

Miami-Dade Homeless Continuum of Care Housing First Permanent Supportive Housing Standards of Care and Policies

I. PURPOSE OF CoC HOUSING FIRST PROGRAMS

Housing First is a model of permanent supportive housing (PSH) assistance that is offered without preconditions (such as sobriety, mental health stability, non-violent criminal history or a minimum income threshold) or service participation requirements though services are readily available, and rapid placement and stabilization in permanent housing are primary goals (Housing First PSH).

Housing First PSH within the Miami-Dade County Continuum of Care is targeted to Chronically Homeless individuals and families. Such programs are operated by local community-based agencies and/or housing providers and supported by multiple funding sources. Access to the Miami-Dade County's CoC Housing First PSH Programs and participating housing projects is coordinated through the Miami-Dade County Homeless Trust's Coordinated Outreach and Assessment Process as described below. The Standards of Care for the provision of Housing First PSH Programs funded by and/or through the Miami-Dade County Homeless Trust (Homeless Trust) are set forth below.

II. DEFINITIONS

A. Chronically Homeless

U.S. HUD definition of chronic homelessness is an individual or family with a documented disability condition who has been continuously homeless for a year or more (or at least four episodes of homelessness in the past three years).

Chronically homeless persons are among the most vulnerable people in the homeless population. They tend to have high rates of behavioral health problems, including severe mental illness and substance abuse disorders, conditions that may be exacerbated by physical illness, injury or trauma. Consequently, they are frequent users of emergency services, crisis response, and public safety systems.

B. Harm Reduction Model

This is a homeless housing model. The Harm Reduction philosophy prioritizes housing stability among persons who have experienced homelessness and who may be facing disabilities. Although recovery from mental health and substance abuse disorders is always the goal, harm reduction acknowledges that persons may be at different places along the continuum of behavior change. Services are informed by a harm reduction philosophy that recognizes that drug and alcohol use and addiction are a part of tenants' lives, where tenants are engaged in non-judgmental communication regarding drug and

alcohol use, and where tenants are offered education regarding how to avoid risky behaviors and engage in safer practices.

Harm reduction focuses on meeting tenants where they are at and assisting them to set and achieve goals for themselves. In this process a trusting relationship is established with the provider. This relationship has been proven to be a key to many individual change processes. Services focus on helping tenants stay housed by assisting with the management of problems that interfere with their ability to meet the obligations of tenancy, such as paying rent. Tenants are also encouraged to explore obstacles toward their goals in an open and non-judgmental atmosphere where they can contemplate costs and benefits of receiving services addressing their special needs, so that staff does not alienate tenants or cause them to begin a dishonest game of hiding their drug use, psychiatric symptoms, etc. Like any other tenant, tenants receiving services using this philosophy must still pay rent and comply with the terms of their lease

C. Housing First Model

Housing First is a philosophy that homelessness can be most efficiently ended by providing someone with access to safe, decent and affordable housing. Although an individual experiencing homelessness may benefit from supportive services such as mental health or substance abuse counseling, participation in these services is not a prerequisite to access housing or a condition of maintaining it. In fact, the stability provided by a housing unit facilitates the ability of a tenant to participate in these services. Research has shown that even when participation in services is not required as a condition of tenancy in supportive housing, tenants still participate at high rates.

The Housing First philosophy focuses on simplifying the process of accessing housing through streamlining the application process and removing unnecessary documentation or site visits. It also ensures that supportive housing tenants are not subject to conditions of tenancy that exceed the normal conditions under which any leaseholder would be subject, including participation in treatment or other services. Research has demonstrated that this approach is effective in promoting housing stability, particularly among people who have been homeless for long periods of time and have serious psychiatric disabilities, substance use disorders and/or other disabilities.

D. Trauma-Informed Service Provision

Trauma-Informed service provision takes into account knowledge about trauma — its impact, interpersonal dynamic, and paths to recovery — and incorporates this knowledge into all aspects of service delivery.

Trauma Informed Service provision:

- Integrates an understanding of trauma, substance abuse and mental illness throughout the program.
- Reviews service policies and procedures to ensure prevention of retraumatization.
- Involves consumers in designing/evaluating services.
- Sees trauma as a defining and organizing experience that can shape survivors' sense of self and others.
- Creates a collaborative relationship between providers and consumers, and

- place priority on consumer safety, choice and control.
- Focuses on empowerment and emphasize strengths.

E. Strength-Based Client-Centered Case Management

Strength-based client-centered case management includes strategies to identify and build on clients' strengths and goals rather than focusing primarily on their problem areas. Staff, in partnership with clients, tap into clients' motivation and identify clients' skills and capacities, existing resources, challenges, and the supports they need to meet their short- and long-term goals. This approach also recognizes the importance of drawing from the strengths of an individual's family and community when developing a plan.

Strengths-based approaches employ a holistic approach to working with clients, recognizing their intrinsic value, and working with the individual's strengths and capacities in addition to his/her unmet needs. When employed together, client-centered case management and strength-based approaches aim to reduce stigmatization and marginalization experienced by clients by promoting their self-worth and value, and targeting the spectrum of challenges causing conflict in their lives rather than focusing exclusively on individual problems.

F. Motivational Interviewing

Motivational Interviewing (MI) is defined as a client-centered, directive method for enhancing intrinsic motivation to change by exploring and resolving ambivalence. This approach contrasts to approaches that would directly inform the client that the person has a problem and needs to change; offers direct advice or prescribes solutions to the problem without the person's permission or without actively encouraging the person to make his or her own choices; uses an authoritative/expert stance leaving the client in a passive role; and/or imposes a diagnostic label.

III. HOUSING FIRST PLACEMENT COAP SCREENING, REFERRAL, HMIS PARTICIPATION AND CONFIDENTIALITY PROVISIONS

A. Assessment

Homeless families and individuals seeking assistance will first be assessed through the Homeless Continuum of Care's Coordinated Outreach and Assessment Process (COAP). Based on the assessment outcome, families and individuals will be referred for Housing First PSH.

B. Referral Standard

The COAP utilizes the VI-SPDAT to conduct such assessment. Homeless families and individuals are referred for CoC assistance using HMIS based on preference for chronicity, vulnerability and other factors. Homeless individuals and families who meet the definition of chronically homeless will be referred for Housing First PSH placement using HMIS if they are among the most vulnerable using the VI-SPDAT.

- First Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.
- Second Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness.
- Third Priority—Disabled Homeless Individuals and Families with the Most Severe Service Needs.
- Fourth Priority—All Other Disabled Homeless Individuals and Families.

Veteran Homeless Families and Individuals

During COAP, homeless veterans and families who report a veteran member or individuals who identify as a veteran will be referred to the Veterans Administration (VA) for housing and services assistance. Such families and individuals will be initially assessed by the VA using the VI-SPDAT.

VI-SPDAT assessment and referral information generated by the VA will be captured in the Homeless Trust's HMIS. If the VA determines such homeless individual or household to be ineligible for VA assistance, they will be referred back to COAP for CoC assistance.

C. Screen In/Not Screen-Out Policies

Under the Housing First philosophy, a policy of screen in, not screen-out policy is adopted. Thus, persons cannot be screened out of units set-aside for the CH on the basis of pre-conditions of sobriety, mental health stability, non-violent criminal history or a minimum income threshold.

D. HMIS Participation and Confidentiality

All providers of Housing First PSH must participate in the Miami-Dade County Homeless Trust Homeless Management Information System (HMIS) under an HMIS Participation Agreement and subject to the HMIS Standards, Policies and Procedures.

Further, all providers shall comply with the Homeless Trust's Confidentiality Policies and Procedures.

IV. APPLICATION AND DOCUMENTATION REQUIREMENTS

A. Application Form

1. Applicants for Housing First PSH assistance must complete the **Standard CoC Housing First PSH Application** issued by the Homeless Trust, as may be amended from time to time (**Attachment B**). Required documents are incorporated into the Standard CoC Housing First PSH Application package.

a. Disability Documentation

The Housing First PSH housing provider is responsible for securing documentation of the participant's disability in the manner required by US HUD.

2. The Standard CoC Housing First PSH Application will be the sole application form utilized by all agencies providing CoC Housing First PSH assistance.

B. Application Process

The COAP shall be the sole referral source for all CoC Housing First PSH units and any housing units made available for CoC use for Housing First PSH through a Referral Memorandum of Understanding.

In the event that an applicant is currently residing in a CoC emergency or transitional housing program, such program will assist the applicant in completing and submitting the application package. Otherwise, the CoC Housing First PSH Program will assist the applicant in completing the application package.

V. HOUSING ASSISTANCE PROGRAMS UNDER HOUSING FIRST PSH

Housing First PSH may be provided in the form of scattered site tenant-based rental assistance (TBRA) or project-based PSH operated by a housing provider. In some cases, the project may be considered "sponsor-based" in that it is being master-leased by the provider, opposed to owned/leased and operated by the provider. These three types of housing programs are subject to differing federal regulations.

1. Separation of Property Management

Property management and/or operations must be staffed separately from case management or housing specialist services. Case managers or housing specialists must not be responsible for enforcement of lease or occupancy agreement terms.

VI. HOUSING SEARCH AND PLACEMENT

A. Housing Placement

1. Single Placement List

There is a single list for placement into tenant-based rental assistance or, project or sponsor-based housing. Such list is managed in accordance with Article III above and all efforts are made to place households in the type of housing most appropriate for their permanent housing needs, rather than first available housing opportunity.

2. Tenant-Based Rental Assistance Housing Search and Placement

In the case of tenant-based rental assistance (TBRA), assigned housing specialists or case managers will assist households in locating rental properties that are within the household's current or projected budget. Households will be placed within **45** days of referral.

a. Tenant-Choice

Selection of a housing unit is based on applicant or prospective participant's choice.

b. 45-Day Limit to Housing Search and Move-In

The prospective participant must select and move into an HQS-approved unit within 45 days of the date of the Housing First PSH Program's written approval of assistance unless extensions are granted by the PSH provider for good cause. Failure to do so, without approved extensions, will result in the withdrawal of the opportunity for TBRA and referral back to the CoC Housing Coordinator for alternative referral.

The number of units viewed and rejected by the prospective participant will not adversely impact such participant's prospective assistance or current assistance in the event of a request to move to another unit at the end of a lease term.

3. Limit on Rejection of Project or Sponsored-Based Housing Assistance

Following referral to a project or sponsor-based unit, an applicant must accept or reject the unit within 5 days. If the applicant rejects the unit, the applicant will be referred back to the CoC Housing Coordinator for referral.

If the applicant accepts the unit, the applicant must take occupancy within 45 days of acceptance, unless extensions are granted by the PSH provider for good cause. Failure to take occupancy within 45 days without approved extensions will result in the unit being offered to another applicant.

An individual or household listed for PSH placement may reject no more than three units in a program's given property. Upon the third rejection, the individual or household will no longer be offered a unit in such property should one become vacant.

B. Tenant-Based Rental Assistance Agreement

Any unit that receives rental assistance payments must have a rental assistance agreement between the CoC Housing First PSH program paying the rent assistance and the property owner (or management company authorized to enter into the agreement and take payments on behalf of the owner). Such agreement shall incorporate language requiring the property owner, or the property manager, to request the assistance of the participant's case manager or housing specialist to address behavior which may lead to possible eviction in advance of taking any action toward evicting the participant. All CoC-funded providers of Housing First PSH in the

form of tenant-based rental assistance shall use a rental assistance agreement form issued by the Homeless Trust as may be amended from time to time.

C. All Forms of Assistance - Lease Between Property and Participant

Under all forms of Housing First PSH housing (TBRA, project or sponsor-based), the participant must enter into a lease with an initial term of not less than one year, terminable for cause and automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.

D. All Forms of Assistance - HQS Standards

CoC-assisted units must pass HUD Housing Quality Standards found at 24 CFR § 982.401 per HEARTH requirements set forth in 24 CFR 578.75(b) CoC-funded PSH Program providers must use HUD's HQS Inspection Checklist Form 52580.

VII. HOUSING FIRST ENGAGEMENT, CASE MANAGEMENT AND SERVICES

A. Engagement and Service Methods

1. Evidence-Based Methodologies

Harm reduction philosophy must be embedded in engagement methods which shall employ evidence-based strength-based and client-centered case management and counseling practices such as MI.

Staff must be trained in such evidence-based methodology and practice.

2. Harm-Reduction Philosophy and Trauma-Informed Service Provision

The harm-reduction philosophy and trauma-informed service provision must be holistically incorporated into case management program policies and procedures and exercised by all housing program staff. Such staff shall be trained in such harm reduction philosophy and trauma-informed service provision and application.

B. Housing Plan and Case Management Requirements

1. The Housing First philosophy proactively offers support services to help tenants achieve and maintain housing stability. The program does not require participation in disability-related services; however, the PSH provider may require a monthly contact with one of the members of the support services team to verify the tenant is occupying the apartment. PSH providers will provide evidenced based techniques offering harm reduction or motivational interviewing as a methodology of engaging tenants whom are at risk of eviction due to underlined, untreated, behavioral health issues, in treatment services. The primary objective of the Housing First PSH programs is to ensure that assisted households maintain long-term housing stability.

In order for participants, as tenants, to maintain housing and avoid future homelessness as a result of eviction, three behaviors are necessary:

- Pay their portion of the rent on time every month;
 - Maintain their home in a safe and sanitary condition and in the condition in which it was initially rented to them, except normal wear and tear;
 - Avoid behavior (their own or that of a household member or guest) that would disturb their neighbors' peaceful enjoyment of their own home (i.e. yelling, loud music or noise, violence, drug use, other illegal activity, damage to, or theft of, others' property, blocking or cluttering common areas or right-of-ways); and
 - All other conditions of the lease agreement.
2. A participant must be assisted through one of the evidence-based strength-based client-centered case management methodologies such as MI techniques to develop a Housing Assistance Plan (HSP) no later than **21** days of the Housing First PSH referral, in making an assessment of issues and barriers to their own housing stability and assist the participant in developing their plan to identify their own goals to enhance their own housing stability directly related to the three behaviors listed above.
- a. If the participant desires supportive services as listed below, the case manager or housing specialist shall promptly assist the participant in accessing such services: medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living;
 - b. The case manager or housing specialist will also work with the participant to secure government and private benefits and financial assistance including, but not limited to Medicaid; SNAP; WIC; unemployment; SSDI/SSI, Food Stamps) for which the participant is entitled.
3. Case management engagement (including location(s) and frequency of case management meetings, including home visits) shall be established specific to the needs of the client and governed by the strength-based, client-centered case management methodologies employed by the provider consistent with these Standards.

C. Staff Competency

CoC Housing First PSH staff must have the qualifications, licensing, proper training and supervision necessary and appropriate to the job function(s) with which the staff members are entrusted.

D. Support Services Agreements

The PSH provider may review the support services agreement with the tenant incorporating evidenced based techniques offering harm reduction or motivational interviewing as a methodology of voluntarily engaging tenants whom are at risk of eviction.

E. Non-Discrimination in Provision of Services

There shall be no discrimination on the basis of race, color, gender, sexual orientation, disability, religion, or national origin in the provision of services to participants by agencies. No religious practice or affiliation requirement shall be imposed upon participants.

Providers shall demonstrate sensitivity to participants' primary language and cultural background.

VIII. DENIAL OR TERMINATION OF PSH ASSISTANCE

- A. Applicants denied CoC Housing First PSH assistance must receive written notice by certified mail explaining the reason for denial, the method for making an appeal of the decision to deny assistance and contact information (including name, mailing address, email and phone number) for the person designated by the CoC Housing First PSH provider to receive an appeal. Review of the decision to deny assistance if appealed shall be the same as set forth below for terminations of assistance.

The CoC Housing First PSH providers must use the standard **Denial Notice** form issued by the Homeless Trust, as may be amended from time-to-time (**Attachment G**).

- B. To terminate PSH to a program participant, the required formal process, at a minimum, must consist of:
1. Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
 2. An agency must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
 - a. A participant may not be terminated for refusing services or terminating participation in services.
 - b. Use of alcohol or drugs in and of itself and other behavioral health issues (without other serious lease violations or a pattern of lease violations) are not considered a reason for eviction from housing provider-managed housing or termination from a program.
 - c. Underlying issues leading to difficulties with lease compliance must be taken into consideration as mitigating factors against termination.
 - d. Tenants in permanent supportive housing must be given reasonable flexibility in paying their tenant share of rent (after subsidy) on time and offered special

payment arrangements (e.g. a payment plan) for rent arrears and/or assistance with financial management (including representative payee arrangements) whenever possible.

- e. Every effort must be made to offer a transfer to a tenant from one housing situation to another, if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness must be avoided.
3. Written notice to the program participant containing a clear statement of the reasons for termination;
 4. 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
 5. Prompt written notice of the final decision to the program participant.
- C. Termination under this section does not bar further assistance at a later date to the same family or individual.

