



## BOARD OF SUPERVISORS AGENDA ITEM REPORT AWARDS / CONTRACTS / GRANTS

☐ Award ☒ Contract ☐ Grant

Requested Board Meeting Date: February 20, 2024

\* = Mandatory, information must be provided

or Procurement Director Award: ☐

**\*Contractor/Vendor Name/Grantor (DBA):**

Tucson Preparatory School dba Tucson Prep

**\*Project Title/Description:**

United States Housing and Urban Development Continuum of Care Program - La Casita

**\*Purpose:**

La Casita addresses the high priority gap in housing and supportive services to Tucson's homeless, unaccompanied youth and parenting young adults ages 18 to 24. La Casita focuses on skill development in four areas: educational, vocational, social, and personal living that provide program participants with an individualized and integrated program of transitional housing, education, employment assistance and job training, intensive case management, life skills training and a comprehensive support system. A focus of the program will be to address the needs of youth who have not completed a high school education.

A standardized assessment tool is used to match participants to Sullivan Jackson Employment Center (SJEC). Program participants enter transitional housing and have up to twenty-four months to achieve educational and employment goals that will lead to self-sufficiency. Tucson Prep, a subrecipient, works with clients to stabilize housing and enrolls them into high school. SJEC then works with participants to help them obtain employment and become self-sufficient.

This amendment will provide additional funding for the period of July 1, 2023 to June 30, 2024.

The contract and amendment can be found in OnBase by searching 21\*499 in Doc\_ID\_AMS

Attachment: Contract Number CT-CR-21-499 (Amendment 2)

**\*Procurement Method:**

This Subrecipient Agreement is a non-Procurement contract and not subject to Procurement rules.

**\*Program Goals/Predicted Outcomes:**

Subrecipient will maintain a minimum of 12 units filled at any given time (1 unit is considered 1 individual or family.)

**\*Public Benefit:**

The La Casita Program provides a method for homeless young adults to obtain housing, education, and employment.

**\*Metrics Available to Measure Performance:**

The program performance will be tracked in the Homeless Management Information System (HMIS) or a comparable database and Subrecipient will provide monthly Excel reports on program participant activities.

**\*Retroactive:**

Yes, to July 1, 2023. Contract preparation could not begin until the Board accepted the grant, which occurred on November 21, 2023. Drafts were reviewed internally by Grants Management & Innovation and the Pima County Attorney's Office the week of December 4, 2023 and signed by the Subrecipient on January 22, 2024. The negative impact of not approving this amendment is Pima County homeless youth and young adults may not receive funds for the La Casita program.

TO: COB, 2-6-24 (1)  
VERS: 7  
PGS: 21

6th J. 2/1/24  
2/1/24

FEB05'24PM1200 PD

THE APPLICABLE SECTION(S) BELOW MUST BE COMPLETED

Click or tap the boxes to enter text. If not applicable, indicate "N/A". Make sure to complete mandatory (\*) fields

**Contract / Award Information**

Document Type: \_\_\_\_\_ Department Code: \_\_\_\_\_ Contract Number (i.e., 15-123): \_\_\_\_\_  
Commencement Date: \_\_\_\_\_ Termination Date: \_\_\_\_\_ Prior Contract Number (Synergen/CMS): \_\_\_\_\_  
☐ Expense Amount \$ \_\_\_\_\_ \* ☐ Revenue Amount: \$ \_\_\_\_\_

**\*Funding Source(s) required:** \_\_\_\_\_

Funding from General Fund? ☐ Yes ☐ No If Yes \$ \_\_\_\_\_ % \_\_\_\_\_

Contract is fully or partially funded with Federal Funds? ☐ Yes ☐ No

If Yes, is the Contract to a vendor or subrecipient? \_\_\_\_\_

Were insurance or indemnity clauses modified? ☐ Yes ☐ No

If Yes, attach Risk's approval.

Vendor is using a Social Security Number? ☐ Yes ☐ No

If Yes, attach the required form per Administrative Procedure 22-10.

**Amendment / Revised Award Information**

Document Type: CT Department Code: CR Contract Number (i.e., 15-123): 21-499  
Amendment No.: 2 AMS Version No.: 7  
Commencement Date: 07/01/2023 New Termination Date: 06/30/2024  
Prior Contract No. (Synergen/CMS): N/A

☒ Expense ☐ Revenue ☒ Increase ☐ Decrease

Amount This Amendment: \$ 154,063.00

Is there revenue included? ☐ Yes ☒ No If Yes \$ \_\_\_\_\_

**\*Funding Source(s) required: U.S. Department of Housing and Urban Development (USHUD)**

Funding from General Fund? ☐ Yes ☒ No If Yes \$ \_\_\_\_\_ % \_\_\_\_\_

**Grant/Amendment Information** (for grants acceptance and awards)

☐ Award ☐ Amendment

Document Type: \_\_\_\_\_ Department Code: \_\_\_\_\_ Grant Number (i.e., 15-123): \_\_\_\_\_  
Commencement Date: \_\_\_\_\_ Termination Date: \_\_\_\_\_ Amendment Number: \_\_\_\_\_  
☐ Match Amount: \$ \_\_\_\_\_ ☐ Revenue Amount: \$ \_\_\_\_\_

**\*All Funding Source(s) required:** \_\_\_\_\_

**\*Match funding from General Fund?** ☐ Yes ☐ No If Yes \$ \_\_\_\_\_ % \_\_\_\_\_

**\*Match funding from other sources?** ☐ Yes ☐ No If Yes \$ \_\_\_\_\_ % \_\_\_\_\_

**\*Funding Source:** \_\_\_\_\_

**\*If Federal funds are received, is funding coming directly from the Federal government or passed through other organization(s)?**

Contact: Rise Hart

Department: Community & Workforce Development

Telephone: 724-5723

Department Director Signature: [Signature] Date: 1/26/2024

Deputy County Administrator Signature: [Signature] Date: 5/26/24

County Administrator Signature: [Signature] Date: 2/5/24

**Pima County Department of Community Workforce & Development – Sullivan Jackson Employment Center**

**Project:** United States Housing and Urban Development Continuum of Care Program – La Casita

**Subrecipient name and address:** Tucson Preparatory School *dba* Tucson Prep  
104 E. Prince Road  
Tucson, AZ 85705

**Amount:** \$444,798.00

**Contract No.:** CT-CR-21-499

**Amendment No.:** 2

<b>Subrecipient Unique Entity Identifier (UEI):</b>	MW48FPFYB3E5	<b>SAM expiration date (if applicable):</b>	03/28/2024
<b>Federal Award Identification Number (FAIN)</b>	AZ0032L9T012215	<b>Federal award date</b>	07/01/2023
<b>Subaward term/ period of performance start and end date</b>	07/01/2021-06/30/2024	<b>Subaward budget period start and end date</b>	07/01/2023-06/30/2024
<b>Amount of federal funds obligated by this action by the pass-through entity to the subrecipient (amount of this amendment)</b>			\$154,063.00
<b>Total amount of federal funds obligated to the subrecipient by the pass-through entity including the current financial obligation (amount of original agreement, plus any prior amendments, including this amendment)</b>			\$444,798.00
<b>Total amount of the federal award committed to the subrecipient by the pass-through entity (amount of original agreement, plus any prior amendments, plus any match, plus any future budget periods, if applicable)</b>			\$483,313.75
<b>Federal award project description (descriptive project title)</b>		Continuum of Care Homeless Program – La Casita. Housing and support services for the homeless youth and young adults.	
<b>Funding agency</b>		U.S. Department of Housing and Urban Development	
<b>Pass-through entity (primary recipient)</b>		Pima County	
<b>Pass-through entity (secondary recipient, if applicable)</b>		N/A	
<b>Assistance listing number and title (applies to 100% of this sub-award, including all disbursements)</b>		14.267, Continuum of Care Program	
<b>Is this subaward for research and development?</b>			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<b>Subrecipient indirect cost rate and methodology</b>	<input type="checkbox"/> Negotiated Indirect Cost Rate Agreement	<input checked="" type="checkbox"/> De minimis rate	<input type="checkbox"/> No Indirect
<b>Required match</b>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<b>Match amount</b>	\$38,515.75

## SUBAWARD AMENDMENT

### 1. BACKGROUND AND PURPOSE.

- 1.1. Background. On July 6, 2021, County and Subrecipient (collectively "Parties") entered into the above referenced agreement to provide case management and financial assistance to help homeless youth and young adults complete their education to become self-sufficient and obtain stable housing and gainful full-time employment.
- 1.2. Purpose. County requires additional year of housing and support services for the homeless.

2. **TERM.** The County is exercising the second extension option to renew the contract for one additional year commencing on 07/01/2023 and terminating on 06/30/2024. If the commencement date is before the Effective Date of this amendment, the parties will, for all purposes, deem the amendment to have been in effect as of the commencement date.

### 3. COMPENSATION AND PAYMENT.

- 3.1. Maximum Payment Amount. The maximum amount the County will spend under this Contract, as set forth in Section 5.1 of the original agreement, is increased by \$154,063.00. County's total payments to Subrecipient under this contract, including any sales taxes, will not exceed \$444,798.00.
- 3.2. Budget Adjustment. The budget in Exhibit A-1 is replaced in its entirety with the below. This budget will remain in effect July 1, 2023 throughout June 30, 2024 unless otherwise adjusted and formally agreed to.

Budget Line Items	Total Direct Cost	Modified Total Direct Costs (MTDC)
Rental Assistance	\$83,520.00	<i>(excluded from MTDC)</i>
Case Management/Support Services	\$56,364.00	\$5,636.00
Administrative Costs	\$7,766.00	\$777.00
<b>Total Direct Costs</b>		\$147,650.00
<b>Indirect Costs (MTDC x 10% de minimis rate)</b>		\$6,413.00
<b>TOTAL BUDGET (Total Direct Costs + Indirect Costs)</b>		\$154,063.00

4. **SCOPE OF WORK.** The parties have revised the original Scope of Work, Exhibit A-1

- 4.1. Paragraph 2.1.1 is amended to read: Subrecipient will perform its duties in a humane and respectful manner and in accordance with any applicable professional standards and will obtain and maintain all required licenses, permits

and authority required for performance under this Agreement. Subrecipient shall ensure that all case management activities are provided in accordance with 24 CFR § 578.53(3). In addition, Subrecipient shall comply with the Tucson Pima Collaboration to End Homelessness CoC Program Written Standards established by the CoC ("the written standards") attached as Exhibit B-1 (17 pages). Subrecipient shall also comply with the Fair Housing Act.

- 4.2. Exhibit B-1 is deleted in its entirety and replaced with the attached Exhibit B-1 Tucson Pima Collaboration to End Homelessness COC Program Written Standards ("the written standards") (17 pages).

All other provisions of the Agreement not expressly modified in this Amendment will remain in effect and be binding on the parties.

**THE REMAINDER OF THIS PAGE IS INTENTIONALLY LEFT BLANK**

This agreement may be executed in counterparts, each of which, when taken together, will constitute one original agreement.

**PIMA COUNTY**

\_\_\_\_\_  
Chair, Board of Supervisors

\_\_\_\_\_  
Date

**SUBRECIPIENT**

  
\_\_\_\_\_  
Authorized Officer Signature

Joseph Lechuga

\_\_\_\_\_  
Printed Name and Title

01/22/2024


\_\_\_\_\_  
Date

**ATTEST**

\_\_\_\_\_  
Clerk of the Board

\_\_\_\_\_  
Date

**APPROVED AS TO FORM**

  
\_\_\_\_\_  
Deputy County Attorney

Kyle Johnson  
\_\_\_\_\_  
Print DCA Name

12/8/2023  
\_\_\_\_\_  
Date

**APPROVED AS TO CONTENT**

  
for: \_\_\_\_\_  
Department Head

1-26-2024  
\_\_\_\_\_  
Date

**TUCSON PIMA COLLABORATION TO END HOMELESSNESS  
COC PROGRAM WRITTEN STANDARDS**  
Adopted April 28, 2015, Amended Jan. 26, 2016, June 28, 2016 and May 11, 2017; Dec. 18, 2018; Feb. 26, 2019;  
, June 26, 2019, January 24, 2023, March 28, 2023

Introduction & Purpose  
Key Terms  
General Policies  
Performance Standards  
Prioritization for HUD-VASH Housing  
Permanent Supportive Housing  
Rapid Rehousing  
Transitional Housing  
Evaluating and Documenting Eligibility (Categories of Homelessness & Required Types of Verification)  
Appendices

**INTRODUCTION & PURPOSE**

Tucson Pima Collaboration to End Homelessness (TPCH) has established written standards that encompass local community needs and follow guidelines set forth by the Department Housing and Urban Development (HUD) and comply with requirements established by law and HUD Notice. These written standards are developed to ensure people within this community who are experiencing homelessness are prioritized and provided with the most appropriate housing and services to meet their needs.

These written standards are reviewed and adjusted at least annually. Changes to priorities may supersede this notice if voted on by the TPCH Board of Directors (for example: a surge in prioritizing veterans). Further requirements are detailed in TPCH Policy and Procedure documents.

These written standards are developed in coordination with recipients of Emergency Solutions Grants program funds to achieve the following:

- Create and maintain a centralized or coordinated entry system that provides an initial, comprehensive assessment of the needs of families and individuals for housing and services
- Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive transitional housing assistance.
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive rapid rehousing assistance.
- Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance.
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive permanent supportive housing assistance.
- Promoting person-centered and culturally responsive approaches to preventing and ending homelessness in Tucson and throughout Pima County.

## KEY TERMS

### Beds

A bed is each assigned spot in a housing program for a person; not literally a bed. If there are three people in a household, regardless of their sleeping arrangements, the household has three beds.

### Person-Centered

Person-centered services are designed and delivered based on the specific needs and wants of each family or individual as they perceive those needs and wants rather than as required or delivered by the service provider based on a schedule, program participation, or the providers' perception. A person-centered service delivery process involves mutual discussion and decision-making on what steps are needed for client stability and when and how to take those steps. For example, person-centered service could include, but not be limited to, determining a family's preferences and helping them find housing that is not just to their needs and liking, but also near a particular school.

### Cultural Responsiveness

Cultural responsiveness refers to services that are respectful of, relevant to, honor, and uplift the beliefs, practices, culture, and linguistic needs of diverse populations and communities. That is, communities whose members identify as having particular cultural or linguistic affiliations by virtue of their place of birth, ancestry or ethnic origin, religion, preferred language or language spoken at home. Cultural responsiveness describes the capacity to respond to the issues of diverse communities and requires knowledge and capacity at different levels of intervention: systemic, organizational, professional, and individual. Research suggests that providing culturally responsive care has the potential to lead to improved:

- Access and equity for all groups in the population.
- Utilization of available housing and service assistance among disparately impacted communities.
- Communication and understanding of meanings between participants and providers resulting in:
  - Increased participation in beneficial services.
  - Clearer expectations
  - Reduced programmatic and adverse events.
  - Improved participant satisfaction.
  - Long-term outcomes
  - Safety and quality assurance
  - Business practice and better use of resources

Cultural responsiveness thus may be viewed as a viable strategy to improve the links between access, equity, quality and safety; improve housing and stability outcomes among culturally and linguistically diverse populations, and as a strategy to enhance the cost effectiveness of service delivery.

### Chronically Homeless

An individual or family is chronically homeless when the person or head of household (adult or minor) meets all three criteria established as the final rule for 24 CFR Parts 91 and 578 as amended December 4, 2015. The three criteria are that the person/family:

- Has a qualifying disability (a diagnosable substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability)



- Is literally homeless (at the time of eligibility assessment for a specific project opening)
- Has at least 12 months of homelessness from one of the below avenues:
  - The current episode of homeless has lasted at least the past 365 nights, including the night before assessment, without breaks in homelessness.
  - Having four episodes, or more, of homelessness within the past three years up to and including the date of assessment. These episodes, when added together, total 365 nights or more of literal homelessness. Also, each break in homelessness must have lasted at least seven (7) consecutive nights.
  - Both the cumulative nights and four or greater episodes criteria must be met. Fewer than four episodes in three years – even if homeless nights add up to 12 or more months – will not qualify the person/family as chronically homeless. Greater than four episodes in three years will not suffice if the total nights homeless are under 365.

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#### **Equal Access:**

This community provides equal access to all programs and activities, regardless of (actual or perceived) sexual orientation, gender identity, marital status, race, color, national origin, religion, sex, familial status, disability, or any other protected class as identified by Federal or Local law.

This community houses people based on the person's self-identified gender and expressly prohibits organizations from questioning, requiring documentation of, or otherwise interrogating any individual's self-reported gender. This community recognizes the HUD Final Rule and all amendments published 2/3/2012, 9/21/16 and the Notice on Equal Access Regardless of Sexual Orientation, Gender Identity, or Marital Status for HUD's CPD Programs.

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#### **Gender Identity**

This is defined as a person's concept of oneself as male, female, both or neither. Gender identity may or may not align with the "sex" or "gender" described on an individual's birth certificate or other identity documents.

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#### **Homeless**

HUD classifies homelessness into categories, or levels, of homelessness. These include literally homeless, imminent risk of homelessness and chronically homeless and are detailed in the Evaluating and Documenting Eligibility (Categories of Homelessness & Required Types of Verification) section of this document.

Unsheltered: People are considered homeless, and unsheltered, when they are living in places not meant for human habitation.

Sheltered: People are considered homeless, yet sheltered, when they are staying in places meant for human habitation, emergency shelters, transitional housing, or facing imminent homelessness.

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#### **Housing First**

Housing First is an approach in which housing is offered to people experiencing homelessness without preconditions (such as sobriety, mental health treatment, or a minimum income threshold) or service participation requirements. Rapid placement and stabilization in permanent housing are primary goals. Service participation is not required for continued tenancy. Projects that use a Housing First approach promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, or participation in services, yet offer assertive engagement in support and treatment options to the participants who are housed.

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#### **LGBTQIA+**

This is an acronym for "lesbian, gay, bisexual, transgender or transsexual, questioning or queer, intersex, asexual, and other sexual orientations and gender identities." It is intended to honor and validate the diversity of sexualities and gender identities of people who do not identify as cisgender and/or heterosexual.

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**Permanent Supportive Housing (PSH)**

Permanent Supportive Housing is rental assistance with supportive services without a designated length of stay to assist homeless persons with a disability to live independently and achieve housing stability.

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**Rapid Rehousing (RRH)**

Rapid Rehousing Assistance is client-centered housing relocation and stabilization services with short and/or long-term rental assistance. RRH helps an individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

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**Safe Haven**

A Safe Haven is a temporary supportive housing program that serves hard-to-reach literally homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services. These facilities allow 24-hour residence for an unspecified duration, have private or semi-private accommodations, and provide access to needed but not required services in a low demand facility.

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**Severity of Service Needs**

TPCH classifies service needs into four categories: Severe, High, Moderate and Low. Families and Individuals are classified via the SPDAT score indicates which level of service needs the individual or family will be classified as.

	VI SPDAT			Full SPDAT	
	Individuals	Youth	Families	Individuals/Youth	Families
Severe Service Needs	12-17	12-17	12-22	45-60	66-80
High Service Needs	8-11	8-11	9-11	35-44	54-65
Moderate Service Needs	4-7	4-7	4-8	20-34	27-53
Low Service Needs	0-3	0-3	0-3	0-19	0-26

An individual or family is considered to have a high severity of services needs when at least one of the following is true:

- History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; or
- Significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing.
- For youth and victims of domestic violence, there is a high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
- When applicable CoC Program-funded PSH may use alternate criteria used by state Medicaid departments to identify high-need, high-cost beneficiaries.

The determination is not to be based on a specific diagnosis or disability type. The determination will not be based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements. (See 24 CFR § 5.105 (a).)

Families and individuals with low service needs will not be served in CoC-funded projects.

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**SPDAT (Service Prioritization Decision Assistance Tool)**

The SPDAT portfolio consists of evidence-based, standardized assessment tools that allow providers to effectively assess the severity of service needs for people experiencing homelessness. TPCH utilizes SPDAT scores for prioritization of families and individuals for housing resources. The Vulnerability Index (VI) SPDAT is utilized for pre-screening families, individuals, and youth. The Full SPDAT assessment also has versions for these populations. These SPDATs are more in-depth assessments and case management tools.

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**Transitional Housing (TH)**

Transitional housing provides homeless families and individuals with the interim stability and support to successfully move to and maintain permanent housing. Homeless persons may live in transitional housing for up to 24 months and receive support services that help them live more independently.

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**TPCH**

Tucson Pima Collaboration to End Homelessness (TPCH) is a coalition of community and faith-based organizations, government entities, businesses, and individuals committed to the mission of ending homelessness, advocating for and addressing the issues related to homelessness in our community, and acting as the U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) for the geographic area of Tucson and Pima County, Arizona.

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**Victim Service Provider**

A victim service provider is an organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, stalking or human trafficking.

## GENERAL POLICIES

Family Admission and Non-Separation  
Ensuring Educational Rights  
Promoting Cultural and Linguistic Responsiveness  
Persons Fleeing Domestic Violence  
Persons Identifying as LGBTQIA+  
Housing First

### Family Admission and Non-Separation

Consistent with the CoC Program Interim Rule 578.93, neither CoC nor ESG program-funded grant recipients and subrecipients may involuntarily separate families. The age and gender of a child under age 18 will not be used as a basis for denying any family's admission to a project that receives CoC or ESG funds. The gender, sexual orientation and/or marital status of a parent or parents will also not be used as a basis for denying any family's admission to a project that receives CoC or ESG funds.

The CoC will work closely with providers to ensure that placement efforts are coordinated to avoid involuntary family separation, including referring clients for the most appropriate services and housing to match their needs. Any client who believes that they or a family member has experienced involuntary separation may report the issue to the CoC through [www.tpch.net](http://www.tpch.net) and "Contact TPCH". The CoC will investigate the claim and take appropriate remedial action.

### Ensuring Educational Rights

CoC and ESG recipients and subrecipients may not make decisions regarding the educational participation of children receiving services and may not require or limit educational decision-making of parents/guardians except where required to do so by Federal or State regulation or statute. Consistent with the CoC Program Interim Rule 578.23 and 578.93 (e), all CoC and ESG program funded recipients and subrecipients assisting families with children or unaccompanied youth must:

1. Take into account the educational needs of children when placing families in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education.
2. Inform families with children and unaccompanied youth of their educational rights, including providing written materials, provide linkage to McKinney Vento Liaisons (including assistance with enrollment if needed) as part of intake procedures.
3. Not require children and unaccompanied youth to enroll in a new school as a condition of receiving services.
4. Allow parents or the youth (if unaccompanied) to make decisions about school placement.
5. Not require children and unaccompanied youth to attend after-school or educational programs that would replace/interfere with regular day school or prohibit them from staying enrolled in their original school.
6. Post notices of educational rights at each program site that serves homeless children and families in appropriate languages.
7. Designate a staff member who will be responsible for:
  - a. ensuring that homeless children and youth in their programs are in school and are receiving all educational services to which they are entitled.
  - b. coordinating with the local McKinney Vento Educational Coordinator and Liaison, the appropriate school district, the CoC, and other mainstream providers as needed.
  - c. facilitating unaccompanied youth who have not obtained a high school diploma or certificate of General Educational Development (GED) to obtain such a credential and ensuring that unaccompanied youth are connected to appropriate services in the community.

Clients who believe that their educational rights have not been observed may report the issue to the CoC through [www.tpch.net](http://www.tpch.net) and "Contact TPCH".

### **Promoting Cultural and Linguistic Responsiveness**

Given the cultural and linguistic diversity of Pima County's population it is incumbent on homeless service agencies and providers to ensure both equitable access to, and the provision of, quality services for the whole population. This requires that service agencies and professionals be able to respond appropriately to the needs of the diverse communities they serve.

The following guidelines and principles are adopted by TPOCH to promote cultural and linguistic responsiveness within all services provided for people experiencing or at risk of experiencing homelessness and expected of Emergency Solutions Grant and Continuum of Care Program Grant projects:

- Every person shall be entitled to high-quality care regardless of their cultural, ethnic, linguistic, or religious background or beliefs.
- Understanding and addressing the links between ethnicity, culture and language will care and outcomes for culturally and linguistically diverse communities. Persons working in and/or administering homeless service programs shall receive training that includes foundational concepts of equity, cultural humility, and inclusivity as well as detailed information about the cultural practices and beliefs of communities disparately impacted by homelessness and/or commonly served by the provider agency.
- Agency services shall be made available in the preferred language of the program participants and, whenever possible, by persons who reflect the culture and/or linguistic traditions of the participant. Translation services must be made available to all participants at no cost to the participant and programmatic forms must be provided in participants' preferred language upon request.
- Participants may not be required to participate in services or activities that the participant identifies as inconsistent with their cultural, ethnic, religious, or linguistic traditions except where required by federal regulation and/or statute governing the project.
- Participants may not be prohibited from or otherwise disincentivized from participating in activities that the participant identifies as important to their cultural, ethnic, religious, or linguistic traditions except where prohibited by federal regulation and/or statute governing the project.

### **Persons Fleeing Domestic Violence**

Consistent with the CoC Program Interim Rule 24 CFR Part 578.5 (8), all CoC program funding recipients and subrecipients will provide safe, confidential and equal access to TPOCH's "no wrong door" coordinated entry process and referrals to either

domestic violence service providers or CoC or ESG funded project recipients and subrecipients for families and individuals who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking regardless of whether or not they consent to share their data through the HMIS.

The CoC will work closely with ESG and domestic violence service providers to ensure that any individual or family fleeing as described above will have the opportunity through coordinated entry and in accordance with the CoC's Coordinated Entry Policies and Procedures to be safely, confidentially and immediately transferred to a domestic violence services provider, if desired. While domestic violence service providers do not participate in the TPCCH HMIS, these providers are encouraged to obtain from their clients consent for confidential staffing (using de-identified data) and referral to housing and services from other providers through the coordinated entry as desired and needed by clients. If individuals or families fleeing domestic violence do not desire such a transfer, they may be assessed and/or undergo intake through the normal coordinated entry system.

All CoC grant recipients and subrecipients within the CoC geographic area will make all efforts to: protect the privacy and safety of domestic violence survivor; uphold client choice by presenting a range of housing and service options; and ensure that housing, once established, is not endangered because of reports of domestic violence or re-victimization. TPCCH will offer staff training on dealing with those fleeing domestic violence and/or trauma informed care no less than annually.

In compliance with under §578.51 (c)(3), any program participants who have complied with all program requirements during their residence and who have been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believe they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking (which would include threats from a third party, such as a friend or family member of the perpetrator of the violence), if they remain in the assisted unit, and are able to document the violence and basis for their belief, may retain the rental assistance and may move to a different CoC geographic area if they move out of the assisted unit to protect their health and safety and the CoC to which they are moving did not participate in the decision to move.

For each program participant who elects to move to a different CoC due to imminent threat of further violence under §578.51 (c) (3), the CoC project in which they participated must retain:

1. Documentation of the original incidence of violence.
2. Documentation of the reasonable belief of imminent threat of further violence. This would include threats from a third party, such as a friend or family member of the perpetrator of the violence.

In either case, the documentation may be the housing or service provider's written observation; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider or other professional from whom the victim has sought assistance; medical or dental records; court or law enforcement records; or written certification by the program participant to whom the violence occurred or by the head of household.

#### **Persons Identifying as LGBTQIA+**

Consistent with the CoC Program Interim Rule 578.93 (a), final rule 77 FR 21 5662 and CPD-15-02, all CoC recipients and subrecipients will make available their housing and services to families and individuals without regard to actual or perceived sexual orientation, gender identity (whether actual or perceived gender-related characteristics), or marital status. In addition, CoC and ESG program funded recipients and subrecipients will:

1. Recognize that biological sex as reported at birth may not correspond to an individual's gender identity; ask about gender identity or sexual orientation to determine eligibility if the facility to which the individual client seeks admission has shared sleeping areas or bathrooms, or to determine the number of bedrooms to which a household may be entitled.
2. Provide access to shelter and housing programs based on a person's self-identified gender, taking health and safety, and non-binary gender identity concerns into consideration.
3. Neither request documentation of a person's sex, anatomy or medical history in order to determine appropriate placement nor deny access to a single-sex emergency shelter or facility solely because the individual's identity documents indicate a sex different than the gender with which the client or potential client identifies or because their appearance or behavior does not conform to gender stereotypes; nor consider a person ineligible for any facility based on the factors outlined above.
4. Maintain the confidentiality of any individual's disclosure regarding their sexual orientation or gender identity; notify persons who identify as LGBTQ when and to whom that identification may be shared during referrals; and, during

Leavers who Increased Income	≥ 40%	39 - 21%	≤ 20%
Leavers with non-cash benefits	≥ 50%	49 - 41%	≤ 40%
Exits to PH	≥ 96%	95 - 91%	≤ 90%

#### PRIORITIZATION FOR HUD-VASH HOUSING

1. Chronically homeless Veterans will be given the highest priority for admission.
2. Admission decisions are to be prioritized by highest need for HUD-VASH, BASED ON Veteran's acuity per clinical judgment and resources availability.
3. Where there are no chronically homeless Veterans, admissions to HUD-VASH will use the HUD Notice CPD-16-11, *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing*, in the following order of priority:
  - a) **First Priority.** Homeless persons with a disability with long periods of episodic homelessness and severe service needs.
  - b) **Second Priority.** Homeless persons with a disability with severe service needs.
  - c) **Third Priority.** Homeless persons with a disability coming from places not meant for human habitation, safe havens, or emergency shelters without severe service needs.
  - d) **Fourth Priority.** Homeless persons with a disability coming from transitional housing.
  - e) **VA Priority Populations.** Homeless Veterans who do not meet criteria for chronic homelessness or the priority groups above may be prioritized for VA-funded Permanent Supportive Housing (PSH) if they demonstrate a need for ongoing case management based on clinical assessment. Additional priority populations include, but are not limited, to the following Veterans: women, those with children, those who served in Operation Enduring Freedom/Operation Iraqi Freedom/Operation New Dawn (OEF/OIF/OND), aging Veterans, those with a debilitating clinical condition that does not meet formal disability criteria, and those with an extensive homeless history that does meet other criteria above.
4. If there are no available case management openings or vouchers, the Veteran will be placed on a HUD-VASH Interest List. The Veteran will be provided with information about HUD-VASH, and when appropriate, the HUD-VASH case management team will invite the Veteran to participate in any existing HUD-VASH pre-admission groups, as available. However, Veterans in this category must be referred to other VA and community resources to address their current needs. HUD-VASH staff must document the referral, in CPRS, and note that the reason for denial was a lack of an available voucher or case management openings. Denials for lack of an available voucher should be recorded as such in HUD-VASH Homeless Operations Management and Evaluation System (HOMES) as well.
  - a) Veterans who are placed on a HUD-VASH Interest List must be reassessed, by HUD-VASH program Coordinator, or their designee, when a voucher becomes available so that the Veteran most in need is admitted to the program.
  - b) Veterans on the HUD-VASH Interest List must have a warm handoff to other VA and/or community programs that can assist with ongoing clinical and housing needs

## PERMANENT SUPPORTIVE HOUSING

### Community Priorities

Priorities for those who will receive assistance with Permanent Supportive Housing programs.

- Beds dedicated and prioritized to serve families and individuals facing chronic homelessness
- Beds that are not dedicated or prioritized to serve families and individuals facing chronic homelessness

### Documentation and Move-In Requirements

- Timelines for obtaining documentation of Chronic Homelessness
- Timelines for accessing housing

### Community Priorities

When housing members of the community, this community prioritizes families and individuals with severe service needs who have experienced two or more years of homelessness. This community follows guidelines set forth in (Notice: CPD-16-11) Case conferencing will be used to further ensure appropriate matching, client choice, and navigation into housing and associated support services offerings.

Due diligence should be exercised when conducting outreach and assessment to ensure that persons are served in the order of priority in these standards, and as adopted by the CoC. HUD recognizes that some persons – particularly those living on the streets or in places not meant for human habitation – might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant where there are persons who meet a higher priority within the CoC and who have not yet accepted the PSH opportunities offered to them. Street outreach providers should continue to make attempts with those persons using a Housing First approach to place as few conditions on a person's housing as possible.

Service needs, defined in detail in the key terms section of this document, are categorized as Severe, High, Moderate, and Low as measured by use of the tools in the SPDAT portfolio.

### Beds Classified as Dedicated or Prioritized for Chronically Homeless (CH)

See the key terms section for the definition of Chronic Homelessness.

TPCH seeks to end chronic homelessness. Certain CoC-funded beds have been dedicated or prioritized to serve families and individuals experiencing chronic homelessness. Only persons experiencing chronic homelessness (CH) will be served in CH-dedicated or CH-prioritized beds until all people facing chronic homelessness within our geographic boundaries have been offered housing. TPCH recognizes those with severe service needs who have been homeless for two years or more over the course of their lives as prioritized for housing. We give first opportunity to those who are unsheltered. Families and individuals with moderate and low service needs are not currently served with these beds.

TPCH prioritizes these beds as follows.

- 1) Severe Service Needs & 2+ years homeless & unsheltered
- 2) Severe Service Needs & 2+ years homeless & sheltered

When priority populations are housed, TPCH will offer housing to the remaining families and individuals facing CH as follows.

- 3) Severe Service Needs & Less than 2 years homeless & unsheltered
- 4) Severe Service Needs & Less than 2 years homeless & sheltered

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- 5) High Service Needs & 2+ years homeless & unsheltered
- 6) High Service Needs & 2+ years homeless & sheltered
- 7) High Service Needs & Less than 2 years homeless & unsheltered
- 8) High Service Needs & Less than 2 years homeless & sheltered

#### **Beds Classified as Not Dedicated or Prioritized for CH**

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This community will follow the above prioritization levels for these beds until the community has determined that we have housed families and individuals who meet the definition of chronic homelessness within our geographic boundaries. When that has been achieved, these beds will be prioritized to those with high service needs, a disability, and have experienced at least 2 years of cumulative lifetime homelessness. Families and individuals with moderate and low service needs are not currently served with these beds.

1. Severe Service Needs, with a disability, with 2 or more years homeless
2. Severe Service Needs with a disability

After everyone in the above groups has been offered housing, TPCH prioritizes the remaining households as follows:

3. Severe Service Needs, 2 or more years homeless
4. Severe Service Needs
5. High Service Needs, with a disability, with 2 or more years homeless
6. High Service Needs, with a disability
7. High Service Needs, 2 or more years homeless
8. High Service Needs

#### **Timelines for Obtaining Documentation of Chronic Homelessness**

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Verification of homeless status and disability are required per HUD. Details on what types of homeless verification are provided in this document under Evaluating and Documenting Eligibility (Categories of Homelessness & Required Types of Verification).

Obtaining verification of disability and chronic homeless status shall not be a barrier to entering housing. When projects are verifying chronic homeless status, TPCH allows projects to require no more than the minimum HUD-required documentation prior to move-in. This includes a review of homelessness with the household to ascertain whether the household qualifies and a primary or secondary source of disability verification. Once the program has enough information from the participant to believe the participant qualifies, the participant should be allowed to move forward with program entry.

The secondary source of disability documentation (social security award letter, handicap parking placard, or written intake worker's notation of a visible disability) allows the program to take up to 45 days to obtain direct third-party disability verification.

Projects are given up to 180 days to obtain written verification of chronic homeless status.

#### **Timelines for Accessing Housing**

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Programs must make every effort to house participants quickly. Additional barriers may not be imposed, and client-centered assistance must be provided to enable participants a quick turnaround from eligibility determination to move-in.

## RAPID REHOUSING PROGRAMS

### Introduction

Rapid rehousing assistance helps families and individuals who are experiencing homelessness to move as quickly as possible into permanent housing and achieve stability in that housing through a combination of rental assistance and supportive services. Rapid rehousing rental assistance is available for a maximum of 24 months within a three-year period, which may not be consecutive. Participants may maintain their housing units once the rental assistance has ended by paying full rent to the property. Rapid rehousing uses Fair Market Rates (FMR) established annually by HUD <http://www.huduser.org/portal/datasets/fmr.html> which includes utility allowances and other funding requirements— with the goal to provide assistance for the shortest amount of time possible based on the needs of those being served, while allowing up to the maximum amounts and periods of assistance (up to 24 months) by not imposing time-limits across the board. This will allow providers to tailor effective assistance to the specific needs and acuity of the households served in order to ensure maximum housing stability and improved outcomes.

Providers will determine for each client the number of months the assistance is needed—there is no such thing as an “automatic” approval for three months of assistance—some clients may receive no rental assistance, one month’s rental assistance, or three months rental assistance. For those with zero income, 100% rental assistance is allowed.

Over time, the client will work towards housing stabilization and gradually take over rent payments independently. It is expected that clients are gaining income and instances of zero income will be rare. Other Financial Assistance Programs may provide non-refundable fees and deposits, refundable security deposits, and utility deposits for program participants. Depending on the funding source, some programs may provide utility assistance payments and application fees.

It is recognized that circumstances will differ for each client and unexpected events can occur during the course of assistance. Exceptions can be made at any level of assistance for extraordinary circumstances if it will increase the likelihood of a successful housing outcome.

### Average length of Rapid Rehousing assistance

While each RRH participant is encouraged to reach rent independence as soon as practical, TPCB recognizes that RRH participants may require time for completing education and/or job training, job search, and other endeavors that contribute to housing stability. Clients are generally expected to assume 100% of their rent after 8 months of assistance.

### Priorities for which families and individuals will receive Rapid Rehousing assistance

Rapid Rehousing programs will use SPDAT tools (through the HMIS per Coordinated Entry) to determine and prioritize who will receive RRH assistance. Households with moderate service needs will be offered rapid rehousing assistance, with priority going to unsheltered households. Families and individuals with low service needs are not currently served with these beds.

Participants must meet the HUD definition of homelessness for Categories 1, 2, or 4. Households must lack sufficient resources and support networks to sustain stability in permanent housing. Rapid Rehousing will be offered on a Housing First basis and re-house households in less than 30 days. Rapid Rehousing utilizes the Transition-In-Place model which allows program participants to retain the unit when the rental assistance and supportive services end.

### Standards for determining what percentage or amount of rent each program participant must pay while receiving Rapid Rehousing assistance

Rental assistance provided under RRH is tailored to the household’s needs and will be no more, or no less, than what the household needs. Households will move to paying full contract rent as soon as possible.

RRH program case managers will assess households to determine the % of contract rent they will be paying prior to moving in and each month thereafter. This determination will not follow a prescribed schedule; households shall pay the maximum amount of rent they can afford from the beginning. Efforts to charge them less rent so they can save money are discouraged. The % of contract rent that households pay may increase, and decrease, over the course of their participation as their household income changes. The program may select any % contract rent, but assistance typically fits under one of these four tiers:

- Tier 1: The program pays 100% of the contract rent
- Tier 2: The program pays 67% of the contract rent
- Tier 3: The program pays 33% of the contract rent
- Tier 4: The program pays 0% of the contract rent

These tiers are not required to be followed consecutively. Households are expected to start at the tier that fits their current income situation and move to Tier 4 as quickly as possible, sometimes skipping some of the tiers.

#### **Standards regarding utility assistance**

If utilities are not included in a project participant's rent, the agency administering the project grant will pay the utilities up to the amount of the participant's utility allowance, which shall not exceed FMR. If the cost of such utilities exceeds the amount of the utility allowance, the project or project participant must pay the excess amount from other sources.

#### **Standards for case management with Rapid Rehousing Assistance.**

All agencies are expected to assist their RRH project participants in accessing or increasing income and to obtain or maintain mainstream benefits (e.g. health insurance, nutritional assistance, child care) to which they may be entitled. All agencies also are expected to progressively engage their clients in case management and all other services (e.g. education, job training, job development, budgeting) that they may need to attain and maintain housing stability. Agencies may neither require participation in services either to obtain or maintain housing nor may they exit a project participant from housing for non-participation in services.

Projects are expected to identify clients among their participants who may be Chronically Homeless and to verify length of time homeless and disabling conditions to facilitate potential transfers.

### **TRANSITIONAL HOUSING**

#### **Introduction**

Transitional Housing (TH) facilitates the movement of homeless families and individuals to permanent housing within 24 months of entering Transitional Housing.

#### **Community Priorities**

Transitional Housing programs will use SPDAT tools (through the HMIS per Coordinated Entry) to determine and prioritize who will receive assistance. Households with moderate service needs will be offered assistance; priority going to unsheltered households who are less likely to be able to secure a lease in their own name. Families and individuals with low service needs are not served with these CoC-funded beds.

#### **Eligibility**

Participants must meet the HUD definition of homelessness Categories 1, 2 and 4.

#### **Documentation Protocol**

Documentation to verify homeless status must be obtained per the Evaluating and Documenting Eligibility (Categories of Homelessness & Required Types of Verification) section of this document.

### **EVALUATING & DOCUMENTING ELIGIBILITY**

HUD further defines homelessness into various categories. This section contains the category definitions and documentation TPCB Continuum of Care Written Standards\_amended\_March 28, 2023

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requirements for each level of homelessness. Procedures for evaluating and documenting eligibility are unique to each category of homelessness. HUD has two levels of documentation. Level 2 is only acceptable if level 1 documentation cannot be obtained.

**Literally Homeless (also referred to as Category 1)**

An individual or family sleeping in an emergency shelter or a Safe Haven (Sonora House), sleeping in a place not meant for human habitation, (staying in someone else's residence does not meet the requirements for literal homeless), or exiting an institution where they have resided for 90 days or less and was at one of the above places immediately before entering the institution.

Level 1 Options:

- Written observation by the outreach worker
- Written referral by another housing or service provider

Level 2 Options (to be obtained when none of the above are available)

- Certification by the individual or head of household seeking assistance stating that s(he) was living on the streets or in shelter PLUS documentation outlining efforts to obtain both level 1 forms of documentation.

For individuals exiting an institution obtain one of the forms of evidence above for where the person slept prior to entering the institution and one of the following regarding the institution stay:

- Discharge paperwork or written/oral referral
- Written record of intake worker's due diligence to obtain the evidence and certification by individual that they exited institution

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**At Imminent Risk of Homelessness (also referred to as Category 2)**

An individual or family who will imminently lose their primary nighttime residence is considered to be imminently homeless if the residence will be lost within 14 days of the application for homeless assistance, no subsequent residence has been identified and the individual or family lacks the resources or support networks needed to obtain other permanent housing.

**Level 1 Options:**

- If in housing, a court order resulting from an eviction action notifying the individual or family that they must leave. If in a motel, evidence showing they lack the financial resources to stay.

**Level 2 Options consist of three components, all of which must be obtained:**

- A documented and verified oral statement with certification that no subsequent residence has been identified
- Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.
- Documentation outlining efforts to obtain the level 1 documentation.

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**Homeless under other Federal Statutes (Category 3) This category is available for RHY and ESG programs; Category 3 households are not eligible for COC programs**

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:

- i) Are defined as homeless under the other listed federal statutes;
- ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- iii) Have experienced persistent instability as measured by two moves or more during the preceding 60 days, and
- iv) Can be expected to continue in such status for an extended period due to special needs or barriers.

There are no level 2 sources of documentation for this category, all of the following must be obtained:

- v) Certification by the nonprofit, state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute
- vi) Certification of no permanent housing in the last 60 days
- vii) Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days
- viii) Documentation of special needs or two (2) or more barriers

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**Fleeing/Attempting to flee domestic violence (Category 4)**

An individual or family is considered to be fleeing domestic violence when fleeing, or attempting to flee, domestic violence, has no other residence and lacks the resources or support networks to obtain other permanent housing. There are no level 2 sources of documentation for this category.

**For victim service providers:**

- An oral statement by the individual or head of household seeking assistance which states: they are fleeing, they have no subsequent residence, and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

**For non-victim service providers all of the below must be gathered:**

- Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker.
- Certification that no subsequent residence has been identified
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

### Chronically Homelessness

See the key terms section for the definition of Chronic Homelessness.

Projects must document households meeting the HUD criteria for chronic homelessness. This documentation includes three things:

- i) Documentation of the current household status as Category 1; Literally Homeless
- ii) Documentation of disability
- iii) Documentation of the homeless history required to qualify as chronically homeless.

These documents may be obtained after the household has moved in. These documents have levels of documentation as prescribed by HUD. Time spent homeless must be verified; breaks in homelessness do not require third-party verification.

Level 1: Third-Party documentation. This includes written observation by an outreach worker, a written referral by another housing or service provider, or documentation from institutions such as hospitals, correctional facilities, etc. when they include length of stay and are signed by the institution staff. HMIS data may be used in when it contains the information required of all third-party documentation.

Level 2: Self-Certification. This is a signed certification by the individual seeking assistance describing how they meet the definition accompanied with the intake worker's documentation of the living situation and the steps taken to obtain evidence to support this. (A minimum of 5 must be made, and documented, to entities that could provide third-party verification).

Projects are capped at the number of households that can self-certify. A household's documentation packet is considered complete when it verifies disability and third-party verification for at least 9 months of the household's time homeless. 75% of the project's households must have complete documentation packets on file. 25% of the project's households may self-certify all of their time homeless.

### REFERENCES

24 CFR 578 HEARTH Act (amending McKinney-Vento Act) and all subsequent amendments

U.S. Department of Housing and Urban Development Notice CPD 16-11, Prioritizing Persons Experiencing Chronic Homeless and Other Vulnerable Homeless Persons in Permanent Supportive Housing

U.S. Department of Housing and Urban Development Notice CPD 17-01: Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System