

**SUBJECT: Miami-Dade County Homeless Trust Continuum of Care
Transitional Housing (TH) Standards**

EFFECTIVE DATE: 04/28/2025

REVISED DATE: 07/13/2026

I. PURPOSE:

The purpose of this policy is to establish Standards of Care for programs that provide transitional housing in the continuum of care. The Transitional Housing Standards of Care serve as the baseline for all providers funded by the Miami-Dade County Homeless Trust (MDCHT) to follow as they provide transitional housing.

II. SCOPE:

This policy and these standards apply to all Transitional Housing programs funded by the Miami-Dade County Homeless Trust. The CoC encourages non-County funded Transitional Housing programs to adopt these Standards of Care to ensure that all homeless persons receive the same level of care regardless of provider or source of financial support.

III. DEFINITIONS:

Miami-Dade County Homeless Trust (MDCHT): unit of local government that serves as the coordinating entity for the local homeless Continuum of Care system, and in this capacity oversees the use of the local Food and Beverage Tax and other state and federal funding.

USHUD: The United States Department of Housing and Urban Development.

Continuum of Care (CoC): The local system of housing and services envisioned by USHUD (24 CFR part 578) that promotes a community-wide commitment to the goal of ending homelessness through the development of coordinated services that are designed to quickly rehouse homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, while minimizing the trauma and dislocation caused by homelessness; the expansion of housing options for persons transitioning out of homelessness; access to and effective utilization of mainstream programs by homeless individuals and families; and the optimization of self-sufficiency among those experiencing homelessness.

Transitional Housing: As defined by USHUD, Transitional Housing (TH) provides temporary housing with supportive services to individuals and families experiencing homelessness with the goal of interim stability and support to successfully move to and maintain permanent housing. TH projects can cover housing costs and accompanying supportive services for program participants for up to 24 months. (**§ 578.37(a)(2)**). In Miami-Dade County we have established specialized Transitional Housing programs that target assisting specific

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homeless subpopulations including (1) substance abuse treatment for persons with a Substance Abuse Disorders (SAD) who may have co-occurring Severe Mental Illness (SMI) or Physical Disabilities; (2) behavioral health services for persons with a SMI who may have co-occurring SAD or Physical Disabilities; (3) Youth and young adults; and (4) Unsheltered Persons. Other TH programs specializing in different subpopulations may be created through future competitions.

Recipient: A private non-profit organization, State or local government, or instrumentality of a State or local government that receives funding under a contract with the Miami-Dade County Homeless Trust to operate a project with funds received directly from the MDCHT. This term is used interchangeably with “provider.”

Sub-Recipient: Refers to a private nonprofit organization, State or local government, or instrumentality of a State or local government that receives funding, including USHUD CoC Funds, under a contract with the Miami-Dade County Homeless Trust to operate a project with funds that have been awarded to the MDCHT, when the MDCHT serves as the pass-through entity for those funds. The definition of “subrecipient” is consistent with the definition of “project sponsor” found in Section 401 of the McKinney-Vento Act. Contractual, compliance and regulatory requirements imposed on MDCHT by the funders are likewise imposed by the MDCHT on the sub-recipient selected to receive the pass-through funds.

Supportive Services: Refers to a wide range of activities (e.g., case management, substance use treatment, mental health treatment, and employment assistance, etc.) provided to program participants that facilitate the movement of program participants into permanent housing. The expected and required supportive services for TH are delineated in this document.

Chronic Homelessness: To be eligible for housing restricted to chronically homeless individuals or families under the CoC program, participants must meet the definition of chronically homeless. The definition of chronically homeless is:

- A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who:
- Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and
- Has been homeless and living as described for at least 12 months* or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least

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12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described.

- An individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility. or
- A family with an adult head of household (or, if there is no adult in the family, a minor head of household) who meets all of the criteria of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

General Participant, or Participant, or Client:

A general participant, also “client”, is a general term used to describe a person and/or household at any stage of engagement, enrollment, or exit from a CoC project such as emergency shelter, rapid rehousing, TH, TH-RRH, and permanent supportive housing. A general participant is distinct from a project participant in that a general participant of the homelessness system need not be enrolled (with an entry date) in a CoC homelessness assistance project, whereas a project participant describes a person’s status only while actively enrolled in a homelessness assistance project.

Homeless

Category 1: Literally Homeless. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

1. Person has a primary nighttime residence that is a public or private place not meant for human habitation.
2. Person 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
3. Person is existing an institution where they have 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.
4. Person left home because of physical, emotional, or financial abuse or threats of abuse and have not secured safe, alternative housing.

Category 4: Domestic Violence. Fleeing/Attempting to flee domestic violence, dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that related to violence against the individual or family member that either takes place in, or

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him or her afraid to return to, their primary nighttime residence (including human trafficking). And,

1. person has no other residence; and
2. person Lacks the resources or support networks to obtain other permanent housing.

Permanent Supportive Housing

Permanent Supportive Housing (PSH) is permanent housing in which housing assistance (e.g., long-term leasing or rental assistance) and supportive services are provided to assist households with at least one member (adult or child) with a qualifying disability in achieving housing stability. To be eligible for PSH under the federal Continuum of Care (CoC) Program, project participants must meet Category 1 of the federal homeless definition (below). Our continuum PSH programs are dedicated plus, meaning priority for referral is provided to any household led by someone experiencing chronic homelessness. Referrals of persons who do not meet the chronic homeless definition are only made when no one who is chronic wants the PSH opportunity. The CoC must document when a non-chronic referral is made to a PSH program. The dedicated plus definition allows someone meeting the chronic homeless definition to remain a priority for referral during the first year of PSH. This allows them to retain their priority for referral should they not succeed during that first year of enrollment, and it allows the CoC to make another PSH referral. Supportive services are offered to maximize housing stability and prevent returns to homelessness, as opposed to addressing predetermined treatment goals prior to permanent housing entry.

Rapid Rehousing

Rapid Rehousing (RRH) is a project for persons experiencing homelessness that includes time-limited rental assistance and services. The goal is to help people obtain safe, adequate housing as quickly as possible and support the long-term retention of housing by building participant self-sufficiency.

Trauma-informed

Trauma-informed care recognizes the presence of trauma symptoms and, when creating a person/family treatment plan, acknowledges the connection between trauma, behaviors, and family interactions.

Trauma-responsive

Trauma-responsive care is the application of being trauma-informed. This “next step” of the treatment process is delivered according to the unique needs of the person who has experienced trauma, as well as the caregivers and family unit. Implementation is the

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difference between trauma-informed care and trauma-responsive care. A practitioner is being trauma-responsive with the application of trauma-informed knowledge.

Self Sufficiency

- IV.** Consistent with the purposes of the McKinney-Vento Act, 42 U.S.C. § 11381(4), means the ability to meet basic needs, including a place to live, without public or private assistance.

PARTICIPANT ELIGIBILITY

- A. Homeless:** All Transitional Housing funded by Miami-Dade County and participating in Miami-Dade County's HMIS must serve only participants referred through the CoC's Coordinated Entry System and meet the federal Homeless definitions 1 or 4).
- B. Legal Presence in this country:** All program participants in federally funded transitional housing programs must be verified to be legally present in this country to receive transitional housing assistance.
- C. Service Requirements:** TH program participants must participate in supportive services, as further delineated in this policy, as a condition of their program participation. The supportive services offered must be tailored to participant needs for the entire duration of their stay.

The following are examples of eligible services:

- One-on-One Case Management: Individualized meetings (at least one hour per week) to set goals, track progress, and coordinate care.
- Housing Search & Counseling: Assisting participants in finding, applying for, and securing permanent housing.
- Safety Planning: Specifically for survivors of domestic violence to minimize trauma.
- Employment Assistance & Job Training: Career counseling, resume building, job search assistance, and vocational training.
- Educational Services: Instruction for GED preparation, literacy, English as a Second Language (ESL), or post-secondary training.
- Financial Literacy: Teaching money management, budgeting, credit counseling, and debt resolution.
- Substance Use Treatment: On-site or off-site outpatient treatment, group therapy, and recovery coaching.
- Mental Health Services: Counseling and therapy provided by licensed professionals to address trauma or mental illness.

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- Outpatient Health Services: Assistance in managing physical health, understanding medical needs, and connecting to primary care.
- Life Skills Training: Critical skills like household management, nutrition, food shopping, and conflict resolution.
- Parenting Skills: Required for programs like Maternity Group Homes; includes childcare coordination and developmental activities.
- Legal Services: Assistance with civil legal matters such as child support, orders of protection, or resolving warrants.
- Transportation Assistance: Providing or coordinating transport to medical care, job interviews, or other essential services.
- Mainstream Benefits Assistance: Actively helping participants sign up for SNAP, SSI/SSDI, or other state and federal benefits.
- Identification Recovery: Assisting participants in obtaining lost birth certificates, Social Security cards, or state IDs.

D. Code of Behavior: TH Providers may require that TH program participants adhere to a code of behavior: Agree to be nonviolent; Agree not to use or sell illegal substances on the premises; Agree to treat other clients, staff and the property with respect; and agree to obey fire and other safety regulations.

E. Prohibited Activities: TH Providers may not require participation in religious services or activities.

F. Self-Care for Medical Condition:

1. Adult TH program participants must be capable of self-administration of medications; adults must administer medications for their minor children; prescriptions must have doctor's name and be locked. Locked prescription medications may be kept in adult client's possession or in a locked area designated by the facility.
2. TH providers may reject placement for any person whose medical care needs exceed the provider's capacity to accommodate.

V. REFERRAL, PRIORITIZATION, HMIS PARTICIPATION, CONFIDENTIALITY

Per HUD regulations (§ 578.23(c)(9) for CoC and § 576.400(d) for ESG) all CoC and ESG programs (except victim services providers) are required to use the Homeless Management Information System (HMIS), participate in (accept referrals from) coordinated entry, which utilizes standardized assessment, prioritization, and referral processes for all people experiencing or at risk of homelessness within the CoC's geographic boundaries. Victim

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service providers must use an MIS that collects the HUD Universal Data Elements and can produce an Annual Progress Report for CoC funded activities, or a CAPER for Emergency Solutions Grants.

A. Referrals, Documentation and Prioritization Standards:

1. TH providers not focusing on DV will receive referrals from HMIS participating Street Outreach, Youth Access Points, or Emergency Shelter. TH providers with a DV focus will accept referrals from the Coordinated Victims Assistance Center for people fleeing or attempting to flee DV, dating violence, sexual assault, stalking or human/sex trafficking.
2. **Referral Assessment:** Homeless individuals that would benefit from Transitional Housing will be assessed at Coordinated Entry access points or SO teams using the HUD Universal Data Elements (UDEs) captured at program entry; vulnerability assessments: VI-SPDAT, or TAY-VI-SPDAT for youth and young adults ages 18-24 or other youth specific tools adopted by the CoC. Families and individuals who are fleeing DV will complete UDEs in an alternate database, and a lethality assessment by Victim Service providers. Families who are not fleeing DV will complete the UDEs but not the family VI-SPDAT. HMIS participating providers also complete customized HMIS assessments to determine housing needs and to track permanent housing referral milestones. Information from the client housing needs assessment will be used to match households for available PH resources. A TH referral must meet the TH program specialization as outlined in this Standard of Care. CES Access Points, including SO teams and Emergency Housing Providers (except for Victim Service Providers) seeking to refer someone into TH must generate a referral using HMIS. Victim Service Providers must document referrals in their MIS or provide a written referral when referring to HMIS participating organizations.
3. **Documentation Standards:**
 - a. TH program providers must use and maintain universal tools provided in HMIS (Victim Service Providers must use their MIS). HMIS Universal Data Elements are reviewed at project entry, no less than annually, and at program exit.
 - b. HMIS participating providers will upload required documents for permanent housing onto the Housing Needs Assessment in the HMIS.
 - c. All TH program providers must maintain the forms outlined below in the participant's file.

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- i. CES TH Referral in HMIS (Victim Service Providers must use their MIS)
 - ii. Occupancy Agreement
 - iii. Housing Stability Plan
 - iv. Housing Needs Assessment (HMIS)
 - v. TH Assessment of Financial Needs
- 4. Prioritization:** Priority for placement in TH housing shall be based on the process defined in the CoC Orders of Priority for Referral Standards of Care.
- 5. Verification of Legal Presence:** Sub-recipients (or their sub-grantees) shall collect documentation relating to legal status and attach evidence of legal status in the client profile in HMIS.

B. HMIS Participation and Confidentiality

- 1. HMIS:** All providers of TH assistance must participate in the Miami-Dade County Homeless Trust HMIS under an HMIS Participation Agreement and subject to the HMIS Standards, Policies and Procedures, to include confidentiality policies.
- 2. Client Expectation of Privacy:** TH Providers shall comply with all federal and state laws and regulations governing the confidentiality of information regarding HIV/AIDS status and medical, substance abuse or mental health history, referral or treatment. Participants may expect a reasonable degree of privacy with regard to information not otherwise protected from disclosure by federal or state laws and regulations that is shared with the emergency shelter staff members.
- 3. Personal Mail and Telephone Calls:** TH Providers shall respect the privacy of a participant's personal mail and telephone calls.
- 4. Sharing Client Information:** A TH program participant's consent to share information with CoC providers is obtained during the COAP. Case managers may not share a TH program participant's information with non-CoC providers to whom the TH program participant may be referred without the TH program participant's written consent

VI. PROGRAM REQUIREMENTS – SUPPORTIVE SERVICES

- A. Assessments:** To facilitate the movement of TH program participants into permanent housing, transitional housing projects should provide a wide range of supportive services to their participants while they reside in the program that meets the needs of their program participants. TH Providers shall conduct an annual assessment of the service needs of their TH program participants and should adjust services according. This

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includes assessing the various needs of program participants through the development of:

1. Housing Needs Assessment
2. TH Assessment of Financial Needs
3. Housing Stability Plan

B. Participation in supportive services/Supportive Services Agreement:

1. TH program participants must take part in supportive services offered by the TH Provider that are not disability-related services, consistent with 24 CFR 579.75(h), as a condition of continued participation in the program. However, if the purpose of the project is to provide substance abuse treatment services, TH program participants may be required to take part in such services as a condition of continued participation in the program.
2. The type of supportive services and assistance that will be offered to program participants (e.g., case management, substance use treatment, employment assistance, etc.) will be individualized to assist the TH participant in successfully obtaining self-sufficiency and exiting homelessness.
 - a. The TH program participant must engage in at least twenty (20) hours of services, activities or employment each week, except program participants who are over age 62; a participant with handicaps as defined in 24 CFR 8.3; or a participant with a developmental disability as defined under 24 CFR 578.3.
 - b. Examples of services or activities to meet the weekly mandatory supportive services participation requirement include case management, counseling, treatment, volunteering, work therapy, education, job training, community building activities, etc. Employment may contribute to the 20 hours per week of supportive services engagement.
3. The TH program participant will sign a Supportive Services Agreement that delineates the required participation in supportive services. This Supportive Services Agreement will include:
 - a. The services to be provided, when and how often services will be provided, and by whom all services will be provided.
 - b. Program participant goals, strategies for achieving those goals, and target dates for achievement to focus on improved health and wellness, housing stability, and increased employment income leading to financial stability and self-sufficiency.
4. The supportive services necessary to assist program participants to obtain and maintain housing (i.e., case management, behavioral healthcare, employment

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training, etc.) may be provided directly by the TH provider, or by a sub-contractor or partner organization under a memorandum of agreement/understanding (MOA/MOU). If provided by a partner organization, 1) the TH provider must have a mechanism to track participation; and 2) an MOU or other similar agreement must be in place delineating the partnership agreement (e.g. types of services to be provided, hours of services, etc.).

5. **Eligible Supportive Services:** The CoC Interim Rule specifies which eligible supportive services can be paid for with CoC Supportive Service funds (§ 578.53(a)(1)). Services not specified in the CoC Interim Rule are not eligible (§ 578.53(d)). While eligible, only those supportive services included in the contract budget submitted and approved for funding will be reimbursed. For TH, eligible supportive services include the following:
- a. Annual Assessment of Services (§ 578.53(e)(1)): The costs of the assessment required by § 578.53(a)(2) are eligible costs.
 - b. Moving costs (§ 578.53(e)(2)): Reasonable one-time moving costs are eligible and include truck rental and hiring a moving company.
 - c. Case management (§ 578.53(e)(3)): The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Component services and activities consist of:
 - i. Counseling.
 - ii. Developing, securing, and coordinating services.
 - iii. Using the centralized or coordinated assessment system as required under § 578.23(c)(9).
 - iv. Obtaining federal, State, and local benefits.
 - v. Monitoring and evaluating program participant progress.
 - vi. Providing information and referrals to other providers.
 - vii. Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
 - viii. Developing an individualized housing and service plan, including planning a path to permanent housing stability.
 - d. Childcare (§ 578.53(e)(4)): The costs of establishing and operating child care, and providing child-care vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible.
 - i. The children must be under the age of 13, unless they are disabled children.

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- ii. Disabled children must be under the age of 18.
 - iii. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.
- e. Education services (§ 578.53(e)(5)): The costs of improving knowledge and basic educational skills are eligible.
 - i. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
 - ii. Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.
- f. Employment assistance and job training (§ 578.53(e)(6)): The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or 6 increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.
 - i. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
 - ii. Services that assist individuals in securing employment consist of:
 - iii. Employment screening, assessment, or testing.
 - iv. Structured job skills and job-seeking skills.
 - v. Special training and tutoring, including literacy training and prevocational training.
 - vi. Books and instructional material.
 - vii. Counseling or job coaching; and
 - viii. Referral to community resources.
- g. Food (§ 578.53(e)(7)): TH Providers must provide or make provisions for (e.g. food vouchers, pre-paid grocery cards, etc.), three (3) daily meals for program participants. The cost of providing meals or groceries to program participants is eligible.
- h. Housing search and counseling services (§ 578.53(e)(8)): Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible.

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- i. Component services or activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements.
 - ii. Other eligible costs are: Mediation with property owners and landlords on behalf of eligible program participants; Credit counseling; accessing a free personal credit report; and resolving personal credit issues.
- i. Legal services (§ 578.53(e)(9)): Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing.
 - i. Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants.
 - ii. Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.
 - iii. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the sub recipient's employees' salaries and other costs necessary to perform the services.
 - iv. Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.
- j. Life skills training (§ 578.53(e)(10)): The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.
- k. Mental health services (§ 578.53(e)(11)): Eligible costs are the direct outpatient

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- treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems. 7
- I. Outpatient health services (§ 578.53(e)(12)): Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:
- i. Providing an analysis or assessment of an individual's health problems and the development of a treatment plan.
 - ii. Assisting individuals to understand their health needs.
 - iii. Providing directly or assisting individuals to obtain and utilize appropriate medical treatment.
 - iv. Preventive medical care and health maintenance services, including in home health services and emergency medical services.
 - Provision of appropriate medication.
 - Providing follow-up services; and
 - Preventive and non-cosmetic dental care.
- m. Substance abuse treatment services (§ 578.53(e)(14)): The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.
- n. Transportation (§ 578.53(e)(15)): Eligible Costs are:
- I. The costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, childcare, or other services eligible under this section.
 - II. Mileage allowance for service workers to visit program participants and to carry out housing quality inspections.
 - III. The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants.
 - IV. The cost of gas, insurance, taxes, and maintenance for the vehicle.
 - V. The costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and
 - VI. If public transportation options are not sufficient within the area, the recipient

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may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:

- VII. Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types).
- VIII. Payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car; and (C)The recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.
- o. Utility deposits (§ 578.53(e)(16)): This form of assistance consists of paying for utility deposits. Utility deposits must be a onetime fee, paid to utility companies.
- 6. Projects can provide services to former residents of TH projects for up to six months after exiting TH to assist in the household's transition to independent living (§ 578.75(h)). The following guidance is provided for organizations that chose to avail themselves of follow up supportive services.
 - a. An exit date and destination must be entered in HMIS at the time the client exits the residential component of the TH program.
 - b. The organization must create a follow-up support services only project in HMIS to track supportive services rendered after the exit date from the TH program.

C. Service Delivery Approach

1. Focus on Self-Sufficiency and Permanent Housing Readiness:

- a. The TH provider will complete the TH Assessment of Financial Needs no later than 21 days of the TH Placement, with a goal of developing an anticipated budget for the TH program participant. An updated TH Assessment of Financial Needs will be completed after twelve (12) months of program participation.
- b. The TH program and TH program participant will develop a Housing Stability Plan no later than 21 days of the TH placement. This Housing Stability Plan is used to assist in developing a customized supportive services strategy for the household, facilitating the household's preparation for transitioning to permanent housing and in their housing search. An updated Housing Needs Assessment must be conducted after twelve (12) months of TH program participation.

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- 2. 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.
- 3. 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:

 - a.** Integrates an understanding of trauma, substance abuse and mental illness throughout the program.
 - b.** Reviews service policies and procedures to ensure prevention of re-traumatization.
 - c.** Involves consumers in designing/evaluating services.
 - d.** Sees trauma as a defining and organizing experience that can shape survivors' sense of self and others.
 - e.** Creates a collaborative relationship between providers and consumers, and place priority on consumer safety, choice and control.
 - f.** Focuses on empowerment and emphasize strengths.
- 4. Restorative Practices:** Restorative practice is a social science that integrates developments from a variety of disciplines and fields including education, psychology, and social work in order to build healthy communities, decrease crime and antisocial behavior, repair harm and restore relationships. Restorative circles and restorative conferences allow clients and program staff to come together to explore how everyone has been affected by an offense and, when possible, to decide how to repair the harm caused by the offense.

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- 5. 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 prescribe 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.

VII. PROGRAM REQUIREMENTS – HOUSING SERVICES

- A. Length of assistance/participation:** TH projects can cover housing costs for program participants for up to 24 months.
- B. Program Participant Agreement:** Participants in a TH project must have a signed Program Participant Agreement
- 1. Term:** The Program Participant Agreement must have:
 - a.** An initial term of at least one month
 - b.** Automatically renewable upon expiration, except by prior notice by either party
 - c.** A maximum term of 24 months
 - 2. The Program Participant Agreement shall delineate the participant's responsibilities as it relates to housing, to include:**
 - a.** The TH provider's property/house rules for effective management of the property. These property/ house rules must be provided to the program participant at the time the Program Participant Agreement is signed. Developing a set of house rules is a prudent practice. By identifying both allowable and prohibited activities in housing units and common areas, TH providers offer structure for treating TH program participants equitably and for making sure that TH program participants treat each other with consideration. House rules are also beneficial in keeping the properties safe and clean and making them more appealing and livable for all participants. These house rules must be reasonable and must not create additional barriers to services and housing or infringe on program participants' civil rights.
 - b.** The TH provider's program requirements not related to supportive services, such as, but not limited to items such as curfew, chores.
 - c.** Any financial contribution required from the participant (e.g. program income).
 - d.** Service Participation requirements for TH program participants.

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- e. Any requirements incorporated in a TH Provider's Lease for the TH participant's housing that affects the TH participant's tenancy in that housing (e.g. pet regulations, use and care of common facilities, parking, etc.).
 - f. The termination process.
- C. **Shared Housing:** Whenever possible, TH shall be provided in a Shared Housing setting. Shared housing may include:
 - 1. More than one person sharing a bedroom (e.g. two persons sharing a single occupancy unit, two persons sharing a one-bedroom unit).
 - 2. More than one person sharing a housing dwelling (e.g. two persons sharing a two-bedroom unit)
 - 3. More than one person sharing a bedroom in a housing dwelling with multiple bedrooms (e.g. four persons sharing a two-bedroom unit, with two persons sleeping in each bedroom).
 - 4. Shared housing may not exceed local zoning requirements.
- D. **Housing standards:** Housing leased with Continuum of Care program funds must meet National Standards for the Physical Inspection of Real Estate (NSPIRE) standards, prior to expending CoC funds on that unit.
 - 1. NSPIRE shifts the inspection and compliance focus to resident health and safety measures while addressing the increase in multifamily properties and tenant and project-based vouchers. NSPIRE includes 3 inspection types: Annual Self-Inspection, Critical-to-Quality, and Critical-to-Quality Plus; and 3 inspection areas: (1) Outside, (2) Inside, and (3) Unit.
 - 2. During an NSPIRE inspection, a rating system will be used that includes four categories, each with a designated response time: (1) life-threatening (24 hours), (2) severe (24 hours or 30 days), (3) moderate (30 days), and (4) low (60 days). A score will be calculated based on the number of deficiencies in each of the four categories found in each of the three inspectable areas. The score will be on a scale of 0-100 and a fail will be a score of 59 or less. If a property loses more than 30 points in the units alone, it will be an automatic fail. The scoring system is outlined in a notice published by HUD on July 7, 2023. All units must additionally meet state and local codes.
 - 3. NSPIRE Inspection Process (post October 1, 2025) Lease-Up Inspection
 - 4. Prior to entering into any lease agreement or move-in by the participant, the unit must be inspected and pass NSPIRE requirements.

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E. Housing Supports

1. TH Providers will ensure there is appropriate and sufficient furniture, furnishings and basic cleaning materials for all residents of their TH housing, as needed. Each TH program participant must be provided their own bed; the bed must be raised from the ground and mattresses must be in a clean and sanitary condition and inspected, and if necessary treated, for presence or evidence of arthropod/insect activity.
2. TH Providers will ensure each TH program participant is provided with items necessary for daily living (e.g. towels, sheets, blankets, pillows, mattress covers, basic toiletries and hygiene articles), as needed.
3. TH Providers shall assist TH program participants in obtaining at least two sets of appropriate clothing (both under and outerwear) and shoes, as needed. Appropriate clothing in the instance of underwear and socks shall mean new or previously unused items. Donated clothing must be washed/sanitized prior to distribution to clients.
4. TH Providers that provide scattered site TH housing without on-site 24-hour supervision must provide after hours and weekend contact information for staff, for times when staff is not present on site.
1. **F. Program Income:** While TH Programs are not required to collect program income from TH program participants as a condition of program participation, a TH program may collect program income from participants. Program income must generally be used for eligible project activities, such as operating costs, supportive services, or leasing costs, and must be documented in the grantee's records. Program Income collected from TH program participants may also be reserved, in whole or in part, to assist the program participants from whom they are collected to move to permanent housing. Income of TH program participants must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a).
2. The TH program participants will be advised of any requirements relating to the payment of program income at the time of program entry.
3. Providers must track, monitor, and report this income in Homeless Management Information System (HMIS).

F. Absence from Program

1. TH housing assistance will continue if the participant is institutionalized for up to 90 days. If this occurs, the project shall re-calculate the program income to \$0. The TH provide will update HMIS to reflect the TH program participant's absence and include

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documentation confirming their period of institutionalization. For the purposes of this policy, local jails are considered an institution.

2. If the TH program participant is absent from the TH program/housing unit without any notice/contact for more than five (5) consecutive days the project must terminate the TH participant from the program. The TH provider shall make a final decision regarding termination of TH program participation.
 - a. The TH program participant will be notified if appropriate, as to the TH Provider's intent to terminate services.
 - b. Appropriate support services will be arranged as possible and documented in the HMIS case notes.
 - c. If the TH program participant is in an institution, the TH case manager or program manager will document the date the TH participant was admitted into the institution, or if not attainable the date the absence was discovered.
 - d. The five (5) days would start the day the TH Participant was discovered missing if the TH program is unable to establish the last day of contact.
 3. A TH program participant may request, and the project may approve an absence, from the TH program of no more than ten (10) consecutive days.
- G. Residential supervision. The TH provider must provide residential supervision as necessary to facilitate the adequate provision of supportive services to the residents of the TH Program throughout the term of the commitment to operate transitional housing. Residential supervision may include the employment of a full- or part-time residential supervisor with sufficient knowledge to provide or to supervise the provision of supportive services to the TH program participants.
- H. Disaster (Emergency) Response Plans. The TH provider must prepare and submit a Disaster Response Plan to the Trust on an annual basis. This plan shall include the TH Provider's response to, at a minimum, Cold Weather, Extreme Heat, and natural disasters, such as hurricanes. If TH program participants are required to evacuate the housing where the program services are offered as a result of an emergency/disaster, the TH Provider will be responsible for identifying alternative housing for their TH program participants and providing necessary supplies and supervision.

VIII. PROGRAM TERMINATION/CLIENT RIGHTS

In general, the CoC expects the TH provider to make every effort to provide assistance to the TH program participant to achieve a positive outcome (e.g. transition to permanent housing). However, there are circumstances in which there may be a need for termination

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from the TH program. Pursuant to 24 CFR 578.91 (a), the TH program provider may terminate assistance to a TH program participant who violates program requirements or conditions of residency. Termination from the TH Program does not bar another provider in the CoC or the TH Provider from providing further assistance at a later date to the same individual or family.

A. Participants may be terminated from the TH program for:

1. Failure to comply with requirements of the Program Participant Agreement, and/or
2. Failure to comply with requirements of the Supportive Services Agreement.

B. Grounds for Termination:

1. Immediate Termination: Serious program violations that impact the integrity of the housing program may result in immediate program termination. These program violations shall be documented in the participant's case notes in detail, including efforts to resolve the matter with the participant. Independent evidence and/or documentation (e.g. police reports relating to behaviors that threaten the health, safety or right to peaceful enjoyment of the premises by other program participants; arrest reports; convictions for drug-related criminal activity; witness statements, etc.), shall also be secured for the file. Serious program violations include:
 - a. Commission of fraud, bribery or any other corrupt or criminal acts in connection with any federal housing program. Such acts include failure to report all household income and/or failure by false statement, misrepresentation, impersonation, or other fraudulent means to disclose a material fact used in making a determination as to the participant's eligibility to receive services.
 - b. Abandoning the program, as defined in Section VII.F.2.
 - c. The second time that the program participant, or a member of his/her household, causes damage to their housing (not ordinary wear and tear).
 - d. Threatening or abusive behavior toward personnel (or others at the TH Program). Threats of violence may be verbal or non-verbal and can occur explicitly or implicitly. When the behavior constitutes a legitimate threat of violence to themselves or others, immediate termination is warranted.
 - e. Commission of drug-related or violent criminal activity by the program participant, any member of their household, guests or any person under the program participant's control. Criminal and drug-related activity leading to termination are defined as follows: i) Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises by other program participants; ii) Any violent criminal activity or drug-related criminal activity on or near the premises.

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2. Violations of other Program rules leading to program termination: Violations of other program rules or requirements not requiring immediate termination will be documented in detail and maintained in the program participant's file. All efforts to resolve the matter with the participant shall also be documented in the participant's case file. Documentation of efforts shall include records of verbal interactions with participant about the violation; copies of written warnings, including the warning of the possibility of termination; the participant's efforts to make corrective action, or lack thereof; if there is a provider-level grievance review, a copy of the final determination; and any other material as may be relevant.

Continued and persistent violation of program rules and participant requirements that undermine the functioning of the program and constituents abuse of the program by participants, and will result in program termination, include but are not limited to:

- a. Failure to notify the TH provider of a change in household composition within five (5) days of the event (if applicable)
- b. Failure to maintain current information on file or to cooperate in providing required documentation/information within five (5) days of program's request.
- c. Failure to attend case management appointments or meet the minimum required weekly supportive services participation requirements.
- d. Failure to make timely payment of program income.
- e. First time that participant causes damage to the TH program property.
- f. Verbal abuse directed toward Program or Miami-Dade County Homeless Trust personnel or other program participants. Such abuse consists of repeated use of offensive speech, particularly speech that directly insults the listener. Verbal abuse constitutes grounds for dismissal when the offensive speech continues or is repeated after at least two direct requests to the participant to refrain from such behavior. If the verbal abuse constitutes a threat of violence, it shall be treated as a violation that merits immediate termination.
- g. Harassment consisting of unwarranted and unwelcome contact of any nature (including phone or face-to-face) after the participant has been explicitly advised to cease the harassing contacts. If the harassment occurs in a way that constitutes a threat of violence, then such behavior shall be treated as a violation that merits immediate termination.
- h. Repeated violation of basic program rules or participant requirements such as participation in required minimum weekly supportive services, room inspections, supplying requested financial documentation, getting approval for new household

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members, etc., undermines the functioning of the program and constitutes abuse of the program by the participant and can lead to termination. The participant's continued participation may be terminated upon three (3) documented incidents of program violations (need not be the same repeated program violation) within a twelve-month period even if the participant took corrective action to cure one or more of these violations.

- C. Notice of Termination:** The TH provider will provide a written notice to the TH program participant containing a clear statement of the reasons for termination (24 CFR 578.91 (b)(2)). Prior to initiating a termination resulting from violation of program rules and requirements that did not require immediate termination, the TH provider shall provide the program participant with:
1. Written notice of the violation when each occurs.
 2. Verbal consultation and, if warranted, review and adjustment to the participant's housing stability plan and/or supportive services agreement.
 3. Opportunity for corrective action.
 4. Opportunity to request a provider-level grievance review of the violation.
- D. Right to Appeal Termination:** The TH program participant will be provided an opportunity to appeal a termination from the TH program using the TH Provider's internal Grievance process which shall include, at a minimum,
1. A review of the decision, in which the TH 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
 2. A prompt written notice of the final decision to the TH program participant.
- E. Grievance Process:** All CoC providers must follow the grievance policies and procedures set forth in the Grievance Standards adopted by the Miami-Dade County Homeless Trust, as may be amended from time to time.
- F. Discrimination - Right to File a Complaint:** A TH program participant who believes that they have been discriminated against on the basis of disability has the right to file a complaint under the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act (Section 504) under the project's Grievance Policy. The TH-RRH program management will review and investigate (if necessary) all complaints and must submit an incident report to the Homeless Trust for any allegations of staff on tenant discrimination. Any person whose requests for accommodations are not fully granted by the project shall be informed of their right to file a complaint or grievance. Individuals who believe they have been discriminated against on the basis of disability (including failure

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to provide reasonable accommodations), race, national origin (including the failure to provide access to services to people with limited English proficiency) may also file a complaint with the Homeless Trust and/or the Miami HUD field office.

G. VAWA Protections: Pursuant to 24 CFR part 5, subpart I, Program admission may not be denied, or termination from participation in the program occur, on the basis or as a direct result of the fact that the program participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the program participant otherwise qualifies for admission, assistance, participation, or transitional housing. Notwithstanding:

1. Nothing in this section limits any available authority of the TH provider to terminate program participation to a TH program participant for any violation not premised on an act of domestic violence, dating violence, sexual assault, or stalking that is in question against the tenant or an affiliated individual of the tenant. However, the TH provider must not subject the TH program participant, who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, or is affiliated with an individual who is or has been a victim of domestic violence, dating violence, sexual assault or stalking, to a more demanding standard than other program participants in determining whether to terminate program participation.
2. Nothing in this section limits the authority of a TH provider to terminate program participation of a program participant if the TH provider can demonstrate an actual and imminent threat to other program participants or those employed at or providing service to property of the covered housing provider would be present if that TH program participant is not terminated from the program.

IV. Prohibited Activities – Drug Use/Possession:

3. TH providers may not operate drug injection sites or “safe consumption sites” in violation of 21 U.S.C. 856(a)(1); knowingly permit the use or distribution of illicit drugs on property under their control in violation of 21 U.S.C. 856(a)(2); or knowingly distribute drug paraphernalia in violation of 21 U.S.C. 863.
4. There is no requirement that TH program participants must be sober in order to receive assistance; participate in treatment in order to receive assistance; or be terminated from program participation for a first-time violation of a drug-related program policy.