a time-limited basis with one or more agencies in the CoC and/or Victim Service Providers, those agencies will also keep all information regarding the transfer confidential.

See the Notice of Occupancy Rights under the Violence Against Women Act (form HUD-5380) for more information on housing providers' responsibility to maintain the confidentiality of information related to DV incidents.

Emergency Transfer Timing and Availability

The program cannot guarantee that a transfer request will be approved or guarantee a specific timeframe for processing a transfer request. The program will make every effort to act as quickly as possible to move a tenant who is a DV survivor to another unit, subject to availability of a unit that is deemed safer for the tenant. If a tenant reasonably believes a proposed transfer

would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. The program may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit. Nothing may preclude a tenant from seeking an internal emergency transfer and an external emergency transfer concurrently if a safe unit is not immediately available.

If the program does not have available units deemed safe for the tenant, the program will assist the tenant in identifying other housing providers who may have safe and available units into which the tenant could move. At the tenant's request, the program will also assist tenants in contacting local organizations and agencies aiding DV survivors. The original housing provider is responsible for ensuring the emergency transfer is completed quickly and safely.

If tenants qualify for an emergency transfer but a safe unit is not immediately available for an emergency transfer within their current agency, the DV survivor shall have priority over all applicants for rapid rehousing, transitional housing, permanent supportive housing, and other rental assistance projects in the CoC provided that 1) the individual or family meets all eligibility criteria required by federal law or regulation, or required by HUD NOFO, and 2) the individual or family meets any additional criteria or preferences established in accordance with section 578.93(b)(1), (4), (6), or (7). The individual or family shall not be required to meet any other eligibility criteria or preferences for the project. The individual or family shall retain their original homeless or chronically homeless status for the purpose of the transfer.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe. Tenants who are or have been DV survivors are encouraged to contact local DV shelters or the National Domestic Violence Hotline via phone at 1-800-799-7233, by texting "START" to 88788, or by chatting online at <https://www.thehotline.org/> for assistance in creating a safety plan. For persons with hearing impairments, the National Domestic Violence Hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who are or have been survivors of sexual assault may call the Rape, Abuse, & Incest National Network's National Sexual Assault Hotline at 1-800-656-4673 or by visiting their online hotline at <https://hotline.rainn.org/online>.

Tenants who are or have been survivors of stalking seeking help may contact the National Domestic Violence Hotline via phone at 1-800-799-7233, by texting "START" to 88788, or by chatting online at <https://www.thehotline.org/>, or they may visit https://www.nebraskacoalition.org/get_informed/stalking.html for assistance in and resources

for creating a safety plan. For persons with hearing impairments, the National Domestic Violence Hotline can be accessed by calling 1-800-787-3224 (TTY).

A listing of agencies across Nebraska serving survivors of domestic & sexual violence, dating violence, and stalking is available through the Nebraska Coalition to End Sexual and Domestic Violence at https://www.nebraskacoalition.org/get_help/

APPENDIX II

Nebraska Balance of State CoC Substance Use and Recovery Housing Policy

Purpose

The Nebraska Balance of State Continuum of Care (BoS CoC) is committed to ensuring that CoC-funded housing projects operate in compliance with federal law, HUD requirements, the FY 2026 CoC Notice of Funding Opportunity (FY26 NOFO), and future CoC Program NOFOs. The CoC also recognizes that substance use disorders (SUDs) are treatable medical conditions and supports access to evidence-based treatment, recovery services, and recovery-oriented housing opportunities.

Prohibited Activities in CoC-funded Housing Projects

All BoS CoC-funded housing projects must comply with the following requirements:

1. Shall not operate drug injection sites or "safe consumption sites."
2. Shall not knowingly distribute drug paraphernalia on or off property under their control.
3. Shall not knowingly permit the use or distribution of illicit drugs on property under their control.
4. Shall not conduct, permit, encourage, facilitate, or allow any of the activities described above under the pretext of "harm reduction."

All applicants for CoC funding and CoC-funded projects must comply with all certifications and assurances required by HUD in the applicable CoC Program Competition.

Recovery and Treatment Services

The BoS CoC urges all CoC-funded projects to:

- Assist participants in accessing SUDs treatment when requested or clinically appropriate;
- Establish referral relationships with licensed treatment providers within or outside of the CoC;
- Connect participants to appropriate medication-assisted treatment, outpatient treatment, inpatient treatment, peer recovery support, recovery coaching, and other evidence-based services within or outside of the CoC;
- Coordinate with recovery housing providers and recovery-oriented systems of care within or outside of the CoC to provide participants with appropriate support; and
- Support participants pursuing recovery goals consistent with their individual needs and preferences.

Recovery Housing and Treatment-Based Programs

Nothing in this policy restricts or prohibits CoC-funded housing projects from requiring program participants—as a condition of assistance—to maintain sobriety, participate in SUD treatment, or participate in recovery programming. Nothing in this policy restricts or prohibits projects from partnering with treatment providers, recovery programs, or recovery housing operators to provide appropriate care and support to participants.

Participant Rights

Nothing in this policy shall be interpreted as requiring:

- Program participants to be sober to receive assistance;
- Program participants to participate in treatment to receive assistance; or
- Automatic eviction, termination, or program exit for a violation of a drug-related lease or program requirement.

Although individual CoC projects may implement the requirements above, the BoS CoC does not require that they do so. Applicants for participating in a CoC-funded housing project may opt to decline an offer for assistance if the project does not meet their needs or preferences. Doing so will not impact the applicant's position on the CoC's Coordinated Entry By Name List.

Projects may establish and enforce program rules or lease requirements consistent with 24 CFR Part 578, fair housing laws, disability rights requirements, and applicable due process protections.

Compliance Monitoring and Remedies

The BoS CoC will monitor compliance with this policy through its established monitoring and compliance oversight processes.

If the CoC determines that a project violated this policy, the CoC may take one or more of the following actions:

1. Require corrective action and submission of a corrective action plan;
2. Require staff training or technical assistance;
3. Place the project on a performance improvement plan;
4. Consider the violation during local competition scoring, project review, or ranking processes; or
5. Pursue any additional remedies available under CoC governance documents, grant agreements, or federal regulations.

Serious, repeated, or unresolved violations may be considered in future funding decisions and may be referred to the CoC Governance Board for further review.

Applicability

This policy applies:

- To all housing projects submitted by the BoS CoC for funding
- To all recipients and subrecipients operating CoC-funded projects within the BoS CoC geographic area.
- Beginning with projects funded through the FY 2026 Continuum of Care Program competition (i.e., projects with operating start dates in CY 2027)