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TX-500 San Antonio and Bexar County Continuum of Care

CoC, ESG, and Local Written Standards

Continuum of Care (CoC), Emergency Solutions Grant (ESG), and Local Written Standards – Pending Board Approval

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About This Document

This document establishes the minimum standards that CoC and ESG funded projects within the San Antonio and Bexar County community must follow to be in compliance with HUD and local regulations.

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Versions of Document

June 2026	Updated the "HUD and Local Definition of Homelessness and HOME-ARP Qualifying Population" section to accurately reflect the language used locally and by HUD to define "homeless;" and Updated sentence structures to improve readability; and Restructured certain lists into paragraph form; and Added missing verbiage to make content accurate; and Reworded sentences to convey ideas more clearly; and Corrected/Removed outdated terminology/verbiage and content to reflect current operations; and Updated "Housing First" language to "Housing-Centered Approach" language; and Updated the "Street Outreach Standards" to the latest version; and Updated the "Training Framework" to the latest version; and Added the "Supporting Survivors Community Resource List" and "Understanding Protective Orders in Texas" to the "Skilled Assessor: Domestic Violence" and "Training Descriptions" section of the "Training Framework;" and Renamed the "Housing First Model" training to "Housing-Centered Approach Model" in the "Federal Grantees" section of the "Training Framework;" and Updated any language that was not "Person First;" and Ensured language was consistent through the document; and Removed duplicative content; and Updated the graphic under "HUD Funding Breakdown;" and Moved the "Agreement to Abide by Standards" from Appendix C and placed at the end of the Street Outreach Standards; and Deleted the signature lines from the "Agreement to Abide by Standards" in Appendix C; and Moved the Street Outreach Standards updates from Appendix B into Appendix C; and Added "YHDP Household Policy Excerpts" and "YHDP Household Guidance" as "Appendix G: YDHP Household Policy Excerpts and Job Aid;" and Made grammar edits; and Applied new template.

June 04, 2025	To improve community readability and cohesion, the Alliance Training Framework addendum has been removed and its content embedded directly into the main document; a new Single Sign-On (SSO) standards section has been added; and the Street Outreach Standards addendum has been removed with those standards now incorporated in-line.
April 24, 2025	In compliance with the executive order, all references to diversity, equity, and inclusion have been removed from Close to Home's (CTH) policies, procedures, websites, and other official documents. CTH affirms that its work and hiring practices have never included preferential treatment based on any group membership, including race, gender, or sex. Collected data continues to be reviewed and analyzed, disaggregated to identify and understand trends in outcomes and performance. By gathering and analyzing as much relevant data as possible, CTH strives to improve sustainable outcomes for all eligible individuals needing services. Close to Home remains committed to ensuring that equality, dignity, and respect are upheld for all eligible individuals and families. The Alliance Training Framework has been updated to reflect clarifying content. Additionally, Language Homeless Strategic Plan Steering Committee was updated to Homeless Strategic Plan Advisory Board. Youth and Young Adult with Foster Care Experience Resource Tool Kit was added as an addendum.
August 29, 2024	Expanded HUD Category of Homelessness number four, Fleeing Domestic Violence to "is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee,

	domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized". Phase II of the Alliance Training Framework has been added.
April 10, 2024	Specified Training and Resource Tools were focused on grant recipients and funders. Added Training Framework as Appendix D. Updated language to reflect alignment with the training framework. Updated the definitions for the Street Outreach values.
February 20, 2024	Addition of HUD CoC's definition of homelessness and HOME-ARP qualifying populations as it applies to coordinated entry. Changed title to include "local", added link to the Spanish version of the Grievance form. Click here for summary of updates to SO Standards.
December 14, 2023	Renaming of SARAH to Close to Home; removal of expired COVID-19 information; updates to Grievance Policy about anti-retaliation language; inclusion of Youth Homelessness Demonstration Program (YHDP) and Unsheltered Special CoC grant information; addition of NSPIRE requirements; addition of VAWA 2022 requirements.
April 27, 2023	Removal of expired COVID-19 waiver language; Inclusion of details regarding Homeless Strategic Plan Oversight Committee; Inclusion of new grievance appeal process for agencies; Increased clarity for client termination policy and grievance process; Inclusion of new grievance appeal process for clients.
June 30, 2022	Inclusion of HUD Notice CPD-22-09, CFR references, and expanded explanations in the Emergency Shelter documentation

	section, and Permanent Supportive Housing prioritization.
February 24, 2022	Added training toolkit, policy, and procedures resources to the appendix; updated COVID-19 waiver information; roles and responsibilities in the introduction; updated formatting to align with appendices.
December 16, 2021	Inclusion of updated Street Outreach, Rapid Rehousing, and Homeless Prevention standards.
October 28, 2021	Updated ESG-CV language; addition of second ESG-CV waiver
September 10, 2021	Inclusion of Emergency Transfer Plan; reformatting.
April 2021	SO Standards added as an addendum to CoC & ESG Written Standards.
February 26, 2021	Inclusion of duplication of benefits, addition of street outreach expense related to transportation, and addition of hygiene expenses with ESG-CV funding.
December 17, 2020	Addition of ESG-CV Standards

Introduction

Definition and Purpose of Written Standards

Written standards are community-wide policies and procedures that agencies funded through the federal department of Housing and Urban Development (HUD) for Continuum of Care (CoC) Program funding and Emergency Solutions Grant (ESG) Program funding, including the city and county, are required to operationalize in their programs. Written standards include both requirements outlined by HUD in 24 CFR 578 (CoC) and 24 CFR 576 (ESG) and local standards implemented by the community of San Antonio and Bexar County.

The purpose of the written standards is to:

- Establish community-wide expectations on the operations of projects within the community; and
- Ensure that the system is transparent to users and operators; and
- Establish a minimum set of standards to manage the quality of CoC and ESG-funded projects' functioning in the community; and
- Make local priorities transparent to CoC and ESG recipients and sub-recipients; and
- Create consistency and coordination between CoC and ESG-funded projects within the San Antonio and Bexar County Continuum of Care.

The CoC Program Interim Rule and 24 CFR 578.37 outline the types of housing projects funded through the CoC Program that must comply with these standards, which include Permanent Supportive Housing (PSH), Rapid Rehousing (RRH) Transitional Housing (TH), and Transitional Housing-Rapid Rehousing (TH-RRH). Youth Homelessness Demonstration Program (YHDP) projects (RRH, TH-RRH, and Supportive Services Only – Street Outreach (SSO-SO)) and Unsheltered Special CoC projects (PSH, RRH, TH-RRH, and Supportive Services Only (SSO)) are required to follow the CoC Program Interim Rule and align with local priorities for these special grants. Locally designated CoCs enforce that CoC-funded programs operate within these standards. The San Antonio/Bexar County CoC, recognized by HUD as TX-500, is led by the CoC Board of Directors, which governs the 501(c)3 nonprofit Close to Home (CTH).

The CoC Program Interim Rule also requires CoCs to establish written standards in consultation with recipients of the ESG Program, consistent with the ESG Program Interim Rule, which includes the City of San Antonio (COSA) and Bexar County. The ESG Program funds the following projects: Emergency Shelter (ES); RRH; Homelessness Prevention (HP); and Street Outreach (SO), which are further described in 24 CFR 576 Subpart B.

For each project type, the standards outline the purpose of the project type, eligibility criteria, prioritization, minimum standards of assistance, client access, and performance standards. At a minimum, CoC and ESG written standards must include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance in the CoC and ESG Programs; and
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive assistance for PSH, RRH, TH, HP, ES, SSO, and SSO-SO; and
- Standards for determining what percentage of rent a program participant must contribute while enrolled in a RRH or HP project.

There may be other federal funding sources that are required to abide by these standards, such as the HOME American Rescue Plan (HOME-ARP), and we encourage local or privately funded programs in San Antonio and Bexar County to align with them to ensure consistency in high-quality service delivery. As of October 1, 2023, RRH, PSH, and HP projects funded by COSA and Bexar County through HOME-ARPA Tenant-Based Rental Assistance (TBRA) must abide by the general standards and project-specific standards as indicated.

HUD and Local Definition of Homelessness and HOME-ARP Qualifying Populations

HUD uses the following categories to determine if a household is eligible to receive assistance through the CoC or ESG Program:

Homeless Category	Criteria
Category 1: Literally Homeless	(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; ii. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); or iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
Category 2: Imminent Risk of Homelessness	(2) An individual or family who will imminently lose their primary nighttime residence, provided that: i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; ii. No subsequent residence has been identified; and iii. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.

Category 3:	(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

Homeless under other Federal statutes	i. Are defined as homeless [under the other listed federal statutes [(24 CFR 578.3 "Homeless" 3(i))]; and ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.
Category 4: Fleeing/Attempting to Flee DV	(4) Any individual or family who: i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; ii. Has no other residence; and iii. Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

Locally, the following categories are used to determine if a household is eligible to receive assistance through the CoC or ESG Program:

Homeless Category	Criteria
Category 1: Literally Homeless	An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human

	beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; or ii. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or iii. An individual who is exiting an institution where they resided for 90 days or less and who lived in an emergency shelter or place not meant for human habitation immediately before entering that institution.
Category 2: Imminent Risk of Homelessness	An individual or family who will imminently lose their primary nighttime residence, provided that: i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance, including "couch-surfing" YYA; and ii. No subsequent residence has been identified; and iii. The individual or family lacks the resources or support networks needed to obtain other permanent housing, e.g., family, friends, faith-based or other social networks.
Category 3: Homeless under other Federal statutes	Unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition.
Category 4: Fleeing/Attempting to Flee DV	(4) Any individual or family who: i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, human trafficking or other dangerous, traumatic, or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; and ii. Has no other residence; and iii. Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing. (If household also meets eligibility for Category 1: Literally Homeless, they can be assisted with RRH.)

Projects funded by HOME-ARP must be used to primarily benefit individuals or families from the following qualifying populations[1]:

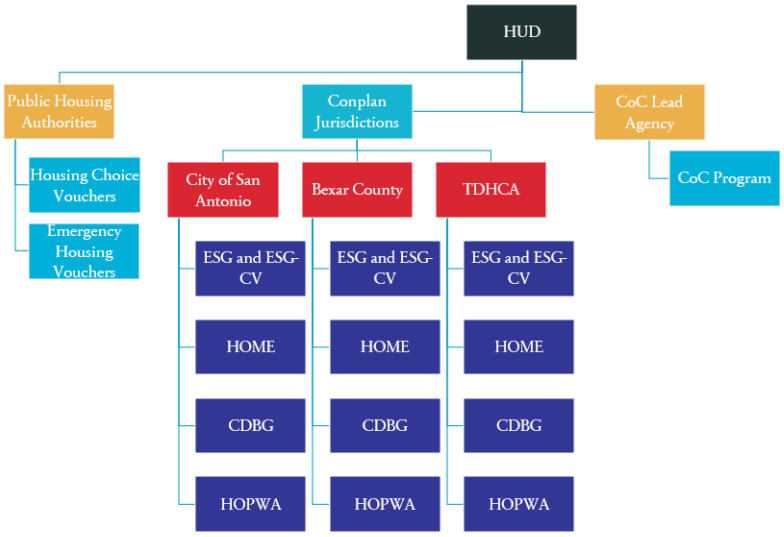
1. Qualifying Population 1 (QP1): Homeless, as defined in 24 CFR 91.5 "Homeless" (1), (2), or (3).
2. Qualifying Population 2 (QP2): At risk of Homelessness, as defined in 24 CFR 91.5 "At risk of homelessness."
3. Qualifying Population 3 (QP3): Fleeing or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, Human Trafficking or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized, as defined by HUD. See the HOME-ARP Notice and 24 CFR 5.2003 for specific references.
4. Qualifying Population 4 (QP4): Other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or serve those with the greatest risk of housing instability.

Local Roles and Processes

HUD Funding Breakdown Graphic

The above "HUD Funding Breakdown Graphic" is a visual guide that shows how HUD Funding is processed and distributed across housing programs.

CoC Lead



[1] Veterans and Families that include a Veteran Family Member that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance. For additional details about QPs, see the HOME-ARP Notice.

As previously mentioned, the CoC Lead for the San Antonio/Bexar County geographical region is the CoC Board of Directors, which governs CTH. The CoC Board of Directors is the final decision-making body for the written standards, and CTH is the agency that coordinates with ESG-funded entities, enforces the standards locally, manages this document on the CTH website, and communicates changes to CoC and ESG programs.

City of San Antonio and Bexar County

COSA and Bexar County are entitlement jurisdictions of ESG funds and may allocate funding to subrecipients to operate these projects in our community. COSA and Bexar County are responsible for ensuring their subrecipients operate within these written standards, along with their duties to report performance and grant spending to HUD. COSA and Bexar County coordinate closely with CTH to ensure subrecipients are following written standards, utilizing the Homeless Management Information System (HMIS) to collect and report data, and accepting all referrals through the local Coordinated Entry (CE) System.

Texas Department of Housing and Community Affairs (TDHCA)

TDHCA is an entitlement jurisdiction of ESG funding on behalf of the State of Texas and may allocate funding to subrecipients across the state to operate these projects. If selected annually by TDHCA, the CoC in San Antonio and Bexar County can act as the local coordinator of these funds by holding the funding competition and recommending funding to the TDHCA Board. This allows the CoC to make recommendations based on local priorities. The CoC does not oversee these funds, however, as TDHCA retains its authority to monitor contracts and collect performance data. The CoC will coordinate with subrecipients to ensure they operate within local written standards, utilizing the HMIS to collect and report data, and accepting all referrals through the local CE System.

Homeless Strategic Planning Advisory Board (HSPAB)

The HSPAB is a formal CoC Board Committee that reports to the CoC Board of Directors at least bi-monthly. The HSPAB is comprised of the CoC Lead (CTH), COSA, Bexar County, and the TDHCA. Its purpose is to ensure alignment among funders of CoC and ESG funding, which includes funding allocation and strategy, performance metrics, and data.

Recipients and Subrecipients

Recipients and subrecipients of CoC and/or ESG funding are required to align their policies and procedures with the written standards and to stay closely coordinated with the CoC to make updates as approved by the CoC Board of Directors. CoC and ESG recipients and subrecipients may develop additional standards for administering program assistance so long as these additional standards do not conflict with those established in this document or those established by HUD. The CoC strongly encourages projects that do not receive CoC or ESG funds to utilize these written standards.

Process for Changes to Written Standards

Changes to the written standards are made in coordination with the CoC Board of Directors, COSA, and Bexar County and are in alignment with HUD guidance. Because these standards are community-driven, there is a process for agencies to submit public comment and recommend edits to this document. This form can be found at the CTH website. There will be a 7-day public comment period for any edits being proposed that will be shared with the Board of Directors to assist in their vote. Requested edits will also go before a committee of

community providers for recommendation to the Board of Directors. Changes will be communicated via email to CoC and ESG-funded agencies and updated to CTH's website.

Agency Grievance Process

Grievances by an agency against another agency's CoC or ESG-funded project must specifically relate to CoC or ESG program components, regulations, and requirements listed under 24 CFR Part 578 (CoC) or 24 CFR Part 576 (ESG) or these Written Standards. This includes full participation in the CE System and abidance by the policies and procedures, full participation in the HMIS and abidance by the policies and procedures, and a Housing-Centered Approach of rapid placement and stabilization into permanent housing that does not have service participation requirements or preconditions for entry.

If a CoC or ESG-funded agency has a grievance with another CoC or ESG-funded agency, the agency is encouraged to first bring the matter to the attention of the person or agency against which they are filing the grievance. If the agency is not satisfied with the result of this informal grievance procedure, a grievance appeal can be made to the CoC by following these steps:

1. Agency's Executive Director/CEO completes the CoC and ESG Grievance Appeal Form on the CoC's website.
    a. Note: the form includes required documentation of making an informal grievance to the agency to attempt to solve the problem.
2. The Homeless Strategic Plan Advisory Board (HSPAB) will review the grievance and substantiate the claim. The process will include gathering pertinent information and supporting documentation from both parties to substantiate or disprove the allegation.
3. A written response to the grievance will be sent to both parties involved as soon as possible but no more than 60 business days of receipt of the grievance. If the HSPAB substantiates a grievance, the funder of the project will address the issue with the funded organization. This may include disclosing a finding to the agency, creating a corrective action plan, and/or reporting the agency to HUD for a formal finding. It is the responsibility of the HSPAB to disclose substantiated grievances during the funding renewal process for the CoC and ESG.
4. If either party involved is not satisfied with the result of the grievance review, they will be given the opportunity to file an appeal, which will be brought to the CoC Board of Directors Executive Committee. The Executive Committee will provide a written response to the appeal within 15 business days after the appeal is sent. The decision of the Executive Committee will be final.

The CoC provides agencies who wish to file a grievance appeal the opportunity to do so without retaliation from the party accused or any representative associated. The CoC will take immediate steps to stop retaliation and prevent its recurrence and will request supporting documentation from the alleged victim of retaliation to substantiate all claims.

General Standards for All CoC and ESG Project Types

CoC and ESG recipients and subrecipients must follow requirements specified in 24 CFR Part 578 (CoC) and 24 CFR Part 576 (ESG) along with the following local standards[2]. This section includes standards that are applicable to all project types that receive CoC and/or ESG program funding. The sections that follow are specific to certain project types. **Please be sure to note all standards applicable to a specific project type upon implementation of a program.**

Coordinated Entry System (CES) Participation (PSH, RRH, TH, TH-RRH Only)

Under the requirements of the CoC and ESG Program Interim Rules and HUD CPD-17-01 Notice Establishing Additional Requirements for a CoC Centralized or Coordinated Assessment System, the San Antonio and Bexar County CoC has established a Coordinated Entry (CE) System that aims to increase the efficiency of the local crisis response system and improve fairness and ease of access to resources. Providers funded through the CoC and ESG are required by law to accept housing referrals through CE, known locally as Homelink.

By utilizing a centralized referral system, Homelink:

- Reduces the burden on households experiencing a housing crisis; and
- Identifies the most appropriate housing resource to facilitate a rapid and permanent exit from homelessness; and
- Prioritizes the most vulnerable households for housing resources; and
- Collects system-wide data to inform necessary shifts in resources, identify gaps, and enable data-driven decision making at the system and project level.

Agency staff must be trained in Homelink prior to accepting housing referrals. Agencies that wish to operate as Homelink Network Partners or Homelink Access Points must sign a Memorandum of Understanding (MoU) with CTH and comply with the CoC, ESG, and Local Written Standards (Appendix III).

Homelink Policies and Procedures can be found on the CoC's website here.

Homeless Management Information System (HMIS) Participation

Reference: 24 CFR 578.57 (CoC) and 24 CFR 576.107 (ESG)

Under the requirements of the CoC and ESG Program Interim Rules and further defined by the Homeless Management Information System (HMIS) Proposed Rule, an HMIS is a locally administered, electronic data collection system that stores longitudinal person-level information about persons who access the Homeless Response System. The CoC Board of Directors designates the HMIS Lead, which currently is Haven for Hope.

Recipients and subrecipients of CoC and/or ESG Program funds are required to enter and maintain their project data in the local HMIS, which requires becoming a Contributory HMIS Organization (CHO) and signing an agreement with Haven for Hope. The agency will be expected to adhere to data quality and confidentiality standards. Data from the HMIS will be exported for annual reports due to HUD.

[2] As of October 1, 2023, HOME-ARPA TBRA projects funded through the City of San Antonio and Bexar County must follow these standards.

Certain agencies are restricted by law from entering data into the HMIS. These agencies must establish a comparable database that meets HUD standards as outlined in 24 CFR 578.57 (CoC) and 24 CFR 576.107 (ESG). Furthermore, these agencies must comply with data reporting as required by the HMIS and CoC. HMIS participation exceptions include: agencies that are defined as Victim Service Providers (VSPs); agencies receiving funding from the Office of Violence Against Women (OVW); staff funded through or clients assisted through the Violence Against Women Act (VAWA), Victims of Crime Act (VOCA), or the Family Violence Prevention and Services Act (FVPSA). For more resources related to this topic, visit the HUD Exchange.

HMIS Policies and Procedures can be found on Haven for Hope's website here.

Lived Experience

Reference: 24 CFR 578.75(g) (CoC) and 24 CFR 576.405 (ESG)

HUD defines "homeless participation" as ensuring persons with lived experience in homelessness are meaningfully included as part of the organization's decision-making structure and are authentically included in the operations of the project. Minimum standards for lived experience participation are outlined in 24 CFR 578.75 (g) (CoC) and 24 CFR 576.405 (ESG) and include the following:

- The provider must have at least one individual currently or formerly experiencing homelessness on the Board of Directors or equivalent policymaking entity of the provider; and
- To the maximum extent possible, the provider shall involve individuals and families experiencing homelessness in paid or volunteer work for the program.

Housing-Centered Approach

Projects will adhere to and follow HUD requirements of accepting all eligible referrals through Homelink. Program participant eligibility will be determined based on HUD's eligible homelessness categories and the classified funding source of the project. Additional project eligibility requirements are not permitted to be a barrier to or impact the receipt of assistance to program participants. The Housing-Centered Approach adheres to the following principles:

- Homelessness is first, and foremost, a housing crisis and can be addressed through the provision of safe and affordable housing.
- All people experiencing homelessness, regardless of their housing history and duration of homelessness, can achieve housing stability in permanent housing. Some may need very little support for a brief period, while others may need more intensive and long-term support.
- Many people experience improvements in quality of life, in the areas of health, mental health, substance use, and employment, as a result of achieving housing.
- The exact configuration of housing and services depends upon the needs and preferences of the population.
- People experiencing homelessness have the right to self-determination and should be treated with dignity and respect.

Fair Housing and Equal Access

Reference: 24 CFR 578.93 (CoC) and 24 CFR 576.403 (ESG)

HUD is committed to enforcing the federal Fair Housing Act and codified commitment in the Equal Access Rule to the fair administration of its projects to serve participants regardless of sexual orientation, family composition, or marital status. CoC and ESG recipients and subrecipients must abide by the following:

- Comply with all federal statutes and rules including the Fair Housing Act, the Americans with Disabilities Act, and Equal Access to Housing Final Rule; and
- Include non-discrimination policies in their program policies and procedures and assertively outreach to people least likely to engage in the Homeless Response System. This includes, but is not limited to, individuals with a chronic experience of homelessness, veterans experiencing homelessness, youth, families with children, and victims of DV; and
- Recognize that individuals who present together for assistance, regardless of age or relationship, are considered a household and are eligible for assistance as a household; and
- If a project serves families with children, serve all types of families with children; if a project targets a specific population (e.g., women with children), 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 that reside together; and
- Cannot deny a family's admission to a project based on the age and gender of a child in the household under 18; and
- Incorporate participant choice and provide case management in a person-centered approach.

Termination Policy

Reference: 24 CFR 578.91 (CoC) and 24 CFR 576.402 (ESG)

The recipient or subrecipient may terminate assistance to a program participant who violates program requirements or conditions of occupancy only under extenuating circumstances and after all options to keep the participant in the program are exhausted. Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same individual or family.

In terminating assistance to a program participant, the recipient or subrecipient must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:

- Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; and
- Providing written notice to the program participant containing a clear statement of the reasons for termination; and
- Conducting a review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Delivering promptly a written notice of the final decision to the program participant.

Recipients and sub recipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.

Grievance and Complaint Policy

All CoC and ESG funded providers must provide a written copy of their program's rules and the grievance process before the participant begins to receive assistance. If a dispute with a project participant is reviewed during a HUD monitoring, the recipient or subrecipient will need to show proof the participant was notified of the grievance policy at intake.

At a minimum, the CoC or ESG agency must follow this process:

- Require participant to submit grievance verbally, in writing, or both. If verbally, it must be documented in case notes; and
- Respond to the participant in writing within 72 hours to confirm receipt and share next steps and a timeline for the process; and
- Designate, if appropriate, an impartial entity to substantiate or dismiss the claims and develop a solution. Notify the participant of the outcome of the grievance and inform them of their right to appeal to the CoC within 30 days of the decision.

Street Outreach Grievances

All agencies delivering street outreach services shall have a grievance policy and accompanying procedures for investigating and responding to grievances. The HSPAB is responsible for maintaining a policy regarding the notification of grievances against individual agencies or outreach staff.

Once a person experiencing unsheltered homelessness has consented to receive street outreach services, they shall be made aware of the grievance policy. The form for grievances will be available in both English and Spanish.

Appeals Policy

Reference: 24 CFR 578.91 (CoC) and 24 CFR 576.402 (ESG)

All CoC and ESG funded providers must provide a written copy of their program's rules and the right to appeal a decision or response to a grievance, before the participant begins to receive assistance. The initial appeal of any decision shall be made to the ESG or CoC funded provider pursuant to the process described below. Should the participant not be satisfied with the appeal decision, they have the right to appeal that decision to the CoC via the HSPAB. To file a grievance appeal, a program participant will use the CoC and ESG Grievance Appeal Form on the CoC's website. The following are reasons for appeal:

- The decision whether to admit the participant into the program
- The determination of the household's income or the household's calculated rent
- Payment/occupancy charge
- Denial of a request to add a member to the assisted household
- Whether to terminate the participation of any participant

The outcome of a grievance or complaint related to adherence to 24 CFR 578 or 24 CFR 576 or these Written Standards. This includes equal access/discrimination, displacement, etc.

Appeal Process

- Participants request an appeal through the CoC and ESG Grievance Appeal Form or the CoC and ESG Grievance Appeal Form (Spanish); and
- The CoC will respond in writing to the appeal requester and the agency involved as soon as possible but no later than thirty (30) calendar days following the request; and
- As part of the appeal, the participant may present written, oral objections, or both, before a person other than the person (or a subordinate of that person) who made the decision that is subject to appeal; and
- The participant may be represented in the appeal but neither the CoC, ESG recipient, nor the provider is responsible for providing or funding someone to represent the participant; and
- Appeals shall be addressed as soon as possible and resolved within sixty (60) business days of receipt of the appeal by the CoC at the HSPAB meeting; and
- Participants and agencies will receive prompt written notification of the outcome of the appeal.

Anti-Retaliation Policy

The CoC provides participants who wish to file an appeal the opportunity to do so without retaliation from the party accused or any representative associated. Retaliation includes, but is not limited to, harassment, intimidation, violence, program dismissal, refusal to provide services, use of profane or derogatory language to or in reference to the complainant, or breach of contract. The CoC will take immediate steps to stop retaliation and prevent its recurrence and will request supporting documentation from the alleged victim of retaliation to substantiate all claims. These steps will include, but are not limited to:

- Written documentation of retaliation brought to the Homeless Strategic Planning Advisory Board (HSPAB); and
- Written documentation of a Corrective Action Plan given to both parties involved; and
- Technical assistance and intervention from the CoC; and
- Mediation between both parties given by the Homeless Strategic Planning Advisory Board (HSPAB); and
- Implementation of an Emergency Transfer Plan for the client.

Violence Against Women Act (VAWA) Confidentiality, Safety, and Emergency Transfer Planning

Reference: 24 CFR 578.99(j) (CoC) and 24 CFR 576.409(d) (ESG)

CoC and ESG programs are required to follow requirements set forth in the HUD Final Rule Regarding the Implementation of Housing Protections Authorized in the Violence Against Women Reauthorization Act of 2013. By March 2023, CoC and ESG programs must meet the requirements in VAWA 2022. These requirements include safety planning, ensuring confidentiality, and developing an emergency transfer plan.

Survivors of domestic violence, dating violence, stalking, human trafficking, or other dangerous, traumatic or life-threatening conditions related to the violence against the individual living in federally assisted housing may need to move to another subsidized unit to protect their safety and maintain affordable housing. The San Antonio and Bexar County CoC

coordinates emergency transfers when survivors need to move to another safe and available subsidized unit.

The San Antonio and Bexar County CoC has adopted an emergency transfer plan that identifies those who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance on safety and security. That plan can be found in Appendix F.

Recipients and subrecipients of federal, county, or state funds for PSH, RRH and TH projects must:

- Follow the CoC's Emergency Transfer Plan; and
- Make the transfer plan publicly available whenever feasible; and
- Make the plan available to participants and community partners upon request; and
- Ensure that refusal of a transfer unit is not a basis for terminating a tenant from assistance.

Recipients and subrecipients are encouraged, but not required, to bear moving costs related to emergency transfers. As necessary, providers are encouraged to work with survivors to identify ways to pay for moves associated with emergency transfers.

Access to Mainstream Resources

Reference: 24 CFR 578.1(b)(3) (CoC) and 24 CFR 576.400(c) (ESG)

Recipients and subrecipients should assess and assist participants with obtaining any mainstream resource for which they may be eligible for, including: Temporary Assistance for Needy Families (TANF), Veteran Health Care, Food Stamps, Medicaid, Children's Health Insurance Program (CHIP), Social Security Income (SSI)/Social Security Disability Insurance (SSDI), Texas Workforce Commission (TWC), etc. Where possible, recipients should streamline processes for participants to apply for mainstream benefits such as the use of a singular form to apply for benefits or collecting necessary information in one step.

Displacement

Reference: 24 CFR 578.83 (CoC) and 24 CFR 576.408 (ESG)

A "displaced person" is defined as any participant that moves from a permanent home because of CoC- or ESG-funded acquisition, rehabilitation, or demolition of a project. The acquisition of real property for an ESG/CoC funded project is subject to the Uniform Act (URA) and Federal government wide regulations.

Displaced participants shall be provided relocation assistance and advised of their Fair Housing Rights. No temporary relocation shall be required for a CoC- or ESG-funded project. When a participant must move for a CoC- or ESG-funded project, the participant shall be treated as permanently displaced and offered relocation assistance and payments.

A participant 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 with CTH. If it is determined that the appeal has merit, the appeal will be heard by the CoC Membership Council. The CoC Board will make a final determination.

Minimum standards for reducing the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) because of a project assisted under CoC and ESG shall comply with §576.408 and 578.83, respectfully. No provider may implement any project or activity funded with either CoC or ESG funds without specific approval of the CoC Board of Directors. Homeless assistance funding is limited and projects involving displacement will only be approved if there is a significant disproportionate benefit provided.

Exceptions to displacement include a participant who:

- 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; or
- Moved into the property after the application was submitted but was provided with written notice that he or she would not qualify as a "displaced person;" or
- Is ineligible under 49 CFR 24.2; or
- Was not displaced as a result of the project by determination from HUD.

Involuntary Family Separation

Reference: 24 CFR 578.93(e) (CoC) and 24 CFR 576.102(b) (ESG)

The age and gender of a child under 18 years of age must not be used as a basis for denying a family's admission to a housing or shelter project. All recipients and subrecipients of CoC and ESG program funds are required to comply with program admission and prohibition against involuntary family separation standards (24 CFR 576.102(b) and 578.93(e)).

Program Coordination

Recipients and subrecipients of CoC and ESG program funds are expected to maintain the minimum standards for on-going system and program coordination and integration of CoC- and ESG-funded activities to the maximum extent practicable. This includes coordination with the following:

- Street Outreach (SO) providers
- Emergency Shelter (ES) providers
- Homelessness Prevention (HP) providers
- Transitional Housing (TH) providers
- Permanent Supportive Housing (PSH) providers
- Rapid Rehousing (RRH) assistance providers

Other Homeless Assistance Programs

- 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 Assistance in the Transition from Homelessness
- Services in Supportive Housing Grants

- Emergency Food and Shelter Program

Connection with Other Resources

Reference: 24 CFR 578.53 (CoC) and 24 CFR 576.105 (ESG)

Recipients and subrecipients of CoC and ESG program funds are expected to follow the minimum standards for assisting each participant in connecting with other supportive and stabilization resources (as applicable). Appropriate supportive services and stabilization resources include the following:

Mainstream Services & Housing Programs

- 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
- 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
- Veterans Justice Outreach Initiative
- 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
- State Housing Related Assistance Program for Adults with Serious Mental Illness
- Other essential services providers

Supportive Services

- Permanent housing
- Medical health treatment
- Behavioral health services
- Counseling
- Medicaid
- Medicare
- Supplemental Nutrition Assistance Program (SNAP)
- Women, Infants, and Children (WIC)
- Federal-State Unemployment Insurance Program
- Supervision

Other Services Needed for Independent Living

- Supplemental Security Income (SSI)

- Social Security Disability Insurance (SSDI)
- Child and Adult Care Food Program
- Other available assistance

Income Determination

Reference: 24 CFR 5.609 (CoC & ESG)

Recipients and subrecipients of CoC and ESG program funds are expected to comply with the minimum standards for determining participants' annual income. This includes calculating income in compliance with 24 CFR 5.609. Annual income is defined as all amounts, monetary or not, which:

- 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.

There are no income limits for CoC assistance but in instances when participants are charged rent or occupancy charges, the amount charged must be based on participants' verified annual income for all sources.

In verifying income, CoC and ESG funded recipients are required to obtain source documents whenever possible. Self-certification or verification is to be accepted only when all efforts to obtain source documents or third-party verification have not produced results.

Records and Recordkeeping

Reference: 24 CFR 578.103 (CoC) and 24 CFR 576.500 (ESG)

Recipients and subrecipients of CoC and ESG program funds must ensure sufficient written records are established and maintained to enable the recipient, the CoC Lead Agency, and HUD to determine whether CoC and ESG requirements are being met and comply with 24 CFR 576.500 and 24 CFR 578.103.

Duplication of Benefits

Reference: 44 CFR 206.191 (CoC & ESG)

"Duplication of benefits" occurs when federal financial assistance is provided to a person or entity through a program to address losses resulting from a federally-declared emergency or disaster, and the person or entity receives or would receive financial assistance for the same costs from any other source, and the total amount received exceeds the total need for those costs. Recipients and subrecipients of CoC and ESG program funds must establish and maintain adequate procedures to prevent any duplication of benefits with emergency disaster funds.

Lead-Based Paint Standards

Reference: 24 CFR 578.99(f) (CoC) and 24 CFR 576.403 (ESG)

Recipients and subrecipients of CoC and ESG program funds must follow minimum standards for compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR 576.403 and 578.99(f), including the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992 and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R.

Recovered Materials

Reference: 24 CFR 578.99(b) (CoC) and 24 CFR 576.407(f) (ESG)

All recipients and subrecipients of CoC and ESG program funds must follow minimum standards for the procurement of recovered materials and shall comply with the requirements identified in 24 CFR 576.407(f) and 24 CFR 578.99(b), including that the recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act 29, 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 Activities

Reference: 24 CFR 578.87 (CoC) and 24 CFR 576.406 (ESG)

All recipients and subrecipients of CoC and ESG program funds must follow minimum standards for faith-based activities outlined in 24 CFR 576.406 and 578.87.

Program Income

Reference: 24 CFR 578.97 (CoC) and 24 CFR 576.201(f) (ESG)

Recipients and subrecipients of CoC and ESG program funds must follow minimum standards for private non-profit organizations regarding the program's income during the project period. 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. Under the ESG Program, program income is to be used as match, and ESG match funds must be used in accordance with 24 CFR 576.201(f). This includes a requirement that matching funds must be contributed to the ESG program and expended for the recipient or subrecipient's allowable ESG costs.

Organizational Conflicts of Interest

Reference: 24 CFR 578.95 (CoC) and 24 CFR 576.404 (ESG)

An organizational conflict of interest arises when activities or relationships with other persons or organizations create an inability or a potential inability for one party to rend impartial assistance in the provision of any type or amount of assistance. Such an organizational conflict would arise when a board member of an applicant participates in a decision concerning the award of a grant, or provision of other financial benefits to the organization that member represents. It would also arise when an employee of a recipient or subrecipient participates in making rent reasonableness determinations under 24 CFR 578.49(b)(2) and 578.51(g) and housing quality inspections of property under 24 CFR 578.75(b) that the recipient, subrecipient, or related entity owns.

CoC and ESG 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 recipient or subrecipient, with respect to individuals or families occupying housing owned by the recipient or a recipient's subsidiary or parent, will carry out the initial evaluation under 24 CFR 576.401 or 578.75(b) or administer homelessness prevention assistance under 24 CFR 576.103.

Individual Conflicts of Interest

Reference: 24 CFR 84.42 (private, non-profit) or 24 CFR 85.36 (government)

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). No CoC Board of Directors 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.

Prohibited Conflicts

No person involved with the CoC or ESG 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 personally 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 recipient or subrecipient's agency. The key issues to consider are the individual's role in the organization, influence over CoC and ESG funding decisions, and access to inside information.

Exceptions

A recipient may request an exception to the individual conflicts of interest provision from HUD, only if he or she meets the threshold requirements identified in 24 CFR 576.404 or 578.95(d)(2).

Emergency Shelter (ES) Program Standards — ESG Only

Reference: 24 CFR 576.102 (ESG)

An effective crisis response system provides immediate and low-barrier access to safe and decent shelter to anyone that needs it and aims to house people as quickly as possible. Emergency shelters, and other types of crisis housing, play a critical role in the community's system response and strategy to end homelessness.

Participant Eligibility

People are eligible for these services if they qualify as "homeless" based on categories (1, 2, or 4) of the "homeless" definition found at 24 CFR 576.2. Eligible activities, in compliance with federal ESG rules, in addition to the provision of decent, safe, and sanitary emergency shelter accommodations include:

- Case management
- Child Care
- Education
- Employment and Life Skills Services
- Legal Services
- Health
- Mental Health and Substance Abuse Services
- Transportation

Minium Standards

Safety, Sanitation, & Privacy

Any building for which ESG funds were used for conversion, major rehabilitation, or other renovation or that receives ESG assistance for shelter operations shall meet state/local government safety and sanitation standards, as well as the following:

- The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety; and
- Any ESG funded renovation, including major rehabilitation and conversion, must use Energy Star and WaterSense products/appliances; and
- The shelter must comply with the applicable Rehabilitation, Fair Housing and Americans with Disabilities Acts and implement regulations; and
- Unless it is a day shelter, it must provide appropriate places to sleep, adequate space, and security for residents and their belongings; and

- Each shelter room/space must have proper ventilation and be pollutant free;
- The water supply must be free of contamination; and
- Each participant must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste; and
- The shelter must have the necessary, properly operating heating/cooling facilities; and
- The shelter must have adequate and appropriate lighting and safe electrical sources; and
- Any food preparation areas must be able to store, prepare, and serve safe and sanitary food; and
- The shelter must be in sanitary condition; and
- Each occupied unit of the shelter must have at least one working smoke detector and when possible, they should be near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas must have at least one working detector and there must be a second means of exiting the building in the event of an emergency.

In October 2026, CoC providers will be required to follow updated housing quality standards called NSPIRE[3].

Homelink Diversion

Homelink Diversion is a strategy that prevents homelessness at the front door by helping to identify immediate alternate housing arrangements and, if necessary, connecting people experiencing homelessness with services and financial assistance to help them return to permanent housing. Diversion should be attempted with all households seeking homeless services assistance.

Eligibility Documentation

Providers of Emergency Shelter services shall admit individuals and families who meet Categories 1, 2, or 4 of the HUD definition of "homeless," as specified in 24 CFR 576.2 and agencies' eligibility criteria. No provider funded under ESG or the CoC program may serve individuals experiencing homelessness under Category 3 until it has been notified by CTH that a request has been made to serve this population and the request has been approved by HUD.

Recipients and subrecipients are required to document eligibility at program entry, even for emergency shelters. Given that third-party documentation at the emergency shelter level is not feasible in most cases, subrecipients operating emergency shelters can document an individual's or family's "experiencing homelessness" status through a certification by the individual or head of household as the primary method of establishing homeless eligibility. In these instances, one method of meeting this standard would be to require households to complete a sign-in sheet, with a statement at the top informing the individual or head of household that by signing, they certify that they are experiencing homelessness.

Under no circumstances must the lack of third-party documentation prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach

[3] NSPIRE Standards have not officially gone into effect. Click here for more information on NSPIRE.

services, or being immediately admitted to shelter or receiving services provided by a victim service provider.

Assessment

Individuals and families shall be assessed for Coordinated Entry using a Homelink assessment, and that assessment must be recorded into HMIS.

Families and individuals remaining in shelter for longer than 30 days shall be reassessed by a Case Manager for housing every 30-45 days.

Intake

When appropriate, based on the individual's needs and wishes, the provision of or referral to Homelessness Prevention (HP) or Rapid Rehousing (RRH) services that can quickly assist individuals to maintain or obtain safe, permanent housing shall be prioritized over the provision of Emergency Shelter (ES) or Transitional Housing (TH) services. Emergency shelters will prioritize shelter services for those:

- Individuals and families who are lacking other resources in the community even if limited assistance could be provided to end their homelessness; or
- Individuals or families who are experiencing category 1 homelessness and in the absence of shelter are likely to be living in an unsheltered setting; or
- Individuals and families who are vulnerable to injury or illness if not sheltered.

Discharge and 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.

Permanent Supportive Housing (PSH) Program Standards

Reference: 24 CFR 578.37(a)(1)(i) (CoC) and CPD-21-10 (HOME-ARP)

Permanent Supportive Housing (PSH) is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist individuals and families with an adult or child member with a disability who are experiencing homelessness achieve housing stability.[4]

[4] As of October 1, 2023, HOME-ARPA RRH projects must abide by the PSH standards as these projects will bridge to PSH. HOME-ARPA PSH projects will also abide by these standards.

Minimum Standards

Minimum standards for shelters and program participant-occupied housing consist of compliance with the safety, sanitation & privacy requirements identified in 24 CFR 576.403 and 578.75. Providers shall not use ESG or CoC funding to help someone remain or move into housing if the housing does not meet the following minimum habitability standards:

- The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety; and
- Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep; and
- Each room or space must have proper ventilation and be pollutant free.
- The water supply must be free of contamination; and
- Residents must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste; and
- The housing must have the necessary, properly operating heating/cooling facilities; and
- The structure must have adequate and appropriate lighting and safe electrical sources; and
- All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food; and
- The housing must be in sanitary condition; and
- The housing must have the necessary fire safety resources and plans:
    - There must be a second means of exiting the building in the event of an emergency; and
    - Each unit must include at least one properly working smoke detector on each occupied level of the unit, located when possible in a hallway adjacent to a bedroom; and
    - If the unit is occupied by a hearing-impaired person, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom he or she occupies; and
    - The public areas of the housing must be equipped with enough detectors, but not less than one for each area.

In October 2026, CoC providers will be required to follow updated housing quality standards called NSPIRE.[5]

Participant Eligibility

Individuals and families who meet the federal criteria under category 1 or 4 of the "homeless" definition in 24 CFR 576.2 qualify for PSH. If the project is funded by HOME-ARP, individuals and families must meet one of the qualifying population definitions.

All referrals must come from the local Coordinated Entry System and utilize the HUD recommended Order of Priority (HUD Notice CPD-16-11):

[5] NSPIRE Standards have not officially gone into effect. Click here for more information on NSPIRE.

- Priority 1
    - Households (HH) experiencing homelessness based on the length of time the individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter; and
    - There is a household member with a disability; and
    - The household has been identified as having severe service needs.
- Priority 2
    - Households (HH) experiencing chronic homelessness based on the length of time the individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter; and
    - There is a household member with a disability; and
    - The household has not been identified as having severe service needs; and
    - There are no eligible households that meet the criteria under Priority 1.
- Priority 3
    - Households (HH) experiencing homelessness based on the length of time the individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter. HH has experienced less than 12 months cumulative across four episodes in three years; and
    - There is a household member with a disability; and
    - The household has been identified as having severe service needs; and
    - There are no eligible households that meet the criteria under Priority 1 and 2.
- Priority 4
    - Households (HH) experiencing homelessness based on the length of time the individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter. HH has experienced less than 12 months cumulative across four episodes in three years; and
    - There is a household member with a disability; and
    - The household has not been identified as having severe service needs; and
    - There are no eligible households that meet the criteria under Priority 1, 2, and 3.

Must follow any additional eligibility criteria set forth in the NOFO through which a project was funded and the grant agreement (e.g. Projects originally funded under the Samaritan Housing Initiative must continue to serve individuals and families chronically experiencing homelessness; projects funded under the Permanent Supportive Housing Bonus must continue to serve the population experiencing homelessness outlined in the NOFO under which the project was originally awarded). Projects that are funded through the Special Unsheltered CoC Program can only serve program participants who meet the definition of literal homelessness and have a history of unsheltered homelessness.

Programs may not establish additional eligibility requirements beyond those specified here and those required by funders.

Additional Requirements for PSH Projects w/ Rental Assistance

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 rental assistance shall only be made when there is a rental assistance agreement between the provider 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.

Participant Contribution

Rent charges may not exceed those specified in CFR 578.77(b)(4).

Rapid Rehousing (RRH) and Homeless Prevention (HP) Programs Standards — CoC (RRH) and ESG (RRH and HP)

Reference: 24 CFR 578.37(a)(1)(ii) (CoC), 24 CFR 576.103 & 576.104 (ESG) and CPD-21-10 (HOME-ARP)

Rapid Rehousing (RRH) and Homelessness Prevention (HP) programs provide housing relocation and stabilization services and short or medium-term rental assistance to help a family or individual retain permanent housing or move as quickly as possible to permanent housing and achieve stability in that housing.

RRH and HP projects are required to operate in compliance with the local RRH-HP Program Standards, included as an addendum to these written standards[6].

Participant Eligibility

Rapid Rehousing (RRH)

To qualify for a RRH project, a program participant must meet the HUD definition of literal homelessness. Projects that are funded through YHDP can only serve youth and young adults who meet the definition of literal homelessness or who are at imminent risk of losing their housing within 14 days, including youth who are doubled-up or couch surfing. Projects that are funded through the Special Unsheltered CoC Program can only serve program participants who meet the definition of literal homelessness and have a history of unsheltered homelessness.

[6] As of October 1, 2023, HOME-ARPA TBRA HP projects funded by the City of San Antonio must abide by these standards.

Projects funded by HOME-ARP must serve one of the qualifying populations described in HUD and Local Definition of Homelessness and Qualifying Populations.

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 participants verified annual income for all sources. All participants must lack sufficient resources or support networks to retain housing without ESG or CoC assistance. Individuals & families assisted under ESG are required to have an annual income at or below 30% of the area median at annual assessment.

RRH can pay short-term (up to 3 months) and medium-term (between 4-24 months) rental assistance, or up to 24 months total during a 3-year period in tenant-based or project-based housing. Project-based rental assistance for RRH is allowable for ESG funded programs only.

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 (arrears covered under ESG only). Rent amount must not exceed HUD's published Fair Market Rent (ESG-funded RRH only) and the HUD standard for rent reasonableness (ESG- and CoC- funded RRH) (24 CFR 982.507). There must be a rental assistance agreement between the landlord and agency and a legally binding, written lease between tenant and landlord. 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.

Homelessness Prevention (HP)

To be eligible for HP relocation and stabilization services and short-term and medium-term rental assistance, people must qualify as "at risk of homelessness" based on categories 2 or 4 of the HUD "homeless" definition or based on the "at risk of homelessness" definition found at 24 CFR 576.2, require HP services to prevent moving into an emergency shelter or another place described in category (1) of the "homeless" definition in 24 CFR 576.2, have an annual income below 30%[7] of the median income for the area, and be a resident of Bexar County for at least 30 days prior to requesting assistance. (24 CFR 576.103, 576.105, 576.106). Households should be identified and prioritized for assistance using the targeted screening tool in alignment with the RRH-HP Standards.

Rental Assistance Duration and Adjustment

For ESG, payment shall not exceed 24 months total during a 3-year period in tenant- or project-based housing.

For CoC, rental payments shall not exceed 24 months.

Re-Evaluations

Rapid Rehousing (RRH)

[7] For HP projects funded through HOME-ARPA TBRA, eligibility is below 50% AMI.

Participants shall be re-evaluated not less than once annually. To be eligible for RRH, participants:

- Must have an annual income that does not exceed 30 percent of median family income for the area, as determined by HUD at the time of annual re-evaluation (ESG only); and
- Must lack sufficient resources and support networks necessary to retain housing without ESG/CoC assistance.

Homeless Prevention (HP)

Participants shall be re-evaluated not less than once every three months.

Street Outreach (SO) Programs — CoC and ESG

Defining Homelessness & Unsheltered

Homelessness

The US Department of Housing and Urban Development (HUD) defines homelessness as an "individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation; or
- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution."

Unsheltered Homelessness

The local definition is an individual or family enrolled in Street Outreach or Coordinated Entry (Homelink CE) who either:

- Has a prior residence of "place not meant for human habitation" (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside) within the past 30 days; OR
- Has a Current Living Situation* of "place not meant for habitation" within the past 30 days.

Defining Street Outreach

Street Outreach in San Antonio and Bexar County is a professional intervention that engages people living unsheltered through trust-based relationships to connect them with shelter, housing, and supportive services that meet their individual needs.

Street outreach workers engage individuals experiencing unsheltered homelessness with cultural humility and trauma-informed care. Their goal is to build trust and connect people to safe shelter, housing, and supportive services through ongoing, relationship-based engagement. Outreach emphasizes diversion and problem-solving strategies to identify immediate and sustainable housing options whenever possible.

The primary focus is to facilitate access to voluntary wraparound services that promote health and stability, including medical and behavioral healthcare, identification recovery, public benefits, and employment supports. Effective outreach requires time, consistency, and multiple interactions, each contact serving as an opportunity to strengthen rapport and support the individual's path toward stability.

Types of Street Outreach

Multiple forms of street outreach are conducted throughout San Antonio and Bexar County, each playing a vital role in engaging individuals living unsheltered and connecting them to shelter, services, and housing. While each outreach type has distinct functions, their activities often overlap and complement one another. These standards apply to all outreach types unless otherwise specified. All outreach providers are expected to understand the various outreach approaches operating within the community and how they collectively function as part of the coordinated homeless response system.

Light-touch outreach focuses on consistency, relationship building, problem-solving techniques, and meeting immediate needs until an individual is enrolled in a shelter, housing, or ongoing services. Street outreach teams conducting light-touch outreach may have larger caseloads or no defined caseload and may conduct short-term engagements to meet immediate needs. Data collection and input may be limited to the required HUD HMIS data Elements for street outreach providers. Agencies providing light touch outreach are held to the introductory provisions of these community shelter standards, but all community standards may not apply to their work.

Shelter/housing-focused outreach operates under a Housing-Centered Approach, prioritizing rapid access to permanent housing and actively working to remove barriers that prevent individuals from obtaining and maintaining housing. This approach builds upon general outreach practices by providing intentional, housing-centered engagement and long-term support for individuals seeking safe and appropriate shelter and/or housing.

Housing-focused outreach prioritizes moving the most vulnerable and highest-need individuals into permanent housing as quickly as possible, while also facilitating access to emergency shelter or transitional housing when needed as short-term stabilization options. Street outreach staff proactively identify and address housing-related barriers – including documentation recovery, income connection, Coordinated Entry enrollment, disability verification, and other eligibility requirements – to accelerate placement into permanent housing interventions.

All street outreach project enrollments connect individuals to Homelink, the CoC's Coordinated Entry System, ensuring equitable access to housing resources and prioritization based on vulnerability and need. Personal choice remains central to housing-focused outreach. Staff support the informed decisions of individuals experiencing unsheltered homelessness, whether they choose to enter shelter immediately or wait for a permanent housing opportunity. Clear, transparent communication is provided regarding realistic

housing timelines, system prioritization processes, and the role of shelter as a temporary stabilization option while pursuing permanent housing.

Population-specific outreach is a shelter/housing-focused outreach subcategory that focuses on connecting with a particular population, such as Veterans or youth/young adults (YYA) experiencing unsheltered homelessness. Street outreach teams providing population-specific outreach may receive training that supplements those listed in the community standards, and staff may have access to more direct pathways to dedicated housing for the persons with whom they work (i.e., YYA and SSVF-funded housing). Population-specific outreach teams are deployed through regular Community Case Conferencing when a person from a particular population is engaged during outreach efforts.

Clinical outreach is conducted by a trained clinician to assess and address immediate medical and behavioral health needs and make connections to the homeless response and healthcare systems that results in positive health outcomes for the individual. Facilitating connections to shelter, housing, or an institution of care is also a primary goal of this outreach, as housing and health outcomes are interrelated.

Encampment outreach is conducted to individuals residing in an encampment to build relationships and make connections to shelter, housing, and/or services before encampment abatement. Encampment outreach is often mobilized when the City of San Antonio identifies an encampment that presents a health or safety concern for persons residing in the encampment and the surrounding community, requiring quick, "all hands on deck" action to connect persons located in encampments to shelter, housing, and/or services, in addition to restoring the environment.

"In-reach" outreach involves efforts to engage with individuals in institutions, including but not limited to hospitals, jails, or the foster care system, and make housing connections before they leave the institution or system of care. Additionally, outreach engagements and service connection activities conducted at Christian Assistance Ministries (CAM), Corazon San Antonio and Haven for Hope Courtyard are considered an "in-reach" activity. Since this type of outreach is not street-based, some community standards may not be applicable. In-reach efforts are provided in coordination with other supports and services to ensure that clients are connected to resources that are accessible, meaningful, and appropriate for their needs.

Service Orientation

The focus of the street outreach worker is to develop authentic engagement with people in unsheltered situations, minimizing a power dynamic that leads to the perception of the street outreach worker as a healer and the person in an unsheltered situation as wounded, and to develop a partnership that builds upon the strengths of each person. Street outreach workers shall demonstrate empathy in every interaction.

A person-centered and strengths-based approach is necessary for effective street outreach engagement and support. Street outreach workers shall endeavor to create service support plans based on the specific needs and presenting issues of the person in an unsheltered situation and leverage the individual's strengths to help develop and implement a plan to resolve their homelessness.

Trauma and its impacts are widespread within the population experiencing unsheltered homelessness, and as such, street outreach workers employ a trauma-informed approach to

all encounters, planning, and actions. The guiding principles of a trauma-informed approach shall be used in street outreach work when encountering and supporting people in unsheltered situations.

Street outreach workers shall communicate with people in unsheltered situations using plain language that is clear and concise and appropriately articulates action steps. Street outreach workers may need to amend their approach to engagement and planning based on the needs of the people in unsheltered situations with whom they work.

Utilizing evidence-based practices, street outreach workers strive to connect individuals with behavioral health needs to appropriate mental health resources, substance use treatment, behavioral health services, and community supports. They shall address the stigma associated with behavioral health. Outreach workers strive to ensure behavioral health needs do not impede individuals' ability to connect with available shelter, housing, and other critical services. Referrals to mental health and substance abuse treatment programs shall be coordinated in advance by outreach staff to ensure bed availability and a smooth client connection to the program.

Street outreach workers shall support risk mitigation practices to help address risks and potential harms related to the use of alcohol and other drugs, as well as participation in sex work by people in unsheltered situations. When an outreach worker is prevented from distributing risk mitigation supplies by their employer, they shall know where and how a person in an unsheltered situation can access them. All street outreach workers shall be knowledgeable in and consistently apply risk mitigation strategies, even when specific supplies are unavailable or not needed.

Street outreach workers shall practice progressive engagement by tailoring the level of support to everyone's strengths, assets, and needs. They shall empower individuals to take the lead in their own progress, offering additional assistance only when barriers or challenges prevent the person from independently taking steps toward housing stability.

Street outreach practices shall be individualized to meet each person where they are and support them in defining their own goals and strategies for change. Street outreach workers shall utilize best practices, including Motivational Interviewing and Assertive Engagement, to create environments that promote readiness for change and empower individuals in unsheltered situations to direct their own progress.

Street outreach workers shall uphold client choice as a core component of effective engagement, planning, and action. They shall provide clear, accurate, and meaningful information to empower individuals in unsheltered situations to determine the course of action that best aligns with their goals, including preferences for housing or shelter options. Choice also includes the right to decline services, which shall be respectfully documented in HMIS.

Street outreach workers shall maintain clear professional boundaries while building trust and rapport with individuals in unsheltered situations. Communications and actions shall always reflect the professional nature of the relationship and avoid any behavior that could be perceived as personal or inappropriate.

Street outreach workers shall practice cultural humility and strive to recognize and minimize personal biases when engaging with individuals from diverse backgrounds. This includes, but is not limited to, people of different races, ethnicities, cultures, gender identities, and sexual orientations. Street outreach workers shall model inclusive practices by sharing their

pronouns when appropriate and using gender-neutral language until an individual self-identifies. This approach promotes respect and belonging in all outreach interactions.

Positive Youth Development (PYD) is an essential framework for supporting youth and young adults (YYA) experiencing unsheltered homelessness in connecting to housing, shelter, and/or services. Street outreach workers engaging with YYA in unsheltered situations should work to build trust and authentically demonstrate that the YYA's experiences and opinions are respected and valued. Language and tone should be person-centered and respectful, and paternalism should be avoided.

Maintaining a Client-Centered Focus

Street outreach staff will know the housing process within and outside of Homelink, and resource sharing shall be part of regular Homelink Skilled Assessor meetings.

When housing options are explored independently of Homelink, street outreach staff are required to offer direct support to the person in an unsheltered situation in accessing housing or shelter, and staff should connect the client to the necessary support to assist the client with this transition.

Street outreach staff will not coerce, force, bribe, trick, or bargain with people in unsheltered situations to get them to accept services. Resources and housing should be driven by client choice.

Street outreach staff will ensure that clients understand services offered and will provide informed consent to receive services.

Once a person moves into housing and is no longer unsheltered, street outreach staff may follow up, engage, and support the person in transferring to other necessary support for up to 90 days (about three months). Additionally, the focus should be on connecting the person to their new case manager during the initial transition period from an unsheltered location to housing.

Coordination and Delivery of Street Outreach Services

Street outreach staff shall follow their agency's directions regarding participation in the Coordinated Entry model.

Centralized Shelter Coordination is a pilot in response to feedback from both outreach workers and shelter providers to quickly and equitably match clients to shelter beds and services. This pilot requires:

- Street Outreach workers maintain knowledge of shelter resources and eligibility and commit to following community guidelines for accessing shelter resources, and
- Provide a warm hand-off for clients moving into Emergency Shelter and light follow-up for a minimum of two weeks to increase the likelihood of a successful transition.

Training modules, skill development, and cross agency training efforts shall align with the community training framework, in coordination with street outreach funders.

Role of Funders

Street outreach agencies are guided by their contractual obligations with their funder(s). Among other criteria, the contracts inform the type of outreach and the approach to be used for street outreach, the activities to be performed with the funding, activities that are not permitted with the available funding, hours of service, area(s) to be served, and performance targets.

Funders provide monitoring and oversight to their funding recipients, and each agency is responsible for meeting the expectations of their funders to allow for future investment in street outreach activities.

As the local Continuum of Care (CoC) Lead Agency and Collaborative Applicant, CTH adopts these standards of operating for TX-500: San Antonio/Bexar County CoC, which includes geographic coverage of all of San Antonio and Bexar County.

If a funder of an outreach program has a specific request regarding outreach, that request shall be processed by the agency receiving the funding and then directed to the street outreach worker(s).

Role of the City, County, and CoC (CTH)

Street outreach agencies are also guided by needs and demands from City and County officials and leaders, including the San Antonio/Bexar County CoC (CTH). The City, County, and CoC coordinate requests through Community Case Conferencing and the Homeless Response System Advisory Committee (HRSAC) of the CoC Board, as appropriate and when time allows. The City, County, and CoC may also provide specific direction to agencies that they fund.

As a requirement of federal funding allocated to the community, the City of San Antonio and Bexar County adopt these standards as a part of the ESG and CoC written standards.

Acknowledging the Risks that Come with the Work

Street outreach comes with inherent occupational, environmental and emotional risks, including exposure to the elements, traffic hazards, animal encounters, interpersonal conflict, retaliation when services cannot meet expectations, secondary trauma, burnout, compassion fatigue, etc. Street outreach agencies and staff are responsible for having a process to address critical incidents appropriately.

Geographic Coverage & Overlap

Agencies engaging in outreach activities of any type shall strategize and collaborate to ensure adequate service connections and complete geographic coverage of San Antonio and Bexar County. This collaboration happens regularly and in real-time through the Homeless Response System Advisory Committee's Outreach and Access Subcommittee.

Geographic coverage strategies account for each agency's outreach funding stream and any resulting restrictions.

When more than one street outreach team serves overlapping geographic areas, those teams shall coordinate to reduce duplication of services. This collaboration happens regularly and in real-time through the Outreach and Access Subcommittee meeting.

Most of the time spent by street outreach staff conducting direct outreach within the geographic area shall be spent engaging with people in unsheltered situations.

Hours of Operation

Street outreach staff shall provide services within their contractually obligated hours. If not specified by a particular contract, street outreach teams shall endeavor, at their agency's discretion, to provide outreach services at different times of the day, including early morning and evening hours, and to provide services on weekends when operationally possible.

Funders shall strive to ensure (through their RFP and/or grant award processes) that adequate coverage and services are provided, including during inclement weather.

In geographic areas served by multiple street outreach teams, those teams shall reasonably coordinate to provide the greatest amount of street outreach coverage each day and across multiple days of the week, including weekends, to provide the greatest opportunities for engagement with people in unsheltered situations.

No outreach worker shall conduct outreach activities outside of times designated by their agency.

Occasionally, street outreach staff may encounter people in unsheltered situations whom they know during non-work hours. During those instances, the off-duty street outreach staff is not to acknowledge the person experiencing unsheltered homelessness unless that person initiates acknowledgment first. If the off-duty street outreach staff is with others during the time of acknowledgment with the person experiencing unsheltered homelessness, no information about the person's name, circumstances, services, or care shall be shared with others.

Any interactions with individuals experiencing unsheltered homelessness outside of the context of street outreach, such as volunteer events, should be focused on the current interaction or assistance being provided and not address any street outreach activities or previous street outreach interactions.

Transportation

Based on their agency guidelines, street outreach teams may provide direct transportation to people in unsheltered situations when a referral is made to shelter, housing, and/or other supportive services.

Before providing transportation to a person experiencing unsheltered homelessness, staff shall determine if it is appropriate to provide transportation based on the individual's current state and health and safety considerations and following their organizational transport policies.

If direct transportation is deemed a safety risk for the client or staff, bus passes, taxi vouchers, or other forms of third-party transportation may be offered if available.

Structured Engagement

During typical engagements, no more than two street outreach staff shall approach a person experiencing unsheltered homelessness at the same time.

Upon initial interactions, street outreach staff shall identify themselves, their organization, and the intention of their engagement. They must also request permission to engage with the person and/or enter an encampment.

Street outreach workers shall seek and record consent (which can be verbal) to engage with people in unsheltered situations; while engagement can happen with people in unsheltered situations before obtaining consent, street outreach staff cannot record services in HMIS as a client will not be enrolled in a program until consent is obtained.

A person in an unsheltered situation receiving street outreach services with informed consent, can request engagement from a different street outreach worker or team at any point in the street outreach process.

Provision of Goods

To build rapport and assist people in unsheltered situations in obtaining housing and stability, street outreach staff may choose to provide hygiene kits, food, clothing, duffle bags, or other available resources.

All items distributed to persons experiencing unsheltered homelessness must be provided and authorized by the street outreach workers' agency.

Previously Unknown

Each week, street outreach teams shall dedicate time to identifying people in unsheltered situations who have not previously been connected to street outreach.

When previously unknown people in unsheltered situations are encountered, the street outreach staff shall seek a rapid resolution to their homelessness, including utilization of problem-solving and diversion strategies.

After obtaining consent, street outreach staff shall complete a street outreach enrollment for the outreach program, including all required HUD data. Service Activity must be updated every 30 days to maintain activity within an enrollment.

Staying Connected

Each week, street outreach staff shall focus primarily on re-engaging and serving people in unsheltered situations who were previously encountered.

Preferred caseloads range between a minimum of 5 and a maximum of 25 people in unsheltered situations at any given time. However, because levels of engagement may vary, street outreach staff may be connected with more than 25 individuals.

To remain active on a caseload, a person in an unsheltered situation must have At least one service and a current living situation recorded in HMIS within a 30-day period. If a person in an unsheltered situation is on the Priority Pool and is hospitalized, incarcerated, or provisionally accommodated for more than 30 days, they will be removed from the Priority Pool. If a person in an unsheltered situation is hospitalized, incarcerated, or provisionally accommodated for more than 60 days, that person shall be exited from the street outreach program in HMIS. If they re-engage in the future, the person's record can be reopened and made active. Space on street outreach worker caseload will remain flexible to allow for reengagements, even if this means exceeding the preferred 25-person caseload limit.

Individuals are only considered to be "unsheltered" in terms of reporting, monitoring, and resource planning, if they have been enrolled in Street Outreach or Coordinated Entry (Homelink CE) who either:

- Has a prior residence of "place not meant for human habitation" (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside). within the past 30 days; or
- Has a Current Living Situation of "place not meant for habitation" within the past 30 days.

As part of outreach activities with people in unsheltered situations, the street outreach staff shall ensure the person has the appropriate documentation to complete the housing referral process and assist with obtaining missing documentation. This documentation shall be scanned and uploaded into HMIS.

Operational Documentation

Street outreach staff shall ensure all Universal Data Elements (UDEs) are recorded accurately in HMIS within two business days of contact with someone in an unsheltered situation. This serves to maintain client activity on the Resource Eligibility List. If there is a significant life event or change in a person's living situation, this should be updated and documented in HMIS.

Street outreach staff must meet all additional documentation requirements of their program and/or funding source.

Street outreach staff shall ensure case notes about street outreach encounters are recorded completely in HMIS within two business days of contact with a person in an unsheltered situation.

Street outreach staff will assist with completing documentation to verify chronicity using community standardized forms, when applicable.

Current Living Situation (CLS)

A CLS record shall be created each time an outreach worker provides a service, referral, or engagement to a client in an unsheltered situation.

The CLS entry shall accurately reflect:

- The client's location type (e.g., street, park, vehicle, abandoned building, emergency shelter, etc.).
- The date the client was seen or served.
- The location description or outreach area, when applicable.
- CLS entries shall also document whether the client was staying in a place not meant for habitation, as defined by HUD, or in a temporary setting (e.g., hospital, jail, or shelter).

Each CLS record must be entered in HMIS.

Date of Engagement

A Date of Engagement shall be entered when the outreach worker and client have an intentional, meaningful interaction that goes beyond initial contact. This may include:

- Completion of an assessment or referral
- Agreement to ongoing case management or follow-up
- Active participation in goal setting or service planning.

The Date of Engagement shall only be entered once per enrollment in a Street Outreach project. If a client exits and later re-enters services, a new Date of Engagement shall be recorded for the new enrollment.

Timeliness and Data Quality

All CLS and Date of Engagement entries shall be completed within two (2) business days of the interaction.

Supervisors shall review data quality reports at least monthly to ensure compliance with HUD standards.

Incomplete or inconsistent records must be corrected within five (5) business days of notification.

Staff Responsibilities

Street Outreach workers are responsible for accurate, timely, and complete data entry.

Supervisors shall monitor data quality, provide feedback, and ensure compliance through routine review and coaching.

Program leadership shall coordinate with the HMIS to ensure staff receive training and updates on HUD data entry requirements.

Street Outreach Coordination with Coordinated Entry System (Homelink)

Street Outreach workers will conduct Homelink enrollments for any persons they encounter in order to add them to the Resource Eligibility List (REL) - A dynamic, prioritized list of individuals and households who have been assessed through Coordinated Entry and determined eligible for specific housing interventions, and who are awaiting referral or

placement into an available housing resource. Homelink, the local Coordinated Entry system, employs a no-wrong-door hybrid model- a design that ensures individuals and families can enter the homeless response system through multiple access points while maintaining centralized prioritization and standardized assessment. All clients enrolled in Emergency Shelter, Street Outreach or Safe Haven projects receive a Homelink assessment and are added to the REL. All other individuals experiencing unsheltered homelessness, fleeing domestic violence or are considered at imminent risk of homelessness according to HUD Homeless Definition Standards, are able to connect to the REL through their street outreach worker or by accessing a Homelink Hub, including the COSA Community Connections Hotline. Individuals remain on the REL if they are actively enrolled in their ES or SO and have received a qualifying service that has been documented in HMIS within the most recent 60 days and have a current living situation within the past 30 days.

Outreach staff whose clients are referred to a housing provider should be available for Community Case Conferencing Meetings to connect clients to the housing provider. If street outreach staff cannot be present, they shall send a proxy with knowledge of the client's case. If the housing provider and street outreach staff cannot connect prior to case conferencing, but after the referral is made and the case conferencing document is uploaded in HMIS, neither party is required to be present for Community Case Conferencing. There must be collaboration between street outreach staff and the housing referral partner to complete all necessary documentation for housing to ensure timeliness and reduce barriers.

Consent

Street outreach teams shall receive explicit informed consent from any person in an unsheltered situation to provide a service to them. Street outreach staff must ensure they receive a signed Release of Information (ROI) from people in unsheltered situations to share or disclose data as needed to coordinate care and access to services. Client consent must be entered into HMIS via scan or picture.

Outreach agencies are responsible for maintaining all required records of consent.

Confidentiality

For rare occasions where a person in an unsheltered situation cannot consent due to behavioral health challenges, street outreach staff shall work with a behavioral health provider to conduct a capacity assessment.

Agencies and staff conducting street outreach activities shall adhere to all confidentiality, privacy, and security standards established by the CoC's HMIS Standard Operating Procedures.

Street outreach staff shall maintain the confidentiality and identity of all people in unsheltered situations encountered through their professional efforts unless there is explicit consent to share that information with others, as documented through a signed 20.5 Release of Information (ROI) uploaded to HMIS or via documentation of verbal consent, or a legal duty to report.

Electronic information records shall be password-protected to decrease the potential of a privacy breach.

Any written notes related to outreach activities shall be kept confidential.

Record Keeping

Agencies and staff conducting street outreach activities shall adhere to all documentation and record-keeping standards established by the CoC's HMIS Standard Operating Procedures.

Street outreach staff are responsible for meeting or exceeding their employer's requirements for record-keeping and all record-keeping requirements identified in their funding contract.

Roles of Governance and Decision Making

The Homeless Response System Advisory Committee (HRSAC) of the Close to Home (CTH) Board of Directors, which operates as the Continuum of Care (CoC) Board, serves to inform the community-wide strategy, help address systemic concerns, understand the scope and needs of people experiencing unsheltered homelessness. HRSAC facilitates the development and implementation of community driven policy, procedure and written standards recommendations to the CoC Board that guide both access via street outreach and referrals and connecting with resources that meet individual needs to achieve and maintain permanent housing for individual's experiencing unsheltered homelessness. The committee has designated voting seats comprised of representatives from different community organizations and Alliance to House Everyone's partners including, individual(s) with lived homeless expertise, Community Case Conferencing Chair, Outreach and Access Chair(s) , Veteran Case Conferencing Chair, housing providers, prevention providers, the US Department of Veteran Affairs, Bexar County Housing Authority, City and County representatives, and other community stakeholders. The committee is responsible for determining and addressing barriers within and recommending policies and procedures for the operation of the homeless response efforts across San Antonio and Bexar County. This committee is led jointly by CoC board members. Click here for additional information about the Close to Home Nonprofit and CoC Governance Charter and Bylaws.

Outreach and Access subcommittee of the HRSAC – This subcommittee, consisting of Street Outreach and Emergency Shelter Leadership, meets monthly to discuss issues and take a problem-solving approach to propose recommendations at a macro level. These recommendations are intended to influence system-wide policies, procedures, or written standards within the homeless response system, specifically targeting those impacting individuals currently experiencing homelessness. The subcommittee actively contributes to the improvement of the homeless response system by addressing challenges, identifying gaps and recommending proposals to the HRSAC. There is a commitment to ongoing evaluation and enhancement of the system to better meet the needs of the individual's experiencing homelessness.

Case Conferencing

Community Case Conferencing meetings are led by a Chair and a Co-Chair. The Chair of Community Case Conferencing regularly attend the Homeless Response System Advisory Committee (HRSAC) to report on identified system issues and make policy recommendations and has a designated seat on that committee. CTH designates a Homelink (Coordinated Entry) representative to serve as part of Community Case Conferencing to provide

administrative support for the Chair and Co-Chair, supply updates on Coordinated Entry, the Priority Pool as needed and ensure to collaborate with CCC Chairs to ensure that case conferencing system issues are brought to the HRSAC when identified.

The Chair and Co-Chair of Community Case Conferencing are responsible for staying abreast of, at a high level, available shelter and temporary or permanent housing options and issues regarding Homelink and Priority Pool. The Chair's responsible for disseminating this information to the outreach team staff and providing updates on these topics at each Community Case Conferencing meeting.

Designated staff from CTH provide support. Community Case Conferencing establishes regular coordination and communication regarding people in unsheltered situations referred to housing via the Homelink Priority Pool, the ability to make expedited referrals and follow up on referrals that resolved as unsuccessful. Community Case Conferencing occurs weekly.

The following are the goals for Community Case Conferencing:

- To support Street outreach staff and teams in improving engagement and services and follow-up with people in unsheltered situations to help them access shelter, housing, and services
- To be a space for front door partners (street outreach/shelter) and referral partners (housing providers) who are in communication, collaboration, and provide follow-through for individuals experiencing homelessness who have been referred to housing via the Priority Pool
- To provide general on-the-ground coordination between teams
- To offer space for case conferencing on specific clients
- To facilitate discussion on upcoming housing referrals through Homelink
- Give time to check-in on clients who are identified as missing and are active on the BOLO list
- To provide information about new community programs, procedures and resources

Staff participating in Community Case Conferencing shall ensure appropriate client consent is in place before sharing information. Community Case Conferencing includes only approved staff; all attendees must have HMIS access.

Collaboration and Participation in Meetings

Outreach workers and agency management staff are encouraged to participate in the Outreach and Access Subcommittee meeting. These meetings are open to applicable organizations' leadership and cover the following areas regularly:

- Consult on needs and barriers.
- Make system level recommendations to the HRSAC for street outreach policies, procedures, and standards.
- Resource sharing.

Meetings may include full community participation, but when specific street outreach clients are discussed, the attendees must be limited to people with the authority to access and share client data.

Grievances

All agencies delivering street outreach services shall have a grievance policy and accompanying procedures for investigating and responding to grievances. The Homeless Strategic Planning Advisory Board is responsible for maintaining a policy regarding the notification of grievances against individual agencies or outreach staff.

Once a person experiencing unsheltered homelessness has consented to receive street outreach services, they shall be made aware of the grievance policy. Click the following links for the grievance appeal form in English and Spanish.

Monitoring

The Homeless Strategic Planning Advisory Board (HSPAB) and Homeless Response System Advisory Committee (HRSAC) monitor compliance with these street outreach standards as part of their contract and system monitoring activities. HRSAC is responsible for maintaining a policy regarding notification of violations of the street outreach standards by individual agencies or agency staff.

Any agency funded through CTH, the City of San Antonio, or Bexar County found to be out of compliance with one or more of these street outreach standards may be placed on a Performance Improvement Plan or Quality Improvement Plan by the CoC at the recommendation of the HSPAB to ensure future fidelity to the standards. Failure to remediate findings may result in loss of future funding.

Personal Safety & Equipment

Street outreach staff perform their work in the community and may witness or encounter first-hand risks inherent in serving people experiencing unsheltered homelessness. Street outreach agencies are responsible for reducing the impacts of those risks on their staff whenever possible, and street outreach staff are encouraged to advocate for necessary support.

Street outreach staff may experience secondary or vicarious trauma as a result of performing the duties of their job. Street outreach provider agencies are responsible for creating an environment that allows and encourages self-care, and staff are encouraged to engage in self-care.

Street outreach agencies and staff are responsible for promoting the personal safety of street outreach staff and taking the necessary measures to decrease risks as is reasonable in the context of street outreach. Street outreach staff shall refer to their agency-specific safety plans and policies.

Street outreach staff shall inform their supervisor(s) of their probable locations during their outreach shift. Staff will update their supervisor, as appropriate, if there are deviations from the likely locations identified for the shift.

Street outreach staff will always have a functional phone with them during the delivery of street outreach duties.

Each street outreach team will have access to a first aid kit during the delivery of street outreach duties.

Street outreach staff will have access to a computer or authorized mobile device for data entry into HMIS to enter case notes, communicate via email, and maintain and provide knowledge of available resources to people in unsheltered situations.

Street outreach staff may engage people at or near their encampment site but will not enter a tent or other unsafe enclosed space while providing services. Outreach staff shall request assistance from or make law enforcement aware of their location before entering encampments with known or suspected safety concerns.

Street outreach staff will follow their agency's safety and dress code policies.

Encountering a Person in Distress

Street outreach staff may encounter a person in an unsheltered situation in distress. Efforts are made to engage the person in an unsheltered situation and address their distress. When necessary and appropriate, street outreach staff shall mobilize resources within the community through 9-1-1 to help address the person's distress in an unsheltered situation.

If the person in distress has not already provided informed consent to receive street outreach services, a 9-1-1 response may still be appropriate.

If a person in an unsheltered situation is in distress and a 9-1-1 response has been activated, the street outreach staff shall make all reasonable efforts to stay with the person in an unsheltered situation until assistance arrives and relay pertinent information to first responders.

When directed by a funder or supervisor to do so, a summary of an incident involving a person in an unsheltered situation in distress and the response shall be provided in alignment with agency policy within 24 hours of the encounter with the person in an unsheltered situation in distress.

Encountering a Deceased Person

In infrequent instances, street outreach staff may encounter a person in an unsheltered situation who may be deceased. Upon encountering a possible deceased person, emergency services shall be contacted immediately. Street outreach staff are expected to stay on scene until emergency personnel arrive and follow directions given by the 9-1-1 operator.

When appropriate and necessary, trained street outreach staff should administer efforts to revive the person in an unsheltered situation until first responders arrive, when appropriate.

When directed by a funder or supervisor to do so, a summary of the incident involving the person in an unsheltered situation who is deceased, and the response should be provided based on agency policy or within 24 hours of the encounter with the deceased person in an unsheltered situation.

Agencies will provide accommodation to staff who have experienced traumatic events. Street outreach staff should lead this process as an expert on their emotional needs.

Responding to Encampments

Encampment site assessments and abatement events shall be planned weekly and prioritized with the appropriate city department(s), homeless street outreach teams, and partner providers. Street outreach workers shall be provided with a regularly updated list of current encampments and information regarding upcoming encampment abatements as soon as possible to facilitate effective outreach and engagement efforts. The Encampment Abatement Coordinator coordinates this with the City of San Antonio Homeless Services and Strategy Department (HSSD).

Outreach efforts shall continue before, during, and throughout the process of encampment abatement to provide emergency shelter coordination, transportation assistance, and other supportive services to individuals interested in accessing services at sites scheduled for abatement to avoid displacement and/or relocation concerns.

Street outreach agencies and staff shall be trained and knowledgeable on how and when to engage partner agencies to respond to the health and safety needs of persons residing in encampments, including but not limited to Child Protective Services (CPS), Adult Protective Services (APS), and the Public Health Department. Outreach staff will involve CPS in specific circumstances where there is an imminent threat to the health and safety of a child under age 18 and will work with SAPD to make any reports. Otherwise, families experiencing unsheltered homelessness are prioritized for housing and shelter options, including access to Haven for Hope any time of day, which allows outreach staff to quickly identify shelter and housing options for these persons without CPS intervention.

Street outreach agencies and staff address encampments through a "clearance with support" framework, which states that encampments need to be abated and closed for public health and safety reasons but ensures that intense services, support, and offers of assistance, including temporary and permanent housing options , are offered well in advance of closure by street outreach workers if safe conditions exist.

Inclement Weather

In cases of severe inclement weather, COSA HSSD immediately alerts agencies of the upcoming weather and plans. Street outreach staff throughout the community will alert people in unsheltered situations about the current weather risk and the need to take shelter. This includes but is not limited to disseminating information to people in unsheltered situations about approaching inclement weather, assisting with shelter placement, advising people in unsheltered situations to relocate to safe areas if shelter is not accepted, system navigation, providing updates to outreach leadership, and coordinating with community partners for shelter, transportation, and access to services as needed.

Service Restrictions

In rare circumstances, a person in an unsheltered situation may display actions that present a real and credible threat to street outreach staff or deface or destroy the property of street outreach staff. In these instances, the street outreach staff may issue a service restriction to the person in an unsheltered situation if other attempts to de-escalate the situation have been unsuccessful.

Service restrictions may be issued verbally to the person in an unsheltered situation and shall be documented in HMIS, including documentation of de-escalation strategies and attempts.

If a service restriction is implemented, the restriction shall not exceed seven (7) calendar days unless otherwise warranted and shall be documented in HMIS.

Engagement on Public Property and Private Property

Outreach staff shall work alongside the City of San Antonio's Development Services Department and the San Antonio Police Department to conduct outreach activities on private property if assistance is needed.

Street outreach services shall be provided on all public properties within any street outreach team catchment area open to all members of the public, such as parks, sidewalks, green spaces, etc.

Street outreach services may be provided on semi-public property within the catchment area of street outreach services, such as the parking lot surrounding a strip mall or business, unless expressly prohibited by the property owner or operator.

Unless expressly invited by the owner/operator of a private building or in coordination with the City of San Antonio, street outreach activities will not occur within a private building such as a business or restaurant.

Interface with Law Enforcement

Street outreach staff shall not be responsible for communicating or leading enforcement activities involving people in unsheltered situations.

In rare circumstances, street outreach staff may witness behavior or actions on the part of a person in an unsheltered situation that may trigger a legal duty to report the incident or information to law enforcement. Street outreach staff shall contact their direct supervisor for guidance on police involvement. If it is determined that law enforcement intervention is appropriate and necessary, street outreach staff shall do so promptly and thoroughly in these rare instances. Note: this does not negate the crisis response process outlined in Section 30 of this document.

Street outreach workers should establish and maintain relationships with SAPD SAFFE and/or Bike Patrol officers in their geographic area of operation.

Amending Street Outreach Standards

These Street Outreach Standards for San Antonio and Bexar County are formally accepted as part of the CoC Written Standards. Therefore, they must be updated and approved by the CoC at least annually.

With regular coordination between street outreach providers, updates and edits to these standards will likely be identified in discussion and problem-solving around on-the-groundwork. In this case, it is the responsibility of the Chair(s) of the Outreach and Access

Subcommittee to track suggested edits and communicate them to the Homeless Response System Advisory Committee of the CoC Board.

If an agency or funder identifies specific standards in need of revision, they may submit the proposed revisions the Outreach & Access Subcommittee or HRSAC of the CoC.

Changes to these Standards shall be discussed and voted upon by the HRSAC of the CoC Board and ultimately approved by the CoC Board.

The local Homelessness Response System specifically engages people with lived experiences of unsheltered homelessness, including the Lived Expertise Advisory Board (LEAB) and Youth Action Board (YAB) to continuously help inform the outreach standards and practices of San Antonio and Bexar County.

The Homeless Response System Advisory Committee shall recommend changes to the Homeless Street Outreach Standards to the CTH Board of Directors, which operates as the CoC Board. The CTH Board of Directors, in their role as CoC Board, has final approval on all updates and edits to these Standards.

Agreement to Abide by Standards

All street outreach programs funded by the U.S. Department of Housing and Urban Development (HUD) or through the City of San Antonio, Bexar County, or Texas Department of Housing & Community Affairs (TDHCA) must meet or exceed the standards for street outreach herein.

Supportive Services Only (SSO) – CoC (Unsheltered Special Only)

SSO projects funded through the Unsheltered Special CoC NOFO must follow the rules and regulations outlined in 24 CFR 578 and must align with the CoC Plan to Address Severe Service Needs.

SSO projects are funded to provide Housing Navigation and SSI/SSDI Outreach, Access, and Recovery (SOAR) to connect program participants with histories of unsheltered homelessness to housing, vouchers, and resources/benefits.

Overview

Supportive Services Only (SSO) programs are designed to provide critical services that help individuals and families experiencing homelessness access permanent housing and maintain long-term stability. These programs are essential components of our community's Homeless Response System, which is built on the Homelink Coordinated Entry model. Homelink ensures that housing resources are allocated fairly, efficiently, and according to need, based on standardized assessment and prioritization processes.

Under the Continuum of Care (CoC), Emergency Solutions Grant (ESG), and local funding standards, SSO projects are expected to align with HUD priorities and local strategic goals by addressing service gaps and reducing barriers to housing.

As part of HUD's Special Notice of Funding Opportunity (SNOFO) to Address Unsheltered Homelessness, our community has implemented SSO-funded projects that serve as centralized system resources, including:

- SOAR (SSI/SSDI Outreach, Access, and Recovery)
- Housing Navigation

These initiatives are designed to provide high-impact, specialized services to literally homeless individuals, particularly those who are currently or were recently unsheltered. Emergency shelters, street outreach teams, and other Homelink access points can refer clients to these community-wide projects for targeted assistance.

Eligibility for Referral: To qualify for SSO services through these SNOFO-funded initiatives, clients must:

- Be literally homeless at the time of referral, as defined by HUD Category 1 (e.g., sleeping in a place not meant for human habitation or staying in an emergency shelter).
- Be currently or formerly unsheltered, with documented engagement through Homelink outreach or shelter systems.
- Individuals coming from Transitional Housing programs must have originally come from either:
    1. Residing on the streets, in emergency shelter, or safe havens; or
    2. Institutions where they resided for 90 days or less and were residing on the streets, in an emergency shelter, or safe haven immediately prior to entering the institution.

Referrals must come from:

- Emergency Shelter Providers
- Street Outreach Teams
- Other Homelink Access Points

All referrals must be documented in HMIS or a comparable database (for victim service providers) following established Homelink documentation standards.

Referrals to these SSO projects do not remove clients from the Priority Pool (PP). Clients will remain active and prioritized for permanent housing placement through Homelink while receiving supportive services, so long as the current living situation continues to be updated in HMIS every 30 days.

SOAR (SSI/SSDI, Outreach, Access, and Recovery)

The SOAR project provides support to individuals who may qualify for Social Security Income (SSI) or Social Security Disability Insurance (SSDI), focusing on:

- Completion of high-quality SSI/SSDI applications
- Development of Medical Summary Reports (MSRs)
- Coordination with medical providers, shelters, and outreach workers

- Expedited connection to income to support housing stability

Housing Navigation Series

Housing Navigation provides intensive, short-term housing-focused case management to assist literally homeless individuals in overcoming barriers to permanent housing. Services include:

1. Housing Search and Placement Support
    - Identify and connect clients to available permanent housing options.
    - Assist with housing applications, housing voucher documentation, and lease readiness.
    - Coordinate with landlords and property managers.
    - Support clients in applying for rental assistance, security deposit support, diversion funding, and other financial resources.
    - Ensure a warm handoff to the permanent housing provider's case manager upon referral.
2. Document and Benefit Readiness
    - Help clients gather necessary documentation, such as ID, proof of income, and rental history.
    - Assist with applications for housing vouchers, Medicaid, SNAP, WIC, TANF, unemployment, SSI/SSDI, and veteran-specific services

Transitional Housing (TH) Programs — CoC Only

Reference: 24 CFR 578.37(a)(2) (CoC)

Transitional Housing (TH) is designed to provide individuals and families experiencing homelessness with interim stability and support to successfully move to and maintain permanent housing. ESG funds may not be provided to help individuals to remain in or move to transitional housing.

Minimum Standards

Transitional housing facilitates the movement of homeless individuals and families from temporary housing to permanent housing within 24 months of entering the program. Eligible persons for transitional housing meet the homeless definition based on categories 1 and 4. Providers of transitional housing services shall arrange for or make available services to participants to assist them in securing permanent housing within specified time periods. Transitional housing may be provided in scattered site or site based locations. Individuals and families assisted in transitional housing shall be provided housing accommodations as well as a services program intended to address issues that may hinder the household from obtaining or maintaining stable, long-term housing.

Safety, Sanitation, and Privacy

Providers shall not use ESG or CoC funding to help someone remain or move into transitional housing that does not meet the following minimum habitability standards:

- The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep.
- Interior air quality: Each room or space must have proper ventilation and be pollutant free.
- Water supply: Must be free of contamination.
- Sanitary facilities: Residents must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- Thermal environment: The housing must have the necessary, properly operating heating/cooling facilities.
- Illumination and electricity: The structure must have adequate and appropriate lighting and safe electrical sources.
- Food preparation: All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food.
- Sanitary conditions: The housing must be in sanitary condition.
- Fire safety:
    - There must be a second means of exiting the building in the event of an emergency.
    - Each unit must include at least one properly working smoke detector on each occupied level of the unit, located when possible in a hallway adjacent to a bedroom.
    - If the unit is occupied by a hearing-impaired person, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom he or she occupies.
    - The public areas of the housing must be equipped with enough detectors, but not less than one for each area.

In October 2026, CoC providers will be required to follow updated housing quality standards called NSPIRE.[8]

Participant Eligibility

Transitional Housing (TH) programs will receive referrals based on the prioritization established in the local Homelink Policies and Procedures. This prioritization will be updated periodically through the HRSAC based on subpopulation data and community input. The following target populations are HUD's preferred focus for Transitional Housing:

- Youth
- Individuals seeking to continue recovery in recovery-focused housing
- Institutional re-entry (may not be eligible for CoC funding but needed for people leaving criminal justice and mental health facilities)

[8] NSPIRE Standards have not officially gone into effect. Click here for more information on NSPIRE.

- Individuals fleeing domestic violence where it is not possible to find units for rapid rehousing

Limitations on Occupancy

No individual or family may be assisted in transitional housing for a period of more than 24 months. No person shall be discharged from transitional housing into homelessness because of this limitation. Transitional housing programs are expected to place individuals and families into permanent housing as quickly as possible.

Participant Contribution

Individuals and families residing in transitional housing are not required to pay rent. Providers of transitional housing may impose occupancy charges. If the provider elects to charge rent or occupancy charges, the charges may not exceed those specified in 24 CFR 578.77.

Program Fees

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

Occupancy Agreements

All individuals and families served in transitional housing must be provided an occupancy agreement for a minimum of a monthly term and which can be renewed provided that the household does not remain in transitional housing for longer than 24 months. The agreement must specify the expectations for safety in housing and program expectations. Residents in transitional housing may not be discharged for failure to participate in services. No person may be terminated from transitional housing without first being provided the right to appeal that decision in accordance with the due process provisions at 24 CFR 578.91(b).

Alliance Training Framework

Overview and Background

In March 2023, the Homelessness Response System Advisory Committee (HRSAC) adopted understanding training needs and aligning training efforts as a priority to improve confidence, performance, and outcomes in our community. To create the space for collaboration, HRSAC established an Ad Hoc Training Subcommittee to evaluate the system's training needs. This subcommittee convened Alliance to House Everyone partners, who deliver training or support, to understand the need and develop the training framework. During these meetings, the team identified all objectives, curricula, training formats, and training frequencies.

This Training Framework includes extensive work done by community partners in the Alliance. In August 2024, the Continuum of Care Board of Directors approved incorporating it into CoC, ESG, and Local Written Standards for guidance. The trainings covered in this framework are available and tracked through Close to Home's Alliance Training Portal, which was also developed as part of this initiative to improve training across the homeless response system.

Objectives

The Alliance to House Everyone (the Alliance) is comprised of a wide range of organizations and local government departments, each playing a vital role in the homelessness response system. To ensure an aligned approach and consistency in practice and service delivery across the system, the Alliance Training Framework is designed to provide all system users access to shared community training guidance, support, and resources regardless of their agency of origin.

The Alliance Training Framework is designed to outline a comprehensive set of training courses and learning opportunities for community partners and various types of service providers. It is intended to ensure that our community is well-informed and that all service providers are equipped with the knowledge, skills, and tools necessary to carry out the critical work of ensuring everyone has a safe place to call home.

The Training Framework is intended to support:

- A clear and transparent plan for capacity-building tools accessible to all direct service providers and system partners,
- A logical timeline and 'roadmap' for meeting the learning needs of each type of community partner,
- An array of learning modes and mechanisms for continuous education and information sharing, and
- Increased accountability through early identification of goals and a plan to measure success over time.

The Key Performance Indicators (KPIs) for success at the individual level, agency level, and system level are outlined below:

Learning Goals and Key Performance Indicators (KPIs)	
Individual Level	
Goals	Key Performance Indicator
Increase in Staff Confidence	Fewer HMIS trouble tickets; Increased morale of staff
Improved individual performance	Improved HMIS data quality and completeness
Increased Trust between Staff and Participants	Increased engagement with LEAB and YAB
Improved Experience for People Seeking Assistance	Fewer refusals of services by participants; Focus Groups with people with lived

	experience reflect improvements in experience
Improved Individual Outcomes (people more likely to receive the individualized services they need)	Increase in successful Homelink referrals; Increase in housing stability
Agency Level	
Goals	Key Performance Indicator
Increase in Agency Confidence and Organizational Capacity	More organizations applying for federal, state, and local funding opportunities
Improved Reporting and Grants Management	Successful drawing of funds and timely and accurate reporting
Less Duplication of Effort and Confusion	Increased formal partnerships among organizations (able to lean on each other's strengths); Fewer questions and concerns about Homelink
System Level	
Goals	Key Performance Indicator
Consistent information on services	Increase in successful Homelink referrals
Increased accountability to people with lived expertise (LEAB and YAB)	Increased engagement with LEAB and YAB
Improved System Performance	Increased housing placements; Decrease in returns to homelessness; Reduction in first time homeless; Reduction in length of time homeless
Increased Collaboration and Alignment of Community Partners	Increase in partners participating in Homelink and HMIS; Increased engagement with CTH on social media and events
Increased Trust in the System	
Better and increased housing options	Increase in federal and state funding allocated to the region; Increase in formal partnerships with Landlords and Property Owners/Managers

Homeless Response System Roles

General Community

Preventing and ending homelessness in the San Antonio/Bexar County area requires an aligned community-wide effort. It is crucial that the general community understand the

underlying issues and barriers, the collaborative response efforts, and take informed action for long-term, sustainable solutions to ensure that everyone in our community has a safe place to call home.

The overall community plays a vital role in shaping and supporting a compassionate, effective homelessness response system through advocacy, education, relationship-building, and resource mobilization. When aligned with the general community, our collective homelessness response will include community champions that push on the mission by:

- Raising Awareness ("Humanizing Homelessness"): Increasing public understanding of the root causes of homelessness, reducing stigma, and promoting person-centered language and narratives.
- Advocacy: Supporting policies and funding that expand access to affordable housing, homelessness response, and homelessness prevention programs (i.e., 2022 Housing Bond).
- Volunteering & Donations: Contributing time, skills, or resources to local shelters, outreach teams, Point in Time (PIT) Count, and service providers that serve people experiencing homelessness.
- Connection & Humanity: Treating people experiencing homelessness with dignity and respect by offering acknowledgment, kindness, Billy Bundles, and, when appropriate, guidance to access services.
- Community Engagement: Participating in neighborhood planning efforts, supporting inclusive housing developments, and engaging with local leaders to ensure housing and services are prioritized (Combating NIMBYism).

CoC Governance Seat Holder

Continuum of Care (CoC) governance seat holders—including individuals serving on the Board of Directors, Advisory Boards (such as the Lived Expertise Advisory Board), Committees, and Subcommittees—are responsible for the collective oversight, strategy, and stewardship of the homelessness response system. Governance seat holders serve as decision-makers, thought leaders, and accountability partners working to create a more effective and person-centered system for preventing and ending homelessness. The roles include:

- Overseeing the response strategy to ensure alignment with community goals and federal, state, and local standards.
- Exploring barriers within the system through both data analysis and direct feedback from people with lived experience and other impacted parties.
- Proposing and approving written standards, data quality plans, policies and procedures that are objective-driven, data-informed, and grounded in lived expertise.
- Supporting implementation of these decisions in collaboration with partners across the Alliance.
- Monitoring progress of specific initiatives and the overall performance of the homelessness response system.

The Close to Home Nonprofit and CoC Governance Charter and Bylaws outlines all governing bodies, their roles, and representatives.

Federal Grantees

Recipients of federal grants such as Continuum of Care (CoC), Emergency Solutions Grant (ESG), and Youth Homelessness Demonstration Program (YHDP) play a critical role in advancing the local homelessness response. These organizations operate programs aligned with the Homeless Response System's Strategic Plans and are expected to adhere to the CoC, ESG, and Local Written Standards. By doing so, they help ensure a coordinated, person-centered, and objective-driven approach to preventing and ending homelessness while meeting local and federal compliance and performance requirements.

Service Provider Direct Supervisors & Homelink Skilled Assessors

A Homelink Skilled Assessor is an individual who provides direct homelessness response services in a capacity that requires them to assess clients' needs, whether immediate, such as shelter or food, or longer-term housing needs. They have successfully completed the designated learning pathway for their role and demonstrated the competencies required to support coordinated entry within the Homelink system. Being a Homelink Skilled Assessor reflects a commitment to quality, accountability, and compassionate service in the coordinated entry process.

To earn this designation, the individual must:

- Complete the role-specific learning path,
- Be recommended by their direct supervisor as someone who consistently demonstrates a strong understanding of their role
- Exhibit a person-centered approach in all interactions,
- Adhere to all applicable Continuum of Care (CoC), Emergency Solutions Grant (ESG), and Local Written Standards, and
- Sign and comply with the Skilled Assessor Agreement.

Establishing a strong communication channel with the direct supervisors of frontline staff is paramount. These partnerships ensure that staff not only have access to the necessary training but also receive the ongoing support, coaching, and encouragement needed to continue developing and refining their skillsets. Supervisor engagement is essential to maintaining alignment with system standards and promoting a culture of continuous learning and improvement.

Alliance Training Portal (ATP)

The Alliance Training Portal (ATP) is a centralized learning management system designed to support users across the Alliance. It provides easy access to policies, procedures, job aids, training materials, and allows users to register for upcoming training opportunities.

For Skilled Assessors, the ATP offers a clear, guided learning pathway, allowing them always to know what training comes next, when it is offered, and how it is delivered, whether in-person, self-paced, or directly through the ATP.

Importantly, the ATP also allows tracking training and outcome monitoring, enabling CTH to assess whether the training framework meets its intended goals, including building confidence, competency, and consistency across the system. This data-driven approach supports continuous improvement and alignment with system-wide performance goals.

Learning Paths

The framework is organized into distinct sections based on the role of the learner, including the general community, individuals serving in Continuum of Care (CoC) governance roles, federal grantees, and service providers. Each section offers a structured learning path, sometimes called a pathway, tailored to that role's responsibilities and learning needs. See below for a complete description of all training.

General Community

General community members and key partners are offered various trainings such depending on the level of detail appropriate for the audience. These trainings are designed to build understanding of the complexities of homelessness, the local homelessness response system, and how individuals and organizations can engage in meaningful solutions.

Available upon request, these sessions are often used to increase awareness at neighborhood associations, community meetings, and partner gatherings, helping nurture a more informed, compassionate, aligned, and coordinated approach to addressing homelessness.

Training Name	Frequency	Mode
Homelessness 101	As Requested	In Person
Homelessness 102	As Requested	In Person
Getting Connected	As Requested	In Person

CoC Governance Seat Holders

New governing body members, including the Board of Directors, Advisory Boards, Committees, and Subcommittees, receive CoC Governance onboarding to ensure they are equipped to fulfill their roles effectively. This onboarding includes training on governance format and operations, a structured problem-solving approach to governance business, and the role of strategic planning in governance. The goal is to prepare members to engage in a transparent, methodical, and strategic process that supports sound decision-making and effective oversight of the coordinated homelessness response.

Training Name	Frequency	Mode
CoC & Governance Orientation	Quarterly & Self-Paced	In-Person or Virtual
Governance Overview	Self-Paced	Virtual
Coc Strategic Plan Training	Self-Paced	Virtual
CoC Governance Workflow	Self-Paced	Virtual
Close to Home Nonprofit and CoC Governance Charter	Yearly	In Person or Virtual
CoC Program Interim Rules	Self-Paced	Virtual

Federal Grantees

Newly funded CoC Grantees with topics ranging from local onboarding with CoC Governance and the CoC's Common Language Glossary to introductory Federal Requirement onboarding, including the CoC Startup Training Webinar and Recipient Post Award Guide. This onboarding includes high-level overview of fiscal grant management practices to best assist grantees in fully expending funds for their allocated award amounts. Topics will vary from match requirements, eligible costs, grant expansions, budget reallocations and reporting requirements for grantees to the CoC, CoC Monitoring processes for all CoC-funded grantees in regard to CoC Site Visit preparations, and Federal Reporting Requirements in SAGE.

Training Name	Frequency	Mode
HUD CoC Regulations Overview: Review of the CoC Interim Rule and Recipient Post Award Guide	Self-Paced	Virtual- Alliance Training Portal
HUD Exchange	Self-Paced	Virtual-Alliance Training Portal
Housing-Centered Approach Model	Self-Paced	Virtual-Alliance Training Portal
Common Language Glossary	Self-Paced	Virtual-Alliance Training Portal
Overview of CoC Program Components and Eligible Costs	Self-Paced	Virtual-Alliance Training Portal
Grant Expansions and Budget Reallocation	Self-Paced	Virtual-Alliance Training Portal
ELOCCS Basics	Self-Paced	Virtual-Alliance Training Portal
Grant Deobligation and Transfer Process	Self-Paced	Virtual-Alliance Training Portal
Draw Down Worksheets	Self-Paced	Virtual-Alliance Training Portal
Match Requirements in the CoC Program	Self-Paced	Virtual-Alliance Training Portal
Housing First Assessment	Self-Paced	Virtual- Alliance Training Portal
CoC Site Visits	Self-Paced	Virtual- Alliance Training Portal
SAGE Training: Annual Performance Report (APR)	Self-Paced	Virtual- Alliance Training Portal

Service Provider Direct Supervisors

All supervisors withing the Alliance will have clear guidance on new staff onboarding processes, including critical systems access protocols for HMIS/Homelink that ensure smooth team integration and operational continuity. Through our structured Learning Framework, develop expertise in guiding their teams through professional development pathways, including required certifications and ongoing skill enhancement opportunities. The training experience is enriched through peer learning sessions, where managers collaborate and share real-world solutions to common challenges, creating a supportive network of housing services leaders committed to excellence.

Training Name	Frequency	Mode
Supervisors/Managers Training Meeting	Bi-Annually	In-Person
Supervisor Orientation	As Needed	In-Person
Alliance to House Everyone Orientation	As Needed	In-Person
System Access	Sef-Paced	Virtual-Alliance Training Portal
Communication	Self-Paced	Virtual- Alliance Training Portal
Forms and Documents	Self-Paced	Virtual-Alliance Training Portal
Staff Management	Self-Paced	Virtual-Alliance Training Portal
Training Pathways	Self-Paced	Virtual-Alliance Training Portal
Housing Programs	Self-Paced	Virtual-Alliance Training Portal
Specialized Populations	Self-Paced	Virtual-Alliance Training Portal
Meeting Structure	Self-Paced	Virtual-Alliance Training Portal

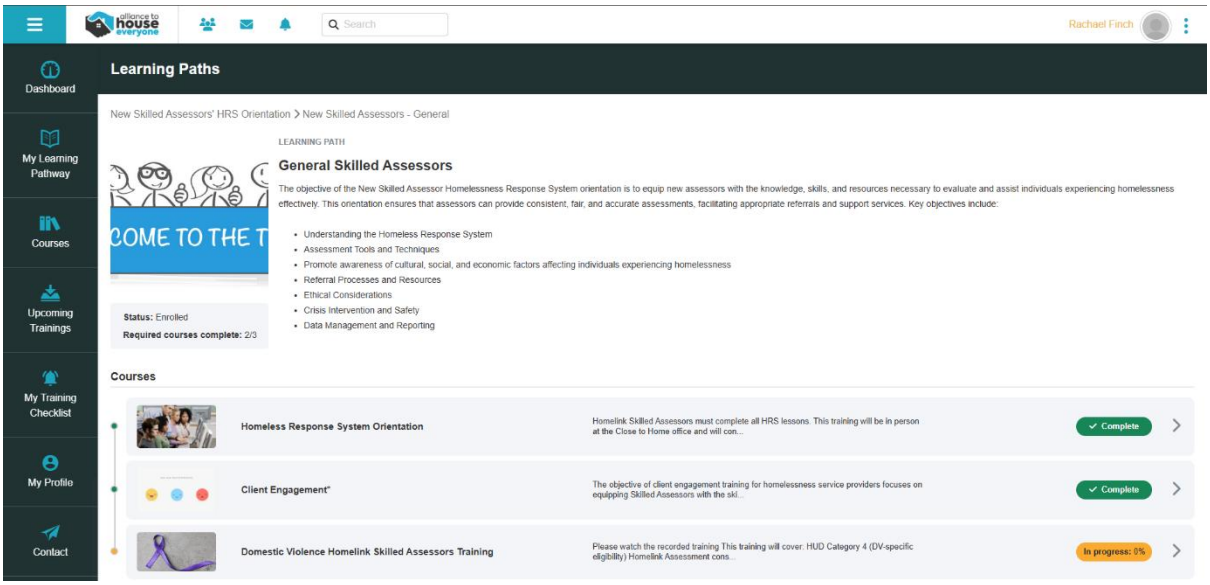
Homelink Skilled Assessors

Skilled Assessors are allotted six months to complete their learning path due to the extensive nature of the training and the demands of the job. Core training is completed within the first 90 days of employment and is indicated with an asterisk.

General Skilled Assessor Courses

These "general" courses are required for all Skilled Assessors, no matter their specific Skilled Assessor Type.

Training Name	Frequency	Mode
HMIS Fundamentals	Bi-Weekly	Virtual
HMIS Principles	Bi-Weekly	Virtual
Homeless Response Overview	Bi-Weekly	In-person event
Homelink Functionality	Bi-Weekly	
Client Engagement: Motivational Interviewing	Quarterly	In-person event
Client Engagement: Harm Reduction Administering Naloxone/Narcan	Quarterly	In-person event
Client Engagement: Mental Health First Aid	Quarterly	Virtual event
Client Engagement: Trauma Informed Care and Ethics and Boundaries	Quarterly	Virtual
First Aid & CPR	TBD	In Person



The above image depicts a Learning Path (Pathway) view from the ATP.

Skilled Assessor: Domestic Violence

In addition to the General Skilled Assessor course, the Homelink Skilled Assessor for staff working primarily with survivors fleeing Domestic Violence[9] the learning path includes the following courses:

Training Name	Frequency	Mode
Trauma-Informed Care Training (20 hrs.)	Quarterly	Virtual
Empowering Survivors: LGBTQ+ Domestic Violence Prevention and Intervention Strategies	Bi-annual	Virtual
Safety Planning Training	Quarterly	Virtual
Serving Domestic Violence Survivors	Quarterly	Virtual
Survivor Sensitivity	Quarterly	Virtual
Supporting Survivors Community Resource List	Self-Paced	Virtual-Alliance Training Portal
Understanding Protective Orders in Texas	Self-Paced	Virtual

Skilled Assessor: SOAR

In addition to the General Skilled Assessor course, the Homelink Skilled Assessor for staff working primarily with assisting clients in obtaining SSI/SSDI benefits as SOAR (SSI/SSDI Outreach Access and Recovery) case managers will complete the following:

Training Name	Frequency	Mode
SOAR Certification (Certification Training provided by SAMHSA)	Self-Paced	Online
Medical Summary Report/ Medical Documentation (SSI/SSDI applications and Reviewing Quality Checklist	Self-Paced	Virtual-Alliance Training Portal
Understanding Social Security Administration and Disability Determination Services (Unit 22)	Sefl-Paced	Virtual-Alliance Training Portal

[9] Per HUD, "Domestic Violence" includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).

File Management (SOAR Checklist)	Self-Paced	Virtual-Alliance Training Portal
Online Application Tracking (OAT)	Self-Paced	Online - SAMHSA
Medicaid Application Process	Self-Paced	Online - SAMHSA

Skilled Assessor: Street Outreach

In addition to the General Skilled Assessor course, the Homelink Skilled Assessor for staff working primarily in Street Outreach capacity, the learning path includes the following courses:

Training Name	Frequency	Mode
Street Outreach Standards	Self-Paced	Virtual Document
Street Outreach Orientation	Self-Paced	Virtual-Alliance Training Portal
Street Outreach Safety Training	Self-Paced	Virtual-Alliance Training Portal
Outreach Grid Training	Self-Paced	Virtual-Alliance Training Portal
Peer to Peer learning (40 hours?)	As scheduled	In-Person

Skilled Assessor: Youth Young Adult

In addition to the General Skilled Assessor course, the Homelink Skilled Assessor for staff working primarily youth and young adults ages 18-24, the learning path includes the following courses:

Training Name	Frequency	Mode
ACES	Monthly	Virtual
Youth Mental Health First Aid	Quarterly	In-Person
Positive Youth Development 101	Self-Paced	Virtual-Alliance Training Portal
Bexar Necessities Learning Course	Bi-Monthly	Virtual
Safe ZoneTraining	Quarterly	Virtual

The Texas Foster Youth Justice Project	Self-Paced	Virtual-Alliance Training Portal
Tenant's Rights Training TRLA	Self-Paced	Virtual-Alliance Training Portal
At Risk Youth Training	Quarterly	Virtual
Youth Housing Problem Solving (Reunification strategies and how to advocate in support of safe housing options)	TBD	Virtual
Life Skills Toolkit	Self-Paced	Virtual – Alliance Training Portal
Youth with Foster Care Experience Resources Tool Kit	Self-Paced	Virtual-Alliance Training Portal

Skilled Assessor: Rapid Rehousing Pathway

In addition to the General Skilled Assessor course, the Homelink Skilled Assessor for staff working primarily in Rapid Rehousing programs, the learning path includes the following courses:

Training Name	Frequency	Mode
Introduction: Context	Self-Paced	Virtual Document
Rapid Rehousing Standards	Self-Paced	Virtual-Alliance Training Portal
Rapid Rehousing Program Philosophy	Self-Paced	Virtual-Alliance Training Portal
Federal Regulations	Self-Paced	Virtual-Alliance Training Portal
Homelink System Navigation	Self-Paced	Virtual-Alliance Training Portal
Housing Identification	Self-Paced	Virtual-Alliance Training Portal
Financial Assistance	Self-Paced	Virtual-Alliance Training Portal
Case Management	Self-Paced	Virtual-Alliance Training Portal
Specialized Populations	Self-Paced	Virtual-Alliance Training Portal

Lived Expertise Pathway

This pathway is for members of the Lived Expertise Advisory Board and Youth Action Board to be equipped with the needed resources for engagement within the CoC.

Training Name	Frequency	Mode
Governance & Onboarding	Self-Paced	Virtual
DV Homelink Skilled Assessor Training	Self-Paced	Virtual
Client Engagement: Motivational Interviewing	Quarterly	In-person event
Client Engagement: Harm Reduction Administering Naloxone/Narcan	Quarterly	In-person event
Client Engagement: Mental Health First Aid	Quarterly	Virtual event
Client Engagement: Trauma Informed Care and Ethics and Boundaries	Quarterly	Virtual

Annual Skilled Assessors Trainings

Training Name	Frequency	Mode
Governance & Onboarding	Self-Paced	Virtual
DV Homelink Skilled Assessor Training	Self-Paced	Virtual
Client Engagement: Motivational Interviewing	Quarterly	In-person event
Client Engagement: Harm Reduction Administering Naloxone/Narcan	Quarterly	In-person event
Client Engagement: Mental Health First Aid	Quarterly	Virtual event

Continuing Educational Offering

Training Name	Frequency	Mode
Trauma Informed Care	Quarterly	In-Person

Listening Sessions with YAB and LEAB	As Needed	In-Person
Understanding the CoC Interim Rule	As Needed	Virtual
Mental Health and Substance Use Continuing Education	TBD	
Human Trafficking	Quarterly	Virtual

Training Registration/Requests

If you have any questions regarding the training framework or gaining access to the Alliance Training Portal, please email training@closetohomesa.org.

To begin the Skilled Assessor Pathway that is specific to your role, you start by requesting HMIS training and get enrolled into the Alliance Training Portal. Click here to get started.

It is recommended to log into the Alliance Training Portal at least once every 30 days to review any updates, procedural changes, or notifications regarding trainings.

Training Descriptions

Below is a list of all training courses that have been identified throughout the training framework in various learning pathways and their objectives. Refer to the learning path section to know what trainings are needed for each role in the homeless response system.

Aces Adverse Childhood Experiences: To increase awareness and understanding of the impact of childhood trauma on development and behavior.
At Risk Youth Training: To equip professionals with the knowledge and skills needed to identify, prevent, and respond to child exploitation effectively.

Bexar Necessities Learning Course: To enhance the ability of local agencies and organizations to effectively utilize the Bexar Necessities platform.
Board of Directors: To equip CoC Board members with a thorough understanding of the Continuum of Care (CoC) components and the governance structure supporting it, Non-profit monitoring, HMIS Lead, CE lead, and Collaborative applicant lead ensuring they can effectively contribute to decision-making policy for the entire CoC and CTH as a non-profit.

Client Engagement: The objective of client engagement training for homelessness service providers focuses on equipping Skilled Assessors with the skills, knowledge, and strategies needed to engage, service, and support clients experiencing homelessness effectively.
Close to Home Non-Profit and CoC Governance Charter: provides an in-depth examination of the Close to Home Non-profit organization and the Close to Home Nonprofit and CoC Governance Charter and Bylaws. Participants will gain a thorough understanding of the governance structure that guides the TX-500 Continuum of Care, including the roles, responsibilities, and interrelationships of all governing bodies. The course explores the legal and regulatory framework that establishes the CoC's authority, outlines decision-making

processes, and defines how policies are developed, approved, and implemented across the homeless response system.
CoC Governance in Practice: To provide members with hands-on experience and practical insights into governance operations, fostering confidence in participating in real-time decision-making and collaboration within the CoC governance framework.
CoC Governance Orientation: To familiarize new Alliance members with the roles, responsibilities, and processes within the CoC governance structure, helping them understand how to effectively contribute to decision-making and policy development.
CoC Governance Overview: To offer governance participants a comprehensive overview of the CoC's committees, their functions, and the interconnection of governance within the broader homeless response system, preparing them to actively engage in governance activities.
CoC Local Requirements: These trainings are intended to provide an overview of our local policies and requirements for our CoC and ESG funded agencies.
CoC Notice of Funding Opportunity New Applicant Grant Conference: To inform and support new NOFO grant applicants by providing clear guidance, helpful resources, and an overview of the application process and full competition cycle.
CoC Program Interim Rule: To provide new Alliance members with foundational knowledge of the CoC model, including its regulatory framework and guiding principles, enabling them to understand the HUD CoC structure.
CoC Renewal Applicant Grant Conference: To inform and support renewal NOFO grant applicants by providing updated guidance, relevant resources, and a clear overview of the application process, including key changes from the previous competition cycle.
CoC Strategic Plan Training: provides participants with a comprehensive understanding of the strategic planning process that guides the Continuum of Care's efforts to prevent and end homelessness in San Antonio and Bexar County. This course examines how the Local Strategic Plan to Respond to Homelessness serves as the foundation for setting priorities, allocating resources, and measuring progress within the homeless response system.
Communication & Support Structure: To familiarize supervisors with the available communication channels and support resources, including monthly supervisor meetings, ATP contact features, office hours, and emergency protocols.

DV Grantees: Develop an overview of the parameters of DV Bonus, and how this project type differs from other project set ups. Provide agencies with the knowledge of DV Federal Regulations their projects will be required to abide by, and a clear understanding of what VSPs are and how they differ in from other DV providers.

Empowering Survivors: LGBTQ+ Domestic Violence Prevention and Intervention Strategies: This focused training session equips service providers and advocates with essential knowledge and skills for supporting LGBTQ+ survivors of domestic violence. Through interactive learning and practical applications, participants will gain understanding of unique challenges and develop culturally responsive intervention strategies.

Federal Regulations and Local Standards: To ensure participants understand the regulatory framework governing Rapid Rehousing programs, including HUD CoC Program Interim Rule, ESG Program requirements, TX-500 CoC Written Standards, HMIS data collection requirements, and Fair Housing and VAWA protections.
File Management (SOAR Checklist): To ensure that case workers can efficiently organize, manage, and maintain the documentation required for SSI/SSDI applications.

Financial Assistance and Progressive Engagement: To build competency in implementing the progressive engagement model, calculating rental assistance, verifying income, providing move-in cost assistance, and supporting clients with budget planning and financial counseling.
First Aid and CPR: To prepare Homelink Skilled Assessors to respond effectively to medical emergencies by providing initial care and potentially saving lives.
Forms and Documentation Management: To ensure supervisors understand the purpose, requirements, and submission processes for Skilled Assessor Forms and Supervisory Forms, enabling effective documentation management.

Getting Connected: To empower the audience with foundational knowledge about homelessness, including what it is, how San Antonio and Bexar County's Homeless Response System operates, available resources and how to access them, and the roles of the Alliance and the Close to Home initiative. This understanding will support informed advocacy for individuals at risk of or experiencing homelessness.
Grantee Data System Overview: Develop a comprehensive understanding of what steps are involved in the project set up processes and the importance of data quality. (Furthermore, there will be a developed portion for the HMIS team to develop a clear understanding of our agency's Grant Transfer process, and the steps taken to ensure both the CE Lead and the HMIS Lead are aligned in this collaborative effort.)
Grantee Financial Overview: Provide agencies with a generalized overview of their grants, and what they are able to utilize their funding for in regards to spending. An overview of grant expansion and budget reallocations will summarize the processes needed for these steps and ensure that agencies are able to thoroughly understand these processes within our CoC.
Grantee Monitoring: These trainings are intended to provide an overview of our local policies and requirements for our CoC and ESG funded agencies.
Grantee Performance Overview: Provide a comprehensive overview of the necessary data elements Grantees will be required to participate in, and what these processes require from each agency.

Harm Reduction: To equip Homelink Skilled Assessors with the knowledge and skills to effectively implement harm reduction strategies aimed at minimizing the negative health, social, and economic impacts associated with risky behaviors, particularly in the context of substance use.
HMIS Fundamentals: Fundamentals Training is designed to teach you the basics of HMIS. The topics covered in this training are: Exploring the HMIS Website, HMIS Workspaces, How to Find a Client, How to Enter Services, and How to Enter Case Notes. Principles of HMIS is required for all HMIS users who are responsible for enrolling and/or exiting clients into projects.
Homeless Response Overview Homelink Day 1: To gain a thorough understanding of the Continuum of Care (CoC) and Homelink systems, including their purposes, structures, and services. This includes developing problem-solving skills to address housing challenges, promoting positive youth development principles, and recognizing the importance of equity and inclusion in addressing homelessness. Additionally, the objective aims to cultivate buy-in through the sharing of success stories.
Homelessness 101: To educate the general public and interested organizations—including neighborhood associations—about homelessness in San Antonio and Bexar County. This includes an overview of the local Homeless Response System, a foundational understanding of homelessness, the roles of Close to Home and the Alliance, and the resources available

throughout the community.
Homelessness 102: To equip and engage homelessness direct service providers with a comprehensive understanding of the Continuum of Care (CoC), the local Homeless Response System, Close to Home and Alliance programs roles, and opportunities for collaborative involvement.
Homelink Functionality Day 2: To gain a comprehensive understanding of the Homelink process, from initial access to permanent housing. This includes effectively navigating the HMIS database to connect clients to services or retrieve housing referrals, understanding the steps and criteria for Homelessness Prevention, Diversion, Housing Vouchers, and Housing projects, SOAR and Skilled Nursing Programs, and maintaining client activity. Additionally, the objective encompasses learning how to download and sort the Priority Pool in HMIS for housing referrals, resource eligibility lists, and prevention lists, understanding various meetings and case conferencing sessions, exploring all Homelink forms, and comprehending the monthly performance report for each intervention.
Homelink System Integration: To develop proficiency in navigating the coordinated entry process, RRH enrollment procedures in HMIS, referral partner expectations, priority pool management, and proper documentation through case notes templates.
Housing Identification and Landlord Engagement: To equip participants with effective strategies for landlord recruitment, housing search processes, understanding landlord-tenant rights and responsibilities, applying fair housing principles, and supporting lease negotiation.
Housing Program Overviews: To equip supervisors with essential knowledge about various housing programs, including Rapid Rehousing, Permanent Supportive Housing, and Transitional Housing, covering program definitions, eligibility criteria, and success metrics.
HUD CoC Regulations Overview: These trainings are intended to review the essential aspects of the CoC funded program federal regulations and guidance received from HUD.

Income Determination Training: To ensure that Homelink Skilled Assessors accurately assess and verify the income of individuals and households applying for various assistance programs
Introduction: Context & Objective of Rapid Rehousing: To provide a comprehensive understanding of Rapid Rehousing's role in the homeless response system, including its three core components: housing identification, rental assistance, and case management, while emphasizing trauma-informed care.
Introductory to the CoC: Provide an encompassing overview of what the CoC is, including Federal Regulations and Local Requirements to ensure Grantees are well educated in these areas prior to project implementation.

LEAB/YAB: To have Lived ex-board members that are experts in the San Antonio Homeless Response System through training on the system to be integrated into governance decision-making and have a system that champaigns nothing about us without us.
Life Skills Toolkit: The Life Skills Toolkit for Youth and Young Adult Serving Agencies is a self-paced, practical training designed to strengthen the capacity of youth-serving professionals to support adolescents and young adults as they build essential skills for stability, independence, and long-term success.

Medicaid Application Process: To equip participants with the knowledge and skills needed to efficiently navigate and manage the Medicaid application process.
Medical Summary Report/Medical Documentation: The Medical Summary Report (MSR) is SOAR's signature tool and key to a successful application. It provides a succinct,

comprehensive summary of the child's personal and treatment history and its impact on his or her life. It also clearly describes the factors affecting functioning and ability to work.
Meeting Structure and Participation: To clarify the required meetings within the system, staff attendance requirements by role, and the purpose of each meeting to ensure appropriate participation and representation.
Mental Health First Aid: To provide Homelink Skilled Assessors with the skills and knowledge needed to offer initial support to individuals experiencing mental health crises or issues.
Motivational Interviewing: To provide Homelink Skilled Assesors with the skills and techniques needed to effectively engage individuals in conversations about change while addressing unique challenges and needs.

Naloxone/Narcan Training: To ensure that Homelink Skilled Assessors are equipped with the knowledge and skills to effectively administer naloxone, an opioid antagonist used to reverse opioid overdoses.

Online Application Tracking (OAT – SOAR): To equip participants with the skills and knowledge needed to effectively use the OAT system for managing and tracking SOAR-Assisted SSI/SSDI applications.
Outreach Grid Training: To Onboard new users to Outreach Grid. Outreach Worker Users have access to client management, camp management, referrals (to other agencies or within their own), and incidents. Outreach workers may only assign themselves as a client's case manager. Users may only edit client assessments that they themselves created. Outreach workers do not have access to reports. Users may refer their clients to shelters. Outreach workers can inform other users of a missing client using a BOLO alert.

Peer to Peer Learning: Peer to Peer learning reinforces concepts learned in the classroom and provides an opportunity for learning through observation of real-world service delivery. It also provides an opportunity for new outreach workers to develop a solid foundational knowledge of our community's approach to street outreach, familiarizes staff with available resources, and allows staff to network and build support across teams.
Positive Youth Development: To empower young people by fostering their strengths and providing them with the skills, opportunities, and support they need to thrive.
Principles of HMIS: Principles of HMIS is required for all HMIS users who are responsible for enrolling and/or exiting clients into projects. This training provides an in depth overview of the HMIS Data Standards Manual, Chronic Homelessness, Focus Elements, Enrolling clients, Exiting clients, and Adding or Editing Assessments.
Program Philosophy & Design: To establish a solid foundation in the key principles guiding Rapid Rehousing programs, including progressive engagement principles and strengths-based case management.

Rapid Rehousing and Homelessness Prevention Guidelines: To equip Homelink Skilled Assessors with the knowledge and skills necessary to effectively implement programs that help individuals and families quickly exit homelessness and achieve housing stability.
Renewal Biannual Trainings: Review required HUD trainings in order to achieve understanding and alignment with Federal Regulations.
Renewal Grantees Annual Trainings: Provide a clear overview of the NOFO, processes and steps required by each agency throughout the process.

RRH Enrollment Process: To demonstrate the practical application of RRH enrollment procedures, including completing housing stability plans, documenting financial assistance determination, and understanding the timing within the enrollment process.
RRH Program Standards Review: To familiarize participants with the detailed standards and requirements of Rapid Rehousing programs through a section-by-section examination of the standards in HMIS.

Safe Zone Training: To create environments where individuals feel secure, respected, and supported. By promoting safety, fostering inclusivity, enhancing awareness and building support networks.
Safety Orientation: To ensure that Homelink Skilled Assessors are equipped with the knowledge and skills to maintain a safe and secure environment for both themselves and their clients.
Safety Planning Training: The objective of safety planning training for working domestic violence (DV) survivors is to empower them with strategies and tools to enhance their safety and well-being.
Serving Domestic Violence Survivors: To equip Homelink Skilled Assessors with the knowledge, skills, and sensitivity needed to effectively support and empower survivors.
SNOFO Grantees: These trainings will develop an overview of the SNOFO grant parameters, including the unsheltered definition and what the SOAR project component is to ensure alignment across all SNOFO agencies.
SOAR Certification: To equip case workers with the skills and knowledge needed to assist individuals who are experiencing or at risk of homelessness and have serious mental illness, medical impairments, and/or co- occurring substance use disorders.
Specialized Populations in RRH: To enhance understanding of the unique needs and requirements when serving youth and young adults, domestic violence survivors, and families with children in Rapid Rehousing programs.
Staff Management Best Practices: To enhance supervisors' capacity to implement effective hiring practices that incorporate lived experience expertise, promote authentic engagement with people experiencing homelessness, and oversee staff training progress.
Street Outreach Orientation: To equip new outreach workers with the knowledge, skills, and understanding necessary to effectively engage with and support individuals experiencing homelessness. The orientation will cover key principles of compassionate communication, safety protocols, resource navigation, and the importance of building trustful relationships. By the end of the orientation, new workers will be prepared to approach their roles with empathy, cultural sensitivity, and a comprehensive understanding of the community they will serve.
Street Outreach Standards: To improve service coordination and collaboration to better respond to the needs of people experiencing homelessness across agencies serving people in unsheltered situations.
Supervisor Professional Development: To strengthen supervisors' leadership skills, ability to support staff wellness, and capacity to manage complex cases through frameworks, strategies, and resources for effective team leadership.
Supporting Survivors Community Resource List: This course provides direct access to the Supporting Survivors Community Resource List, a centralized collection of community-based resources designed to support survivors of domestic violence and other forms of trauma. Within this course, participants can explore a curated list of services organized by key areas of need, including workforce development, support groups, and legal assistance. The resource list is designed to help providers quickly identify and connect survivors to trusted community partners that promote safety, stability, and long-term self-sufficiency.

Survivor Sensitivity Training: Best practices for working with survivors of sexual assault and responding to outcries. Explores specific populations that are at higher risk for sexual assault and the barriers they face when reporting and seeking help.
System Access & Staff Management: To provide supervisors with comprehensive knowledge of HMIS training registration processes and staff departure protocols to ensure proper system access management.

Tenants' Rights Training with Texas Rio Grande: To educate tenants about their legal protections and responsibilities.
The Texas Foster Youth Justice Project: To equip YYA Homelink Skilled Assessors with the knowledge and skills necessary to effectively support foster and youth who are experiencing homelessness.
Training Pathway Overview: To provide supervisors with a comprehensive understanding of how different training pathways connect, their progression logic and prerequisites, through an interactive walkthrough of key pathways.
Trauma Informed Care & Ethics and Boundaries: In order to enhance and develop the appropriate skills to serve clients who may have experienced trauma, and too ensure that Homelink Skilled Assessors understand and apply ethical principles that respect the dignity, autonomy, and rights of individuals experiencing homelessness.

Understanding Protective Orders in Texas: This training explains types of protective orders available under Texas law, recent legislative updates, and how orders can improve survivor safety. Topics include protective orders for family violence, dating violence, sexual assault, stalking, trafficking, and emergency situations.
Understanding Social Security Administration and Disability Determination Services (Unit 22): To provide a comprehensive understanding of how disability benefits are determined and administered, Increase knowledge of SSA programs, enhance application skills and improve case management.

YHDP Grantees: Provide an overview of special activities in order to equip our YHDP funded agencies with as much knowledge on the flexibility of their projects and how they can further expand into areas other CoC funded projects may not be able to.
Youth and Young Adult With Foster Care Experience Resource Tool Kit: This training will increase the awareness of resources that are available to youth and young adult with foster care experience in order to increase their access to support services.
Youth Housing Problem Solving: To equip service providers with the skills and strategies needed to help young people resolve housing crises quickly and effectively, strengthen support networks, increase awareness of resources, foster self-sufficiency and enhance problem solving skills.

Link to Glossary

Click here to find a list of CoC Terminology and Acronyms (Appendix C in the 2026 Alliance to House Everyone One-Year Action Plan) that provides the common language and definitions for the Alliance.

Appendices

Appendix A: Policy and Procedures Checklist

Note: Please refer to Rapid Rehousing and Homeless Prevention Standards in the addendum for more information specific to these project types.

Shelter and Housing Projects

- ☐ Conflict of interest
- ☐ Homeless participation
- ☐ Faith-based activity
- ☐ Nondiscrimination, equal opportunity, and affirmative outreach
- ☐ Uniform administrative rules
- ☐ Program participant records are kept secure and confidential
- ☐ Participation in HMIS or comparable database
- ☐ Homeless status
- ☐ At risk of homelessness status
- ☐ Determination of ineligibility
- ☐ Annual income
- ☐ Program participant records
- ☐ Centralized or coordinated assessment systems and procedures
- ☐ Rental assistance agreements and payments
- ☐ Environmental review
- ☐ Lobbying and disclosure
- ☐ Displacement, relocation, and acquisition
- ☐ Procurement
- ☐ Utility allowance
- ☐ Emergency shelter facilities
- ☐ Services and assistance provided
- ☐ Coordination with CoCs and other programs
- ☐ Matching
- ☐ Financial records
- ☐ Subrecipients and contractors
- ☐ Period of record retention
- ☐ Access to records
- ☐ Reports

ESG Program Participation Records

- ☐ Evidence of homeless status or at risk of homelessness status, as applicable
- ☐ The services and assistance provided to the program participant including, as applicable, the security deposit, rental assistance, and utility payments
- ☐ Compliance with applicable requirements for providing services to that program participant under the program components and eligible activities
- ☐ Compliance with applicable requirements for providing services to that program participant under the provision on determining eligibility and the amount and type of assistance.
- ☐ Compliance with applicable requirements for providing services to that program participant under the provision on using appropriate assistance and services.

Case Management

- ☐ 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
- ☐ Notes documenting reported changes in the program participant

Eligibility Requirements

- ☐ A copy of the CoC-approved coordinated assessment of the program participant and recording that information in HMIS
- ☐ Determination and verification/certification that the program participant was eligible for the services and/or financial assistance
- ☐ Determination and verification/certification of the program participant's homeless or at risk of homelessness status
- ☐ Determination and verification/certification that the program participant lacked sufficient resources and support networks to obtain the assistance from other sources.
- ☐ Determination and verification/certification that the program participant met income requirements, as applicable, and that an effort was made to obtain source documents or 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.
- ☐ When applicable, determination that individual or family was ineligible for ESG assistance, which should include the reason for that determination in sufficient detail that the logic behind determination is clear.
- ☐ For CoC funded projects, acceptable evidence of homeless status.

Financial Assistance Information Requirements

- ☐ Identification of the specific services and financial assistance amounts that were provided to 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

Housing Relocation & Stabilization Requirements

- ☐ When applicable, verification that the services were terminated.
- ☐ Copy of individualized housing stability plan
- ☐ For CoC funded projects, acceptable evidence of homeless status.

Permanent Supportive Housing (PSH) Only Requirements

- ☐ Determination and verification/certification that the only households served through permanent supportive housing dedicated for chronically homeless individuals and families meet the definition of chronic homelessness

- ☐ Units that are prioritized for the chronically homeless must maintain documentation that: the participant met the definition of chronic homeless on program entry or that there were not eligible chronically homeless participants at the time of project vacancy and this can be documented by the Coordinated Entry System
- ☐ 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

Homelessness Prevention (HP) Only Requirements

- ☐ 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

Rapid Rehousing (RRH) Only Requirements

- ☐ Determination and verification/certification that the program participant met the criteria for being Category 1 or Category 4 Homeless (as long as the individuals/families fleeing or attempting to flee DV are also literally homeless) and that an effort was made to obtain written third-party verification, when possible and applicable

Financial Records Requirements

- ☐ Supporting documentation for all costs charged to ESG or CoC grant
- ☐ Documentation showing ESG or CoC funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles
- ☐ Time sheets and time allocation for all personnel paid for with CoC and/or ESG funding
- ☐ Documentation of the receipt and use of program income
- ☐ Documentation of the receipt and use of matching funds
- ☐ Copies of procurement contracts

Appendix B: Street Outreach Governance Structure

The following graphic demonstrates the local governance structure for policy and practice decisions regarding street outreach in San Antonio/Bexar County.

Appendix C: Summary of Updates to Homeless Street Outreach Community Written Standards

February 2024

- **Entire Document**
  a. Added logos for Corazon and Christian Assistance Ministries (CAM)
  b. Changed Close to Home Governance verbiage to match the changes made January 1st, 2023.
  c. Changed Street Outreach Case Conferencing to Community Case Conferencing.
  d. Grammatical fixes.
  e. Formatting fixes.
- **Section I.1 Defining Homelessness and Unsheltered**
  a. Added Homelessness and Unsheltered definition
- **Section 1.3.7 "In-reach" Outreach**
  a. Included CAM and Corazon
- **Section I.5. Maintaining A Housing Focus**
  a. Changed heading to Maintaining A Client-Centered Focus
  b. Removed section 4.6 because it was redundant and condensed into other sections.
- **Section 1.6. Coordination and Delivery of Street Outreach Services**
  a. Removed the "Taking direction in the" Coordination and Delivery title
  b. Clarified role of HRSAC and named outreach-specific committee seats in section I.6.3
  c. Clarified description of Outreach and Access subcommittee in section I.6.4
  d. Clarified description of Community Case Conferencing in section I.6.5
  e. Added purpose and expectations for Centralized Shelter Coordination in Section I.6.6
- **Section 1.9. Professional Training and Ethics**
  a. Section removed as it will be incorporated into the Community Training Framework.
- **Section I.11. Hours of Operation**
  a. Condensed section 11.4 into other areas.
- **Section I.12. Transportation**
  a. Shortened the language in this section to reflect current transportation requirements.
  b. Added 12.3 a disclaimer on what to do if you are unsure what steps to take.
- **Section I.13. Structured Engagement**
  a. Added language around engagement without consent and not recording services in HMIS.
- **Section I.16. Staying Connected to Existing Unsheltered Persons**
  a. Shortened title to "Staying connected"
  b. Added a section to include language around the new field guy, defining pre-engagement encounters, and how to capture them.
  c. Updated information regarding inactivity.
- **Section I.17 Operational Documentation**
  a. Added language about assisting with the completion of community standardized forms (i.e., Chronic Homelessness, etc.).

- **Section I.19 Street Outreach Coordination with Homeless Response System (Homelink)**
    a. Shortened the title
    b. Clarified "No-Wrong Door" Hybrid Model.
    c. Added information about new programs and procedures are discussed at Community Case Conferencing
- **Section I.25. Grievances**
    a. Added language around the current grievance policy offered through the CoC
    b. Added links to Grievance policy and the grievance form in English and Spanish
- **Section I.27. Personal Safety & Equipment**
    a. Reformatted this section
    b. Added language around responsibility for personal safety and taking necessary measures to reduce risks.
- **Moved section 32 responding to encampments to the training section.**
- **Section I.31. Inclement Weather**
    a. Renamed entire section to Weather Advisories

Appendix D: Youth and Young Adult with Foster Care Experience Resource Tool Kit

In the Summer of 2024, the Youth and Young Adult Subcommittee held a group discussion to identify and acknowledge the resources available for youth with foster care experience, from this discussion they identified that there was an evident disconnection in the knowledge of the resources available to youth and young adults who have transitioned out of foster care or had foster care experience. Following this discussion, the subcommittee agreed that formalized connections to the available resources needed to be made in order to maximize and explore all housing options for youth and young adults who may be experiencing homelessness with a history of foster care experience.

In alignment with the Alliance Action Plan's third objective "Strengthen Homeless Response and Services for Youth and Young Adults" the Subcommittee proposed the option to the Homeless Response System Advisory Committee to approve the addition of Youth and Young Adult with Foster Care Experience Resource Tool Kit to the Youth Young Adult Training Pathway within the Alliance Training Portal. The Homeless Response System Advisory Committee approved this proposal in March of 2025.

This Pathway will allow staff who work with Youth and Young Adults to learn about additional resources available within the community that can be shared with Youth and Young Adult program participants, along with the inclusion of an identified point of contact for staff to connect with from each resource for any inquiries. This tool kit will further support the strengthening of the Homeless Response System for Youth and Young Adults by providing staff with consistent access to resources in a centralized location.

To ensure sufficient monitoring of this resource, key vision holders will be informed during the Youth and Young Adult Subcommittee and through monthly summary updates during parent committee meetings. The Youth and Young Adult Subcommittee will ensure that the training courses available are up to date by checking in quarterly in their subcommittee space with the assistance of the Close to Home Youth and Young Adult Subcommittee Lead.

Appendix E: Training and Resource Tool for Aligned Federal-Funded Programs

This tool is for CoC and ESG funders and recipients to provide resources and assist with monitoring. This tool will be updated as new resources become available.

Training and Resource List for All CoC, ESG, and other federally funded aligned programs:

If CoC funded:

- CoC Program Interim Rule
- 24 CFR 578

If ESG funded:

- ESG Program Interim Rule
- 24 CFR 576

Both CoC and ESG funded:

- HUD Virtual Binders
- Homeless Management Information System (HMIS) Policies and Procedures
- Coordinated Entry System (Homelink) Policies and Procedures
- Authentic Homeless Participation
- Equal Access Agency Assessment Tool
- Equal Access Expectations: Training Scenarios for Use with Project Staff

Appendix F: Emergency Transfer Plan

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

Emergency Transfers:

[Insert name of covered housing provider (acronym HP for purposes of this model plan)] is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, stalking or human trafficking. In accordance with the Violence Against Women Act (VAWA)[10], HP allows tenants who are victims of domestic violence, dating violence, sexual assault, stalking, human trafficking, or other dangerous, traumatic or life threatening conditions related to the violence against the individual or a family member in the individual's family or family's current housing situation to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex or sexual orientation.[11] The ability of HP to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, and on whether HP has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to 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), the Federal agency that oversees that [insert name of program or rental assistance here] is in compliance with VAWA.

Eligibility for Emergency Transfers:

A tenant who is a victim of domestic violence, dating violence, sexual assault, stalking, human trafficking or other dangerous, traumatic or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. 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 may still request an emergency transfer if they meet the eligibility requirements in this section.

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[10] Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

[11] Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

Emergency Transfer Request Documentation:

To request an emergency transfer, the tenant shall notify HP's management office and submit a written request for a transfer to [HP to insert location]. HP will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

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

Confidentiality:

HP will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives HP written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, stalking, human trafficking or other dangerous, traumatic or life-threatening conditions against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about HP's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, stalking, human trafficking or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual.

Emergency Transfer Timing and Availability:

HP cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. HP will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, stalking, human trafficking or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual to another unit, subject to availability and safety of a unit. 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. HP may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If HP has no safe and available units for which a tenant who needs an emergency is eligible, HP will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, HP will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking that are attached to this plan.

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 victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY). Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE or visit the online hotline at https://ohl.rainn.org/online/.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at https://www.victimsofcrime.org/our-programs/stalking-resource-center.

Appendix G: YHDP Household Policy Excerpts and Job Aid

YHDP Household Policy Excerpts

YHDP Household Composition Policy

The Youth Homeless Demonstration Program (YHDP) is allocated federal funding to Youth and Young Adult serving projects, whose main focus is to target and mark youth homelessness brief and nonrecurring. YHDP funding is dedicated to serving individuals ages 18-24 years old who are experiencing homelessness under HUD eligible categories outlined in 24 CFR 578.3.

Instances have occurred throughout the years regarding YHDP Household compositions where household members may be above or below YHDP age eligibility requirements. The following provides outlined guidance from HUD regarding these situations. See "YHDP Household Guidance" for the full complete job aid.

Households With Individuals 25+

Recent guidance from HUD clarifies that while YHDP eligibility is limited to unaccompanied youth experiencing homelessness, this restriction does not restrict YHDP program participants from adding additional members to their household, so long as the eligible YHDP program participant is the Head of Household and approval is received from their service provider and landlord.

YHDP programs cannot serve the older member of the household with supportive services or house the family in a larger unit based on the additional older household member.

If a Household with a YHDP aged Head of Household presents for assistance with a household member aged 25+ years old, the full Household should be enrolled within the YHDP project, based on our local HMIS connecting household members through their enrollments.

At the time of Annual Performance Report (APR) submissions, YHDP programs should notate the number of Households with an older member who were not serviced by the YHDP project within the Additional Comments section of the report.

Households With Minors

HUD has emphasized the importance of creating separate records for individuals under the age of 18 who present together to better understand homelessness among youth, but that entering individuals in separately is **not** permitted to be a barrier to or impact the receipt of future interventions.

Should two or more people under the age of 18 present together for assistance, and one of the people presenting is not the child of the other (e.g., brother and sister) HUD has outlined that each person should be entered as their own record in their own respective household.

Should two people under the age of 18 present together for assistance with a child, the two minors should be recorded in separate households, with eh child being added to the household of the parent the child would live with should the parents be separated for any reason.

HUD's guidance has outlined that this guidance is applicable for all project model types, including SSO, TH, RRH and Joint TH-RRH.

YHDP Household Guidance

Background

Over the past year we have had multiple instances of CoC funded agencies inquiring about older members of a household who reside with a YHDP aged participant, and what our policies are surrounding them being entered into HMIS. According to HUD requirements, YHDP eligibility is limited to unaccompanied youth experiencing homelessness, including pregnant or parenting youth, who are not accompanied by their parent or guardian during their episode of homelessness and where no member of the household is older than 24.

Recent guidance from HUD further clarifies that this restriction means that youth can add this older member to the household, but YHDP programs cannot serve the older member with supportive services or house the family in a larger unit based on this additional older household member. These excerpts include guidance received directly from the TX-500's dedicated YHDP Desk Officer along with HUD reporting requirements and serving Households.

Some initial instances that were brought up were as follows:

A client who is eligible for a YHDP project has a spouse over 25 years old who will be living in the same home as the program participant.

A YHDP project is serving a client with a child and her partner in a two-bedroom unit. The client's lease will be up soon, and the client wants to move into a three-bedroom unit so her sister and child can move in with her to assist in caring for her child while they both work. Would the agency need to add her sister and child into HMIS under the original client's family composition? Or would this have to be considered a separate household?

Guidance from HUD

If the person is under 25, it does not matter whether this second youth is experiencing homelessness or not (according to the eligible HUD categories). The Head of Household can add this youth to their household with approval from their service provider and landlord as long as the unit is large enough to accommodate additional family member in accordance with applicable federal, state and local standards, the services required to meet the needs of a new family member are available (if meet age requirement), and housing the family together does not present an imminent health and/or safety risk. They would be served as one household and added to the same lease with landlord approval.

Because a person 25 or older is not eligible for YHDP, youth can add this older member to their household, but YHDP programs cannot serve the older member with supportive services or house the family in a larger unit based on this additional older household member. In other words, if this household is composed of the youth and the older person they would only qualify for a one-bedroom unit.

How to Capture YDHP Household Compositions in HMIS

If a Household with a YHDP aged Head of Household presents for assistance with a household member aged 25+ years old, the full Household should be enrolled within the YHDP project.

The YHDP project should notate the following within HMIS Case Notes, "Household includes an adult age 25+ who is not eligible for YHDP assistance. No YHDP funds or services are provided to this individual. Eligibility, rent calculation, and services are based solely on YHDP-eligible household members age 24 or younger."

At the time of Annual Performance Report (APR) submissions, YHDP projects should notate the number of Households with an older member who were not serviced by the YHDP project within the Additional Comments section of the report.

Scenario	Eligibility	How it is administered
Two youth present as a family seeking assistance together as one household and both youths are currently experiencing homelessness (according to the eligible.	Both are eligible for YHDP assistance as one household.	Would be served as one household on the same lease. For the purposes of YHDP RRH, their combined income would be considered for the rental calculation.
Two youth present as a family seeking assistance together as one household. Only one of the two is currently experiencing homelessness (according to the eligible HUD categories).	In general, when determining the homeless status of families where the individual members are not residing together when they present for intake into the project (e.g. one parent is staying in an emergency shelter and the other parent is staying with a child at a friend's house), eligibility must be assessed based on the homeless status of the head of household (family can choose HoH). Therefore, both are eligible for YHDP assistance as one household if they choose the eligible youth as HoH.	Would be served as one household on the same lease. For the purposes of YHDP RRH, their combined income would be considered for the rental calculation.
One youth, who is experiencing homelessness (according to the eligible HUD categories), presents for assistance. After program entry, the youth wishes to add another youth to their household (adding a member to their family).	As an added family member to the household, it does not matter whether this second youth is experiencing homelessness or not (according to the eligible HUD categories). The HoH can add this youth to their household with permission from service provider and landlord as long as the unit is large enough to	Would be served as one household and added to the same lease with landlord approval. For the purposes of YHDP RRH, their combined income would be considered for the rental calculation.

	accommodate additional family member in accordance with applicable federal, state and local standards, the services required to meet the needs of a new family member are available (if they meet age requirement), and housing the family together does not present an imminent health and/or safety risk.	
One youth, who is experiencing homelessness (according to the eligible HUD categories), presents for assistance. This youth wishes to roommate with a non-YHDP participant (regardless of age).	The youth is eligible. The roommate will not receive services or financial assistance from the program.	The youth participant would be served as a separate household from the roommate with a separate lease that clearly states the youth participant's rent obligation (pro-rated share) and right to remain in the unit, even if the roommate leaves.
One youth present with another person, who is age 25 or older, seeking assistance together as a family. Both are experiencing homelessness (according to the eligible HUD categories).	Establishing a Household must be done at assessment. If this situation occurs, offer guidance that the Household should seek other resources that can provide services and assistance to the entire family.	n/a
One youth, who is experiencing homelessness (according to the eligible HUD categories), presents alone for assistance. After program entry, the youth wishes to add another member to their household who is over 24.	Per recent HUD guidance, the youth participant can add this older member to their household and lease with provider and landlord approval. This applies even if the older member is a parent or guardian. But YHDP programs cannot serve the older member with supportive services or house the family in a larger unit based on this additional older household member. The rent would not need to be pro-rated and the entire household's income would	If adding the older household member does not necessitate a larger unit, then can add the household member to the lease with landlord approval. Only the youth would receive services, and the older Household member would not. The rent would not need to be pro-rated. If the additional household member necessitated a larger unit, then they can pursue this as a shared living situation. The youth

	be considered when calculating rental assistance. However, if the inclusion of an additional household member necessitated a larger unit size**, then you would treat this as shared housing (pro-rata share). Or, when appropriate, the youth and their new household member(s) could consider another assistance program that would serve them together.	participant would be served as a separate household from the roommate with a separate lease that clearly states the youth participant's rent obligation (pro-rated share) and right to remain in the unit, even if the roommate leaves. Or, when appropriate, the youth and their new household member(s) could consider another assistance program that would provide services to them together.

**Unit is not large enough to accommodate additional family members in accordance with applicable federal, state, and local standards (Note that CoC funded programs are required to have at least one bedroom or living/sleeping room for each two persons and may not require children of the opposite sex, other than very young children, to occupy the same bedroom or living/sleeping room).

Households with Individuals Under the Age of 18

In seeking guidance for older members in YHDP Households, questions arose surrounding data entry requirements for minor households seeking assistance. HUD's guidance has outlined that the following guidance is applicable for all YHDP project model types, including SSO, TH, RRH and Joint TH-RRH.

HUD has emphasized that it is important to create separate records for people under 18 who present together to better understand homelessness among youth, but that entering individuals in separately is not permitted to be a barrier to or impact the receipt of future interventions.

Scenario	How Data is Captures
Two or more people under the age of 18 present together for assistance, and one of the people presenting is not the child of the other (e.g., brother and sister)	Each person should be entered as their own record in their own household.
Two people under the age of 18 present together for assistance with a child	The two minors should be recorded in separate households, with the child being added to the household of the parent that the child would live with should the parents be separated for any reason.