



**Special Meeting Agenda
Continuum of Care (CoC) Board
Friday, December 19th, 2025, 10:00am – 11:30am
Ventura County Office of Education
Conference & Educational Services Center – Oxnard Room
5100 Adolfo Road, Camarillo**

Zoom Meeting ID: 160 522 3925

<https://www.zoomgov.com/j/1605223925>

1. Call to Order
2. Board Comments
3. CoC Staff Comments
4. Public Comments: An opportunity for the public to participate in public meetings by addressing the Ventura County Continuum of Care Board in connection with one or more agenda or non-agenda items. Public comment is limited to 3 minutes per person during the opening part of the meeting and per item. The time allotment can be increased or decreased by the Chair depending on the number of speakers. This meeting is subject to the Brown Act and public comments may be submitted by using one of the following options:

Email in advance of the meeting: If you wish to make a written public comment, the comment must be submitted via email no later than 4:30pm on the day prior to the Board meeting. Send emails to: venturacoc@ventura.org Please indicate the agenda item you would like to speak on if relevant and whether you would like your message read by staff or if you will be participating in person.

During the meeting: Participants attending online may use the chat function in zoom to indicate they would like to make a comment. Participants attending in-person can complete a public comment card indicating which item they would like to comment on and submit to the Board Chair. Staff will call on participants during the public comment section of the meeting or during specific items following staff presentation of the item.

Continuum of Care Governance Board Business

5. Approval of Board Minutes from November 12, 2025
6. Approval of Board Minutes from November 25, 2025
7. Review and Approval of Amended 2025 Ventura County CoC Written Standards to comply with U.S. Housing and Urban Development (HUD) Policy Changes.
8. Review and Approval of Amended Ventura County CoC Alliance Governance Charter, Authorization to Solicit Nominations for New Board Seats, and Establish the Nominating Committee.



Meeting Minutes
Continuum of Care (CoC) Board
Wednesday, November 12, 2025, 2:00 – 3:30pm
Ventura County Office of Education
Administrative Services Center – Simi Room
5189 Verdugo Way, Camarillo

1. **Call to Order:** Manuel Minjares, Vice Board Chair, called the meeting to order at 2:05pm.
Board Members: Jeff Lambert, Manuel Minjares, Michael Skinner, Jack Edelstein, Dr. Sevet Johnson, Pauline Preciado, Juliana Gallardo, Paul Drevenstedt, Ingrid Hardy, Stefany Gonzalez, Carrie Sabatini
Absent: Dawn Dyer, Mara Malch
Staff: Jennifer Harkey, Alicia Morales-McKinney, Felipe Flores, Morgan Saveliff
2. **Board Comments:** Jeff Lambert shared that Valentine Road is in the matching process to begin lease ups and Michael Skinner shared that lease ups at Casa de Carmen will begin tomorrow. Carrie Sabatini shared that Rancho Sierra lease ups are expected at the end of the month. Juliana Gallardo shared that Cypress Phase I will be fully leased up by the end of next month and Phase II will begin in 2026.
3. **CoC Staff Comments:** Jenn Harkey shared that all HUD CoC contracts for FY 25-26 have been issued, and it is anticipated that HUD will re-open federal access to eloccs for programs to begin drawdowns. Jenn further shared that a new HUD CoC NOFO is expected to be released with significant changes including funding cuts, priority shifts from permanent supportive housing to transitional housing, and substance use treatment requirements. Jenn shared that we will be looking at local and State HHAP dollars to potentially fill gaps.
4. **Public Comments:** None.

Continuum of Care Governance Board Business

5. **Approval of Board Minutes from October 8, 2025.**
Jack Edelstein moved to approve; Jeff Lambert was second; Ingrid Hardy and Stefany Gonzalez abstained; the balance of the Board was in favor.
6. **Approval to submit the 2024-25 Longitudinal Systems Analysis (LSA) Report as required by the U.S. Department of Housing and Urban Development (HUD) for the Continuum of Care program.**
Jenn Harkey shared with the Board that HUD requires all CoCs to submit LSA data annually for inclusion in the national Annual Homeless Assessment Report (AHAR) to Congress. The LSA uses local HMIS data to track demographics, homelessness patterns, service utilization, and housing outcomes, supporting federal, state, and local planning to prevent and end homelessness.

Ventura County CoC staff, working with the HMIS team, will submit the first draft of the 2024–25 LSA by November 30, 2025 and make needed corrections before the final submission, expected in January 2026.

Jeff Lambert moved to approve staff to submit the draft and final LSA reports to HUD by the required deadlines; Carrie Sabatini was second; all in favor.

7. Receive an update on 2024-25 State System Performance Measures and Data Quality.

Jenn shared with the Board that in order to receive HHAP-6 funding, the CoC must show improvement in at least 50% of the performance measures. Jenn shared that CoC staff have consistently been monitoring performance with the State and current results show compliance in 4 of 6 required HHAP performance measures. The two areas for improvement include increasing the number of people exiting homelessness into permanent housing and increasing successful placements from street outreach. Jenn shared that continued work is needed on the average length of time homeless, income reporting, and capturing accurate housing move-in dates and living situation data. VC CoC and HMIS staff have conducted provider trainings to improve data quality and improve outcomes through housing focused case management in the field.

To strengthen accountability, the CoC Board previously approved adding HMIS Data Quality Assessments as a scoring factor for funding application reviews (up to 5 points). This scoring criteria will be included for each grant analysis, including the upcoming HHAP-6 and HUD CoC NOFO.

The Data Committee met on November 5, 2025, and recommended expanded trainings (e.g., diversion, workforce development, SOAR) and quarterly review of street outreach data. CoC staff will research training options and report back in January 2026.

8. Receive and file a report on VC CoC Committees, Workgroups and Staff Updates.

Jenn provided the CoC Committee and staff report to the Board. She encouraged Board members to save the date for the 2026 Point in Time Count on January 28, 2026. The Housing & Services Committee reconvened in September to review the Point in Time Count plan and youth case conferencing processes, and its next meeting is scheduled for April 2026. The Veterans One Team Subcommittee continues bi-monthly coordination to prioritize housing referrals for Veterans. The newly launched Youth Subcommittee is developing youth CES processes and will next focus on data quality.

The HMIS Steering Committee continues onboarding new CalAIM providers and additional shelter beds, implementing HUD-required updates, and strengthening data quality policies. The Data Committee is reviewing state and HUD performance measures and will evaluate HHAP-6 proposals in December. The Public Information & Outreach Committee expanded community education through social media and the CoC Chronicle, with the latest edition released on October 30, 2025.

Staff provided expanded training for grant subrecipients and delivered Housing-Focused Street Outreach training to more than 50 frontline providers. Jenn noted that staff currently oversee 72 active contracts for CoC, ESG, and HHAP grants, with an average quarterly draw of \$375,000.

9. Receive and File a Report on Progress to End Homelessness Among Veterans in Ventura County.

Alicia Morales provided an update on efforts to end Veteran homelessness in Ventura County. The Ventura One Team, comprised of the VA, Salvation Army, local housing and shelter providers, and the VC CoC, continues bi-monthly case conferencing, outreach, and coordinated housing navigation. As of October 27, 2025, there are 46 Veterans on the active By-Name List, with 36 already matched to housing resources or pending VASH approval. The team also continues prevention work and in-reach at the County Jail.

The VA recently released updated national operational standards for reaching Functional Zero, emphasizing rapid housing, system consistency, and reducing returns to homelessness. Ventura County is aligning local data systems and practices with these requirements. Inflow/outflow data from January 2024–October

2025 indicate continued progress toward Functional Zero, supported by strong collaboration and increased permanent housing placements.

Jesse Gomez with Gold Coast Veterans Foundation and Cassandra Villareal with SSVF presented on how their programs coordinate within the Veteran One Team to support housing connections for Veterans. They described the One Team process, in which Veterans are typically engaged through Street Outreach, connected to Transitional Housing, and then supported in securing permanent housing, with wraparound services including health care, benefits, and transportation. They noted that Veterans are being placed into permanent housing within an average of 30 days from entering the By-Name List and emphasized the importance of intensive supportive services for long-term housing stability. Jesse and Cassandra also shared several success stories of Veterans housed through the One Team.

Additional items not on the agenda: none

Next meeting set for December 10th, 2025

Meeting adjourned at 3:35pm



**Special Meeting Agenda
Continuum of Care (CoC) Board
Tuesday, November 25, 2025, 10:00 – 11:00am
Ventura County Community Foundation
Board Room
4001 Mission Oaks Blvd, Camarillo**

- 1. Call to Order:** Dawn Dyer, Board Chair, called the meeting to order at 10:00am
Board Members: Dawn Dyer, Paul Drevenstedt, Jeff Lambert, Stefany Gonzlez, Mara Malch, Carrie Sabatini, Jack Edelstein, Juliana Gallardo, Michael Skinner, Manuel Minjares, Dr. Sevet Johnson, Ingrid Hardy
Absent: Pauline Preciado
CoC Staff: Jennifer Harkey, Alicia Morales-McKinney, Morgan Saveliff
- 2. Board Comments:** none.
- 3. CoC Staff Comments:** Jenn Harkey thanked the Board for their dedication and flexibility for meeting on short notice to accommodate the HUD CoC NOFO timeline.
- 4. Public Comments:** none.

Continuum of Care Governance Board Business

- 5. Approval to Release a Notice of Funding Availability (NOFA) for New Project Applications, Renewals, Transition Grants, and Reallocations in the FY25 HUD Continuum of Care Competition; and Approval of the 2025 VC CoC Notice of Funding Opportunity (NOFO) Calendar (Presenter: Jenn Harkey)**
Staff reported that HUD released the FY25 Continuum of Care (CoC) Program NOFO on November 13, 2025, with the consolidated application due January 14, 2025. Significant program changes this year include a 30% cap on funding for Permanent Housing (PSH/RRH), placing approximately \$2.6 million in current local PH funding at risk, and new eligibility for Transitional Housing and Supportive Services Only projects. Significant priority shifts include the shift away from Housing First and harm reduction and new priorities for treatment and recovery, advancing public safety, and promoting self-sufficiency and long-term economic independence.

Ventura County’s Annual Renewal Demand (ARD) is \$3.75M. Tier 1 funding is limited to 30% of ARD (\$1.12M) and must incorporate the HMIS/CES project (\$429k), leaving approximately \$696k available for Tier 1 programs. All other projects must compete nationally in Tier 2. HUD is also implementing new federal priorities, revised scoring criteria, and expanded risk-review factors, including public reports and alignment with NOFO purposes. Additional bonus points are available for Opportunity Zone projects and voluntary SAVE immigration-status verification.

The mandated local timeline requires project applications in e-snaps by December 15, 2025; rank-and-review notification by December 30, 2025; and submission of the CoC Consolidated Application by January 14, 2025. Due to the compressed timeframe, it may be necessary for the County to submit an umbrella application and subsequently identify subrecipients to prevent loss of regional funds.

Staff requested approval to release the local FY25 NOFA and to adopt the proposed 2025 CoC NOFO Calendar. The full NOFA, calendar, and presentation can be found on the VC CoC Website. CoC staff explained that part of the HUD CoC scoring includes suggested changes in the CoC Governance Board Structure to include three elected official board seats and a minimum of two seats for law

enforcement representation. The Board discussed and agreed to add three elected official seats, one for a Board of Supervisor, one West County position, and one East County position. The Board also agreed to add three law enforcement seats, one for Ventura County Sheriff, one for West County jurisdiction, and one for East County jurisdiction. The board seats would rotate through the jurisdictions, and each member would serve two-year terms with one proxy representative for each. This will increase the total number of Board members from thirteen to nineteen, which would require a quorum of ten members or proxy representatives in person at each meeting. The Board Governance Charter will be brought back to the Board next meeting for review and approval.

Board members also discussed the SAVE immigration-status verification requirements from HUD. The FY25 HUD CoC NOFO includes up to four policy preference points for CoCs where all non-profit charitable organizations voluntarily facilitate immigration status verification before distributing benefits. VC CoC staff discussed this option for preference points with the CoC Board and after an in-depth conversation on the potential impacts on funding and the community, decided not to require SAVE immigration-status verification from non-profit organizations.

Michael Skinner moved to approve CoC staff to release the NOFA without the scoring criteria requirement for participants to use SAVE to verify immigration status. Carrie Sabatini was second; Paul Drevenstedt; Mara Malch, Jeff Lambert, Dr. Sevet Johnson, and Stefany Gonzalez moved for approval; Ingrid Hardy, Manuel Minjares, and Jack Edelstein abstained; the motion was approved.

Ingrid Hardy moved to approve the VC CoC NOFO Calendar, Dawn Dyer was second; all in favor.

6. Approval of the 2025 Ventura County Continuum of Care (VC CoC) Rank and Review Policy for the FY2025 Housing and Urban Development (HUD) Continuum of Care Funding Competition (Presenter: Alicia Morales)

Staff presented the updated draft of the Ventura County Continuum of Care (VC CoC) Rank and Review Policy for the FY25 HUD CoC funding competition. The FY25 NOFO, released November 13, 2025, includes significant changes, including a shift in funding priorities from Permanent Housing (PSH/RRH) to Transitional Housing and Supportive Services Only projects, as well as a 30% cap on Tier 1 and 30% cap on overall permanent housing funding.

The revised policy establishes local procedures and scoring templates to ensure project applications align with federal priorities, including renewals, new proposals, transition grants, and reallocations. The VC CoC Data, Performance & Evaluation Committee will use the policy to review and rank projects, and will submit the recommended rankings and proposed reallocations to the VC CoC Board for review and approval on December 19th, 2025. The full policy can be viewed on the VC CoC website.

Ingrid Hardy moved to approve the VC CoC Rank and Review Policy with the adjusted scoring criteria for SAVE requirements; Paul Drevenstedt was second; all in favor.

7. Approval to Reschedule the December 2025 CoC Board Meeting (Presenter: Jenn Harkey)

The CoC Board discussed rescheduling the December 2025 Board Meeting from December 10th to December 19th to adjust for the 2025 HUD CoC NOFO timeline.

Paul Drevenstedt moved to approve; Michael Skinner was second; all in favor.

Additional items not on the agenda: none
Next meeting set for December 19th, 2025
Meeting adjourned at 11:25am

December 19, 2025

CoC Governance Board

SUBJECT: Review and approval of amended 2025 Ventura County Continuum of Care Written Standards

BACKGROUND: The Continuum of Care Interim Rule provides rules and regulations for the Continuum of Care program authorized by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act). In section 578.7, “Responsibilities of the Continuum of Care”, the Continuum of Care must: “In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance”.

The Ventura County CoC Written Standards include local guidelines that meet HUD and State regulatory requirements for coordinated entry, fair housing, policies and procedures for each program type, documentation standards, program eligibility, confidentiality, recordkeeping, reporting, HMIS and performance standards. To ensure compliance with updated federal and state regulations, we have made several key policy changes. These include the following:

- **II. Program Overview:** Revision of Continuum of Care Program HUD goals and objectives.
- **III. Coordination Among Providers:** Increase Coordination with Law Enforcement and removal of references to gender identity or sexual orientation.
- **IV. Policies and Procedures:** Service participation requirements, performance measures, HUD CoC statutory requirements related to discrimination, HUD CoC limits on safe consumption or harm reduction, and updates to Permanent Supportive Housing prioritization.
- **V. Components and Eligible Activities:** Addition of Street Outreach under the HUD CoC program.
- **VIII. Changes in Household Composition:** Removal of references to gender identity or sexual orientation.
- **Attachment I:** Removal of references to gender identity or sexual orientation.

RECOMMENDATION: Approve the amended Ventura County Continuum of Care 2025 Written Standards to comply with U.S. Housing and Urban Development (HUD) policy changes.



VENTURA COUNTY CONTINUUM OF CARE WRITTEN STANDARDS FOR THE HUD COC AND ESG

Updates Approved by VC CoC Board on December 19, 2025

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The County of Ventura is the Collaborative Applicant (CA) for the Ventura County Continuum of Care. Staff support is provided to the Ventura County Continuum of Care Alliance and Board by the County of Ventura County Executive Office. The standards contained within this document shall be applied to all projects funded within the Ventura County Continuum of Care. Standards that apply only to subrecipients of Ventura County will be differentiated by the term “Subrecipient”; all other standards will refer to “recipient.”

I. Introduction

Purpose for Standards

The purpose of the *Standards* is to:

- ✓ Provide detail on participant eligibility;
- ✓ Outline the allowable activities; and
- ✓ Provide standards for documenting eligibility.

For Subrecipients of Ventura County, this document is incorporated into the Specific Terms and Conditions (Exhibit A) of the signed agreement (hereinafter Contract) between the County and its Subrecipient. Local policies and procedures are subject to change at any time.

Overview of the HEARTH Act

The U.S. Department of Housing and Urban Development (HUD) Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) was signed into law on May 20, 2009. The HEARTH Act reauthorizes the McKinney-Vento Homeless Assistance Act of 1987, but with some important changes, including:

- The consolidation of HUD's competitive grant programs, the Supportive Housing Program (SHP), Shelter Plus Care Program (SPC) and the Section 8 Moderate Rehabilitation Program;
- The revision of the Emergency Shelter Grants Program and renaming it as the Emergency Solutions Grants (ESG) Program;
- The creation of a Rural Housing Stability Assistance Program;
- A change in HUD's definition of homelessness and chronic homelessness;
- A simplified match requirement;
- An increase in prevention resources; and,
- An increased emphasis on performance.

The HEARTH Act implementation is occurring in stages, including the publication of the following regulations:

- ❖ [Definition of Homeless \(Final Rule\) Docket No. FR-5333-F-02](#)
This final rule was published on December 5, 2011, and provided the definition of "homeless", "disability", and "developmental disability". Additionally, the rule established clear recordkeeping requirements for verifying eligibility to receive assistance.
- ❖ [Defining "Chronically Homeless" \(Final Rule\) Docket No. FR-5809-F-01](#)
This final rule was effective on January 4, 2016, and HUD expected compliance with this definition for all new admissions as of January 16, 2016. The final rule changed the definition that was in effect in the CoC Program interim rule: key changes included requiring an individual or head of household to have been living in a place not meant for human habitation, in an emergency shelter, or in a safe haven for the last 12 months continuously or on at least four occasions in the last three years *where those occasions cumulatively total at least 12 months*; replacing the term "disabling condition" with "homeless individual with a disability"; and defining an occasion by a break of at least seven nights not residing in an emergency shelter, safe haven, or a place not meant for human habitation. The final rule also established recordkeeping requirements for documenting chronic homelessness.

❖ Emergency Solutions Grant (Interim Rule) 24 CFR § 576

The interim rule revises the Emergency Shelter Grants Program and renames it the Emergency Solutions Grants Program to broaden existing emergency shelter and homelessness prevention activities and to add short- and medium-term rental assistance and support services to rapidly rehouse homeless people. There is now a greater emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The key changes that reflect this new emphasis are the expansion of the homeless prevention component and the addition of the rapid rehousing assistance component.

❖ Conforming Amendments to the Consolidated Plan (Interim Rule) 24 CFR § 91

This interim rule updated the annual action plan requirements, revising the homeless needs narrative to describe the local one-year goals and specific action steps for reducing and ending homelessness. In addition, the ESG narrative section was revised to include new requirements such as written standards for the provision of ESG assistance, performance standards for evaluating ESG activities, and a homeless outreach and consultation strategy.

The annual report requirements were updated to include an evaluation of the jurisdiction's progress in meeting its specific objectives in reducing and ending homelessness. The ESG narrative section was also revised to include additional reporting information on ESG, including the evaluation of the outcomes for ESG activities measured under the new performance standards developed.

❖ Homeless Management Information System

The HEARTH Act requires that CoC, and ESG funded projects participate in the Homeless Management Information System (HMIS). The HMIS component varies between the CoC and ESG Program regulations. County policy is to share HMIS funds with Subrecipients. The data made available by these reporting standards will create a more accurate account of the individuals and families served by the homelessness response system..

❖ Continuum of Care (Interim Rule) 24 CFR § 578

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

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

❖ Rural Housing Stability Assistance Program (Proposed Rule)

The overall goal of the HEARTH Act is to reduce and ultimately end homelessness by reducing the duration of time people spend homeless and reducing recidivism back into homelessness. Currently, Ventura County has funding through the Emergency Solutions Grants Program and the Continuum of Care Program to undertake projects that work toward this goal.

II. Program Overviews

a. Emergency Solutions Grants Program

The Emergency Solutions Grants (ESG) Program is designed to respond to crisis and provide emergency assistance to prevent homelessness and enable homeless households to move toward independent living. ESG funds are authorized under the McKinney-Vento Homeless Assistance Act and are intended to help improve the quality of existing emergency shelters for the homeless, make additional shelters available, meet the costs of operating these facilities, rapidly rehouse homeless individuals and families, provide essential services to them, and to prevent homelessness. ESG projects will be required to assist people in moving to permanent housing and reduce the time spent in shelters and on the streets.

Recent changes to ESG funding have further defined the purpose and expanded the breadth of activities and going forward, the funds will be used for a variety of assistance, including: Street Outreach, Emergency Shelter, short- or medium-term Rental Assistance, *Housing Search and Placement*, and *Housing Stability Case Management*. The Street Outreach component provides immediate relief such as meals, clothing, medicines, or transportation to medical appointments for vulnerable individuals and families living in the streets. The Homelessness Prevention component includes various housing relocation and stabilization services and short- and medium-term rental assistance. The Rapid Rehousing component includes similar services and assistance to help people who are homeless move quickly into permanent housing and achieve stability in that housing. The funds under this program are intended to target households who would be unsheltered but for this assistance. The County of Ventura and the City of Oxnard are recipients of HUD ESG Program funds and will administer this award for eligible agencies referred to as Subrecipients. The County of Ventura acts as the administrative entity for State of California ESG funds. All funded agencies are required to follow federal guidelines in the implementation of ESG funding.

Policy on Project Selection

The County will notify community members and key stakeholders that ESG funding is available and will publish applications on the Ventura County CoC (www.venturacoc.org) website with a deadline for project applications to be submitted to the County. The CoC Data Performance & Evaluation Committee scores projects locally and recommends projects for funding. The CoC Data recommendations are taken to the CoC Board for final recommendations and approved by the local entity administering this funding (County Board of Supervisors or City of Oxnard).

b. Continuum of Care Program

The Continuum of Care (CoC) Program consists of projects that provide housing and supportive services to formerly homeless individuals and families. The goal of projects funded under the CoC Program is to assist households with attaining and sustaining permanent housing as quickly as possible. In Ventura County, CoC Program funds are currently used to support various

projects, including Permanent Supportive Housing and Rapid Rehousing. In addition to these allowable project components, the interim rule also allows funding to be used to provide, to a limited degree, Prevention.

Ventura County is the Collaborative Applicant for the VCCoC. The County, along with non-profit entities, are directly awarded projects under the CoC Program. The County also passes funds on to subrecipients to carry out activities under the CoC Program.

Policy on Project Selection

Annually, HUD publishes a Notice of Funding Availability (NOFA) for the CoC Program competition. The County will notify community members and key stakeholders that the application is available and will publish all parts of the CoC Consolidated Application on the Ventura County CoC (www.venturacoc.org) website with a deadline for project applications to be submitted to the County. During this competitive process, the CoC develops objective scoring criteria based on the criteria from the NOFA and local priorities that are consistent with the Federal Strategic Plan to Prevent and End Homelessness. The CoC Data Performance & Evaluation Committee scores projects locally and recommends projects for inclusion in the application submitted to HUD. The CoC Board receives committee recommendations and makes final approval. The County shall notify project applicants in a timely manner, per the NOFA guidelines, whether the project application(s) will be included in the CoC Consolidated Application submission. If a project is not recommended for funding, the County will notify the project applicant, in writing, of this decision.

HUD CoC Goals and Objectives

The CoC Program is designed to promote a community-wide commitment to the goal of ending homelessness and to provide funding for efforts by nonprofit providers, States, Indian Tribes or Tribally Designated Housing Entities, and local governments to quickly rehouse individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma caused by homelessness. The CoC Program promotes access to and the effective utilization of mainstream programs by homeless individuals and families to optimize self-sufficiency among those experiencing homelessness. HUD hopes to accomplish the following goals through the collaborative efforts of applicants for CoC Program funding and local CoC stakeholders:

1. Ending the Crisis of Homelessness on Our Streets

The number of people experiencing unsheltered homelessness is at an all-time high. People living on the streets and in encampments have high rates of substance use disorder and mental illness. According to a nationwide study, 75% of people experiencing unsheltered homelessness report a substance use disorder and 78% report a mental health condition. The study found that substance use disorder contributed to the loss of housing for 50% of the unsheltered population, and mental health conditions contributed to loss of housing for 51% of the population.

CoCs should direct resources towards outreach, intervention, and assistance that helps people regain self-sufficiency. Consistent with Executive Order 14321 "Ending Crime and Disorder on America's Streets," CoCs should work with law enforcement, first responders, and their state and local governments to reduce encampments, public camping, and public drug use in order to address barriers to maintaining housing and increasing self-sufficiency.

2. Prioritizing Treatment and Recovery.

CoCs should prioritize projects that provide the treatment and services people need to recover and regain self-sufficiency including on-site behavioral health treatment, robust wraparound supportive services, and participation requirements. This NOFO devotes resources to Transitional

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Housing programs and Supportive Service Only projects with the goal of improving health and long-term economic independence for the homeless. HUD encourages CoCs to utilize the full array of mainstream programs and local and private resources to provide housing and healthcare needed to maintain safe and stable housing.

3. Advancing Public Safety Safety and security for all members of the public, especially those living unsheltered, is essential to promoting a community-wide commitment to the goal of ending homelessness. CoCs should cooperate with law enforcement to advance public safety for the entire community impacted by homelessness. No one should sleep outside on the street or in dangerous encampments, and everyone should be able to enjoy public spaces safely. HUD encourages CoCs to assist in preventing and minimizing the trauma associated with living on the streets or in encampments, especially for women and youth that are the victims of sexual assault and trafficking. Unchecked public camping and public illicit drug use inhibit nonprofit providers and local government from effectively addressing homelessness.

First responders are critical partners in engaging people into treatment and services and protecting public order and vulnerable individuals experiencing homelessness. In *Grants Pass v. Johnson*, the Supreme Court of the United States upheld the authority of local governments to prohibit public camping.

4. Promoting Self-Sufficiency.

One of the primary purposes of the CoC Program is to optimize self-sufficiency. CoCs should partner with workforce development centers, employers, childcare, and other supportive service providers to increase employment and employment income for program participants. CoCs should prioritize projects that help lead to long-term economic independence for individuals and families to exit homelessness and prevent future returns to homelessness.

5. Improving Outcomes.

CoCs should review all projects eligible for renewal under this NOFO to determine their effectiveness in reducing homelessness and increasing self-sufficiency. CoCs should prioritize projects that promote self-sufficiency, increase employment income over government assistance, and promote treatment and recovery.

This NOFO includes several options to help CoCs improve their effectiveness, including reallocation, expansion, and transition grants, and CoC's should take advantage of these options to expand the pool of providers, including faith-based providers, and improve the overall performance of the CoC.

6. Minimizing Trauma.

One of the purposes of the CoC program is to minimize the trauma associated with homelessness. CoCs should encourage providers to provide trauma informed care and ensure participant safety in programs, especially for youth and survivors of domestic violence, dating violence, sexual assault, and stalking. Women experiencing homelessness or domestic violence should have access to safe, single-sex spaces and other considerations for personal privacy (24 CFR 578.93(b)).

These guidelines will be updated as necessary throughout the grant period and will continue to expand and include a variety of project components. The County reserves the right to revise the guideline as deemed necessary and will to the extent practicable or as required by HUD, consult with the Ventura County Continuum of Care, ESG subrecipients, CoC recipients/subrecipients, homeless or formerly homeless or other interested parties.

III. Coordination Among Providers

The County and the Continuum of Care have been engaged in planning activities to:

- ✓ Increase systems coordination among the various housing and service providers;
- ✓ Improve access for participants;
- ✓ Better target funding; and
- ✓ Better address the housing and service needs in our community.
- ✓ Increase coordination with law enforcement

The County, CoC, and ESG (Sub)/Recipients will coordinate and integrate, to the maximum extent practicable, CoC and ESG funded activities as well as other homeless programs within the area covered by the Ventura County CoC with other mainstream housing, health, social services, employment, education, and youth programs, including those identified in 24 CFR § 576.400(b) and (c).

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a. Coordinated Entry and Assessment System

The Continuum of Care’s Coordinated Entry System, Pathways to Home, has been developed in accordance with the HUD Continuum of Care Regulations. Participation in this system is mandatory for ESG and CoC (Sub)/Recipients. See the Ventura County Continuum of Care: Coordinated Entry Process and Policies, incorporated herein by reference.

The CoC uses the coordinated entry process to prioritize homeless persons within the CoC’s geographic area. Prioritization is based on a specific and definable set of criteria that are documented, made publicly available and applied consistently throughout the CoC for all populations. The CoC prioritization policies and procedures are consistent with CoC and ESG written standards under 24 CFR 578(a) (9) and 24 CFR 576.4.

The following criteria establish how homeless individuals/families will be prioritized for shelter and housing programs in the CoC. The Vulnerability Assessment Tool (VAT) will be used by the Coordinated Entry Assessment Sites to assess individuals experiencing homelessness and guide recommendations for referrals. The first three serve as the primary methods of ranking individuals and the remaining two prioritizations serve as tie breakers if the first three prioritization methods result in tied rankings:

- 1. Chronic Homeless Status:** This first prioritization criteria focuses on those individuals with a disability who have experienced long-term or multiple episodes of homelessness and are generally those with the highest need and vulnerability. In addition, this population has been identified as being the largest user of homeless system resources. This will be determined by the documented length of time of homelessness (episodic or continuous) and the reported service needs of individuals including chronic health, mental health, substance use, or other service needs that impact vulnerability. Persons with the document longest length of time homeless and documented highest service needs will receive first priority.
- 2. VAT Score:** This second prioritization factor targets the most vulnerable clients in the homeless system as determined by their total VAT score. VAT score will be utilized in making recommendations on the prioritization list in combination with the factors in the section above.
- 3. Length of Time Homeless:** The third prioritization factor is the length of time an individual has experienced homelessness, giving priority to the person that has experienced homelessness the longest.

- 4. **Service Level Needs:** The fourth prioritization factor targets individuals with medical needs who will be prioritized when they have behavioral health conditions or histories of substance use which may either mask or exacerbate medical conditions.
- 5. **Date of VAT Assessment:** The final prioritization criteria will be the date of the individual’s assessment, giving priority to the earliest date of assessment.

Prioritizing chronically homeless persons in CoC program-funded Permanent Supportive Housing beds dedicated or prioritized by persons experiencing chronic homelessness:

- 1 (a) First Priority—Homeless Individuals and Families with a Disability experiencing chronic homelessness that is based on the length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the individual or families’ service needs.
- (b) If there is not a person that meets specific program eligibility criteria of a target population (i.e.: mental illness), the agency would then accept the next prioritized person on the list. This means, if the CoC has served everyone with self-reported target disability (i.e., mental illness), the agency may be referred another person that meets the chronic homeless status (i.e. with a different disability).

Prioritizing when there are no chronically homeless individuals and families within the VCCoC’s geographic area:

- 1. First Priority-Homeless Individuals and Families with a Disability with long-term or multiple episodes of homelessness (may not meet chronic homelessness definition) and Severe Service Needs.
- 2. Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs.
- 3. Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs
- 4. Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing

Unsheltered persons receive first priority for emergency shelter and rapid re-housing. In order to expedite referrals in placing individuals with emergent needs, a direct referral for Transitional Housing can occur if there are three or more vacancies, with a case update at the next case conference meeting.

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b. Fair Housing and Equal Opportunity

i. Affirmatively Furthering Fair Housing

Recipients shall market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap; and shall provide program applicants and participants with information, in writing, on their rights and remedies under applicable federal, state, and local fair housing and civil rights laws. 24 CFR § 578.93(c). Subrecipients shall submit these written materials to the County as an attachment to the Subrecipient’s Management Plan, as required by the Statement of Work (Exhibit B) of the Contract, effective FY2013. The County shall review these documents for potential violations of fair housing laws and shall assist Subrecipients in coming into

compliance with this requirement. If the County encounters a condition or action that impedes fair housing choice, the County shall work with the applicable jurisdiction(s) that provided the Certification of Consistency with the Consolidated Plan to address and remedy the violation(s). 24 CFR § 578.93(c)(2).

ii. **Integration and Accessibility**

Housing and supportive services must be offered in an integrated manner, such that persons with disabilities may enjoy a meaningful life within the community. See *Olmstead v. L.C.* (527 U.S. 581 (1999) 138 F.3d 893). Recipients shall offer housing and supportive services to enable individuals with disabilities to fully interact with nondisabled persons possible. 24 CFR § 578.93(d). Reasonable accommodations and modifications must be offered when appropriate. See *Reasonable Accommodations and Modifications* below.

iii. **Reasonable Accommodations and Modifications for Persons with Disabilities**

Providers are required to provide reasonable accommodations and modifications for persons with disabilities. Reasonable accommodation is defined as changing the rules, policies, or services so that a person with a disability has equal opportunity to fully use and enjoy a dwelling unit or common space. Allowing a person with a disability to have a service animal is an example of a reasonable accommodation. A reasonable modification is defined as modifying a structure so that a person with a disability has the full enjoyment and use of the housing and related facilities. Installing a grab bar in the bathroom for a person with a disability is an example of a reasonable modification. For federally funded housing, the provider bears the burden of paying for the modification(s). Providers must inform applicants during the intake process of their right to request a reasonable accommodation or modification.

iv. **Discrimination Based on Household Composition**

A recipient receiving funds under the ESG, or CoC Programs cannot discriminate against a group of persons presenting as a family based on the composition of the family, the age of any members of the family, the disability status of any members of the family, marital status, ~~However, housing may be limited to families with children who are under the age of 18.~~

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v. **Preventing Involuntary Family Separation**

In an effort to maintain family unity, for housing serving families with children, the age and gender of a child under age 18 shall not be used as a basis for denying any family's admission. 24 CFR § 578.93(e). Additionally, recipients may not deny admission to any member of the family (e.g., 15-year-old son). If a family is involuntarily separated for any reason, a report must be sent to the Ventura County Continuum of Care staff. Please contact Jennifer Harkey at 805-658-4342 or Jennifer.harkey@ventura.org

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vi. **Anti-Discrimination Policy**

CoC and ESG funded providers shall not discriminate on the basis of any protected characteristic, including race, ethnicity, color, immigration status, national origin, language, justice system involvement, ancestry, religion, sex, familial status, age, ~~veteran status, marital status, domestic or sexual violence victim status, or sensory, mental, or physical disability.~~ Ventura County CoC will ensure staff and contracted service providers are trained on Anti-Discrimination policies and procedures.

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vii. Prioritized Subpopulations and Fair Housing Implications

Recipients shall comply with applicable civil rights laws, including the Fair Housing Act. Within this framework, these standards establish subpopulations to be prioritized for housing and services that align with the identified needs of the local community and the goals of the Federal Strategic Plan to End Homelessness. Subpopulations may be prioritized as long as doing so does not discriminate against any protected class under federal nondiscrimination laws in 24 CFR § 5.105; subpopulations may also be prioritized according to who needs the specialized supportive services that are offered by the project. 24 CFR § 578.93(b)(2) and (7).

1. *Dedicated versus Prioritized*

Projects and/or beds that are *dedicated* to serving a specific subpopulation must continue serving only this subpopulation. (For instance, a Permanent Supportive Housing project that is dedicated to serving chronically homeless individuals must continue serving only chronically homeless individuals). Projects and/or beds that are not currently dedicated to serving a specific subpopulation must give the designated subpopulations priority for admission, in the order established by these standards when a bed becomes available through turnover. This means that if two otherwise eligible individuals are seeking admission into the program, one who falls within the designated prioritized subpopulation and one who does not, the individual who is in the designated prioritized subpopulation must be given priority for admission. **For both dedicated and prioritized beds, if there are no persons on a waiting list or applying for entrance to the program who fall within the dedicated or first priority subpopulation, recipients should not hold the unit vacant, but instead should serve the next prioritized subpopulation who may benefit from the services being provided.**

2. *Fair Housing Implications*

The Local Standards establish priority subpopulations by project type (i.e. Permanent Supportive Housing); recipients may not set more restrictive priorities unless a federal statute or executive order specifically authorizes this limitation, or unless expressly authorized by 24 CFR § 578.93(b)(1) to (7). For instance, while a Permanent Supportive Housing project may prioritize chronically homeless persons with a qualifying disability per the Local Standards, beds may not be reserved to persons with a *specific* disability (i.e., physical disability). If an individual who is otherwise qualified but who does not have a *physical* disability seeks admission and would benefit from the services offered, this person may not be excluded from the project. Alternatively, for example, recipients may reserve beds for persons with HIV/AIDS if the housing also receives funding from the Housing Opportunities for People with AIDS program (HOPWA).

3. *Anti-Discrimination Policy*

Ventura County CoC partner agencies shall make housing available to all otherwise eligible individuals regardless of ~~sex~~ or marital status. Agencies will ensure equal access to programs for all individuals and their families; provide housing, services, and/or accommodations in accordance with ~~sex~~ or marital status.

viii. Domestic Violence Victims & Violence Against Women Act (VAWA)

An Emergency Transfer Plan (ETP), which is the written policy defining the process of allowing victims of domestic violence, dating violence, sexual assault, and stalking to

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Recipients operating ESG-single-sex emergency shelters (or other ESG, and CoC) must follow HUD's guidance regarding placement for transgender persons, HUD Notice CPD- 15-02, and the Equal Access Rule.¶

¶
A recipient that makes decisions about eligibility for or placement into single-sex emergency shelters (or other facilities) must place an applicant or participant in a shelter (or facility) that corresponds to the gender with which the person identifies, taking health and safety concerns into consideration. This placement should not be based on complaints of another person when the sole stated basis of the complaint is an applicant's or participant's non- conformance with gender stereotypes. A recipient must not ask an applicant or participant to provide anatomical information or documentation, physical or medical evidence of the person's gender identity. The recipient must take reasonable steps to address safety and privacy concerns; the recipient should provide for privacy in bathrooms and dressing areas. For instance, recipients may install privacy curtains or partitions.¶

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request and receive a transfer from their current, unsafe unit new, safe unit, will be made available upon request by Victim Service Providers (see Attachment J).

The leases, subleases, or occupancy agreements of applicants and tenants assisted under the CoC or ESG Programs must include information and addendums describing pertinent and relevant VAWA protections. These addendums may (but are not required to) be written to expire if/when the participant is no longer receiving assistance (CoC and ESG).

If an applicant or participant otherwise qualifies for assistance from any other CoC- or ESG funded project, including but not limited to CoC-funded safe havens and ESG-funded emergency shelters, they cannot be denied admission to, denied assistance under, terminated from participation in, or evicted from the project on the basis or as a direct result of the fact that they are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

ix. Marketing and Outreach

The Continuum of Care has developed marketing strategies for the purpose of fair and equal access to services. Outreach includes information flyers available at services sites and public locations, direct outreach to people on the street, announcements at public meetings, quarterly educational training to service providers, updated CoC website with resource materials, and a contract with 2-1-1 to assist with the coordinated entry process and refer people to the appropriate services. The coordinated entry process is linked to street outreach efforts to prioritize people in the same manner as any other person seeking services through other means.

IV. Policies & Procedures

In order to best meet the needs of the community and in accordance with 24 CFR § 576 and 24 CFR § 578, the following policies and procedures have been established to ensure consistent practices in regard to admission, service requirements, duration of assistance, and exiting for all homeless housing projects within the Ventura County Continuum of Care. All projects must incorporate the Coordinated Entry prioritization standards for the project type. Refer to the Coordinated Entry Assessment Policies and Procedures, which are incorporated by reference.

a. Emergency Shelter / Safe Haven

The overarching goal of shelter projects is to reduce the time spent homeless. Emergency Shelter funds are intended to respond to crises and provide short-term emergency assistance to enable homeless households to move toward independent living by obtaining permanent housing as quickly as possible. Safe Havens serve a hard-to-reach homeless population with severe mental illness with the goal of permanent housing placement.

i. Admission

To the extent practicable, recipients will prioritize individuals and families who are currently living in Ventura County who have an identified prior residence as living in places not designed for, or not ordinarily used as, a regular sleeping accommodation including a car, a park, an abandoned building, a bus or train station, an airport, or a campground. Recipients that are defined as Victim Service Providers will exclusively serve individuals and families who are fleeing or attempting to flee domestic violence. *See Section IV,*

[Victim Service Providers](#), and [Table 6.2](#), Category 4, for additional details. In accordance with VAWA, no individual or family may be denied admission to or removed from the ES on the bases or as a direct result of the fact that the individual or family is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the individual or family otherwise qualifies for admission or occupancy. If an unaccompanied minor youth enters an emergency shelter, the shelter provider must notify Children & Family Services within 24 hours and follow the Ventura County Youth Emergency Shelter guidelines. All participants served in Emergency Shelter must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#). Safe Haven projects serve literally homeless persons with severe and persistent mental illness, as defined by the CoC Program interim rule.

ii. Service Requirement

Each participant will be assessed to identify needs and barriers to obtain housing and increase self-sufficiency. An initial evaluation and assessment must be completed in HMIS at program entry, including verifying and documenting eligibility. If a participant's stay in Emergency Shelter is longer than 30 days, then the recipient must reassess and document the need for continued services every 30 days while the participant continues in shelter. The reassessment must show that the participant needs additional time in shelter to obtain other housing and would be unsheltered without ESG assistance. Safe Haven projects must provide 24-hour residence for eligible persons for an unspecified period, have an overnight capacity limited to 25 or fewer persons, and provide low-demand services and referrals for the residents.

Obtaining appropriate housing, particularly permanent housing, and addressing the most immediate and manageable barriers is the priority for emergency shelters and safe havens. Given the expected short period of assistance in emergency shelters, the focus is on those barriers that can be addressed during the timeframe of assistance. Each participant in both emergency shelters and safe haven projects will have a housing stability/service plan that may include longer-term solutions to other barriers or risk-factors that might destabilize a household after assistance has ended. See *Section XIV, Recordkeeping Requirements*. This plan is to be completed at program entry and updated at least every 30 days for Emergency Shelter. The plan will be derived from the assessment and include at a minimum, housing stability goals and other goals as appropriate to the essential services identified in the Subrecipient's Application and Statement of Work (Exhibit B) of the Contract. Each participant will participate in developing her/his own individualized housing stability/service plan to obtain housing and maintain housing stability after funded assistance ends.

Recipients may use their current evaluation and assessment form, reassessment form, tracking method, and housing stability/service plan, or develop new forms or other tracking methods. The evaluation, assessment, reassessment, housing stability/service plan, and goals must be documented according to the recipient's protocols for documentation, and at a minimum must be in a format that is readily available for monitoring. Essential services must be tied directly to the needs and barriers identified in the assessment and recipients are encouraged to build on the participants' strengths to attain housing stability and increase self-sufficiency.

iii. Lease Requirement

Participants must *not* be required to sign a lease or occupancy agreement. For additional information, refer to Section XIII, [Housing Requirements](#).

iv. **Duration of Assistance**

Emergency Shelters must operate a maximum 90-day project model. To the extent practicable, participants will be assisted in obtaining housing within 30 days of entry into the emergency shelter. All shelters will strive to reduce the average length of stay. However, participants may stay longer in order to prevent them from becoming homeless, on the streets, or other places not meant for human habitation. Safe Haven projects must provide 24-hour residence for eligible persons for an unspecified period and strive for permanent housing placement.

The County works with the Continuum of Care community stakeholders to develop policies for the maximum allowable length of stay in emergency shelters as well as to identify benchmarks to enhance efficient utilization of the homeless services system. These policies and benchmarks will be updated during the applicable funding rounds. Updates will be communicated through revisions to these Local Standards and in Subrecipient contracts.

v. **Exiting**

To the degree practicable, participants exiting emergency shelter and safe havens will be assisted in accessing housing that best fits their needs, with a preference for assisting participants to access permanent housing. Exits may also include participants entering treatment facilities to address mental health, substance abuse, or medical needs; recipients will coordinate with the treatment provider to support a successful transition.

When possible, housing options or other resources should be provided at exit, so that participants have knowledge of where to go when treatment is completed.

vi. **Performance Measures**

Emergency Shelter and Safe Haven programs will be evaluated on HUD's System Performance Measures and reported on a quarterly basis to ensure they are operating efficiently. The CoC staff will lead the evaluation efforts, with guidance from the CoC Data Committee.

System Performance Measure 1: Length of Time Persons Remain Homeless

System performance measure one evaluates length of time homeless, measuring the average and median length of time people spend in homeless situations (including Emergency Shelters / Safe Havens). This measure focuses on whether that time period is getting shorter, staying the same, or getting longer.

System Performance Measure 7: Successful Placement in Permanent Housing

System performance measure seven focuses on how successful emergency shelter projects are at helping people move off the "street" and towards permanent housing. This is important because people living on the street and in places not meant for human habitation are at an increased risk of death. This measure calculates the percent of Emergency Shelter and Safe Haven clients who have exited to a permanent housing destination as recorded in HMIS during the report period. The measure is looking for an increase in the percentage of people who exit to permanent housing destinations from an emergency shelter or safe haven project during the reporting period.

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b. Transitional Housing

The policies and procedures in this Section b apply only to Transitional Housing that is filled through Pathways to Home.

i. Admission

To the extent practicable, recipients will prioritize individuals and families who are currently living in Ventura County; cannot be more appropriately served by another program or system of care; have an identified prior residence as living in places not designed for, or not ordinarily used as, a regular sleeping accommodation including a car, a park, an abandoned building, a bus or train station, an airport, or a campground; lack a support network and have no other options or resources for housing. Transitional Housing is reserved for persons with high barriers who require longer-term interventions. All participants served in Transitional Housing must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#).

ii. Service Requirement

For Transitional Housing projects, supportive services must be made available to participants throughout the duration of their residence in the project. Services will require program participants to take part in supportive services (e.g. case management, employment training, substance use treatment, etc) in line with 24 CFR 578.75(h) by attaching a supportive service agreement (contract, occupancy agreement, lease, or equivalent). Provide 40 hours per week of customized services for each participant (e.g. case management, employment training, substance use treatment, etc.). The 40 hours per week may be reduced proportionately for participants who are employed. The 40 hours per week does not apply to participants over age 62 or who have a physical disability/impairment or a developmental disability (24 CFR 582.5) not including substance use disorder.

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Services must be necessary to assist participants to obtain and maintain permanent housing. Each participant must have an individual support plan in place, derived from recipients' ongoing, at least annual, assessment of participant needs, and services must be adjusted accordingly. See *Section XIV, Recordkeeping Requirements*.

ii. Lease Requirement

Participants must sign a lease or occupancy agreement that is for a term of at least one (1) month but no more than twenty-four (24) months and cannot be extended. For additional information, refer to Section XIII, [Housing Requirements](#).

iii. Duration of Assistance

Transitional Housing facilitates the movement of homeless households to permanent housing within 24 months of entry. Efforts should be made to move persons to permanent housing within 6 months of entering transitional housing. Services may also be provided to former residents of Transitional Housing for no more than 6 months after leaving Transitional Housing to assist their adjustment to independent living.

iv. Exiting

The sole purpose of Transitional Housing is to assist participants to obtain permanent housing. Except in extenuating circumstances, participants will exit transitional housing to permanent housing within 24 months.

v. Performance Measures:

System Performance Measure 1: Length of Time Persons Remain Homeless

System performance measure one evaluates the length of time persons are homeless in emergency shelter, safe haven program and transitional housing programs.

System Performance Measure 2: The extent to which persons who exit homelessness from permanent housing destination return to homelessness

System performance measure two evaluates recidivism, measuring the percent of returns to homelessness in people who exited to permanent housing. Specifically, this measure looks at returns over three time periods as well as the overall number of returns over two years:

- Number returning to homelessness in less than 6 months
- Number returning to homelessness from 6 to 12 months
- Number returning to homelessness from 13 to 24 months
- Total number of returns to homelessness over 2 years

System Performance Measure 4: Employment and income growth for homeless persons

System performance measure four focuses on the increase in the percent of adults who gain or increase employment or non-employment cash income over time.

System Performance Measure 7: Successful placement in or retention of permanent housing

System performance measure seven focuses on how successful Permanent Supportive Housing projects are at helping people exit to or remain in permanent housing. This measure is looking for an increase in the percentage of people who remain in a Permanent Supportive Housing project during the reporting period.

vi. CoC Statutory Requirements: The project applicant will not engage in racial preferences or other forms of illegal discrimination.

vii. The CoC project applicant will not operate drug injection sites or “safe consumption sites,” knowingly distribute drug paraphernalia on or off of property under their control, permit the use or distribution of illicit drugs on property under their control, or conduct any of these activities under the pretext of “harm reduction.”

c. **Homelessness Prevention (ESG)**

Homelessness Prevention is intended to prevent households from moving into emergency shelter or other homeless situations.

i. Admission

Prevention assistance will be prioritized for individuals and families who are currently living in Ventura County, cannot be more appropriately served by another program or system of care, lack a support network, and have no other options or resources for housing. Prevention projects must collect documentation that participants would become homeless for this assistance. All participants served under Prevention must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#).

ii. Service Requirement

Prevention projects must require the participant to develop a plan on how they will retain permanent housing after assistance ends and to meet with a case manager not less than once per month* to assist the participant in maintaining long-term housing stability as set forth in 24 CFR § 576.401 (e)(1)(i). See Section XIV, [Recordkeeping Requirements](#).

***Exception:** Recipients that also receive funding under the Violence Against Women Act of 1994 (VAWA) or the Family Violence Prevention and Services Act (FVSP) are exempt from the requirement to meet with participants monthly because these programs prohibit making housing conditional on the participant's acceptance of services. See § 576.401(e)(2). See also [Victim Service Providers](#).

Re-evaluation of eligibility is required for Prevention; re-evaluation must occur at least every three (3) months. Re-evaluations must be documented in each participant's file and demonstrate that the participant lacks sufficient resources and support networks necessary to retain housing without assistance. Re-evaluations must also demonstrate that the household's annual income is less than or equal to 30% of the Area Median Income (AMI).

Projects must follow evaluation and participant eligibility rules and regulations as set forth in 24 CFR § 576.401(a) through (e).

All supportive services will be provided as necessary to help participants maintain permanent housing or move as quickly as possible into permanent housing and achieve stability in that housing. Supportive services are limited with ESG funds and may be used only to provide housing relocation and stabilization services. Prevention assistance must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR § 576.104 and 576.105, the short- and medium-term rental assistance requirements in 24 CFR § 576.106, and the written standards and procedures established under 24 CFR § 576.400.

Rent Subsidy Models

Prevention funds are used to assist participants to remain in permanent housing and regain stability. Or, where the current housing does not meet the participant's needs, the participant may move to more suitable housing. Funds may be used to provide short-term (up to 3 months) or medium-term (4 to 24 months) rental assistance over a 3-year period. Funding requirements may be further limited or defined by the Ventura County Continuum of Care in NOFA's or RFP's but at a minimum, all participants served in Prevention projects must have an identified rent subsidy model prior to receiving assistance or moving into a unit and this must be consistent throughout their term of service. The steps must be known (and documented) in advance and act as deadlines for increasing income. Whether

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the rent subsidy is based on participants' income or a fixed rate, the subsidy declines in "steps" until the participants assume full responsibility for monthly housing costs either by:

- Using a fixed timeline; or
- When the participant has reached specific goals

Rent assistance will be graduated, so the participants' share of rent will increase until they pay full rent. Should participants experience a situation that prevents them from achieving the graduated subsidy goal, then the subsidy may be extended or adjusted with a revised graduated subsidy established. Participants must be in compliance with the program and working on their housing stability plan to be considered for an extension or revised graduated subsidy plan.

Participants may receive up to two subsequent financial assistance payments after their graduated subsidy has ended if they were compliant with their housing stability plan and they experienced a hardship that prevented them from making their payment. Hardships may include a job loss or reduction in pay/hours, medical expenses, or other similar situations. The participant must not have exited the program to receive assistance. However, at no time may the rental assistance exceed 24 months in any three (3) year period.

iii. Lease Requirement

For ESGHomelessness Prevention, participants must sign a legally binding, written lease agreement; however, there are no requirements regarding a minimum term or other standards. For additional information, refer to Section XIII, [Housing Requirements](#).

iv. Duration of Assistance

For participants seeking permanent housing, housing stability case management may not exceed 30 days. Once permanent housing is obtained, rental assistance may not exceed 24 months during any three (3) year period, although the assistance may be further limited or defined by the Ventura County Continuum of Care. A graduated subsidy model must be identified and applied to all participants as outlined above in Section c.ii, [Service Requirement](#).

v. Exiting

Prior to the assistance ending, a plan must be in place that identifies how the participant will maintain stability in permanent housing. If the participant is not yet able to retain permanent housing, they will be re-assessed. Participants may receive additional assistance to prevent them from becoming homeless, on the streets, or other places not meant for human habitation. However, participants may not receive more than 24 months of rental assistance in any three (3) year period.

vi. Performance Measures

Homeless Prevention programs will be evaluated on HUD's System Performance Measures and reported on a quarterly basis to ensure they are operating efficiently. The CoC staff will lead the evaluation efforts, with guidance from the CoC Data Committee.

System Performance Measure 5: Number of Persons who Become Homeless for the First Time

System performance measure five evaluates the number of persons who become homeless for the first time during the reporting period. This measure focuses on whether that number is getting larger, staying the same, or getting smaller. The goal of this measure is to reduce every year the number of people who become homeless for the first time.

d. Rapid Rehousing

Rapid Rehousing is a type of permanent housing that offers supportive services, as needed, and/or short-term (up to three (3) months) or medium-term (three (3) to 24 months) rental assistance in order to help homeless individuals or families move as quickly as possible into permanent housing and achieve stability. 24 CFR § 578.37(a)(1)(ii). Participants may locate housing of their choice in the private rental market within Ventura County.

Rapid Rehousing projects must comply with the [Office of Community and Homeless Services \(OCHS\) Rapid Rehousing Guide](#), which is incorporated herein by reference.

i. Admission

Rapid Rehousing assistance will be prioritized for individuals and families who are currently living in Ventura County, cannot be more appropriately served by another program or system of care, lack a support network and have no other options or resources for housing. Persons who have been homeless previously, have received Prevention assistance in the past, or have a history of chronic homelessness will be prioritized. Rapid Rehousing projects must collect documentation that participants would become homeless but for this assistance. In addition to the general priority established above, Rapid Rehousing assistance will be prioritized for individuals and families with the highest vulnerability score based on a Coordinated Entry Prioritization Assessment. Homeless veteran households will be further prioritized. All participants served under Rapid Rehousing must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#), and as further described in the [Rapid Rehousing Guide](#).

ii. Service Requirement

~~Supportive services and assistance that will be offered to program participants (e.g., case management, substance use treatment, mental health treatment, and employment assistance) will ensure that the participant is able to successfully obtain self-sufficiency and exit homelessness. Require program participants to take part in supportive services (e.g. case management, employment training, substance use treatment) in line with 24 CFR 578.75(h) by attaching a supportive service agreement (contract, occupancy agreement, lease, or equivalent).~~

Deleted: Refer to the Rapid Rehousing Guide.¶

iii. Lease Requirement

Refer to the [Rapid Rehousing Guide](#). For CoC-Rapid Rehousing, participants must sign a lease that is for an initial term of one (1) year, that is terminable only for cause, and that automatically renews upon expiration (goes month-to-month). For ESG-Rapid Rehousing, participants must sign a legally binding, written lease agreement; however, there are no requirements regarding a minimum term or other standards. For additional information, refer to Section XIII [Housing Requirements](#).

iv. Duration of Assistance

Refer to the [Rapid Rehousing Guide](#).

v. **Exiting**

Refer to the [Rapid Rehousing Guide](#).

vi. **Performance Measures**

Rapid Rehousing programs will be evaluated on HUD's System Performance Measures and reported on a quarterly basis to ensure they are operating efficiently. The CoC staff will lead the evaluation efforts, with guidance from the CoC Data Committee.

System Performance Measure 2: The extent to which persons who exit homelessness from permanent housing destination return to homelessness

System performance measure two evaluates recidivism, measuring the percent of returns to homelessness in people who exited to permanent housing. Specifically, this measure looks at returns over three time periods as well as the overall number of returns over two years:

- Number returning to homelessness in less than 6 months
- Number returning to homelessness from 6 to 12 months
- Number returning to homelessness from 13 to 24 months
- Total number of returns to homelessness over 2 years

System Performance Measure 4: Employment and income growth for homeless persons

System performance measure four focuses on the increase in the percent of adults who gain or increase employment or non-employment cash income over time.

System Performance Measure 7: Successful placement in or retention of permanent housing

System performance measure seven focuses on how successful Permanent Supportive Housing projects are at helping people exit to or remain in permanent housing. This measure is looking for an increase in the percentage of people who remain in a Permanent Supportive Housing project during the reporting period.

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vii. CoC Statutory Requirements: The project applicant will not engage in racial preferences or other forms of illegal discrimination.

viii. The CoC project applicant will not operate drug injection sites or "safe consumption sites," knowingly distribute drug paraphernalia on or off of property under their control, permit the use or distribution of illicit drugs on property under their control, or conduct any of these activities under the pretext of "harm reduction."

System Performance Measure 7: Successful placements to permanent housing destinations.

System performance measure seven focuses on how successful Rapid Rehousing projects are at helping people exit to permanent housing. This measure is looking for an increase in the percentage of people who exit to positive destinations from a Rapid Rehousing project during the reporting period.

e. Permanent Supportive Housing (CoC)

Permanent Supportive Housing provides assistance to individuals with disabilities and families in which one adult or child has a disability. The policies and procedures in this Section e apply to all CoC Permanent Supportive Housing within the Ventura County Continuum of Care.

i. Admission

Permanent Supportive Housing will be prioritized for families and individuals currently residing in Ventura County; who are and have been living in places not designed for, or not ordinarily used as, a regular sleeping accommodation including a car, a park, an abandoned building, a bus or train station, an airport, or a campground; who cannot be more appropriately served by another program or system of care and have no other options or resources for housing; and, designed to serve elderly individuals and/or individuals with a physical disability/impairment or a developmental disability (24 CFR 582.5) not including substance use disorder. The units will prioritize these populations.

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Who meet the criteria of chronic homelessness. Permanent Supportive Housing projects will also be prioritized for individuals and families with the highest vulnerability based on the Coordinated Entry System (CES) Prioritization Policy. All participants served in Permanent Supportive Housing must meet the appropriate eligibility requirements as described in Section VI, Participant Eligibility.

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In addition to the general priority established above, Permanent Supportive Housing projects will utilize the following order of priority based on HUD Notice: <https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf>

Severe Service Needs

The most severe service needs, which should be identified and verified through data-driven methods, means that at least one (1) 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 physical disability health, impairment or a developmental disability or behavioral health challenges, not including substance use disorder which require a significant level of support in order to maintain permanent housing.

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The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. Refer to the nondiscrimination and equal opportunity requirements in 24 CFR 5.105 (a).

If no chronically homeless individuals or families are on the waiting list or applying for entrance to the program, Permanent Supportive Housing projects will prioritize homeless persons with disabilities who have been residing on the streets or in emergency shelter on less than four (4) separate occasions in the last three (3) years,

but where the cumulative total length of the occasions equals at least 12 months. If no such individuals or families are on the waiting list or applying for entrance to the program, Permanent Supportive Housing projects will then utilize the following order of priority:

1. *Homeless persons with a disability and the most severe service needs.*
Persons in a place not meant for human habitation, safe haven, or emergency shelter, with the most severe service needs as defined in the paragraph above.
2. *Homeless persons with a disability with a long period of continuous or episodic homelessness.*
Persons in a place not meant for human habitation, safe haven, or emergency shelter continuously for at least six (6) months or on at least three (3) separate occasions in the last three (3) years where the cumulative total is at least six (6) months.
3. *Homeless persons with a disability coming from places not meant for human habitation, safe havens, or emergency shelters.*
4. *Homeless persons with a disability coming from transitional housing.*
Persons that entered transitional housing directly from a place not meant for human habitation, safe haven, or emergency shelter.

ii. Service Requirement

Permanent Supportive Housing projects must offer supportive services for the participants that enable them to live as independently as is practicable throughout the duration of their residence in the project. [CoC program will require program participants to take part in supportive services \(e.g. case management, life skills, substance use treatment\) in line with 24 CFR 578.75\(h\) by attaching a supportive service agreement \(contract, occupancy agreement, lease, or equivalent\).](#)

Each participant must have an individual support plan in place, derived from recipients' ongoing, at least annual, assessment of participants' needs, and services must be adjusted accordingly. See Section XIV, [Recordkeeping Requirements](#). Services must be necessary to assist participants obtain and maintain housing.

iii. Lease Requirement

Participants must sign a lease that is for an initial term of one (1) year, that is terminable only for cause, and that automatically renews upon expiration (goes month-to-month). For additional information, refer to Section XIII [Housing Requirements](#).

iv. Duration of Assistance

There is no designated length of stay for participants of this type of housing.

Participants receiving rental assistance are permitted to be out of their unit for the purpose of brief institutional stays (jail, hospital, treatment) for a period not to exceed 90 days per occurrence.

v. Exiting

Permanent Supportive Housing is intended to be available to participants for as long as it provides housing assistance that meets their needs. Successful exits from Permanent Supportive Housing include:

- Owned by client, no ongoing housing subsidy
- Owned by client, with ongoing housing subsidy
- Exiting to another permanent supportive housing program
- Rental by client, no ongoing housing subsidy
- Rental by client, other (non-VASH) ongoing housing subsidy
- Staying or living with family or friends, for a permanent tenure
- Exiting with a VASH subsidy

vi. Performance Measures:

System Performance Measure 2: The extent to which persons who exit homelessness from permanent housing destination return to homelessness

System performance measure two evaluates recidivism, measuring the percent of returns to homelessness in people who exited to permanent housing. Specifically, this measure looks at returns over three time periods as well as the overall number of returns over two years:

- Number returning to homelessness in less than 6 months
- Number returning to homelessness from 6 to 12 months
- Number returning to homelessness from 13 to 24 months
- Total number of returns to homelessness over 2 years

System Performance Measure 4: Employment and income growth for homeless persons

System performance measure four focuses on the increase in the percent of adults who gain or increase employment or non-employment cash income over time.

System Performance Measure 7: Successful placement in or retention of permanent housing

System performance measure seven focuses on how successful Permanent Supportive Housing projects are at helping people exit to or remain in permanent housing. This measure is looking for an increase in the percentage of people who remain in a Permanent Supportive Housing project during the reporting period.

vii. CoC Statutory Requirements: The CoC PSH project will not engage in racial preferences or other forms of illegal discrimination.

viii. The CoC PSH project will not operate drug injection sites or “safe consumption sites,” knowingly distribute drug paraphernalia on or off of property under their control, permit the use or distribution of illicit drugs on property under their control, or conduct any of these activities under the pretext of “harm reduction.”

f. Street Outreach

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Street Outreach is intended to serve unsheltered homeless individuals and families with a focus on achieving placement into permanent housing. The policies and procedures in this Section f apply to all Street Outreach within the Ventura County Continuum of Care.

i. Admission

Street outreach will be for families and individuals currently residing in Ventura County, who are and have been living in places not designed for, or not ordinarily used as, a regular sleeping accommodation including a car, a park, an abandoned building, a bus or train station, an airport, or a campground. All participants served in Street Outreach must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#).

ii. Service Requirement

Street Outreach program staff engage unsheltered homeless individuals and families for the purpose of providing immediate support, intervention, and connections with homeless assistance programs, mainstream social services, and housing programs. The staff will utilize the Vulnerability Assessment Tool (VAT) to determine the level of need and assist with referrals to services.

Supportive services and assistance that will be offered to program participants (e.g., case management, substance use treatment, mental health treatment, and employment assistance) will ensure that the participant is able to successfully obtain self-sufficiency and exit homelessness. Require program participants to take part in supportive services (e.g. case management, employment training, substance use treatment) in line with 24 CFR 578.75(h) by attaching a supportive service agreement (contract, occupancy agreement, lease, or equivalent). Outreach programs shall demonstrates supportive services as necessary to assist people in exiting homelessness and increasing self-sufficiency including earned income, and will conduct annual assessments

Essential services must be tied directly to the needs and barriers identified in the VAT assessment by addressing urgent physical needs. Case management includes assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant.

Services for special populations include services for homeless youth, victim services, services for people living with HIV/AIDS, persons with mental illness, and disabled persons, so long as the costs of providing these services are one of the eligible Street Outreach activities. The term victim services mean services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters.

Outreach programs shall have a detailed plan of how they partner with first responders and law enforcement to engage people living in places not meant for human habitation to access emergency shelter, treatment programs, reunification, Transitional Housing or Independent Living Programs.

iii. Duration of Assistance

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Street Outreach must be provided to homeless individuals and families for at least the period during which grant funds are provided. Each subrecipient has been given a project goal to serve a certain number of beneficiaries within the contract year.

iv. Exiting

To the degree practicable, participants exiting Street Outreach will be assisted in accessing housing that best fits their needs, with a preference for assisting participants to access permanent housing. Exits may also include participants entering treatment facilities to address mental health, substance abuse, or medical needs; recipients will coordinate with the treatment provider to support a successful transition. When possible, housing options or other resources should be provided at exit, so that participants have knowledge of where to go when treatment is completed.

v. Performance Measures

Street Outreach programs will be evaluated on HUD's System Performance Measures and reported on a quarterly basis to ensure they are operating efficiently. The CoC staff will lead the evaluation efforts, with guidance from the CoC Data Committee.

System Performance Measure 2: The extent to which persons who exit homelessness from street outreach to permanent housing destination return to homelessness.

System performance measure two evaluates recidivism, measuring the percent of returns to homelessness in people who exited from street outreach to permanent housing. Specifically, this measure looks at returns over three time periods as well as the overall number of returns over two years:

- Number returning to homelessness in less than 6 months
- Number returning to homelessness from 6 to 12 months
- Number returning to homelessness from 13 to 24 months
- Total number of returns to homelessness over 2 years

System Performance Measure 7: Successful placements from street outreach to acceptable destinations.

System performance measure seven focuses on how successful street outreach projects are at helping people move off the "street" and towards permanent housing, recognizing this process may be direct or may involve other temporary situations along the way. This is important because people living on the street and in places not meant for human habitation are at an increased risk of death. This measure calculates the percent of street outreach clients who had a positive exit as recorded in HMIS during the report period. Most destinations that move a client off the street are considered positive exits, with some minor exceptions, like jail or prison, and other places not meant for human habitation. The measure is looking for an increase in the percentage of people who exit to positive destinations from a street outreach project during the reporting period.

Positive Exits Include:

- Emergency shelter, including hotel or motel paid for with emergency shelter voucher
- Foster care home or foster care group home
- Hotel or motel paid for without emergency shelter voucher

- Moved from one HOPWA funded project to HOPWA TH
- Psychiatric hospital or other psychiatric facility
- Safe haven
- Staying or living with family, temporary tenure (e.g., room, apartment or house)
- Staying or living with friends, temporary tenure (e.g., room, apartment, or house)
- Substance abuse treatment facility or detox center
- Transitional housing for homeless persons (including homeless youth)
- All permanent housing destinations

Negative Exits Include:

- Jail, prison, or juvenile detention facility
- Place not meant for human habitation
- Client doesn't know, client refused, data not collected, no exit interview completed, or other

Exits that should be removed from the Denominator Include:

- Hospital or other residential non-psychiatric medical facility
- Residential project or halfway house with no homeless criteria

g. All Project Types

Safeguards, Safety and Needs of Special Populations

i. Victim Service Providers

The term 'victim service provider' means a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Such organizations include rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs (Section 401(32) McKinney-Vento Act).

The Violence Against Women Act Reauthorization Act of 2022 (VAWA 2022) both renewed and expanded VAWA's protections for people fleeing domestic violence, dating violence, sexual assault, and stalking. VAWA 2022 also amended the McKinney-Vento Homeless Assistance Act to add a new eligible CoC Program activity related to facilitating emergency transfer requests and monitoring compliance with VAWA confidentiality provisions. VAWA 2022 added to, and did not replace, the existing VAWA housing protections for survivors. Housing providers must continue to provide VAWA protections as provided by law.

ii. Emergency Transfer Plan

Projects serving individuals or families qualified under Category 4 of the Defining "Homeless" Rule (persons fleeing or attempting to flee violent situations) must follow all related federal and state laws, follow confidentiality policies, and have written policies and procedures regarding the provision of specific services to meet the safety and special needs of this population. Projects providing shelter and housing must comply with the Ventura County Continuum of Care Emergency Transfer Plan (see attachment L) for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking to ensure tenants with a safety concern the ability to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. Per the requirements of an emergency transfer plan, projects must provide tenants with a

Notice of Occupancy Rights under the VAWA along with an optional Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternative Documentation.

Every person who applies for or receives assistance must be informed of their full rights under VAWA to ensure they have the knowledge required to exercise them.

Any information exchanged between Victim Service and Housing Providers in response to a VAWA requirement or provision, including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking, is confidential. This information must be always maintained in strict confidence.

iii. Veterans

Projects serving homeless veterans must prioritize those veterans who are ineligible for Veterans Affairs (VA) services, and work closely with the local Department of Veterans Affairs and coordinate resources with VA-funded housing and services (e.g. HUD-VASH, Supportive Services for Veteran Families (SSVF)) through the Veteran One Team Case Conferencing. Veterans must be screened for eligibility for VA-funded housing and/or services.

Veterans who choose to enter transitional housing must be placed as a short-term option while working on a permanent housing solution. A monthly review of their individualized service and housing plan must be completed by the provider.

iv. Youth

HUD's definition of youth includes unaccompanied children under age 18 or youth between the ages of 18 and 24. Projects serving youth must prioritize youth based upon vulnerability to victimization, length of time homeless, unsheltered homeless, lack of access to family and community support networks, and current or past sexual exploitation.

It is important to note that youth are not responsible for obtaining their own eligibility documentation; instead, intake workers are responsible for documenting the youth's eligibility (including homelessness status). Further, intake workers must consider the youth's safety concerns before contacting third parties: intake workers must *not* contact anyone that the youth does not want contacted because of fears for his/her safety.

HUD's homeless assistance programs may provide emergency shelter or street outreach to unaccompanied youth who can self-certify their homelessness. CoC funded projects must be HUD approved to serve youth under Homeless Status Category 3; however, ESG funded projects do not require HUD approval for this category.

v. High Needs

Projects serving individuals and families with very high needs must provide shelter and services that meet the special needs for these populations.

vi. Imminent Threat of Harm

Participants who are receiving *Tenant-Based Rental Assistance* and 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 move to a different Continuum of Care geographic area if they move out of the assisted unit to protect their health and safety. Recipients must retain a record of the Imminent Threat of Harm for both participants who enter and exit under provisions as described at 24 CFR § 578.51(c)(3). If providing housing or shelter, recipient also must comply with the Ventura County Continuum of Care Emergency Transfer Plan (see attachment L) which includes provision of a Notice of Occupancy Rights under the Violence Against Women Act to participants and an optional Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternative Documentation.

vii. Education Services

The educational needs of children and youth must be accounted for, to the maximum extent practicable, and families with children and unaccompanied youth must be placed as close as possible to the school of origin so as not to disrupt the children's education. Projects that serve homeless families with children and/or unaccompanied youth must have policies and practices in place that are consistent with the laws related to providing education services to children and youth. These recipients must have a designated staff person to ensure that children and youth are enrolled in school and receive education services, as appropriate. 42 U.S.C. 11432 et. seq. Homeless families with children and unaccompanied youth must be informed of their eligibility for McKinney-Vento education services as well as other State and local education services. Recipients shall maintain documentation in the participant's case file to demonstrate that these requirements have been met and that applicants and participants understand their rights.

Collaboration with McKinney-Vento Local Education Liaisons

Recipients must document whether school-aged children are eligible for McKinney-Vento services and whether the child is connected with a local education liaison. If the child is not already engaged, recipients must refer the family directly to the liaison at their school of choice. All applicants/participants with school-aged children must be provided with documentation that explains their rights under the McKinney-Vento Act and that provides contact information for the liaison at every school district within Ventura County.

Mitigation Plans

Mitigation Plans and case conferencing are steps to help support Permanent Housing providers discuss behaviors and/or challenges individuals and households have been experiencing and further develop mitigation strategies by seeking consultation and support from CES providers. Mitigation plans and case conferencing are intended to address ongoing challenges with those at high risk of returning to homelessness. Bringing forth cases to CES case conferencing is intended to receive feedback from the diverse CES network of providers, connect other potential resources for support and provide recommendations for a possible higher level of care such as board and care, enhanced care management (ECM), treatment, etc. Case conferencing may address CoC PSH transfer requests. CoC PSH transfers are for those at risk of returning to homelessness due to unsuitable housing which includes household composition changes (no longer meeting occupancy requirements due to change in household size), higher level of care needs (scattered site model transfer to onsite case management model for additional support) and/or emergency transfer plan for

those fleeing DV/ stalking; a CoC PSH transfer may be requested through CES by submitting a case conference form.

Persons may be terminated from the program *only* when violations of the lease are serious, and only in the most severe cases. Use of alcohol or drugs in of itself (without other lease violations) is not a reason for program termination. It is important to note that a participant may be evicted from the housing unit, but this does not mean that the recipient must terminate the participant from the program; the recipient may continue serving the participant in another housing unit. In cases where a participant has unpaid back owed rent, a referral to a homeless prevention program for rental assistance should be made whenever possible to prevent an eviction.

V. Components and Eligible Activities

This section will help to determine and define the allowable activities within a project as defined by the project component under both ESG and CoC. Components define a type of project (e.g., Transitional Housing) and have a set of allowable activities (e.g., Supportive Services). Activities are a set of allowable costs. For example, a phone line for a case manager might be considered a Supportive Services activity under the Transitional Housing component for the CoC Program.

ESG and CoC Programs each have five (5) eligible components that are detailed in [Table 5.1](#) (ESG) and [Table 5.7](#) (CoC). Rapid Rehousing, Homeless Prevention and HMIS are allowable components of both funding sources; however, the activities that are allowable vary by Program. Street Outreach and Emergency Shelter are eligible under ESG only. Permanent Supportive Housing and Supportive Services Only are unique to the CoC Program. It is important to become familiar with the allowable activities under the funded component. The areas in grey are currently not being funded.

The funded components of a project are described in the contract with HUD for direct recipients or with Ventura County for Subrecipients.

a. Emergency Solutions Grant

i. Eligible ESG Components

<i>Table 5.1</i>		<i>ESG Eligible Components</i>		
Street Outreach	Emergency Shelter	Homelessness Prevention	Rapid Rehousing	HMIS

ii. Eligible ESG Activities

1. Street Outreach 24 CFR § 576.101 (ESG Only)

ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people, referred to as Street Outreach. Eligible activities include engagement, case management, and transportation. Street outreach includes services that are unable to be provided to individuals or families due to their unwillingness to come to a shelter. Emergency health and mental health services may be eligible if these services are inaccessible or unavailable within the area.

Table 5.2		ESG Street Outreach - Eligible Activities			
<i>Essential Services</i>					
Engagement	Case Management	Emergency Health Services	Transportation	Emergency Mental Health Services	Services for Special Populations

2. [Emergency Shelter](#) 24 CFR § 576.102 (ESG Only)

Emergency Shelter is defined as any facility, where the primary purpose is to provide “a temporary shelter for the homeless in general, or for specific populations of the homeless people and which does not require occupants to sign leases or occupancy agreements. Any project that was funded under a Fiscal Year 2010 Emergency Solutions Grant may continue to be funded under ESG (24 CFR § 576.2).” However, because of the limited number of funding sources for which emergency shelter costs are eligible, Emergency Shelter will be prioritized for funding under ESG. Eligible activities include essential services, shelter maintenance, renovation, and relocation assistance (576.408).

Table 5.3		ESG Emergency Shelter – Eligible Activities		
<i>Essential Services</i>				
Case Management	Child Care	Education Services		Employment Assistance & Job Search
Outpatient Health Services	Legal Services	Life Skills Training		
Mental Health Services	Substance Abuse Treatment Services	Transportation		Services for Special Populations
<i>Renovation</i>				
<i>Shelter Operations</i>				
<i>Assistance Required Under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970</i>				

3. [Homelessness Prevention](#) 24 CFR § 576.103 (ESG Only)

Homelessness Prevention provides housing relocation, stabilization services and short- and medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in Category 1 of the Defining “Homeless” Rule, see [Table 6.2](#). The cost of homelessness prevention is only eligible to help the participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in the housing. ESG financial assistance cannot be provided to a program participant receiving the same type of assistance for the same period of time from another public program.

Table 5.4		ESG Homelessness Prevention – Eligible Activities
		<i>Housing Relocation & Stabilization Services</i>
		<i>Short- and/or Medium-Term Rental Assistance</i>

4. [Rapid Rehousing](#) 24 CFR § 576.104 (ESG)

Rapid Rehousing provides housing relocation, stabilization services and short- and medium-term rental assistance to help homeless individuals or families move as quickly as possible into permanent housing and achieve stability in that housing. *Please note:*

Rapid Rehousing varies between ESG and CoC Program Regulations. For a comparison of costs and activities between ESG and CoC Rapid Rehousing, see [Attachment D](#).

<i>Table 5.5</i>	ESG Rapid Re-Housing – Eligible Activities
	<i>Housing Relocation & Stabilization Services</i>
	<i>Short- and/or Medium-Term Rental Assistance</i>

5. *HMIS Component 24 CFR § 576.107 (ESG)*

Section 416(f) of the McKinney-Vento Act requires for the first time that ESG-funded projects participate in the Homeless Management Information System (HMIS). The ESG interim rule makes certain costs eligible to the extent necessary to enable this participation. HUD published a proposed rule on HMIS, 24 CFR part 580, that will govern HMIS when it is published as final.

Please note: the HMIS Component varies between the ESG and CoC Program Regulations. See Section V.b for CoC information on the [HMIS component](#) and [HMIS eligible activities](#).

County policy is to share HMIS funds with Subrecipients. The amount available will be determined at the time of award and through the contracting process and shall be based upon funding available. If a Subrecipient receives funding allocated for HMIS costs, they must track the time spent entering HMIS data separately on a timesheet and provide back-up documentation when requested. A different line item will be provided on Subrecipient Invoices with the expectation of the HMIS time being reported separately.

<i>Table 5.6</i>	ESG Administrative Costs
	<i>Ventura County CoC retains all administrative funds to manage contracts, complete monitoring and cost reimbursement activities.</i>

6. *Administrative Costs (ESG)*

Eligible activities include accounting for the use of grant funds, preparing reports for submission to HUD, obtaining program audits, staff salaries associated with eligible administrative costs and ESG training for program administrator and case managers.

b. Continuum of Care

i. Eligible CoC Components

Table 5.7		CoC Eligible Components				Formatted Table
Permanent Housing		Transitional Housing (TH)	Supportive Services Only (SSO)	HMIS	Street Outreach	Prevention (HPC* Only)
Including:						
PSH**	RRH***					
<p>*High Performing Community (as designated by HUD) **Permanent Supportive Housing ***Rapid Rehousing</p>						

1. Permanent Housing 24 CFR § 578.37(a)(1) (CoC) Definition

Permanent Housing is community-based housing, the purpose of which is to provide housing without a designated length of stay. Under the CoC Program, Permanent Housing includes both Permanent Supportive Housing and Rapid Rehousing.

a. Permanent Supportive Housing 24 CFR § 578.37(a)(1)(i) (CoC) Definition

Permanent Supportive Housing provides assistance to individuals with disabilities and families in which one adult or child has a disability. Supportive Services designed to meet the needs of the participant must be made available to the participant.

b. Rapid Rehousing 24 CFR § 578.37(a)(1)(ii) (CoC) Definition

CoC funds under Rapid Rehousing may be used to provide supportive services and/or short-term (up to 3 months), and/or medium-term (3 to 24 months) tenant-based rental assistance.

Please note: Rapid Rehousing varies between ESG and CoC Program Regulations. For a comparison of costs and activities between ESG and CoC Rapid Rehousing, see Attachment D.

2. Transitional Housing 24 CFR § 578.37(a)(2) (CoC) Definition

Transitional Housing is housing that facilitates the movement of homeless individuals and families to permanent housing within 24 months.

3. Supportive Services Only 24 CFR § 578.37(a)(3) (CoC) Definition

Projects that contain a Supportive Services Only (SSO) component provide supportive services to unsheltered and sheltered homeless persons for whom the recipient is not providing housing or housing assistance. The lack of housing or housing assistance provision is the defining difference between a project that is considered to be an SSO project, versus a project that is considered to be a housing project even if the only activities funded under the CoC are services. The County is not currently funding projects for which this definition would apply.

4. *HMIS 24 CFR § 578.37(a)(4) (CoC)*

Under the CoC Program, only the Homeless Management Information System (HMIS) Lead, in this case Ventura County, may apply for a project with an HMIS component; however, HMIS may be an eligible cost for a recipient if permitted by the contract.

Please note: the HMIS Component varies between the ESG and CoC Program Regulations. See Section V.a for ESG information on [HMIS eligible activities](#) and Section

V.b for CoC information on [HMIS eligible activities](#).

5. *Street Outreach 24 CFR 578.37 (CoC)*

Definition

Under the CoC Program, project have a strategy for providing supportive services to eligible program participants including those with histories of unsheltered homelessness and those who do not traditionally engage with supportive services.

6. *Prevention 24 CFR § 578.37(a)(5)(CoC)*

Definition

Homelessness Prevention is an eligible component under the CoC Program only for Continuums of Care that are designated as a High Performing Community (HPC) as defined by Subpart E of 24 CFR § 578. Ventura County is not currently designated as an HPC.

ii. Eligible CoC Activities

The CoC Program allows for a number of different eligible activities. Each project’s ability to expend funds for the costs listed below is limited by the project’s component, project application, Subrecipient Contract with the County, and the NOFA.

Please note that the following is a list of all eligible activities under the CoC Interim Rule. Costs such as *CoC Planning Activities* and *UFA Costs* are eligible only if the County is funded for such activities, and then only the County, as the Collaborative Applicant, can bill to them. Acquisition, Rehabilitation, New Construction and Relocation are onetime costs, and the County is not currently pursuing such activities due to limited funding. In the table below, activities have been shaded in grey to indicate that they are not billable.

<i>Table 5.8</i>		<i>CoC Eligible Activities</i>	
CoC Planning Activities	UFA* Costs	Acquisition	
Rehabilitation	New Construction	Leasing	
Rental Assistance	Supportive Services	Operating Costs	
HMIS	Project Administration	Relocation Costs	Indirect Costs
<i>*Unified Funding Agency</i>			

As mentioned above, the CoC Program authorizes a variety of eligible activities; however, projects may charge costs to the grant only that are agreed upon in the contract between

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the Subrecipient and Ventura County or between the direct recipient and HUD. Therefore, activities that are not being utilized locally have not been included below.

Table 5.9		CoC Eligible Activities* by Component			Formatted Table
		PH: PSH	PH: RRH	SSO	TH
Housing Costs**	Leasing	X			X
	Rental Assistance	X	X		X
	Operating	X			X
Supportive Services		X	X	X	X
HMIS		X	X	X	X
Administration		X	X	X	X
Indirect Costs		X	X	X	X
<p>* Refer to Eligible CoC Activities below.</p> <p>**The following Housing Costs may not be combined in the same project:</p> <ul style="list-style-type: none"> - Rental Assistance and Leasing - Rental Assistance and Operating 					

4. *Leasing 24 CFR § 578.49 (CoC)*
Leasing funds under the CoC Program may be used to lease a structure or individual units to provide housing or supportive services to homeless persons. Funds cannot be used to lease units or structures owned by the recipient, Subrecipient, their parent organization(s), or other organizations more fully described in 24 CFR § 578.49(a) unless
5. *Rental Assistance 24 CFR § 578.51 (CoC)*
Rental assistance funds may be used to provide homeless individuals or families with short-, medium- or long-term rental assistance as outlined below. Rental assistance cannot be provided to participants who are already receiving rental assistance or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.

Administering Rental Assistance

Contracting for and making rental assistance payments to landlords, as well as conducting [Housing Quality Standards](#) (HQS) Inspections are considered to be a service delivery cost of rental assistance and is therefore an eligible cost under this section. Other eligible costs of administering rental assistance include: examining participant income and family composition; providing housing information and assistance; and receiving new participants into the program.

Table 5.12			CoC Rental Assistance – Eligible Costs		
<i>Length of Housing Assistance</i>					
Short-Term <i>Up to 3 months</i>		Medium-Term <i>From 3 to 24 months</i>		Long-Term <i>>24 months</i>	
<i>Model of Assistance</i>					
Tenant Based <i>Participants choose unit</i>		Sponsor Based <i>Participants reside in housing owned or leased by Sponsor</i>		Project Based <i>Units are provided through a contract with the owner</i>	
<i>Other Eligible Costs</i>					
Vacancy Payment – up to 30 days following end of the month when unit vacated		Property Damage – may not exceed one month’s rent; one-time cost per participant at the time participant exits unit		Security Deposits – not to exceed 2 months of rent	
<i>Administering Rental Assistance – Eligible Costs</i>					
Processing rental payments to landlords		Examining participant income and family composition		Providing housing information and assistance	
Inspecting units for compliance with Housing Quality Standards (HQS)			Receiving new participants into the program		

Table 5.13		CoC Rental Assistance – Key Requirements	
Unit Rent Standard	The unit rent must be reasonable in comparison to similar units and cannot exceed comparable, unassisted units. <i>See Section XIII.d, Rent Reasonableness and Fair Market Rent.</i>		
Unit Lease – Lease and Rental Assistance Agreement	Participants must have a lease agreement with the landlord/owner of housing. In addition, recipients may make rental assistance payments only to landlords/owners with whom the recipient has a rental assistance agreement. The rental assistance agreement must include the terms under which rental assistance will be provided, the term of the agreement, that the landlord/owner will provide the recipient with a copy of all written notices to the participant (including notices to vacate, notices of noncompliance, etc.). <i>See Section XIII.e, Housing Agreements.</i>		
Participant Rent	Except in Rapid Rehousing projects, participants must contribute toward their rent in accordance with 3(a)(1) of the U.S. Housing Act of 1937 (42 USC 1437a(a)(1)). Changes to rental payment amounts must be made as changes in income are identified (no less than annually). For further guidance on calculating rent, refer to Section X.g, Calculating Rent (or Occupancy Charge) .		

6. *Supportive Services 24 CFR § 578.53 (CoC)*
Supportive Services funds may be used to provide supportive services that address the special needs of participants. Services must be limited to those which assist participants

in obtaining and maintaining housing. Ongoing, at least annual, assessments of service needs are required, and services should be adjusted accordingly. Where supportive services are provided within a facility not contained in a housing structure, the costs of operation of the facility are eligible, including maintenance, repair, building security, utilities, and equipment.

The following table is a complete list of eligible costs under this component. See 24 CFR § 578.53(e) for additional details about what these costs include.

Table 5.14 CoC Supportive Services – Eligible Costs		
Annual Assessment of Service Needs	Assistance with Moving Costs	Case Management
	Food	Housing Search & Counseling Services
Employment Assistance & Job Training	Outpatient Services	Outreach Services
	Education Services	
Mental Health Services	Substance Abuse Treatment Services	Legal Services
Child Care		Transportation
Life Skills Training	Utility Deposits	Direct Provision of Services

7. *Operating Costs 24 CFR § 578.55 (CoC)*

Operating funds may be used to pay the day-to-day costs of operation of transitional and permanent housing in a single structure or individual units. Operating costs for supportive service facilities are considered supportive services; see *Section V.b, Supportive Services*.

Table 5.15 CoC Operating – Eligible Costs			
<i>Model of Assistance</i>			
Structure		Individual Units	
<i>Eligible Costs</i>			
Repair & Maintenance	Property Tax & Insurance	Scheduled payments to	Security*
Electricity, Gas & Water	Furniture	reserve	Equipment

**Where >50% of the units are paid for with grant funds*

Table 5.16 CoC Operating – Key Requirements	
Unit Rent Standard	Not applicable.
Unit Lease	Participants must have a lease or occupancy agreement with the recipient. See <i>Section XIII.e, Housing Agreements</i> .
Participant Rent	Agencies are not required to have participants pay rent, but if they choose to charge participants rent, the rent must be calculated in accordance with 24 CFR § 578.77 and cannot exceed the highest of 30% of the participant’s adjusted monthly income, 10% of the participant’s monthly income, or the welfare rent. For further guidance on calculating rent, refer to Section X.g, <i>Calculating Rent (or Occupancy Charge)</i> . Any participant rent that is collected is considered Program Income and must be used for eligible costs in accordance with 24 CFR § 578.97.

8. *HMIS 24 CFR § 578.57 (CoC)*

HMIS funds may be used to pay the costs of contributing data to the Ventura County Homeless Management Information System (HMIS).

Please note: the HMIS Component varies between the ESG and CoC Program Regulations. See Section V.a for ESG information on [HMIS eligible activities and Section](#)

V.b for CoC information on the [HMIS component](#).

<i>Table 5.17</i>		CoC HMIS – Eligible Costs	
Purchasing/Leasing Computer Hardware	Purchasing Software or Software Licenses	Purchasing/Leasing Equipment (telephones, fax machines, furniture)	Obtaining Technical Support
Leasing Office Space	Electricity, Gas, Water, Phone Service, High Speed Data Transmission	Salaries for Operating HMIS	Costs of Staff to Travel and Attend HUD Sponsored/ Approved Training on HMIS
Staff travel Costs to Conduct Intake		Participation Fees Charged by the Lead	

9. *Project Administration 24 CFR § 578.59 (CoC)*

CoC-funded projects may apply to use up to 10% of their project funds to pay for administrative costs. The NOFA may further limit project requests for administrative costs. For instance, during the FY2013 NOFA, local projects were limited to requesting no more than 7% in order to receive maximum points in this section of the application.

For projects through Ventura County, administrative funds are split between the County (50%) and the Subrecipient (50%) for all projects unless determined otherwise by the County and Subrecipient.

Staff and overhead costs directly related to carrying out eligible costs are considered eligible under those activities and are not considered project administration.

<i>Table 5.18</i>		CoC Administrative Costs	
<i>General Management & Oversight</i>			
Preparing Budgets & Schedules	Assure Compliance	Development of Agreements to Carry Out Program Activities	
Monitoring for Progress & Compliance	Preparing HUD Reports	Coordinating Resolution of Findings	
Evaluating Results & Objectives	Managing/Supervising Staff Who Engage in General Management & Oversight		
<i>Training on CoC Requirements</i>		<i>Environmental Reviews</i>	

10. *Indirect Costs 24 CFR §578.63*

Indirect costs are eligible under the CoC Program and must be in accordance with OMB Uniform Guidance.

VI. Participant Eligibility

Eligibility for assistance under CoC and ESG Programs is determined by HUD Regulations 24 CFR § 578, and 24 CFR § 576 respectively. Eligibility is further defined by project component. The table below provides an overview of eligibility by component and funding type. Eligibility may be further restricted by the contract.

a. Eligibility by Component

<i>Table 6.1</i>		<i>Eligibility By Component</i>						
Component	Funding	Homeless Status Category*			Income**		Disability	Chronic Homeless (CH)
		1	2	4	30%			
Shelter	ESG	X	X	X	N/A			
Prevention	ESG		X	X	X			
			X	X	X			
RRH	ESG / CoC	X			Required at Revaluation Only			
Transitional	CoC	X	X	X	N/A			
Supportive Services Outreach	CoC	X			N/A			
PSH	CoC	X			N/A		X	Prioritized
PSH – CH Dedicated	CoC	X***			N/A		X	X

X = Required
 N/A = Not Applicable
 *Homeless Status Categories are established by the Defining “Homeless” Rule; see Table 5.2 for corresponding categories
 **Participant’s annual income may not exceed the specified % of median family income for the area (AMI), as determined by HUD
 ***Permanent Supportive Housing that is dedicated to chronically homeless households must serve only persons who qualify as chronically homeless who are coming from a place not meant for human habitation, safe haven, or emergency shelter. While persons in transitional housing are considered to be Category 1 homeless, they do not qualify as chronically homeless.

Homeless Eligibility Criteria

In order to receive assistance, persons must meet the HUD definition of homeless as detailed below in [Table 6.2](#) for the duration of their participation in ESG projects, and at entry for CoC projects.

<i>Table 6.2</i>		<i>Homeless Eligibility Criteria</i>	
Cat.	Description	Component	Criteria
1	Literally Homeless	<i>Emergency Shelter</i> <i>Transitional Housing</i> <i>Rapid Rehousing</i> <i>Permanent Supportive Housing</i> <i>Street Outreach</i>	<p>A household is literally homeless if they lack fixed, regular & adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> • Sleeping in a place not designed for, or not ordinarily used as, a regular sleeping accommodation, including a car, a park, an abandoned building, a bus or train station, an airport, or a campground. • Living in a shelter designated to provide temporary living arrangements, including congregate shelters, transitional housing, hotels/motels paid for by charitable organizations, or federal/state/local government programs. • Exiting an institution such as a jail or hospital where they resided for 90 days or less AND was residing in an emergency shelter or place not meant for human habitation immediately before entering the institution.

2	Imminent Risk of Homelessness	Emergency Shelter Transitional Housing Prevention	<p>A household that will imminently lose their primary nighttime residence provided that:</p> <ul style="list-style-type: none"> • The residence will be lost within 14 days of the application for assistance • No subsequent residence has been identified; AND • The individual or family lacks the resources or support networks needed to obtain other permanent housing
3	Unaccompanied Youth ()	Emergency Shelter Transitional Housing Rapid Rehousing Prevention	<p>Unaccompanied youth under age 25 or families with children and youth who:</p> <ul style="list-style-type: none"> • Are defined as homeless under section 387 of the Runaway and Homeless Youth Act; • Have not had lease, ownership interest, or occupancy agreement at any time within 60 days of application; • Have moved two or more times within 60 days of application; AND <p>Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse; child or youth with a disability; or two or more barriers to employment.</p>
4	Fleeing or Attempting to Flee to Domestic Violence	Emergency Shelter Transitional Housing Rapid Rehousing Prevention	<p>Households fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or other dangerous or life-threatening conditions related to violence, who:</p> <ul style="list-style-type: none"> • Have no identified subsequent residence; AND • Lack the resources and support networks needed to obtain other permanent housing.

b. Income 24 CFR § 576.103

Income limits are based on Area Median Income (AMI) and are updated at least annually by HUD. Projects that have an income eligibility requirement must ensure they are using the most current information available. Current income limits can be found at <http://www.huduser.org/portal/datasets/il.html>

c. Disability

In order to qualify for [Permanent Supportive Housing](#), the homeless household must have an adult or child member with a disability that meets the definition below (Docket No. FR-5333-F-02).

Table 6.3	Disability
Physical, Mental or Emotional Impairment	
A person shall be considered to have a disability if he or she has a disability that:	
(i)	is expected to be long-continuing or of indefinite duration;
(ii)	Substantially impedes the individual's ability to live independently;
(iii)	Could be improved by the provision of more suitable housing conditions; and
(iv)	Is a physical, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, posttraumatic stress disorder, or brain injury.
Developmental Disability	

A person will also be considered to have a disability if he or she has a developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002)
HIV/AIDS
A person will also be considered to have a disability if he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).
Other Considerations
Notwithstanding the preceding provisions of this definition, the term <i>person with disabilities</i> includes, except in the case of the Single Room Occupancy (SRO) component, two or more persons with disabilities living together, one or more such persons living with another person who is determined to be important to their care or well-being, and the surviving member or members of any household described in the first sentence of this definition who were living, in a unit assisted under this part, with the deceased member of the household at the time of his or her death. (In any event, with respect to the surviving member or members of a household, the right to rental assistance under this part will terminate at the end of the grant period under which the deceased member was a participant.)

d. Chronic Homelessness

Some projects under the CoC Program are specifically dedicated to or prioritized for persons with a disability who have had several episodes of homelessness or an extended duration of homeless, which is referred to as *Chronic Homelessness*. The 2010 Federal Strategic Plan to Prevent and End Homelessness prioritized ending chronic homelessness by 2015; in February 2015, this goal was revised to 2017. The local 2010 Point in Time Count demonstrated that 234 individuals were experiencing chronic homelessness at the time of the count; in 2012 the number had dropped to 163.

i. Definition of Chronic Homelessness 24 CFR § 578.3

A homeless individual with a [disability](#) who lives in a place not meant for human habitation, a safe haven, or in an emergency shelter and who has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least twelve (12) months or on at least four (4) separate occasions in the last three (3) years, as long as the combined occasions equal at least twelve (12) months and each break in homelessness separating the occasions included at least seven (7) consecutive nights of not living in a place not meant for human habitation, a safe haven, or in an emergency shelter.

A person who meets the chronic homeless definition as described above, but who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days, and who was on the streets or in emergency shelter immediately before entering the institution, also qualifies as chronically homeless. Chronically homeless persons also include 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 the criteria of chronic homelessness, including a family whose composition has fluctuated while the head of household has been homeless.

Table 6.4

Duration of Homelessness

Duration	Definition	
Continuous, for at least twelve (12) months		
On the streets or in emergency shelter continuously, without a break, for at least twelve (12) months		
Continuous	A stay on the streets or in emergency shelter without a break.	
Break	At least seven (7) or more consecutive nights not residing on the streets or in emergency shelter. Stays in institutional care facilities for fewer than 90 days do not constitute a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility.	
Twelve (12) Continuous Months	Twelve (12) consecutive calendar months. NOTE: If the person has a documented encounter with a homeless service provider on a single day within a given month, this is sufficient to consider the person homeless for the entire calendar month, unless there is evidence of a break in homelessness. This applies ONLY if the encounter is documented by third-party documentation – a self-declaration is insufficient.	
At least four (4) separate occasions in the last three (3) years where the combined occasions equal at least twelve (12) months		
On the streets or emergency shelter on four (4) separate, distinct, and sustained occasions in the last three (3) years, as long as the combined occasions equal at least twelve (12) months and each break in homelessness separating the occasions included at least seven (7) consecutive nights of not living in a place not meant for human habitation, a safe haven, or in an emergency shelter		
Occasion	Separate and Distinct	Stay on the streets or in emergency shelter is interrupted by a Break (period of seven (7) or more consecutive nights residing in a place other than on the streets or in emergency shelter).
	Sustained	Stay on the streets or in emergency shelter is more at least one (1) night.
Three (3) years	Thirty-six (36) consecutive calendar months	
Twelve (12) Total Months	Four (4) separate occasions on the streets or emergency shelter that equal a cumulative total of twelve (12) months, meaning twelve (12) calendar months.	

ii. **Chronically Homeless Veterans**

The Department of Veteran’s Affairs (VA) conducts an initial verification of status and subsequently provides services to qualified veterans through a single episode of care. This VA “episode of care” may consist of services provided by different VA providers and/or different VA programs. Veterans who have been identified as chronically homeless through the VA’s initial intake maintain this status throughout his/her episode of VA care. Therefore, projects that are dedicated to or prioritized for chronically homeless persons may serve a person documented as chronically homeless by the VA, no matter the services received during his/her episode of VA care (i.e., a project may serve a person identified as chronically homeless by the VA, even if (s)he was in VA-transitional housing).

iii. **Chronic Homelessness and Rapid Rehousing**

Persons identified as chronically homeless prior to enrolling in a rapid rehousing project *maintain* their status as chronically homeless while they receive rapid rehousing assistance. However, chronic homelessness must be documented (as described in Section VII, [Documentation Standards](#)) prior to entering the rapid rehousing program. Therefore, projects that are dedicated to or prioritized for chronically homeless persons may serve a person who is receiving rapid rehousing assistance as long as his/her chronic homeless status was documented prior to entering the rapid rehousing project.

e. **Special Considerations for Serving a Person Who May be Undocumented**

Eligibility for the receipt of public benefits is restricted by The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 which provides that people who are undocumented are not to receive public benefits. The Act further specifies how to inquire into a person’s status. However, programs that are necessary for the protection of life or safety, which provide short-term shelter or housing assistance, non-cash services at the community level, which is not means-tested are exempt.

This exemption does not apply to permanent housing programs, however. HUD clarifies this matter through the SHP Desk Guide as such, “[...] nonprofit organizations are not required to, but may, verify an applicant’s citizenship or immigration status before providing assistance. If a nonprofit elects to verify citizenship or immigration status, they must follow the procedures required by [Executive Order 14218](#) and should consult with their legal counsel on how to comply.”

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f. **Special Considerations for Households if Individual Members are Residing in Different Places**

Persons presenting together as a household may be served together, regardless of marital status, or sex. Refer also to Section III.b.iv, [Discrimination Based on Household Composition](#).

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The implications of this are that household members may be residing in different places at entry. In order to determine the household’s eligibility for assistance, the recipient must determine eligibility based on the status of:

1. The adult head of household; or
2. The minor head of household when no adult is present.

If there is more than one (1) adult in the household, the household may choose which adult is considered to be the head of household for the purposes of determining eligibility.

Please note that the person, whose eligibility qualifies the entire household, must meet all of the applicable eligibility requirements for the project.

Refer also to HUD’s Frequently Asked Question, <https://www.hudexchange.info/faqs/2318/how-should-recipients-determine-a-family-eligibility-for-assistance/>.

VII. Documentation Standards for Eligibility for Assistance

a. **Eligibility Overview**

Participants must be deemed eligible as described in Section VI, [Participant Eligibility](#). The tables below describe the required documentation for each funding source and project component and details the type of documentation required to meet federal requirements and local standards. Required documentation must be clearly noted and documented in the participant’s case file. The County has developed standard forms that may be used by recipients to document eligibility; these forms are located on the County’s Continuum of Care Program website.

b. **Homeless Verification**

Intake staff are required to document homelessness for all persons seeking assistance. Determination and documentation of eligibility must be based on homeless status at intake; intake is the time the individual or family enters the project and begins receiving assistance under the grant program.

Unless otherwise noted, the general order of priority for obtaining evidence is third-party documentation first, intake worker observations second, and certification by the person seeking assistance third. However, for homeless assistance projects that provide emergency assistance, such as emergency shelter and street outreach, a lack of third-party documentation must not prevent an individual or family from being immediately admitted. Emergency shelter and street outreach providers will clearly document homeless status through intake worker written observation in HMIS (under "Current Living Field") to include notes describing the observed condition(s) where the participant resides, program name, provider position and observation date. Where printed copies of participant eligibility are required, forms must be legibly completed, signed, and dated by all parties involved.

<i>Table 7.1</i>		Homeless Verification - Documentation	
Cat.	Description	Component	Documentation
1	Literally Homeless	<i>Emergency Shelter</i> <i>Rapid Rehousing</i> <i>Transitional Housing</i> <i>Permanent Supportive Housing</i> <i>Street Outreach</i>	1. Legible, properly documented and signed written observation by outreach worker of the conditions where the individual or family is living; OR 2. Written referral by another housing or service provider; OR 3. Certification by the household seeking assistance/self-declaration*. 4. When needed, supplemental documentation clarifying or confirming eligibility may be added to the participant's file.
2	Imminent Risk of Homelessness	<i>Emergency Shelter</i> <i>Prevention</i> <i>Transitional Housing</i>	1. Court order resulting from an eviction action notifying the household they must leave; OR 2. For household leaving hotel/motel that they were paying for, evidence that they lack the financial resources to stay; OR 3. Documented and verified oral statement; AND <ul style="list-style-type: none"> a. Certification that no subsequent residence is identified; AND b. Self-declaration* or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

4	Fleeing/Attempting to Flee Domestic Violence	<i>Emergency Shelter</i>	<p>For victim service providers:</p> <p>Self-declaration/oral statement by the household seeking assistance which states: they are fleeing, they have no subsequent residence, and they lack resources. The statement must be certified by intake worker.</p> <p>For non-victim service providers:</p> <p>1. Self-declaration/oral statement by household seeking assistance which states: they are fleeing, they have no subsequent residence, and they lack resources.</p> <p>2. If the household is not jeopardized, the oral statement that the household is fleeing must be verified by intake worker or by written referral by an organization from which assistance was sought for domestic violence.</p>
		<i>Prevention</i> <i>Transitional Housing</i>	
<p>*Self-Declarations must generally be accompanied by intake worker documentation of due diligence to obtain third-party verification.</p>			

Due Diligence

Written documentation of due diligence must describe efforts to obtain third-party documentation (e.g., phone logs, email correspondence, copies of certified letters), and must be signed and dated by intake staff as true and complete.

Due diligence is not defined by HUD; locally, it is interpreted to mean making reasonable attempts to obtain third-party documentation. Intake workers must document these reasonable attempts, the outcome of the effort, and obstacles encountered. "Reasonable attempts" means that the intake worker, with the assistance of the applicant, creates a comprehensive list of third parties who may have knowledge of the applicant's homelessness, and that more than one (1) attempt was made to contact each identified third-party.

c. Disability Verification

<i>Table 7.2</i>	<i>Disability Verification</i>
	1. Written verification of the disability from a professional licensed* by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently; OR
	2. Written verification from the Social Security Administration; OR
	3. The receipt of a disability check; OR
	4. Intake staff-recorded observation of a disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence (as outlined in this table number 1, 2, 3 or 5)**; OR
	5. Other documentation approve by HUD.

*An exception to the licensing requirement is made only for persons certified as a Chemical Dependency Professional (CDP), as defined in Chapter 18.205 RCW; this exception does not extend to a certified Chemical Dependency Professional – Trainee (CDP-T).

**Recipients are discouraged from admitting participants into their project without confirmation of a qualifying disability and documented evidence of that disability. Recipients that choose to admit participants under Category 4 of the table above, do so at their own risk. If confirmation of disability and evidence are not attained within 45 days, the recipient will not be reimbursed for costs incurred for that participant.

d. Special Considerations for Documenting Chronic Homelessness

For each person applying to the project, written documentation must be provided by an appropriate third party that verifies the person’s status as chronically homeless. Letters may be written and signed by either homeless shelter providers, homeless outreach workers or other homeless service providers. An HMIS printout that demonstrates that the individual or family meets the criteria for chronic homelessness may be substituted for a letter. Letters and HMIS printouts must:

- ✓ Be on letterhead stationery with the name, address, and phone number of the agency;
- ✓ Contain the full name of the participant;
- ✓ Contain dates verifying the timeframe of homelessness including both a start date and completion date; and
- ✓ Be signed by a staff member whose title appears on the letter.

If all other efforts to obtain third-party documentation have been exhausted and unsuccessful, a participant self-declaration may be used in the absence of any other documentation. However, this should be a rare exception to the composition of most homelessness records for participants; recipients must document their attempts to obtain documentation in order to demonstrate due diligence and must document the severity of the situation in which the individual has been living. Self-declarations should be used only in the rarest and most extreme cases (e.g., where the individual has been in a place not meant for human habitation in a secluded area without any contact with anyone for that period). For at least 75 percent of the chronically homeless households assisted by a recipient in a project during an operating year, no more than three (3) months of living on the streets or emergency shelter may be documented by self-declaration.

Recipients should expect that chronic homeless documentation for the majority of participants will be pieced together from several sources.

i. Documenting Duration of Homelessness

To properly document the length of time homeless, documentation must include the start and end date of each occasion of homelessness.

<i>Table 7.3</i>		<i>Documenting Duration of Homelessness</i>	
Definition		Documentation	

<p>Continuous, for at least twelve (12) months: On the streets or emergency shelter continuously, without a break, for at least twelve (12) months.</p>	<p>At least nine (9) of the 12 months must be documented through third-party documentation.</p> <p>Breaks in homelessness may be documented through self-certifications.</p>
<p>At least four (4) separate occasions in the last three (3) years: On the streets or emergency shelter on four (4) separate, distinct, and sustained occasions in the last three (3) years.</p>	<p><u>NOTE: third-party documentation of a single encounter with a homeless service provider on a single day within one (1) month is sufficient to consider an individual as homeless and living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter for the entire calendar month (e.g., a documented encounter on May 5, 2015, counts for May 1 to May 31, 2015).</u></p>

ii. Documenting Disability

Refer to Disability Verification, [Table 7.2](#) above.

iii. Documenting Severity of Service Needs for Prioritization

Chronically homeless individuals or families with the most severe service needs must be [prioritized](#) for permanent supportive housing projects. Severe service needs must be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool that can identify the severity of needs, such as the Investing in Futures Housing Assessment. This determination must be based on the severity of the needs of the individual, not on a specific diagnosis or disability type.

Further information regarding documenting Chronic Homelessness can be found in HUD’s Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status, located at:

<http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf>

Refer also to HUD’s Defining Chronic Homelessness Final Rule, located at: <https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf>

VIII. Changes in Household Composition

Projects are frequently targeted to serving specific homeless populations and/or subpopulation(s) per the project application, contract, and/or applicable regulations. For instance, one project may be targeted to serve homeless individuals while another may be targeted to serve homeless families with children. Please note that in targeting services to a specific population, recipients must comply with all applicable fair housing and civil rights laws. Occasionally, a household that is enrolled in the project subsequently desires to change their household composition (e.g., add or remove a household member). Recipients must follow these policies and procedures in approving or disapproving requests to change household composition.

For the purposes of these Local Standards, the following definitions apply.

<i>Table 8.1</i>		<i>Applicable Definitions</i>	
Definition		Description	

Family	Family includes, but is not limited to, regardless of marital status or sex , any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family. Refer also to Section III.b.iv, Discrimination Based on Household Composition .		
	Projects serving families may be targeted to serve households with children, households without children, or households with only children; however, projects may not discriminate against homeless households with children.		
	A household with children is composed of at least one adult and one child (minor under the age of 18).	A household without children is composed of multiple adults, but no children under the age of 18.	A household with only children is composed of multiple persons, all of whom are under age 18.
Individual	An individual is a single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person.		
	Projects serving individuals may be targeted to serve households without children or households with only children; however, projects may not discriminate against homeless households with children.		
	A household without children is composed of a single adult only.	A household with only children is composed of a single person under age 18.	

Deleted: , actual or perceived
Deleted: sexual orientation, or gender identity

a. Documenting Homelessness

At project entry, intake staff *must* obtain documentation of homelessness (or chronic homelessness) for the head of household (or other household member, as applicable) in order to establish eligibility. After enrollment, new household members *may* be permitted to join the household. However, minimum considerations should be taken into account. Refer to Section VIII.b, [Household Composition Considerations](#).

If the original household seeks to add member(s) to the household, intake staff should, to the extent possible, obtain documentation of homelessness (or chronic homelessness) for any new members of the household. This is particularly important in the event of a household break-up subsequent to enrollment: the project is permitted to continue serving (albeit separately) those household members that continue to need the housing/services offered and whose eligibility was documented at entry.

b. Household Composition Considerations

Changes in household composition raise several issues that must be considered prior to permitting the change. Refer to the Table below for examples of minimum considerations.

<i>Table 8.2</i>		<i>Minimum Considerations</i>
Consideration	Description	
Fair Housing	Projects must follow fair housing laws and requirements. Refer to Section III.b., Fair Housing and Equal Opportunity .	

Eligibility	The new family member(s) need not meet the eligibility requirements of the project, unless expressly required by the application, contract, or regulation, as long as the head of household's eligibility was documented at entry. Refer to Section VI, Participant Eligibility .
Terms of Occupancy	The terms of occupancy (i.e., lease agreement) must not prohibit a change in household composition. Refer to Section XIII.e, Housing Agreements .
Housing Requirements	The unit must meet all applicable housing requirements, such as suitable dwelling size. Refer to Section XIII, Housing Requirements .
Rent or Occupancy Charges	The income of all household members must be considered where participants pay rent or an occupancy charge. Refer to Section X., Determining Income and Calculating Participant Rent .

c. Transfers to Suitable Units

If a change in household composition causes the unit to be unsuitable (i.e., of unsuitable dwelling size, etc.), transfers to a suitable unit may be made within the same project. If the recipient cannot accommodate the household within the same project, the recipient must contact Ventura County for further guidance. In addition, eligible CoC PSH transfer requests are for those at risk of returning to homelessness due to unsuitable housing which includes household composition changes (no longer meeting occupancy requirements due to change in HH size), higher level of care needs (scattered site model transfer to onsite case management model for additional support) and or emergency transfer plan for those fleeing DV/ stalking; a CoC PSH transfer may be requested through CES by submitting a case conference form and notifying CoC staff.

IX. Shared Housing

Projects may serve separate families in a shared housing situation; this is a situation where a family chooses to live in a unit with another family, both of whom do not wish to be considered together as one (1) family. This type of shared housing situation may be particularly appealing for participants of rapid rehousing projects, where the goal is for participants to maintain housing without an ongoing subsidy.

For shared housing situations, the following requirements must be followed.

<i>Table 9.1</i>	
Shared Housing Requirements	
Requirement	Description
Choice	The decision to live in shared housing must be the families' choice. The separate families must also determine that they do not wish to be considered together as one (1) family.

Eligibility	For all project types, with the exception of rapid rehousing, each family must be eligible for the project (except for reasonable accommodations). For rapid rehousing projects, only the assisted family must be eligible. In a rapid rehousing project where an eligible family shares a housing unit with an ineligible family, assistance may not be provided on behalf of an ineligible family. Refer to Section VI, Participant Eligibility .
Housing Requirements	The unit must meet all applicable housing requirements, such as suitable dwelling size. Refer to Section XIII.
Unit Rent	The cost and size of the unit must be reasonable and appropriate. Refer to Section XIII.d., Rent Reasonableness and Fair Market Rent .
Rent or Occupancy Charges and Rent Subsidies	Where participants pay rent (or an occupancy charge) or receive a rent subsidy, each family's rent/rent subsidy will be calculated separately. The income of all family members must be considered where participants pay rent or an occupancy charge. Refer to Section X., Determining Income and Calculating Participant Rent .

X. Determining Income and Calculating Participant Rent

a. Income Definition

Income must be calculated in accordance with 24 CFR § 5.609, and deductions must be made in accordance with 24 CFR § 5.611(a). Income is money that is paid to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member, and are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and which are not specifically excluded in 24 CFR § 5.609(c) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

Documents and information collected to verify income should be recent. Documentation dated within 30 days is acceptable. However, for public assistance benefits, (e.g., SSI, food stamps), a benefits statement received any time within the twelve months prior to the time of application and reflecting current benefits received by a household is allowed. A copy of a recent bank statement indicating direct deposit is also acceptable.

b. Income Inclusions Examples

<i>Table 10.1</i>		Income Inclusions Examples
<i>Not an exhaustive list; refer to 24 CFR § 5.609(b)</i>		
(1)	The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;	
(2)	The full amount of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits and other similar types of periodic receipts, including lump sum payment for delayed start of a periodic payment;	
(3)	Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay;	
(4)	Welfare assistance. Welfare or other payments to families or individuals, based on need, that are made under program funded, separately or jointly, by Federal, State, or local governments (e.g., Social Security Income (SSI) and general assistance available through state welfare programs);	
(5)	Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from persons not residing in the dwelling;	

(6)	Net income from the operation of a business or profession;
(7)	Interest, dividends, and other net income of any kind from real and personal property;
(8)	All regular pay, special pay and allowances of a member of the Armed Forces, except special hostile fire pay.

c. Income Exclusions

Table 10.2		Income Exclusions	
<i>Not an exhaustive list; refer to 24 CFR § 5.609(c)</i>			
(1)	Income from employment of children (including foster children) under the age of 18 years;		
(2)	Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone);		
(3)	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in paragraph (b)(5) of this section);		
(4)	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;		
(5)	Income of a live-in aide, as defined in 24 CFR § 5.403;		
(6)	Subject to paragraph (b)(9) of this section, the full amount of student financial assistance paid directly to the student or to the educational institution;		
(7)	The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;		
(8)	Amounts received under training programs funded by HUD;		
	Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);		
	Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program;		
	Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time;		
	Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program;		
(9)	Temporary, nonrecurring, or sporadic income (including gifts);		
(10)	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;		
(11)	Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household and spouse);		
(12)	Adoption assistance payments in excess of \$480 per adopted child;		
(13)	Deferred periodic amounts from supplemental security income and social security benefits that are received in a lump sum amount or in prospective monthly amounts.		
(14)	Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit;		
(15)	Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or		

(16)	Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR § 5.609(c) apply.
Table 10.3	
Mandatory Deductions	
Refer to 24 CFR § 5.611(a)	
(1)	\$480 for each dependent;
(2)	\$400 for any elderly family or disabled family;
(3)	The sum of the following, to the extent the sum exceeds three percent of annual income:
(a)	Unreimbursed medical expenses of any elderly family or disabled family; and
(b)	Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and
(4)	Any reasonable childcare expenses necessary to enable a member of the family to be employed or to further his or her education.

d. Income Review Requirements

Refer to Section X.g., [Calculating Rent](#), for further detail. For projects providing rental assistance, participants must agree to supply the information or documentation necessary to verify the participant’s income. Participants must also provide the recipient with information at any time regarding changes in income or other circumstances that may result in changes to a participant’s contribution toward rent. Refer to 24 CFR § 578.77(c)(3).

Table 10.4		Income Review Requirements
Funding	Activity	Frequency
ESG	Rental Assistance	Initially, annually and as changes in income are identified
CoC	Leasing	Initially, annually and per tenant request for change in household composition or decrease in income
	Operating	
	Rental Assistance	Initially, annually and as changes in income are identified

e. Annualizing Wages and Periodic Payments

When calculating income based on hourly, weekly, or monthly payment information, add the gross amount earned in each payment period that is documented and divide by the number of payment periods. This provides an average wage per payment period. Depending on pay periods used by the employer or the schedule of periodic payments, the following calculations convert the average wage into annual income:

- ✓ Hourly Wage multiplied by Hours Worked per Week multiplied by 52 weeks
- ✓ Weekly Wage multiplied by 52 weeks
- ✓ Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods
- ✓ Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods
- ✓ Monthly Wage multiplied by 12 months

Standards and procedures for documenting **Income** are further detailed in [Attachment A](#).

f. Calculating Rent (or Occupancy Charge)

Guidelines for charging participants rent (or an occupancy charge) are dependent on the funding source, component, and activity type. While participants *must* be charged rent in some circumstances (i.e., CoC-permanent supportive housing providing *rental assistance*), participants *may* be charged rent in other circumstances (i.e., CoC-*leased* permanent supportive housing); however, under no circumstances may participants be charged a “program fee.” A program fee includes any fee assessed by the recipient other than rent (or an occupancy charge); examples include: fees for laundry or cleaning services, childcare, transportation, or case management.

Funding	Component	Activity	Required to Charge Rent?	Calculation
ESG	Rapid Rehousing	Rental Assistance	Yes	According to Rapid Rehousing Guide .
	Prevention	Rental Assistance	Yes	Prevention projects must use a Graduated Subsidy Model. Policies will be developed at the time that the Ventura County Continuum of Care chooses to fund projects under this component.
CoC	Rapid Rehousing	Rental Assistance	Yes	According to Rapid Rehousing Guide .
	Transitional Housing	Leasing	No, but may	May not exceed the highest of (rent may not be rounded up): 1) 30 percent of the family’s monthly adjusted income; 2) 10 percent of the family’s monthly income; or 3) If the family is receiving payments for welfare assistance from a public agency and a part of such payments, adjusted in accordance with the family’s actual housing costs, is specifically designated by such agency to meet the family’s housing costs, the portion of such payments which is so designated.
		Operating	No, but may	
CoC Cont.	or Permanent Supportive Housing	Rental Assistance	Yes	Rent must be calculated in accordance with section 3(a)(1) of the U.S. Housing Act of 1937 (42 USC 1437a(a)(1)): A family shall pay as rent the highest of the following amounts, rounded to the nearest dollar: A) 30 percent of the family’s monthly adjusted income; B) 10 percent of the family’s monthly income; or C) If the family is receiving payments for welfare assistance from a public agency and a part of such payments, adjusted in accordance with the family’s actual housing costs, is specifically designated by such agency to meet the family’s housing costs, the portion of such payments which is so designated.

g. Utility Allowances

In calculating participant rent, a utility allowance must be applied where the cost of utilities (excluding telephone) is not included in the rent. The public housing authority establishes the

utility allowance schedule annually for Ventura County. Apply the utility allowance for the appropriate unit size. Refer to Section XIII.b., [Suitable Dwelling Size](#).

This requirement is not applicable for ESG-Rapid Rehousing.

h. Program Income

Program income is considered to be any rent (or occupancy charges) and any other income that is received by the recipient directly generated by a grant-supported activity. Program income must be retained by the recipient, committed to the project, and used to cover any eligible costs (not limited to the costs identified in the project budget).

XI. Termination of Participation, Denial and Grievance Procedures

Recipients must have written termination, denial, and grievance policies and/or procedures. The policies and/or procedures should be readily available to applicants and participants of assistance. With the exception of high-volume shelters where it is acceptable to have policies posted in a public place, applicants and participants must receive written information about program policies. It is important to effectively communicate these policies and/or procedures to ensure that they are fully understood.

✓ Denial and Grievance

Causes of denial of assistance include, but are not limited to, the person's ineligibility or failure to provide verifiable evidence of eligibility, etc. Established procedures should describe:

- Circumstances in which persons may not qualify or would be denied;
- Notification of denial; and
- A person's right to review a recipient's decision.

✓ Termination of Participation and Grievance

Involuntary termination from any project funded under the HEARTH Act places the participant at great risk because (s)he will likely exit to a place that is less safe than the project in which (s)he is currently participating. Termination is the last option. Recipients are encouraged to limit rules of participation to only that which constitutes immediate danger. For example, in a communal living project, it would not be appropriate to terminate a participant's housing because (s)he did not complete her/his chores. Recipients are encouraged to find other strategies to increase participants' contributions to their community by encouraging engagement rather than threatening loss of housing.

That being said, there may be instances where termination cannot be avoided. The written grievance procedure must include:

- Written notice to the participant containing a clear statement of the reason(s) for termination.
- A review of the decision, in which the 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. This may include the participant's right to question or confront staff involved; and
- Prompt written notice of the final decision.

For projects where participants are required to request a review of the termination decision, participants must be given an adequate amount of time to submit their request. The review must be held at a mutually agreeable time.

XII. Confidentiality of Participant Records

Recipients must have policies and/or procedures to ensure that participant records, including electronic records, are maintained in a confidential manner as per RCW 43.185C.030, 24 CFR § 578.103(b), and 24 CFR § 576.500(x), and keep records or files pertaining to participants under lock and key with designated personnel only granted access to those documents. All records that contain protected identifying information (e.g., Name, Social Security Number, Date of Birth, etc.) of persons applying for and/or receiving housing and/or services must be kept secure and confidential.

The procedures must also ensure that the address or location of any family violence project will not be made public, except with written authorization of the person responsible for the operation of the project; and that the address or location of any housing of a participant will not be made public, except as provided under a preexisting privacy policy of the recipient and consistent with State and local laws regarding privacy and obligations of confidentiality.

XIII. Housing Requirements

a. Inspection Requirements

All housing assisted with ESG and CoC Program funds must meet the minimum housing standards; housing standards vary by Program and component type.

i. Emergency Shelter/Interim Shelter (ESG)

Projects that receive ESG funds for shelter operations must comply with minimum safety, sanitation and privacy standards as outlined in 24 CFR § 576.403. Inspections to ensure compliance must be done before assistance is provided and at least annually.

ii. Rapid Rehousing (ESG)

Projects providing ESG Rapid Rehousing assistance are required to perform Habitability Standards inspections and maintain documentation of these inspections as defined in 24 CFR § 576.403(c). These inspections must be done before assistance is provided and at least annually. Recipients of ESG Rapid Rehousing may adopt more stringent requirements that exceed or add to the requirements in 24 CFR § 576.403(c). HUD Housing Quality Standards (HQS) inspection procedures *are not* considered sufficient because HQS is less stringent in the areas of fire safety and interior air quality. However, the HQS form may be amended to include the more stringent safety and interior air quality requirements. A record of the inspections must be kept for each assisted unit and must be readily available.

iii. Transitional Housing, Permanent Supportive Housing, Rapid Rehousing (CoC)

Deleted: and HHAP

All CoC-housing, including transitional housing, permanent supportive housing, and rapid rehousing must meet applicable housing quality standards (HQS) under 24 CFR § 578.75(b). HQS requirements are contained within [24 CFR § 982.401](#), which state the performance and acceptability criteria for the key aspects of housing quality listed in [Table 11.1](#).

<i>Table 13.1</i>		<i>Housing Quality Standards – Key Aspects</i>	
Sanitary facilities		Food preparation and refuse disposal	
Space and security		Thermal environment	
Illumination and electricity		Structure and materials	
Interior air quality		Water supply	
Access		Site and neighborhood	
Sanitary condition		Smoke detectors	

Physical inspections of units to ensure compliance with HQS must be completed prior to the issuance of assistance. Additionally, recipients must inspect all units at least annually (at least every twelve (12) months) to ensure ongoing compliance with HQS. Deficiencies must be remedied within thirty (30) days of inspection, with the exception of emergency failures, which must be corrected within twenty-four (24) hours, see below. Payment may not be issued beyond the annual recertification date for units that do not meet HQS.

For housing leased with CoC Program funds, or for which rental assistance payments are made with CoC funds, recipients must comply with applicable conflict of interest requirements and shall not conduct HQS inspections of property that the recipient or a related entity owns. See 24 CFR § 578.95(c).

Emergency Fails

The following deficiencies constitute an emergency fail and repairs must occur and be verified within twenty-four (24) hours (rather than the standard thirty (30) days) of inspection (24 CFR 982.401(a)).

- Lack of security for the unit
- Waterlogged ceiling in imminent danger of falling
- Major plumbing leaks or flooding
- Natural gas leaks or fumes
- Electrical problem which could result in shock or fire
- No heat when outside temperature is below 40°F and the temperature inside the unit is below 55°F
- Utilities not in service
- No running hot water
- Broken glass where someone could be injured
- Obstacle which prevents entrance or exit
- Lack of functioning toilet
- Inoperable smoke detector

b. Suitable Dwelling Size

Recipients must establish guidelines for establishing the appropriate unit size; these guidelines must be applied consistently for all participants of like size and household composition. Agency standards cannot have a disproportionate impact on specific family composition (i.e., non-traditional households).

Participants must be placed in units that are of suitable size: the unit must have at least one (1) bedroom or living/sleeping room for each two (2) persons. 24 CFR § 578.75(c). Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room. 24 CFR § 578.75(c)(1).

Participants should be assisted in choosing a unit with the smallest number of bedrooms needed without overcrowding. Except in limited circumstances (i.e., request for reasonable accommodation, etc.), participants should not be assisted in units with a greater number of bedrooms than is needed.

If household composition changes during the term of assistance, households should be assisted in relocating to a more appropriately sized unit and continue to access appropriate services. 24 CFR § 578.75(c)(1). Refer also to Section VIII.c, [Transfers to Suitable Units](#).

c. Lead-Based Paint Requirements

Recipients must ensure that all participants who reside in housing that was constructed pre-1978 receive the “Protect Your Family” lead-based paint hazard brochure. In addition, owners must disclose the presence of lead-based paint and provide participants with any existing documentation on known lead-based paint hazards in the unit. Recipients must document that participants received this information and maintain this documentation in the participant files. Refer also to [Attachment C: Step by Step Guide to Compliance with Lead Based Paint Inspection Requirements](#).

i. Visual Assessments

The lead-based paint visual assessment requirement exists to protect vulnerable families from potential health hazards. To prevent lead poisoning in young children, recipients must comply with the Lead-based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR § 35.

The applicable parts of 24 CFR § 35 are as such:

1. For funded shelters and housing occupied by project participants, recipients must comply with subparts A, B, H, J, K, M and R.
2. For CoC funded housing that receives project-based or sponsor-based rental assistance, recipients must comply with subparts A, B, H, and R.
3. For CoC funded residential property receiving leasing, services or operating costs, recipients must comply with subparts A, B, K and R.

A lead-based paint visual assessment must be completed for all units that meet the three following conditions:

1. The household moving into or remaining in their current unit is being assisted with ESG rent/utility assistance, ESG arrears assistance, CoC rent assistance, or it is a residential property using CoC funds to fund leasing, services, or operating costs.
2. The unit was constructed prior to 1978.
3. A child under the age of six or a pregnant woman is, or will be, living in the unit.

For units and facilities that meet these conditions, recipients must conduct a visual assessment at least annually. For rental units, a visual assessment must be conducted prior to providing rent assistance and on an annual basis thereafter (as long as assistance is provided). The recipient must maintain the record on file with the inspection's record and readily available for review.

Visual assessments must be conducted by a HUD-Certified Visual Assessor. Agency staff may complete the Visual Assessment Training at <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>. The certificate of completion must be maintained on record and readily available for review. For rental units, documentation must be kept with the HQS or Habitability Standards Worksheet and maintained in the participant file.

ii. Exceptions to the Requirement

There are certain exceptions to the requirement. Visual assessments are not triggered under the following circumstances:

- It is a zero-bedroom or SRO-sized unit;
- X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint;
- The property has had all lead-based paint identified and removed in accordance with HUD regulations;
- The unit has already undergone a visual assessment within the past 12 months –obtain documentation that a visual assessment has been conducted; or
- It meets any of the other exemptions described in 24 CFR § 35.115(a).

If any of the conditions outlined above are met, recipients need to document the condition.

d. Rent Reasonableness and Fair Market Rent

Where applicable, adherence to rent reasonableness and/or Fair Market Rent (FMR) must be determined before assistance is provided and no less than annually. ESG must meet both requirements.

When determining rent reasonableness and Fair Market Rent, recipients must compare the unit's gross rent with the applicable standard. Gross rent includes the entire housing cost: rent plus the cost of any utilities that must (according to the lease) be the responsibility of the tenant. Utilities include gas, electric, water, sewer, and trash, and exclude telephone, cable, or satellite television service, and internet service.

Rent Reasonableness

All ESG- and CoC-units and structures for which rent is paid must be reasonable in relation to rents being charged for comparable unassisted units in the same market; reasonable rents must also not exceed rents currently being charged by the same owner for comparable unassisted units.

Fair Market Rent

Annually (effective October 1), HUD determines Fair Market Rent (FMR) by geographic area; FMRs are based on the results of a local rent survey and reflect the gross rent estimates (rent

plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service). Ventura County falls within the Ventura County HUD Metro FMR Area.

Fair market rents are published here: <http://www.huduser.gov/portal/datasets/fmr.html>

Table 13.2		Unit Rent Standard by Component	
Activity	Funding	Requirement	Frequency of Review
Leasing	CoC	<p>Rent Reasonable The unit's gross rent must be rent reasonable. Units with gross rents that exceed rent reasonableness standards may not be leased with CoC funds.</p> <p>Fair Market Rent As long as the unit's gross rent is rent reasonable, the gross rent <i>may</i> exceed FMR; however, the amount paid with CoC-leasing funds may not exceed the current published FMR. Therefore, if the gross rent exceeds FMR, CoC leasing funds may pay for a portion of the rent up to the FMR amount and the difference must be paid with other, non-CoC funds.</p> <p>Maximum CoC-Leasing Payment The maximum amount of rent that can be paid for with CoC-leasing funds is the lower of the rent reasonableness standard and FMR.</p>	Initially, annually
Rental Assistance	CoC	<p>Rent Reasonable The unit's gross rent must be rent reasonable. Units with gross rents that exceed rent reasonableness standards may not be assisted with CoC-rental assistance funds.</p> <p>Fair Market Rent As long as the unit's gross rent is rent reasonable, the gross rent and the amount paid with CoC-rental assistance funds <i>may</i> exceed FMR.</p> <p>Maximum CoC-Rental Assistance The maximum amount of rental assistance that can be paid for with CoC-funds is the rent reasonableness standard.</p>	Initially, annually
Rental Assistance	ESG	<p>Rent Reasonable The unit's gross rent must be no more than \$100 above the average gross rent of three (3) comparable units. Units with gross rents that exceed rent reasonableness standards may not be assisted with ESG-rental assistance funds.</p>	Initially, annually

	<p>Fair Market Rent The unit's gross rent must be equal to or less than the FMR. Units with gross rents that exceed FMR may not be assisted with ESG-rental assistance funds.</p> <p>Maximum ESG-Rental Assistance The maximum amount of rental assistance that can be paid for with ESG-funds is the lower of the rent reasonableness standard and FMR.</p>	
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e. Housing Agreements

Different types of housing agreements are required depending on the component and activity.

i. Lease Agreements

Participants must have a written lease agreement with the landlord/owner of the housing unit (or for CoC-leasing projects, a written sublease with the recipient). For CoC-permanent housing, in addition to the minimum requirements listed below, the lease must be for a term of at least one (1) year that is renewable (for a minimum term of one (1) month) and terminable only for cause. For CoC-transitional housing, in addition to the minimum requirements listed below, the lease must be for a term of at least one month that ends in 24 months and cannot be extended.

At a minimum, written lease agreements must contain:

- Name of participant
- Name of landlord/owner
- Address of dwelling unit
- Occupancy (who is permitted to live at the dwelling unit)
- Term of agreement (lease start and end dates)
- Dwelling unit rent and date due
- Deposits (if any, and for what/term)
- Signature of participant/date
- Signature of landlord/owner/date

All participant lease agreements must contain VAWA protections as listed under 24 CFR Part 5, Subpart L. If the VAWA protections are not incorporated in the lease, the subrecipient must provide and require a lease amendment including the necessary language. See Attachment G for a sample lease addendum.

ii. Master Lease Agreements (CoC Leasing)

Where units or structures are leased with CoC leasing funds, the recipient must have a master lease agreement with the landlord/owner. For CoC leasing projects, the lease agreement between the recipient and participant is a sublease agreement; therefore, the master lease agreement must permit subleases. The master lease must be written, legally binding, and must allow the required lease agreement provisions (as described above) to be met.

iii. Rental Assistance Agreements (ESG and CoC-Rental Assistance)

Recipients must make rental assistance payments only to landlords/owners with whom the recipient has a rental assistance agreement. The rental assistance agreement must

include the terms under which rental assistance will be provided, the term of the agreement, and acknowledgement that the landlord/owner will provide the recipient with a copy of all written notices to the participant (including notices to vacate, notices of noncompliance, etc.). The rental assistance agreement must include VAWA protections in accordance with 24 CFR Part 5, Subpart L. For a sample rental assistance agreement, refer to Attachment H.

XIV. Recordkeeping Requirements

In order to receive assistance, the following information must be documented in the participant file. Documentation must be retained for five (5) years after the expenditure of all funds from the grant under which the participant was served, unless a greater period of time is specified in the contract.

a. Initial Consultation & Eligibility Determination

The participant must lack sufficient resources and support networks to obtain/retain housing and this must be documented in the file. The participant must receive an initial consultation and eligibility assessment to determine housing status eligibility (and other eligibility requirements, as applicable) and the appropriate type of assistance needed to regain stability in permanent housing. Verification of homeless status must be documented in the participant file in accordance with Section VII, Documentation Standards for Eligibility for Assistance. To ensure minimum, appropriate documentation is gathered for ESG program participants, Street Outreach, Emergency Shelter, Homeless Prevention and Rapid Rehousing components will require the use of corresponding Client File checklists as indicated by HCD. An HMIS (ESG) Intake Form and a Release of Information (ROI) are also required. Further information and instruction can be found in the ESG Program HMIS Manual.

b. Income and Participant Rent

Please see Section X, [Determining Income and Calculating Participant Rent](#), for full detail. Income documentation and completed calculations of participant rent must be maintained in each participant file; forms must be signed and dated by the staff person who completed the calculation.

c. Housing Stability Plan

The Housing Stability Plan (ESG -Emergency Shelter/Interim Shelter, ESG Prevention, CoC and ESG-Rapid Rehousing) must include:

- ✓ Needs assessment to identify barriers and specific housing and self-sufficiency goals
- ✓ Action steps to retain permanent housing after assistance ends
- ✓ Households receiving assistance from a victim service provider may be exempted from the case management requirement.

d. Individual Support Plan

The Individual Support Plan (CoC Transitional Housing and CoC Permanent Supportive Housing) must include:

- ✓ Problem Identification
- ✓ Goals
- ✓ Action Plan
- ✓ Outcomes

Per 24 CFR § 578.53, projects must complete an assessment of the service needs of participants at least annually. Services must be adjusted accordingly.

e. Assistance in obtaining mainstream and other resources

Participants must receive appropriate supportive services and referrals essential to achieving independent living through other federal, state, local, and private assistance.

f. Proof of Complete Inspection

Please see Section XIII, [Housing Requirements](#), for full detail.

- ✓ [Habitability \(ESG\)](#)
- ✓ [Housing Quality Standards \(CoC\)](#)

Completed inspection forms must be retained in the file and must contain the date the inspection was performed and the signature of the staff person who performed the inspection.

g. Proof of Complete Lead Based Paint Visual Assessment

See Section XIII, [Housing Requirements](#), for full detail. Completed assessments must be retained in the file and must contain the date the inspection was performed and the signature of the staff person who performed the inspection.

h. Rent Reasonableness and Fair Market Rent

See Section XIII, [Housing Requirements](#), for full detail.

Rent Reasonableness

Documentation of rent reasonableness ensures that rents being paid are reasonable in relation to rents being charged for comparable unassisted units in the same market. Please see [Attachment B](#) for further detail.

Recipients must:

- ✓ Use the Rent Reasonableness Certification Form (Attachment F) to document rent reasonableness
- ✓ Retain a copy of each Ventura County Rent Reasonableness Survey every year, beginning in
- ✓ Retain documentation of any supplemental documents used to compare rents i.e., copies of advertisements for properties for rent, etc.

Fair Market Rent

Recipients must ensure that client files contain applicable FMR data to document the FMR for the participant's unit size and geographic area.

Recipients must:

- ✓ Use the Rent Reasonableness Certification Form (Attachment F) to document FMR

i. Housing Agreements

See Section XIII, [Housing Requirements](#), for full detail. Fully executed housing agreements must be maintained for each unit that is assisted.

j. **Case Notes and record of services received**

Files must contain case notes that align with either the Housing Stability Plan or the Individual Support Plan, be legible, dated and contain a record of the staff member responsible for each note.

Homeless Management Information System (HMIS)

Agencies providing CoC and ESG assistance must enter client-level data into the HMIS system for reporting data to HUD. A comparable database may be used to collect data for domestic violence or victim services. Emergency Shelter, Homelessness Prevention, Rapid Re-Housing and Street Outreach must be tracked in the HMIS system. Further information is detailed in section XVI or in the HMIS Manual.

k. **Staff Training and Training Records**

All CoC and partner agency staff will undergo training for any or all (ESG) program component recordkeeping. This includes maintaining Training Logs current and recording/storing acquired, pertinent certifications.

XV. Reporting Requirements

Subrecipients shall follow the reporting requirements as outlined in the contract or MOU.

Recipients shall participate in Ventura County Continuum of Care activities, which includes participation in planning activities, and the annual Point-in-Time (PIT) count of the homeless. Recipients will complete the Ventura County Annual Homeless Housing Inventory Chart (HIC), which includes data on beds, units, HMIS participation, services, and financial data on all projects.

An Annual Performance Report (APR) is currently required for the CoC Program and will be required for ESG. An ESG CAPER report will be required. With the exception of Victim Service Providers, which are required to track required data in a comparable database, the majority of the data required for the APR will be generated from the Homeless Management Information System (HMIS). Recipients are required to report on financial data and provide narratives regarding their project(s). ESG Subrecipients are required to complete and submit a semi-annual budget report. The details of these reports will be outlined in future drafts of these guidelines. The most recent APR must be submitted to HUD no later than 90 days from the date of the end of the project’s grant term.

Subrecipients will report Match detail in a format prescribed by the CoC. Matching contributions may be obtained from any source, including any Federal source other than the ESG, as well as State, local and private sources. Please reference CFR 576.201 for further information on matching requirements.

Subrecipients will report Program Income detail on their monthly or quarterly invoice to the County.

The County reserves the right to request additional information or prescribe or change reporting requirements.

XVI. Homeless Management Information Systems Participation

Recipients will participate in the Ventura County Homeless Management Information System (“Ventura County HMIS”) which is administered by the County’s Human Services Agency. Ventura County HMIS is

an electronic database that collects data on homeless persons who receive outreach, homelessness prevention and intervention services, emergency shelter, transitional housing, supportive services not linked with housing, and permanent supportive housing.

HMIS Participation will include:

- Technical set up;
- Staff training;
- Development of and adherence to an HMIS implementation schedule;
- Adherence to the requirements set forth in the [Ventura County HMIS Policy and Procedures Manual](#) including:
 - Confidentiality
 - Privacy and Security Protocols
 - Adherence to the Data Quality Plan
- Adherence to the requirements set forth in the “Agency Partner Agreement” and “User Policy, Code of Ethics and Responsibility Statement” executed by the Recipient and the Recipient’s staff.

XVII. Performance Standards

Ventura County, as the Collaborative Applicant (CA), establishes performance standards for CoC- and ESG funded projects in consultation with its Subrecipients. Performance standards are established by project type, based upon HUD’s national targets, as well as local targets that account for the unique needs of the homeless population and subpopulations within the Ventura County. To set these performance targets, the CoC reviews HUD established performance areas, including those for High-Performing Communities and those included in the application review criteria in the CoC Notice of Funding Availability (NOFA), as well as HMIS and performance data for CoC ~~and~~ ESG funded projects. See the Ventura County Continuum of Care Performance Standards, incorporated herein by reference.

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The County will monitor project performance on an ongoing basis through HMIS data as well as annually through the Annual Performance Report (APR). In addition:

- Annually, for CoC-funded projects, after HUD has published the Notice of Funding Availability (NOFA), the CoC Data, Performance & Evaluation Committee scores projects locally and recommends projects for funding. *See Section II, [Policy on Project Selection](#).* Project data, including project performance, is compiled for County and PRC review.
- Once Subrecipients are selected and projects begin operating, the County utilizes a Program Monitoring Tool – Subrecipient Risk Assessment to assess whether Subrecipients qualify as “high risk,” which is determined, in part, by a review of project performance.

The County will take the following action against poor performers:

- Provide technical assistance (TA)
- Provide a corrective action plan if:
 - TA is not implemented by the Subrecipient; or
 - The poor performance is of serious concern; or
 - Prior TA was not followed by the Subrecipient.
- Review all necessary materials and conduct on-site visit(s) as needed

- Follow contracting procedures for suspension or termination of the Contract if the Subrecipient fails to respond and correct the issue(s)
- Request funds be returned if necessary and appropriate.

Attachment A

Income Eligibility Documentation Standards

While Ventura County has established standards for various types of income, the County recognizes that in some instances only applicant self-declaration may be possible. This method should be used only as a *last resort* when all other verification methods are not possible or reasonable. **When using applicant self-declaration, Projects must document why a higher verification standard was not used. Be sure to include this in the case file.**

Gross Income is the amount of income earned before any deductions (such as taxes and health insurance premiums) are made.

Current Income is the income that the household is currently receiving. Income recently terminated should not be included.

Type of Income	Acceptable Types of Documentation
Wages and Salary	<p>Obtain copy of most recent pay stub(s) and include in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax, or email verification of income request to employer. At a minimum, written verification must include: name of employer and participant name, pay amount and frequency, average hours worked per week, amount of any additional compensation and be signed and dated by employer. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the employer by phone or in person. At a minimum, oral verification must include: name of employer and participant name, pay amount and frequency, average hours worked per week, amount of any additional compensation and be signed and dated by staff who obtained the information. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p>
Self-Employment and Business Income	<p>Obtain copy of most recent federal and state tax return from the applicant and keep copy in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p>

<p>Interest and Dividend Income</p>	<p>Obtain copy of most recent interest or dividend income statement from participant and keep copy in participant file.</p> <p><i>OR</i></p> <p>Obtain copy of most recent federal and state tax return from the applicant and keep copy in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p>
<p>Pension/ Retirement Income</p>	<p>Obtain copy of most recent payment statement or benefit notice from Social Security, pension provider or other source. Copy kept in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax, or email verification of income request to Social Security, pension provider or other source. At a minimum, written verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: Name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum</p>

Unemployment and Disability Income	<p>Obtain copy of most recent payment statement and or benefit notice. Copy kept in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax, or email verification of income request to unemployment administrator, workers compensation administrator of former employer. At a minimum, written verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: Name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p>
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TANF/Public Assistance	<p>Obtain copy of most recent payment statement and or benefit notice. Copy kept in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax, or email verification of income request to welfare administrator. At a minimum, written verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p>
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Alimony, Child Support, Foster Care Payments	<p>Obtain copy of most recent payment statement, notices, or orders. Copy kept in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax, or email verification of income request to child support enforcement agency, court liaison or other source. At a minimum, written verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p>
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Attachment B

Rent Reasonableness Policies and Procedures

(Adapted from HUD's Homeless Prevention Rapid Re-Housing Grant Guidelines)

Determining and Documenting Rent Reasonableness: Determining and documenting rent reasonableness is required under CoC and ESG for leasing and rental assistance projects. Rent reasonableness must be documented prior to executing the lease for an assisted unit and at least annually thereafter. Recipients must document the assisted unit's rent reasonableness using the Rent Reasonableness Certification form; this completed form must be maintained in each client file to demonstrate that the assisted unit met the rent reasonableness standard.

Below describes the methodology, staffing, data sources, documentation requirements, and special circumstances that recipients must use to determine, and document rent reasonableness.

Methodology: In order to demonstrate that the assisted unit is rent reasonable, recipients must compare the assisted unit's rent to the rent of at least **three (3)** comparable unassisted units in the area. Methodologies for obtaining comparable rents include:

- Obtaining comparable rents on a unit-by-unit basis from other data sources
- Obtaining documentation from property owners/managers on current rents charged in comparable unassisted units.

Staffing: The responsibility of determining and documenting rent reasonableness should be assigned to program staff in the following order of preference:

1. Staff conducting the housing inspection will be responsible for determining and documenting rent reasonableness.
2. The case manager will be responsible for determining and documenting rent reasonableness.

Strategies for Determining Appropriate Comparable Properties: Each and every certification of rent reasonableness must consider the following:

- *Location:* It is important that, not only are the properties close in proximity, but that they have similar access to services such as bus lines, grocery stores, etc. and are within the same school boundaries where possible.
- *Square Footage (size)*
- *Unit Type:* Single Family, Duplex, Town House, Low-Rise, High-Rise, Manufactured Home, etc.
- *Quality and Condition of the Unit:* Quality of floor coverings, cabinets, appliances, windows, and doors as well as how well the unit has been maintained may make units more or less desirable and may affect the amount of rent the unit commands.
- *Accessibility*
- *Amenities/Facilities:*
The following amenities/facilities may have an effect on the amount of rent the unit commands assuming that it is in good repair and desirable within the market:
 - Garbage Disposal
 - Off-Street Parking
 - Dishwasher
 - Storage Outside of Unit

- Washer/Dryer in Unit
- Patio/Balcony/Deck
- Fenced Yard
- Playground
- Covered/Garage Parking
- Laundry Facilities
- Club House
- Pool
- Fireplace
- *Age of the Unit and Year of Renovation*
- *Utilities*

Data Sources: Acceptable data sources used in determining rent reasonableness include the following:

- Newspaper ads (including internet versions of newspaper ads);
- Classified Ads;
- Weekly or monthly neighborhood or shopper newspapers that have rental listings;
- “For Rent” signs in windows or on lawns;
- Real estate agents; and
- Property management companies that handle rental property.
- Rental Listing websites including:
 - www.apartmentguide.com
 - www.apartments.com
 - www.forrentmag.com
 - www.move.com/apartment/main.aspx

Data in Rural Areas: While there may be fewer rental units in rural areas than in urban and suburban areas, it is possible to find comparable rents or establish rent payment standards for different unit types located in these areas.

- One source of rental housing data for rural areas may be the U.S. Department of Agriculture’s Rural Development Agency. USDA provides direct and guaranteed loans for single and multi-family housing development in rural areas as well as for farm laborers. Contact information for Rural Development State and Local Offices or USDA Service Centers is available at http://www.rurdev.usda.gov/recd_map.html. Each Rural Development Office, if it has a Rural Housing component, should have information on the types of rental housing available in various communities throughout the state, as well as unit sizes and rents.
- Another potential source of comparable rent data are real estate agents. Local real estate agents are not only knowledgeable about real estate prices but often are a source of information on rental housing in the area. They may be able to extrapolate rent comparable based on the general cost of housing in the area. To find real estate agents active in particular communities, Projects can consult the National Association of Realtors on the web at <http://www.realtor.org/>. For demographic information on the housing stock, market trends, etc., projects should access <http://www.realtor.org/research>.

Strategy for Addressing Special Cases: There may be instances where the above methodology and process is not sufficient to establish rent reasonableness for a particular unit.

For example, staff may find in rural areas that there are only one or two comparable units instead of the three (3) units specified by the protocol.

Recipients may use alternative methods to determine, and document rent reasonableness in the following circumstance:

- In rural areas where it may be difficult to find three (3) comparable units.
- In assessing units with an accessibility feature that the tenant requires due to a disability where it may be difficult to find three (3) comparable units.

Documentation Requirements: The following documentation is required to determine rent reasonableness and must be kept in the participant file:

- Rent Reasonableness Certification Form
- Rent Reasonableness – Supplemental and backup documentation (i.e., copies of advertisements of units for rent, etc.) used to compare rents. Unit rent must comply with HUD’s standard of rent reasonableness.

Special Note Regarding Fair Market Rent: The gross rent (rent + utility allowance) for units receiving rental assistance from ESG funds, and leasing funds from the CoC Program cannot exceed the HUD Determined Fair Market Rent (FMR). Programs using rental assistance funds from the CoC Program should make efforts to identify units that do not exceed FMR, where feasible and where such efforts do not adversely affect the housing process. When rental units are available that exceed FMR, programs must document rent reasonableness with the approved methodology. Program should keep in mind that while they can use rent reasonableness standards to exceed FMR, they must still serve the number of households as detailed in their grant agreement. This guidance is specific to programs using rental assistance funds; requirements for projects that use leasing funds are different and addressed in Table 13.2 of the CoC Written Standards.

Attachment C

Step by Step Guide to Compliance with Lead Based Paint Inspection Requirements

Childhood lead poisoning is a major environmental health problem in the United States, especially for low-income families in poor living conditions. If not detected early, children with high levels of lead in their bodies can suffer from damage to the brain and nervous system, behavioral and learning problems (such as hyperactivity), slowed growth, hearing problems, and headaches. To prevent lead-poisoning in young children, Lead/Sub Grantees must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR § 35, Parts A, B, M, and R.

Disclosure Requirements

Disclosure requirements are triggered for ALL properties constructed prior to 1978. These requirements require that lessors (property owners or managers) provide tenants with:

- Disclosure form for rental properties disclosing the presence of known and unknown lead-based paint;
- A copy of the “Protect Your Family from Lead in the Home” pamphlet.

Both the disclosure form and pamphlet are available at:

<http://www.hud.gov/offices/lead/enforcement/disclosure.cfm>

Sharing this information with your participants (or ensuring they have received it from property owners/managers) is an easy thing to do. This is an important opportunity to educate participants about the potential hazards related to lead and their rights as tenants. Informed tenants are more likely to watch for potential problems in their home and proactively work with landlords to address any issues.

Visual Assessment

Visual assessments are only triggered under certain circumstances:

- The leased property was constructed before 1978;
AND
- A child under the age of six (6) will be living in the unit occupied by the household receiving assistance.

Determining the Age of the Unit

Projects should use formal public records, such as tax assessment records, to establish the age of a unit. These records include the year built or age of the property and are available online at:

<http://assessor.countyofventura.org/research/propertyinfo.asp>

Remember to print out a copy of the screenshot for the case file. If you have trouble finding this information online, contact your local Office of Tax and Revenue for assistance. If not available online, the information is public and can be requested from the local authorities. (Note, the taxing authority and the assessment entity may be separate governmental entities and office names vary by locality).

Conducting a Visual Assessment

A visual assessment must be conducted prior to providing rent assistance to the unit and on an annual basis thereafter (as long as assistance is provided). Visual assessments must be conducted by a HUD-Certified Visual Assessor. It is important to note that a HUD-Certified Visual Assessor is not equivalent to a Certified Clearance Examiner. Anyone may become a HUD-Certified Visual Assessor by successfully completing a 20-minute online training on HUD's website at:

<http://www.hud.gov/offices/lead/training/visualassessment/h00101.html>

The training teaches individuals how to identify deteriorated paint and how deteriorated paint must be treated. Projects may choose to have their program staff complete the visual assessments, or they may procure services from a contractor.

Making Assistance Determinations

If a visual assessment reveals problems with paint surfaces, Project cannot approve the unit for assistance until the deteriorating paint has been repaired. At this point, Projects must make a decision: work with the property owner/manager to complete needed paint stabilization activities and clearance, work with the household to locate a different (lead-safe) unit or refer the participant to a different program if assistance cannot be provided.

Locating a Certified Lead Professional and Further Training

To locate a certified lead professional in your area:

- Call your state government (health department, lead poison prevention program, or housing authority).
- Call the National Lead Information Center at 1-800-424-LEAD (5323).
- Go to the US Environmental Protection Agency website at <http://cfpub.epa.gov/flpp/> and click on "certified abatement/inspection firms."

Lead professionals, training providers, and HUD-sponsored Lead Safe Work Practices training listings can be accessed at www.leadlisting.org or 1-888-LEADLIST.

For more information on the Federal training and certification program for lead professionals, contact the National Lead Information Center (NLIC) at <http://www.epa.gov/lead/pubs/nlic.html> or 1-800-424-LEAD to speak with an information specialist.

The Lead Safe Housing Rule as well as a HUD training module to help recipients of funds effectively implement the requirements of the Lead Safe Housing Rule in their programs can be accessed at <http://www.hud.gov/offices/cpd/affordablehousing/training/web/leadsafe/>

Attachment D

Comparison of Rapid Rehousing Under ESG and CoC

	<i>Rapid Rehousing – Eligible Costs</i>	
	ESG - RRH	CoC - RRH
Rental Assistance	<ul style="list-style-type: none"> • Short-term (up to 3 months) • Medium-term (4 to 24 months) • Rent Arrears (one-time for up to 6 months, including late fees) 	<ul style="list-style-type: none"> • Short-term (up to 3 months) • Medium-term (4 to 24 months)
Type of Rental Assistance	<ul style="list-style-type: none"> • Tenant based • Project based 	<ul style="list-style-type: none"> • Tenant based only
Housing Relocation and Stabilization Services	<p>Financial Costs</p> <ul style="list-style-type: none"> • Rental application Fees • Security Deposits (up to 2 months) • Last month's rent • Utility Deposits and payments (up to 24 months, including 6 months of arrears) • Moving costs <p>Service Costs</p> <ul style="list-style-type: none"> • Housing Search and Placement • Housing stability case management • Mediation • Legal services • Credit repair • Budgeting • Money Management 	<p>Financial Assistance</p> <ul style="list-style-type: none"> • Security deposits (up to 2 months) • First and last month's rent <p>Supportive Services</p> <ul style="list-style-type: none"> • Case management • Child Care • Education services • Employment assistance and job training • Food • Housing search and counseling services, including mediation, credit repair, and payment of rental application fee • Legal services • Life skills training • Mental health services • Moving costs • Outpatient health services • Outreach services • Substance abuse treatment services • Transportation • Utility deposits

Formatted Table

Attachment F

Rent Reasonableness Certification

	Proposed Unit	Unit #1	Unit #2	Unit #3
Address				
Number of Bedrooms/Bathroom				
Type of Unit (Low-Rise, Hi-Rise, Single Family, Duplex etc.)				
Neighborhood				
Housing Condition				
Location/Accessibility				
Amenities (List):				
Yr. Built/Renovated				
Utilities Not Included in Rent (E,W,S,G,T)				
Unit Rent	\$	\$	\$	\$
Utility Allowance	\$	\$	\$	\$
Gross Rent	\$	\$	\$	\$
Handicap Accessible?				

Based on a comparison with rents for comparable units, I have determined that the proposed rent for the unit [] IS reasonable. The proposed unit gross rent is no more than \$100 above the gross rent of three comparable units.

By signing below, I hereby certify that the above information is correct and accurate to the best of my knowledge; that this form is accompanied by backup documentation attesting to the specified information for the participant's unit, all comparable units, and the applicable FMR value; and that based on the above, the participant's unit meets the applicable FMR and RR standards.

Staff Signature: _____ Date: _____

Attachment G

LEASE ADDENDUM

VIOLENCE AGAINST WOMEN AND JUSTICE DEPARTMENT REAUTHORIZATION ACT OF 2005

TENANT	LANDLORD	UNIT NO. & ADDRESS
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This lease addendum adds the following paragraphs to the Lease between the above referenced Tenant and Landlord.

Purpose of the Addendum

The lease for the above referenced unit is being amended to include the provisions of the Violence Against Women and Justice Department Reauthorization Act of 2005 (VAWA).

Conflicts with Other Provisions of the Lease

In case of any conflict between the provisions of this Addendum and other sections of the Lease, the provisions of this Addendum shall prevail.

Term of the Lease Addendum

The effective date of this Lease Addendum is _____. This Lease Addendum shall continue to be in effect until the Lease is terminated.

VAWA Protections

1. The Landlord may not consider incidents of domestic violence, dating violence or stalking as serious or repeated violations of the lease or other "good cause" for termination of assistance, tenancy, or occupancy rights of the victim of abuse.
2. The Landlord may not consider criminal activity directly relating to abuse, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, cause for termination of assistance, tenancy, or occupancy rights if the tenant or an immediate member of the tenant's family is the victim or threatened victim of that abuse.
3. The Landlord may request in writing that the victim, or a family member on the victim's behalf, certify that the individual is a victim of abuse and that the Certification of Domestic Violence, Dating Violence or Stalking, Form HUD-91066, or other documentation as noted on the certification form, be completed, and submitted within 14 business days, or an agreed upon extension date, to receive protection under the VAWA. Failure to provide the certification or other supporting documentation within the specified timeframe may result in eviction.

Tenant

Date

Landlord

Date

Attachment H

Rental Assistance Agreement

This Rental Assistance Agreement is entered into between

_____ (“Agency”) and _____ (“Owner”).

The purpose of this Agreement is to assist the Household identified in Section I below to lease a decent, safe, and sanitary dwelling unit from Owner. Agency will make rental assistance payments to the Owner on behalf of Household in accordance with this Agreement.

I. Dwelling Unit and Household

This Agreement applies only to the Household and Dwelling Unit designated below. Owner has leased the Dwelling Unit to the Household through a separate and distinct lease agreement.

Dwelling Unit (“Unit”)

Head of Household

II. Term of Agreement

The term of this Agreement shall begin on _____ and shall end upon 30 days written notice from Agency.

III. Rental Assistance Payment

The Agency agrees to pay a portion, as determined, and calculated solely by the Agency, of the Unit rent. This amount is subject to change at any time during the term of this Agreement. Any portion of the rent that is paid by Agency will be paid to Owner on or about the first day of the month for which the Unit rent is due. The rental assistance payment is equal to the difference between the Unit rent and the rent paid by the Household; at no time shall the rent paid by the Household and the rental assistance payment exceed the Unit rent. The Agency assumes no obligation for the Unit rent, or payment of any claim by the Owner against the Household, for damages or other amounts owed to the Owner.

IV. Notification to the Agency

During the term of this Agreement, Owner agrees to provide Agency with a copy of the following documentation:

- A. Amendments to the lease agreement between the Owner and the Household, including but not limited to, changes in rent, utilities, ownership or mailing address; and
- B. Notices to the Household, including but not limited to, notices to comply, terminations of tenancy, or eviction.

Attachment I

PROGRAM PARTICIPANT SUPPORTIVE SERVICES REQUIREMENT Participant Acknowledgment and Agreement

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1. Purpose

This document outlines the requirement for program participants to engage in supportive services that are not disability-related as a condition of continued participation in the program.

2. Requirement to Participate in Supportive Services

Program participants are required to take part in supportive services designed to promote housing stability, self-sufficiency, and program success.

3. Examples of Supportive Services

In accordance with 24 C.F.R. § 578.53(e), supportive services may include, but are not limited to:

1. Annual Assessment of Services (§ 578.53(e)(1))
2. Case Management (§ 578.53(e)(3))
3. Childcare (§ 578.53(e)(4))
4. Education Services (§ 578.53(e)(5))
5. Employment Assistance and Job Training (§ 578.53(e)(6))
6. Food (§ 578.53(e)(7))
7. Housing Search and Counseling Services (§ 578.53(e)(8))
8. Legal Services (§ 578.53(e)(9))
9. Life Skills Training (§ 578.53(e)(10))
10. Mental Health Services (§ 578.53(e)(11))
11. Outpatient Health Services (§ 578.53(e)(12))
12. Outreach Services (§ 578.53(e)(13))
13. Substance Abuse Treatment Services (§ 578.53(e)(14))
14. Transportation (§ 578.53(e)(15))

1 of 3 Supportive Services Agreement

4. Case Manager Progress Update Chart

To be completed by the assigned case manager to document participation, progress, and any follow-up actions.

Date	Service Area (e.g., Case Management, Employment Assistance, Life Skills)	Participant Goal(s)	Progress Update	Barriers Identified	Next Steps / Action Plan	Case Manager Initials

5. Participant Acknowledgment

By signing below, the participant acknowledges that they have read, understand, and agree to comply with the supportive service participation requirements described in this document.

Participant Name: _____

Participant Signature: _____

Date: _____

Program Staff Signature: _____

Date: _____

Attachment J

§ 5.2005 VAWA protections.

(a) Notification of occupancy rights under VAWA, and certification form.

(1) A covered housing provider must provide to each of its applicants and to each of its tenants the notice of occupancy rights and the certification form as described in this section:

(i) A “Notice of Occupancy Rights under the Violence Against Women Act,” as prescribed and in accordance with directions provided by HUD, that explains the VAWA protections under this subpart, including the right to confidentiality, and any limitations on those protections; and

(ii) A certification form, in a form approved by HUD, to be completed by the victim to document an incident of domestic violence, dating violence, sexual assault or stalking, and that:

(A) States that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking;

(B) States that the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection under this subpart meets the applicable definition for such incident under § 5.2003; and

(C) Includes the name of the individual who committed the domestic violence, dating violence, sexual assault, or stalking, if the name is known and safe to provide.

(2) The notice required by paragraph (a)(1)(i) of this section and certification form required by paragraph (a)(1)(ii) of this section must be provided to an applicant or tenant no later than at each of the following times:

(i) At the time the applicant is denied assistance or admission under a covered housing program;

(ii) At the time the individual is provided assistance or admission under the covered housing program;

(iii) With any notification of eviction or notification of termination of assistance; and

(iv) During the 12-month period following **December 16, 2016**, either during the annual recertification or lease renewal process, whichever is applicable, or, if there will be no recertification or lease renewal for a tenant during the first year after the rule takes effect, through other means.

(3) The notice required by paragraph (a)(1)(i) of this section and the certification form required by paragraph (a)(1)(ii) of this section must be made available in multiple languages, consistent with guidance issued by HUD in accordance with Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency, signed August 11, 2000, and published in the FEDERAL REGISTER on August 16, 2000 (at 65 FR 50121).

(4) For the Housing Choice Voucher program under 24 CFR part 982, the project-based voucher program under 24 CFR part 983, the public housing admission and occupancy requirements under 24 CFR part 960, and renewed funding or leases of the Section 8 project-based program under 24 CFR parts 880, 882, 883, 884, 886, as well as project-based section 8 provided in connection with housing under part 891, the HUD-required lease, lease addendum, or tenancy addendum, as applicable, must include a description of specific protections afforded to the victims of domestic violence, dating violence, sexual assault, or stalking, as provided in this subpart.

(b) Prohibited basis for denial or termination of assistance or eviction -

(1) General. An applicant for assistance or tenant assisted under a covered housing program may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy.

(2) Termination on the basis of criminal activity. A tenant in a covered housing program may not be denied tenancy or occupancy rights solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking if:

(i) The criminal activity is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, and

(ii) The tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault or stalking.

(c) Construction of lease terms and terms of assistance. An incident of actual or threatened domestic violence, dating violence, sexual assault, or stalking shall not be construed as:

(1) A serious or repeated violation of a lease executed under a covered housing program by the victim or threatened victim of such incident; or

(2) Good cause for terminating the assistance, tenancy, or occupancy rights under a covered housing program of the victim or threatened victim of such incident.

(d) Limitations of VAWA protections.

(1) Nothing in this section limits the authority of a covered housing provider, when notified of a court order, to comply with a court order with respect to:

(i) The rights of access or control of property, including civil protection orders issued to protect a victim of domestic violence, dating violence, sexual assault, or stalking; or

(ii) The distribution or possession of property among members of a household.

(2) Nothing in this section limits any available authority of a covered housing provider to evict or terminate assistance to a tenant 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 covered housing provider must not subject the tenant, 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 tenants in determining whether to evict or terminate assistance.

(3) Nothing in this section limits the authority of a covered housing provider to terminate assistance to or evict a tenant under a covered housing program if the covered housing provider can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to property of the covered housing provider would be present if that tenant or lawful occupant is not evicted or terminated from assistance. In this context, words, gestures, actions, or other indicators will be considered an "actual and imminent threat" if they meet the standards provided in the definition of "actual and imminent threat" in § 5.2003.

(4) Any eviction or termination of assistance, as provided in paragraph (d)(3) of this section should be utilized by a covered housing provider only when there are no other actions that could be taken to

reduce or eliminate the threat, including, but not limited to, transferring the victim to a different unit, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat. Restrictions predicated on public safety cannot be based on stereotypes but must be tailored to particularized concerns about individual residents.

(e) Emergency transfer plan. Each covered housing provider, as identified in the program-specific regulations for the covered housing program, shall adopt an emergency transfer plan, no later than June 14, 2017 based on HUD's model emergency transfer plan, in accordance with the following:

(1) For purposes of this section, the following definitions apply:

(i) Internal emergency transfer refers to an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; that is, the tenant may reside in the new unit without having to undergo an application process.

(ii) External emergency transfer refers to an emergency relocation of a tenant to another unit where the tenant would be categorized as a new applicant; that is the tenant must undergo an application process in order to reside in the new unit.

(iii) Safe unit refers to a unit that the victim of domestic violence, dating violence, sexual assault, or stalking believes is safe.

(2) The emergency transfer plan must provide that a tenant receiving rental assistance through, or residing in a unit subsidized under, a covered housing program who is a victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer if:

(i) The tenant expressly requests the transfer; and

(ii)

(A) The tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying; or

(B) In the case of a tenant who is a victim of sexual assault, either the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying, or the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for transfer.

(3) The emergency transfer plan must detail the measure of any priority given to tenants who qualify for an emergency transfer under VAWA in relation to other categories of tenants seeking transfers and individuals seeking placement on waiting lists.

(4) The emergency transfer plan must incorporate strict confidentiality measures to ensure that the covered housing provider does not disclose the location of the dwelling unit of the tenant to a person who committed or threatened to commit an act of domestic violence, dating violence, sexual assault, or stalking against the tenant.

(5) The emergency transfer plan must allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available.

(6) The emergency transfer plan must describe policies for assisting a tenant in making an internal emergency transfer under VAWA when a safe unit is not immediately available, and these policies must ensure that requests for internal emergency transfers under VAWA receive, at a minimum, any

applicable additional priority that housing providers may already provide to other types of emergency transfer requests.

(7) The emergency transfer plan must describe reasonable efforts the covered housing provider will take to assist a tenant who wishes to make an external emergency transfer when a safe unit is not immediately available. The plan must include policies for assisting a tenant who is seeking an external emergency transfer under VAWA out of the covered housing provider's program or project, and a tenant who is seeking an external emergency transfer under VAWA into the covered housing provider's program or project. These policies may include:

(i) Arrangements, including memoranda of understanding, with other covered housing providers to facilitate moves; and

(ii) Outreach activities to organizations that assist or provide resources to victims of domestic violence, dating violence, sexual assault, or stalking.

(8) Nothing may preclude a tenant from seeking an internal emergency transfer and an external emergency transfer concurrently if a safe unit is not immediately available.

(9) Where applicable, the emergency transfer plan must describe policies for a tenant who has tenant-based rental assistance and who meets the requirements of paragraph (e)(2) of this section to move quickly with that assistance.

(10) The emergency transfer plan may require documentation from a tenant seeking an emergency transfer, provided that:

(i) The tenant's submission of a written request to the covered housing provider, where the tenant certifies that they meet the criteria in paragraph (e)(2)(ii) of this section, shall be sufficient documentation of the requirements in paragraph (e)(2) of this section;

(ii) The covered housing provider may, at its discretion, ask an individual seeking an emergency transfer to document the occurrence of domestic violence, dating violence, asexual assault, or stalking, in accordance with § 5.2007, for which the individual is seeking the emergency transfer, if the individual has not already provided documentation of that occurrence; and

(iii) No other documentation is required to qualify the tenant for an emergency transfer.

(11) The covered housing provider must make its emergency transfer plan available upon request and, when feasible, must make its plan publicly available.

(12) The covered housing provider must keep a record of all emergency transfers requested under its emergency transfer plan, and the outcomes of such requests, and retain these records for a period of three years, or for a period of time as specified in program regulations. Requests and outcomes of such requests must be reported to HUD annually.

(13) Nothing in this paragraph (e) may be construed to supersede any eligibility or other occupancy requirements that may apply under a covered housing program.

Attachment K

PART 578—CONTINUUM OF CARE PROGRAM

31. The authority citation for part 578 continues to read as follows:

Authority: 42 U.S.C. 11371 *et seq.*, 42 U.S.C. 3535(d).

32. In § 578.7, paragraphs (a)(9)(ii), (iii) and (v) are revised and paragraph (d) is added to read as follows:

§ 578.7 Responsibilities of the Continuum of Care.

(a) * * *

(9) * * *

(ii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance (these policies must include the emergency transfer priority required under § 578.99(j)(8));

(iii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance (these policies must include the emergency transfer priority required under § 578.99(j)(8));

(v) Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance (these policies must include the emergency transfer priority required under § 78.99(j)(8)); and

*

(d) *VAWA emergency transfer plan.* The Continuum of Care must develop the emergency transfer plan for the Continuum of Care that meets the requirements under § 578.99(j)(8).

33. In § 578.51, add paragraph (m) to read as follows:

§ 578.51 Rental assistance.*

(m) *VAWA emergency transfer plan costs.* Recipients and subrecipients of grants for tenant-based rental assistance may use grant funds to pay amounts owed for breaking the lease if the family qualifies for an emergency transfer under the emergency transfer plan established under § 578.99(j)(8).

34. In § 578.75, add paragraph (j) to read as follows:

§ 578.75 General operations.*

(j) *Remaining program participants following bifurcation of a lease or eviction as a result of domestic violence.* For permanent supportive housing projects, members of any household who were living in a unit assisted under this part at the time of a qualifying member's eviction from the unit because the qualifying member was found to have engaged in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking, have the right to rental assistance under this section until the expiration of the lease in effect at the time of the qualifying member's eviction.

35. In § 578.99, add paragraph (j) to read as follows:

§ 578.99 Applicability of other Federal requirements.

(j) *Protections for victims of domestic violence, dating violence, sexual assault, or stalking— (1) General.* The requirements set forth in 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), implementing the requirements of VAWA apply to all permanent housing and transitional housing for which Continuum of Care program funds are used for acquisition, rehabilitation, new construction, leasing, rental assistance, or operating costs. The requirements also apply where funds are used for homelessness prevention, but only where the funds are used to provide short- and/or medium-term rental assistance. Safe havens are subject only to the requirements in paragraph (j)(9) of this section.

(2) *Definition of covered housing provider.* For the Continuum of Care program, “covered housing provider,” as such term is used in HUD’s regulations in 24 CFR part 5, subpart L refers to:

(i) The owner or landlord, which may be the recipient or subrecipient, for purposes of 24 CFR 5.2005(d)(1) and 5.2009(a);

(ii) The recipient, subrecipient, and owner or landlord for purposes of 24 CFR 5.2005(d)(2) through (d)(4); and

(iii) The recipient, subrecipient, and owner or landlord for purposes of 24 CFR 5.2007. However, the recipient or subrecipient may limit documentation requests under § 5.2007 to only the recipient or subrecipient, provided that:

(i) This limitation is made clear in both the notice described under 24 CFR 5.2005(a)(1) and the rental assistance agreement;

(ii) The entity designated to receive documentation requests determines whether the program participant is entitled to protection under VAWA and immediately advise the program participant of the determination; and

(iii) If the program participant is entitled to protection, the entity designated to receive documentation requests must notify the owner in writing that the program participant is entitled to protection under VAWA and work with the owner on the program participant’s behalf. Any further sharing or disclosure of the program participant’s information will be subject to the requirements in 24 CFR 5.2007.

(3) *Effective date.* The core statutory protections of VAWA that prohibit denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking, applied upon enactment of VAWA 2013 on March 7, 2013. Compliance with the VAWA regulatory requirements under this section and at 24 CFR part 5, subpart L, is required for grants awarded pursuant to NOFAs published on or after December 16, 2016.

(4) *Notification requirements.* (i) The recipient or subrecipient must provide each individual or family applying for permanent housing and transitional housing and each program participant the notice and the certification form described in 24 CFR 5.2005 at each of the following times:

- (A) When an individual or family is denied permanent housing or transitional housing;
- (B) When a program participant is admitted to permanent housing or transitional housing;
- (C) When a program participant receives notification of eviction; and
- (D) When a program participant is notified of termination of assistance.

(ii) When grant funds are used for rental assistance, the recipient or subrecipient must ensure that the owner or manager of the housing provides the notice and certification form described in 24 CFR 5.2005(a) to the program participant with any notification of eviction. This commitment and the confidentiality requirements under 24 CFR 5.2007(c) must be set forth in a contract with the owner or landlord.

(5) *Contract, lease, and occupancy agreement provisions.* (i) Recipients and subrecipients must include in any contracts and leases between the recipient or subrecipient, and an owner or landlord of the housing:

(A) The requirement to comply with 24 CFR part 5, subpart L; and

(B) Where the owner or landlord of the housing will have a lease with a program participant, the requirement to include a lease provision that include all requirements that apply to tenants, the owner, or the lease under 24 CFR part 5, subpart L, as supplemented by this part, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c).

(ii) The recipient or subrecipient must include in any lease, sublease, and occupancy agreement with the program participant a provision that include all requirements that apply to tenants, the owner, or the lease under 24 CFR part 5, subpart L, as supplemented by this part, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c). The lease, sublease, and occupancy agreement may specify that the protections under 24 CFR part 5, subpart L, apply only during the period of assistance under the Continuum of Care Program. The period of assistance for housing where grant funds were used for acquisition, construction, or rehabilitation is 15 years from the date of initial occupancy or date of initial service provision.

(iii) Except for tenant-based rental assistance, recipients and subrecipients must require that any lease, sublease, or occupancy agreement with a program participant permits the program participant to terminate the lease, sublease, or occupancy agreement without penalty if the recipient or subrecipient determines that the program participant qualifies for an emergency transfer under the emergency transfer plan established under paragraph (j)(8) of this section.

(iv) For tenant-based rental assistance, the recipient or subrecipient must enter into a contract with the owner or landlord of the housing that:

(A) Requires the owner or landlord of the housing to comply with the provisions of 24 CFR part 5, subpart L; and

(B) Requires the owner or landlord of the housing to include a lease provision that include all requirements that apply to tenants, the owner, or the lease under 24 CFR part 5, subpart L, as

supplemented by this part, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.005(b) and (c). The lease may specify that the protections under 24 CFR part 5, subpart L, only apply while the program participant receives tenant-based rental assistance under the Continuum of Care Program.

(6) *Transition.* (i) The recipient or subrecipient must ensure that the requirements set forth in paragraph (j)(5) of this section apply to any contracts, leases, subleases, or occupancy agreements entered into, or renewed, following the expiration of an existing term, on or after the effective date in paragraph (j)(2) of this section. This obligation includes any contracts, leases, subleases, and occupancy agreements that will automatically renew on or after the effective date in paragraph (j)(3) of this section.

(ii) For leases for tenant-based rental assistance existing prior to the effective date in paragraph (j)(2) of this section, recipients and subrecipients must enter into a contract under paragraph (j)(6)(iv) of this section before the next renewal of the lease.

(7) *Bifurcation.* For the purposes of this part, the following requirements shall apply in place of the requirements at 24 CFR 5.2009(b):

(i) If a family who is receiving tenant-based rental assistance under this part separates under 24 CFR 5.2009(a), the family's tenant-based rental assistance and any utility assistance shall continue for the family member(s) who are not evicted or removed.

(ii) If a family living in permanent supportive housing separates under 24 CFR 5.2009(a), and the family's eligibility for the housing was based on the evicted individual's disability or chronically homeless status, the remaining tenants may stay in the project as provided under § 578.75(i)

(2). Otherwise, if a family living in a project funded under this part separates under 24 CFR 5.2009(a), the remaining tenant(s) will be eligible to remain in the project.

(8) *Emergency transfer plan.* The Continuum of Care must develop an emergency transfer plan for the Continuum of Care, and recipients and subrecipients in the Continuum of Care must follow that plan. The plan must comply with 24 CFR 5.2005(e) and include the following program requirements:

(i) For families receiving tenant-based rental assistance, the plan must specify what will happen with respect to the non-transferring family member(s), if the family separates in order to effect an emergency transfer.

(ii) For families living in units that are otherwise assisted under this part (assisted units), the required policies must provide that for program participants who qualify for an emergency transfer but a safe unit is not immediately available for an internal emergency transfer, the individual or family shall have priority over all other applicants for rental assistance, transitional housing, and permanent supportive housing projects funded under this part, provided that: The individual or family meets all eligibility criteria required by Federal law or regulation or HUD NOFA; and the individual or family meets any additional criteria or preferences established in accordance with § 578.93(b)(1), (4), (6), or (7). The individual or family shall not be required to meet any other eligibility criteria or preferences for the project. The individual or family shall retain their original homeless or chronically homeless status for the purposes of the transfer.

(9) *Protections with respect to safe havens.* The following requirements apply to safe havens funded under this part:

(i) No individual may be denied admission to or removed from the safe haven on the basis or as a direct result of the fact that the individual is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the individual otherwise qualifies for admission or occupancy.

(iii) The terms “affiliated individual,” “dating violence,” “domestic violence,” “sexual assault,” and “stalking” are defined in 24 CFR 5.2003.

36. In § 578.103, revise the heading of paragraph (a)(6), redesignate paragraphs (a)(6)(i) and (ii) as paragraphs (a)(6)(i)(A) and (B), respectively, redesignate paragraph (a)(6) introductory text as (a)(6)(i) introductory text, and add new paragraph (a)(6)(ii) to read as follows:

§ 578.103 Recordkeeping requirements.

(a) * * *

(6) *Moves for victims of domestic violence, dating violence, sexual assault, and stalking.* * * *

(ii) Data on emergency transfers requested under 24 CFR 5.2005(e) and § 578.99, pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.

Attachment L

Housing Providers with ESG and CoC Program Funds Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Content

- I. Description
- II. Eligibility
- III. Emergency Transfer Request
- IV. Confidentiality
- V. Timing & Availability
- VI. Safety & Security of Tenants
- VII. Resources and Links to Services
- VIII. Denials for Service
- IX. Appendix D (HUD Form 5382) – Certification
- X. Appendix E (HUD Form 5383) – Transfer Request Form

I. **Description**

[Housing Provider Name] is concerned about the safety of its tenants, assisted through the Ventura County Continuum of Care (CoC). In accordance with the Violence Against Women Act (VAWA)¹, HPs within the CoC will allow tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request emergency transfer of assistance between housing units when there is imminent risk of harm. The ability to request a transfer is available regardless of sex.¹ The ability of HP to honor such request for tenants currently receiving assistance, however, may depend upon:

Deleted: gender identity, or sexual orientation

1. A preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and
2. Whether HP has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

Furthermore, this plan identifies:

1. Tenants who are eligible for an emergency transfer
2. Documentation needed to request an emergency transfer
3. Confidentiality protections
4. How an emergency transfer may occur, and
5. Guidance to tenants on safety and security

¹ Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or marital status.

Deleted: perceived sexual orientation, gender identity,

This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that **[name of (rental) assistance program]** is in compliance with VAWA. However, tenants must understand and acknowledge that transfers to other units is dependent upon availability.

II. Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if:

1. The tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit
2. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

III. Emergency Transfer Request Documentation

HP will make the Emergency Transfer Plans available to tenants upon request.

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

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

Tenant's written request to the HP, where the tenant self-certifies that they meet the criteria in the general qualifications section of this policy, is sufficient documentation to meet the VAWA requirements. The types of transfers that can take place are:

- *External emergency transfer* refers to an emergency relocation of a tenant to another unit where the tenant would be categorized as a new applicant; that is, the tenant must undergo an application process in order to reside in the new unit.

- *Internal emergency transfer* refers to an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; that is, the tenant may reside in the new unit without having to undergo an application process.

The housing provider and CoC Coordinated Entry System staff will take every reasonable effort to locate alternate safe housing for tenants requesting emergency transfer that meet VAWA eligibility as defined in section I. Housing comparable to that being vacated and which is acceptable to the tenant is preferred, however, an alternate form of housing that is safe may be offered as an immediate, temporary response. Efforts to identify alternate housing and client acceptance or refusal of the housing offered will be documented in a tenant record maintained by the agency receiving the request for transfer.

IV. Confidentiality

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

To safeguard client data, HP must not allow any individual administering assistance or other services on behalf of HP (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law. HP must not enter your information into any shared database or disclose your information to any other entity or individual. HP, however, may disclose the information provided if:

1. You give written permission to HP to release the information on a time limited basis
2. HP needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program
3. A law requires HP or your landlord to release the information

If a participant seeks the protections granted under VAWA (including, but not limited to an emergency transfer,) HP may, but is not required to, request in writing that the applicant or tenant submit documentation of the occurrence of domestic violence. If the HP requests such documentation, the tenant may submit any one of the following:

1. The HUD-approved certification form (HUD-5382 – Appendix D, attached) that was provided along with the Notice of Occupancy Rights Under VAWA

2. A signed Affidavit
3. A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency; or
4. At the discretion of a covered housing provider, a statement or other evidence provided by the applicant or tenant.

It is at the discretion of the tenant or applicant which one of the above forms of documentation to submit.

V. Emergency Transfer Timing and Availability

HP cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. HP will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. HP may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If HP has no safe and available units for which a tenant who needs an emergency is eligible, HP will assist the tenant in identifying other HPs, or reach out to partner motel operators, who may have safe and available units to which the tenant could move. It will be the tenant's choice to select, choose or decline available housing options. At the tenant's request, HP will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Tenant transfer to a temporary safe housing location may be necessary for safety. In these instances, transfer may involve movement between housing types (such as moving from a permanent, or marketplace unit to an emergency safe house or sponsor-based facility). It is recommended that a housing provider make a direct referral to a Victim Service Provider for safe shelter or transitional housing through a domestic violence program. Immediate placement with a known hotel-motel provider will be used as a last resort and will be limited only to the time necessary to locate a more secure setting.

When necessary, the HP will notify the Coordinated Entry System, Pathways to Home, to request an emergency transfer to another HP if possible and allow the tenant to choose if the proposed transfer would be safe and appropriate for their needs. Confidentiality of the tenant will be maintained by using a unique identifier during case conferencing.

If a need to create a waitlist arises by the Victim Service Providers, priority will be given only to the extent necessary to facilitate transfer between housing units of the same housing type and to the extent that it does not violate Fair Housing regulations.

VI. Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Some cases of violence may require involvement of the Office of the Public Defender or other law enforcement agencies such as the Drug Enforcement Agency. In these cases, the responsible housing agency will assist the tenant in connecting with these external organizations. Information about the case continues to be governed by the terms and conditions described under confidentiality.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter (listed below in section VII), for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE or visit the online hotline at <https://ohl.rainn.org/online/>.

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

VII. Resources and Links to Services

Local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking include:

Coalition for Family Harmony *(Domestic Violence Shelter)*

Emergency Hotline 800-300-2181

Office 805-983-6014

Email: admin@thecoalition.org

Interface Children & Family Services

(Domestic Violence Shelter, Navigation and Supportive Services)

Emergency Hotline 800-636-6738

Office 805-485-6114 or 2-1-1

Text your zip code to 898211

Ventura County Family Justice Center

(Restraining Orders, Court Accompaniment, Counseling)

3170 Loma Vista Road, Ventura, CA 93003

Call 805-652-7655 or 2-1-1

Text 805-947-7981

Email: vcfjc.coop@ventura.org

VIII. Termination of Assistance or Denials for Service

An applicant for assistance or tenant assisted under a covered HP may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy. A referral should be made to the Housing Rights Center if tenants require legal assistance for fair housing rights.

A tenant in a HP may not be denied tenancy or occupancy rights solely on the basis of criminal activity directly relating to domestic violence if:

1. The criminal activity is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, and
2. The tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence.

An incident of actual or threatened domestic violence shall not be construed as a serious or repeated violation of a lease executed under a covered housing program by the victim or threatened victim of such incident; or good cause for terminating the assistance, tenancy, or occupancy rights under a covered housing program of the victim or threatened victim of such incident.

Under this ETP, the conditions for termination of housing assistance or eviction from occupancy remain consistent with existing policies for any recipient, such as failure to pay rent. These policies consider the safety of tenants but do not permit the removal of assistance based on the mere fact of being a victim of violence.

HP is not liable for the protection of tenants (damages, injury, harm) resulting from tenant refusal of safe housing, or from actions of individuals not under the direct control of HP. The responsibilities of agency and HP staff do not extend beyond the ordinary protections of clients as mandated by law.

Appendix A - Certification

*Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and
Alternative Documentation (HUD Form 5382)*

CERTIFICATION OF U.S. Department of Housing OMB Approval No. 2577-
0286

DOMESTIC VIOLENCE, and Urban Development Exp.

06/30/2017

**DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING,
AND ALTERNATE DOCUMENTATION**

Purpose of Form: The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, ~~gender identity, or sexual orientation~~.

Deleted: gender identity, or sexual orientation

Use of This Optional Form: If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

- (1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.
- (2) A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency; or
- (3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

Submission of Documentation: The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

1. **Date the written request is received by victim:**
2. **Name of victim:**
3. **Your name (if different from victim's):**
4. **Name(s) of other family member(s) listed on the lease:**
5. **Residence of victim(s):**
6. **Name of the accused perpetrator (if known and can be safely disclosed):**
7. **Relationship of the accused perpetrator to the victim:**
8. **Date(s) and times(s) of incident(s) (if known):**
9. **Location of incident(s):**

In your own words, briefly describe the incident(s):

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date)

Public Reporting Burden: The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

Appendix B – Emergency Transfer Plan

An Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (HUD Form 5383)

EMERGENCY TRANSFER U.S. Department of Housing OMB Approval No. 2577-0286

REQUEST FOR CERTAIN and Urban Development Exp.
06/30/2017

**VICTIMS OF DOMESTIC
VIOLENCE, DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING**

Purpose of Form: If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA). Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault, or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

The requirements you must meet are:

- (1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.** If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.
- (2) You expressly request the emergency transfer.** Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.
- (3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** This means you have a reason to fear that if you do not receive a transfer, you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened

within the 90-calendar-day period before you submit this form or otherwise expressly request the transfer.

Submission of Documentation: If you have third-party documentation that demonstrates why you are eligible for an emergency transfer, you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: 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 you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER

1. **Name of victim requesting an emergency transfer:**

2. **Your name (if different from victim's)**

3. **Name(s) of other family member(s) listed on the lease:**

4. **Name(s) of other family member(s) who would transfer with the victim:**

5. **Address of location from which the victim seeks to transfer:**

6. **Address or phone number for contacting the victim:**

7. **Name of the accused perpetrator (if known and can be safely disclosed):**

8. Relationship of the accused perpetrator to the victim:

9. Date(s), Time(s) and location(s) of incident(s):

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking a transfer? If yes, skip question 11. If no, fill out question 11.

11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit.

12. If voluntarily provided, list any third-party documentation you are providing along with this notice:

This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

**PROGRAM PARTICIPANT SUPPORTIVE SERVICES REQUIREMENT
Participant Acknowledgment and Agreement**

1. Purpose

This document outlines the requirement for program participants to engage in supportive services that are not disability-related as a condition of continued participation in the program.

2. Requirement to Participate in Supportive Services

Program participants are required to take part in supportive services designed to promote housing stability, self-sufficiency, and program success.

3. Examples of Supportive Services

In accordance with 24 C.F.R. § 578.53(e), supportive services may include, but are not limited to:

1. Annual Assessment of Services (§ 578.53(e)(1))
2. Case Management (§ 578.53(e)(3))
3. Childcare (§ 578.53(e)(4))
4. Education Services (§ 578.53(e)(5))
5. Employment Assistance and Job Training (§ 578.53(e)(6))
6. Food (§ 578.53(e)(7))
7. Housing Search and Counseling Services (§ 578.53(e)(8))
8. Legal Services (§ 578.53(e)(9))
9. Life Skills Training (§ 578.53(e)(10))
10. Mental Health Services (§ 578.53(e)(11))
11. Outpatient Health Services (§ 578.53(e)(12))
12. Outreach Services (§ 578.53(e)(13))
13. Substance Abuse Treatment Services (§ 578.53(e)(14))
14. Transportation (§ 578.53(e)(15))

4. Case Manager Progress Update Chart

To be completed by the assigned case manager to document participation, progress, and any follow-up actions.

Date	Service Area (e.g., Case Management, Employment Assistance, Life Skills)	Participant Goal(s)	Progress Update	Barriers Identified	Next Steps / Action Plan	Case Manager Initials

5. Participant Acknowledgment

By signing below, the participant acknowledges that they have read, understand, and agree to comply with the supportive service participation requirements described in this document.

Participant Name: _____

Participant Signature: _____

Date: _____

Program Staff Signature: _____

Date: _____

DRAFT

December 19, 2025

VC CoC Governance Board

SUBJECT: Review and approval of amended Ventura County Continuum of Care Alliance Governance Charter, Authorization to solicit nominations for new CoC Board seats, and Establish the Nominating Committee

BACKGROUND: The Ventura County Continuum of Care's Governance Charter outlines the CoC Board's responsibilities, terms, and procedures for filling vacancies and recruiting new members. As the VC CoC Alliance and this Board's leadership responsibilities continue to expand, a review of the VC CoC committees is essential to the effectiveness of the work of the Alliance.

As currently adopted, the VC CoC's Governance Charter identifies a minimum of seven (7) and maximum of thirteen (13) Governance Board members from an array of community sectors, special need populations, and geographic areas throughout the region, as well as representation from those experiencing homeless or formerly homeless.

An annual review of the governance charter includes a review of Alliance and Board committees, duties, membership and infrastructure.

DISCUSSION: The U.S Department of Housing and Urban Development (HUD) has shared the following list of FY2025 policy priorities which impact the current Continuum of Care governance structure:

- Ending the crisis of homelessness on our streets by directing resources towards outreach & intervention.
- Prioritizing treatment and recovery with service participation requirements.
- Advancing public safety by cooperating with law enforcement.
- Promoting self-sufficiency through employment focused programs.
- Improving outcomes through increasing earned income and promoting self-sufficiency.
- Minimizing trauma by ensuring the safety of program participants.

In the recently rescinded FY25 HUD CoC Notice of Funding Opportunity (NOFO), there was emphasis on partnerships with first responders and law enforcement to increase service engagement. HUD proposed that local CoC Governance Board structure should include three elected official Board seats and a minimum of two seats for law enforcement representatives. The published and now withdrawn FY25 HUD CoC NOFO included scoring factors related to this Board structure. VC CoC staff expect this language to remain in the modified FY25 HUD CoC NOFO to be released soon and therefore, recommend moving forward with the updated Governance Board structure that was discussed during the CoC Board meeting on November 25, 2025. The following revisions are being recommended based on Board feedback and research of other CoCs:

- 1) Revise the Board composition to a minimum of thirteen (13) and maximum of nineteen (19) members.
- 2) Add three (3) appointed publicly elected officials or their alternates to include one (1) County of Ventura Board Supervisor, one (1) West County jurisdiction official, and one (1) East County jurisdiction official. Each jurisdiction will rotate to ensure broad geographic coverage. West County jurisdiction includes Camarillo, Ojai, Oxnard, Port Hueneme, and Ventura. East County jurisdiction includes Fillmore, Moorpark, Santa Paula, Simi Valley, and Thousand Oaks.

If this amended Governance Board structure is approved, the process for new Board member appointment will include the selection of three current Board members for the Nominating Committee. The responsibilities of the Nominating Committee are described in the VC CoC Governance Charter section 7.02:

1. Evaluates and recommends changes to improve the Governance Board representation structure and ensure it is operating in an optimum way to meet the mission;
2. Reviews Board Member nominations, solicitation responses and provide recommendations to the Board;
3. Reviews the governance Charter and provides recommendations to the Board and Full Membership body; and
4. Develops strategies and approaches to engage new Alliance members to expand membership of underrepresented sectors in the Region.

VC CoC staff will issue a request for nominations to be accepted from the full Alliance membership, in addition to the designated jurisdictions to fill the three (3) appointed public official seats and three (3) law enforcement representative seats. The Nominating Committee will review all nominations to ensure adequate representation and present the recommendations for new Board members to the CoC Governance Board for review and approval. Board members will serve two-year terms with an established five-year limit (ten years maximum), with the exception of the Ex-Officio representative. In the event of a vacancy, the Governing Board may appoint such qualified person(s) necessary to fill the vacancy and serve the unexpired term of the previous Board member.

RECOMMENDATIONS:

- 1) Approval of the amended Ventura County Continuum of Care Alliance Governance Charter;
- 2) Authorization to solicit nominations for six (6) new VC CoC Governance Board seats as described in the amended Governance Charter; and
- 3) Nominate three current VC CoC Board members to form the Nominating Committee.

Exhibit A: DRAFT Amended VC CoC Alliance Governance Charter



VENTURA COUNTY
**CONTINUUM OF
CARE ALLIANCE**

ENDING HOMELESSNESS
IN VENTURA COUNTY

Governance Charter

2026

Deleted: 2025

Approved by CoC Board on September 10, 2025

Amended by CoC Board on December 19, 2025

Effective January 1, 2026

Deleted: October 1, 2025

Ventura County CoC Alliance Governance Charter

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Ventura County CoC Alliance Governance Charter

NAME: Ventura County Continuum of Care Alliance, hereinafter referred to as “Alliance”

ADDRESS: The Alliance is located in the County of Ventura within the State of California. The Alliance’s office of record will be the address and point of contact of the identified HUD Collaborative Applicant. Currently: County of Ventura, County Executive Office - Community Development, Hall of Administration L#1940, 800 South Victoria Avenue, Ventura, CA 93009

ARTICLE I. VENTURA COUNTY CoC GEOGRAPHIC BOUNDARIES

1.01. BOUNDARIES

The Ventura County Continuum of Care Alliance includes all of the geography within the County of Ventura, including 10 incorporated cities and all unincorporated areas. The physical bounds of this geography are consistent with the boundaries inclusive of these areas. These boundaries contain other Housing and Urban Development (hereinafter referred to “HUD”) designated program components, including multiple Housing Authorities, six (6) HUD geocode areas, two (2) local Emergency Solutions Grant (hereinafter referred to as “ESG”) Areas, communities eligible for State ESG funds, as well as federally designated Community Development Block Grant (hereinafter referred to as “CDBG”) entitlement areas, HOME, and Veterans Administration service areas. The CoC primary area of operations within the CoC geography includes the areas served by the program components listed above. This geography is referred to as the Ventura County CoC Region (hereinafter referred to as “Region”) and is known to HUD as City of Oxnard/San Buenaventura/Ventura County CoC (CA-611).

ARTICLE II. ESTABLISHMENT OF THE CoC

2.01. OVERVIEW

The U.S. Department of Housing and Urban Development charges communities that receive funds under the Homeless Continuum of Care Program (hereinafter referred to as “CoC Program”) of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act with specific responsibilities. [Section 578.5](#) of the HEARTH Interim Rule published in July 2012 (Interim Rule), defines a Continuum of Care (CoC) as “the group organized to carry out the responsibilities required under this part and that is composed of representatives of organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.” Relevant organizations in the Ventura County CoC Region established the Ventura County Homeless and Housing Coalition (the Coalition) in 1983 as a collaborative for housing advocates, service providers and local government representatives concerned about issues of homelessness. In 1993 the Coalition incorporated as a non-profit organization and served as the CoC coordinating body acknowledged by HUD from 1998-2012. In 2012, at the request of the Coalition, CoC administrative and oversight responsibilities were transferred to the County of Ventura and the Countywide CoC Alliance was formalized. The Alliance is an unincorporated association as defined under [Section 18035 of the California Corporations Code](#).

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ARTICLE III. MISSION AND PURPOSE

3.01. MISSION

The Ventura County Continuum of Care Alliance is a collaborative group dedicated to promoting a safe, desirable and thriving community by ending homelessness in Ventura County.

3.02. SPECIFIC PURPOSES

In 2014 the Alliance began a transformation to expand membership, seat an inaugural Governance Board, identify Infrastructure Organizations, facilitate compliance with new federal regulations and guidelines, and address local gaps in community coordination and planning. As such, the Alliance outlines below the responsibilities and authorities of the different components that make up the Alliance including: Alliance Membership, Interagency Council on Homelessness, Advisory Committees, the Governance Board, and Infrastructure Organization(s).

A. Collaboration: The Alliance will:

1. Promote community-wide commitment to the goal of ending homelessness in Ventura County;
2. Provide opportunity for regional coordination and interagency collaboration;
3. Promote access to and effective utilization of mainstream programs by homeless individuals and families;
4. Promote the strategic use of available resources;
5. Inform local planning processes;
6. Inform stakeholders of actions impacting homelessness;
7. Advocate for people experiencing homelessness in areas where they have limited access;
8. Ensure availability of a region-wide Continuum of Care that meets requirements under [HEARTH Interim Rule 578.5](#);
9. Coordinate responses to funding opportunities for assistance for people at-risk of or experiencing homelessness;
10. Implement specific goals established in applications for funding; and

B. Actions: The Alliance will:

1. Foster the plan for a permanent system to ending homelessness;
2. Ensure access for homeless persons to quality services and facilities in all phases of the Continuum of Care system;
3. Coordinate services throughout the region to ensure that each special needs population has access to services in each geographic sub-region;
4. Provide a seamless system of care for transition from the street to permanent housing;
5. Support development of a strategic plan to address homelessness in the Region;
6. Establish and evaluate standards and service targets with an eye for continuous improvement; and
7. Actively recruit new and diverse membership.

Ventura County CoC Alliance Governance Charter

ARTICLE IV. RESPONSIBILITIES OF THE ALLIANCE

4.01. OPERATING THE CoC

The Alliance will:

- A. Hold meetings of the full membership at least quarterly with published agendas;
- B. Issue public invitation for new members to join at least annually;
- C. Follow and update annually a governance charter;
- D. Continue development of governance charter to incorporate all procedures and policies including those required by all funding sources including written standards for funding assistance, strategic planning, project evaluations, and HMIS requirements;
- E. Follow *'Process for Board Selection'* hereto outlined in [Section 6.05](#) to select a Governance Board to act on behalf of the Alliance. The process will be reviewed, updated (as applicable), and approved annually by the Alliance as part of its Charter;
- F. Follow *Process for Selection of Infrastructure Organization(s)'* hereto outlined in [Section 10.02](#) to select organization(s) to assume operational responsibilities including HUD CoC Program Collaborative Applicant, HMIS Lead, Staff, Project Monitoring, and preparing the HUD CoC Collaborative Application;
- G. Follow the *'Interagency Council on Homelessness'* process hereto outlined in [Section 8.01](#) to engage key government representatives to end homelessness in Ventura County Region;
- H. Appoint Advisory Committees, subcommittees, or task groups;
- I. Consult with recipients and sub-recipients to establish performance targets appropriate for population and program type, monitor recipient and sub-recipient performance, evaluate outcomes, and take action against poor performers;
- J. Evaluate outcomes of projects funded under the ESG and CoC Programs, and report to HUD and other funders;
- K. Evaluate outcomes of projects funded under the California Homeless Coordinating and Financing Council and other State funding allocated to the CoC;
- L. In consultation with recipients of HUD CoC and ESG Program funds within the Region, establish and operate a Coordinated Entry System (CES) that complies with requirements established by HUD; and
- M. In consultation with recipients of HUD CoC and ESG Program funds within the Ventura County Region, establish and consistently follow written standards for providing Continuum of Care assistance.

4.02. CoC PLANNING

To serve as the regional coordinated body to end homelessness in the Ventura County Region, the Alliance will:

- A. Coordinate the implementation of an effective housing and service system including outreach, engagement, assessment, prevention, shelter, housing, and supportive services within the Region;
- B. Plan for and conduct an annual Point-In-Time (PIT) Count of homeless persons within the Region;
- C. Conduct an annual gaps analysis of the homeless needs and services available within the Region;

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- D. Provide information to local jurisdictions required to complete the Consolidated Plan(s) within Region; and
- E. Consult with State and local government ESG program recipients within the Region on the plan for allocating ESG Program funds and reporting on and evaluating the performance of ESG program recipients and sub-recipients.

4.03. DESIGNATING AND OPERATING HMIS

The Alliance will:

- A. Designate a single Homeless Management Information System (HMIS) for the Region;
- B. Designate an eligible applicant to manage the Continuum's HMIS, known as the HMIS Lead;
- C. Review, revise, and approve (i) privacy, (ii) security, and (iii) a data quality plan for the HMIS;
- D. Ensure consistent participation of recipients and sub-recipients in the HMIS;
- E. Ensure the HMIS is administered in compliance with requirements prescribed by HUD; and

4.04. PREPARING APPLICATIONS FOR FUNDS

The Alliance will:

- A. Design, operate, and follow a collaborative process for development of applications for funding;
- B. Approve, through its Governance Board, submission of applications in response to a HUD CoC Program Notice of Funding Availability (NOFA) among other funding opportunities;
- C. Establish priorities for funding projects;
- D. Ensure that only one application for HUD CoC Program funds be submitted and collect and combine required applications information from all approved projects within Region; and
- E. Seek to secure funding for Alliance operations and infrastructure, including but not limited to HUD Planning grant funds.

4.05. ADDITIONAL RESPONSIBILITIES

The Alliance shall have additional responsibilities, including but not limited to:

- A. Engage organizations in a community-based process;
- B. Convene regular meetings of interested stakeholders;
- C. Work to address the underlying causes of homelessness;
- D. Lessen the negative impact of homelessness on individuals, families, and communities;
- E. Promote a region-wide Alliance;
- F. Foster collaboration;
- G. Develop a permanent system to end homelessness;
- H. Facilitate access to quality services region-wide;
- I. Ensure access to services to all subgroups;
- J. Ensure the system is designed with an equity framework to address racial disparities and other inequities
- K. Ensure access to a full range of services from street outreach to permanent housing;
- L. Facilitate sharing of provider expertise and intervention strategies;
- M. Create, inform, and support to development of regional plans;
- N. Provide a consistent source of data regarding the needs for homeless persons;
- O. Educate stakeholders about regulatory actions and other conditions impacting the Alliance;

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- P. Advocate for policies and essential services that promote fair housing, client well-being, and rights and protections under the law; and
- Q. Assist homeless service providers in acquiring funds dedicated to homelessness.

4.06. LIMITATIONS

The Alliance will not:

- A. Engage in activities in favor or against any political campaign on behalf of candidates for public office, except as the law affords to as the right and privileges of its members; or
- B. Convene members to conspire or to promote the support of activities that are deemed illegal activities under the law.

ARTICLE V. ALLIANCE MEMBERSHIP

5.01. STAKEHOLDERS

The Alliance shall garner community-wide commitment to ending and preventing homelessness in all parts of the Region through inclusion of representation from the entire Ventura County geographic area. In addition to the entities identified in [Interim Rule Section 578.5](#), Alliance membership includes a variety of other community stakeholders to the extent that they are invested in ending homelessness in the Region. Examples of additional stakeholders include private foundations, philanthropists, fraternal organizations, employment development, organized labor, and private health service organizations.

5.02. MEMBERSHIP APPLICATION PROCESS

Interested organizations and individuals can join the Alliance by attending a regularly scheduled meeting, completing a membership application, and committing to participate in the work of the Alliance to achieve stated purposes and goals. Alliance members obtain and retain voting privileges through attendance and participation in accordance with established policies.

New Organizational Members verify the required commitment to the work of the Alliance by preparing a written statement as part of the membership application that identifies the components of the Alliance work that the organization will participate in. An Organizational Member may designate up to three (3) persons annually who are authorized to represent the organization at Alliance meetings. Any one (1) organization can only have one (1) vote. An organization representative may represent only one (1) organization.

Individuals may also become members of the Alliance. Individuals provide a similar commitment statement as part of their membership application to the Alliance; however, Individual Members may not designate additional persons to represent them. Individuals who have a recognized role in a member organization (such as employee, board members, consultants, or current service recipients) may become Individual Member of the Alliance but may not vote. Individuals with formal organizational affiliations, such as those noted above, may be selected to represent the organization with which they are affiliated. This provision creates an opportunity for individual stakeholders to participate in the Alliance without duplicating organizational representation.

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5.03. MEMBER RESPONSIBILITIES

Alliance Member responsibilities include:

- A. Review and approve Governance Charter and all amendments at least annually;
- B. Attend annual and quarterly meetings;
- C. Ratify full slate of Governance Board Members annually; and
- D. Voluntarily participate on Advisory Committees.

5.04. MEMBERSHIP

- A. Membership is open to organizations and individuals who support the Alliance mission. Those seeking membership must complete an application and make their request at any meeting of the Alliance. At the next regularly scheduled meeting of the Alliance, all membership requests from organizations or individuals made at the prior meeting will be assumed as valid for purposes of determining voting rights.
- B. There shall be two (2) categories of Alliance members: Organizational Members and Individual Members.
- D. All members shall have the right to speak at meetings; vote on matters before the Alliance, subject to the voting privileges set forth herein [Section 5.09](#); and to participate in Alliance activities.
- E. There will be an unrestricted number of Organizational Members. However, only one (1) representative from each Organization Member may vote on behalf of that organization on any given issue; representatives are based on authorization from the organization. Each organization shall indicate in writing the names of up to three (3) persons annually who may represent the organization.
- F. There will be an unrestricted number of Individuals Members representing the general community. However, any such members must reside in Ventura County and may not be involved with Organizational Members as employees, board members, consultants, or current contractors.
- G. Nonvoting Alliance memberships are available for members who self-identify as a Nonvoting Member.
- H. All Alliance members are encouraged to actively recruit additional members engaged in ending homelessness in Ventura County.

5.05. MEETINGS AND MEETING SCHEDULE

- A. Any person who attends an Alliance meeting may be asked to leave by staff if the person is verbally or physically disruptive.
- B. The Alliance annual calendar will establish a regular meeting day, time, and location for the calendar year.
- C. The full membership shall convene at least quarterly for the purpose of transacting the business of the Alliance.
- D. All regular meetings shall be published on the Alliance website and distributed electronically to all members at least 72 hours in advance.

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5.06 ANNUAL MEETING

- A. Full Alliance membership shall meet annually to ratify the roster of the Governance Board Members, review and approve Governance Charter, and receive annual meeting calendar.
- B. The notice of annual meeting shall be published on the Alliance website at least seven (7) days prior to the scheduled meeting.

5.07 SPECIAL AND EMERGENCY MEETINGS

- A. Special meetings of the Alliance may be requested and noticed provided by email to each member at least 24 hours prior to the meeting.
- B. Special and emergency meetings of the Alliance may be called at any time by the Governance Board or upon the request by one-third (33%) or more voting Members.

5.08. QUORUM

- A. A quorum shall consist of 50% plus one of eligible voters for the Alliance membership meetings;
- B. No business may be officially transacted without a quorum.

5.09. VOTING

- A. At all meetings of the Alliance, members who have met attendance requirements set forth by the Alliance may vote. Voting privileges are limited to one vote per member, in accordance with attendance policies (Sec 5.09.D).
- B. In the interest of informed decision-making, each Organizational Member may designate up to three (3) persons annually to represent such organizations at Alliance Meetings. Attendance by one (1) of the designated representatives is considered in meeting the attendance requirement associated with voting privileges ([Sec 5.04.E](#)).
- C. Each Organizational Member and Individual Member may have only one (1) vote for any one (1) motion on the floor; a majority of votes shall carry or defeat a motion.
- D. Voter privileges are extended to those Individual Members and Organizational Members that have been represented by a designated member at two (2) of the most recent four (4) full membership meetings.
- E. New members must have attended at least one (1) meeting before being eligible to vote.
- F. Upon ratification of this Charter new voting privileges became effective. Existing Alliance members who have secured voting privileges under previous rules will maintain privileges for the first meeting.
- G. All Members must declare any conflict of interest they or their organization has on any voting issue. Organizational Members and Individual Members shall abstain from voting and discussion on any issue in which they or their organization have a conflict of interest.
- H. The Governance Charter may be amended upon majority vote of the members of the full Alliance who are eligible to vote who are present at a meeting called for such purpose, provided that notice is given provided seven (7) calendar days prior to the meeting. Any such vote shall be conducted in accordance with the established Policies and Procedures of the Alliance. Absentee voting is not permitted.

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5.10. MEETING MINUTES

- A. Minutes of the meeting will be produced and maintained by the Collaborative Applicant staff.
- B. Meeting minutes shall be electronically distributed to all Alliance Members and posted on the Alliance website.

ARTICLE VI. THE ALLIANCE GOVERNANCE BOARD

6.01. OVERVIEW

The Governance Board acts on behalf the Alliance and is representative of the relevant organizations and of projects serving homeless subpopulations within the Ventura County Region. The Alliance Board is charged with important responsibilities and authorities on behalf of the community of stakeholders. Representation of a broad array of stakeholders on the Alliance Board will enhance the capacity to coordinate and leverage resources from various community sectors throughout the Region. To this end, the Alliance will strategically pursue a Governance Board that represents the array of stakeholders, the diverse geographic sub-regions, and the constituency for whom each seat is designated. HEARTH regulations require the Board to be representative of the relevant organizations and of projects serving homeless subpopulations within the Continuum of Care’s geographic area and that includes at least one homeless or formerly homeless individual to act on its behalf.

6.02. ESTABLISHMENT OF GOVERNANCE BOARD

- A. The Alliance has established a Governance Board to include representatives of relevant stakeholders, private and public officials, philanthropic representatives, advocates, businesses and service organizations and projects serving homeless subpopulations. Subpopulations include but are not limited to persons with substance use disorders; persons with HIV/AIDS; veterans; the chronically homeless; families with children; unaccompanied youth; the seriously mentally ill; and victims of domestic violence, dating violence, sexual assault, and stalking. The Board will include a broad representation of key stakeholder groups found within the Region.
- B. One Board member may represent more than one subpopulation or affiliation.
- C. The Board shall include at least one homeless or formerly homeless individual.
- D. Seats will be designated by affiliation, community sector, subpopulation, and geography.
- E. Board leadership will consist of a chair and vice-chair.

F. One (1) Ex Officio Board Member may represent the Collaborative Applicant organization.

G. Three (3) appointed publicly elected officials or their alternates include one (1) County of Ventura Board Supervisor, one (1) West County jurisdiction official (Camarillo, Ojai, Oxnard, Port Hueneme, and Ventura), and one (1) East County jurisdiction official (Fillmore, Moorpark, Santa Paula, Simi Valley, and Thousand Oaks). Newly elected Council members will begin their terms as appointed subsequent to the normal voting process and continue the term of the appointed seat. Each jurisdiction will rotate to ensure broad geographic coverage.

a. Starting in the 2026 term, the City of Oxnard will fill one seat for West County with the largest West County homeless population (634) based on the 2025 Homeless Count; The West County elected official seat will rotate to the next largest homeless population (522) in the City of Ventura in 2028 after a two-year term.

b. Starting in the 2026 term, the City of Thousand Oaks will fill one seat for East County with the largest East County homeless population (162) based on the 2025 Homeless

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Count; The East County elected official seat will rotate to the next largest homeless population (152) in the **City of Simi Valley** in 2028 after a two-year term.

H. Three (3) seats will be designated for law enforcement representatives serving as Homeless Liaison Officers or Deputies. This will include one (1) County of Ventura Sheriff representative, one (1) West County jurisdiction law enforcement representative (Camarillo, Oxnard, Port Hueneme, Ventura, Ojai, Santa Paula, Fillmore), and one (1) East County jurisdiction law enforcement representative (Thousand Oaks, Newbury Park, Moorpark, and Simi Valley). Each jurisdiction will rotate to ensure broad geographic coverage.

a. Starting in the 2026 term, the **City of Ventura** will fill one seat for West County with the second largest West County homeless population (522) based on the 2025 Homeless Count; The West County law enforcement representative seat will rotate to the next largest West County homeless population (90) in the **City of Camarillo** in 2028 after a two-year term.

b. Starting in the 2026 term, the **City of Simi Valley** will fill one seat for East County with the second largest East County homeless population (152) based on the 2025 Homeless Count. The East County law enforcement representative seat will rotate to the next largest East County homeless population (107) in the **City of Santa Paula** in 2028 after a two-year term.

I. The Governance Board is instituted as an unincorporated association. Any change to formal legal structure would require amendment to the Governance Charter.

6.03. BOARD RESPONSIBILITIES

The Board has authority not retained by the membership in the Charter including the following:

- A. Regional Planning: set regional goals and priorities for ending homelessness in the Region;
- B. Monitor Performance: monitors community progress toward ending homelessness in the Region;
- C. Establish and monitor HUD CoC, Emergency Solutions Grant (ESG), and State Homeless Housing Assistance and Prevention (HHAP) grant performance targets and metrics; measure outcomes; evaluate Infrastructure Organization performance annually;
- D. Approve Alliance Policies: including HUD CoC, ESG, and State HHAP funding recommendations and written standards for providing assistance;
- E. Approve selection of and provide direction to Collaborative Applicant, HMIS Lead, and other such Infrastructure Organizations.
- F. Select Governance Board Members annually and fill vacancies; subject to the Governance Board composition, member selection, membership ratification and related requirements set forth in Sections 6.04 through 6.07 below.
- G. Fundraise: authorize grant applications; raise and allocate funds; approve sustainability plans;
- H. Ensure that relevant organizations and projects serving various homeless subpopulations are represented in planning and decision-making; and
- I. Build community awareness inclusive of the needs of all homeless populations found in the Region.

The Board has no authority to act contrary to this Charter, contrary to any applicable law, rule or regulation, or beyond the mission of the Alliance as set forth in Article III of this Charter.

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6.04. BOARD COMPOSITION

- A. The Governance Board shall have a minimum of thirteen (13) and maximum of nineteen (19) Members.
- B. Members must be able to represent an array of community sectors, special needs populations, and geographic areas throughout the region.
- C. One (1) Ex Officio Board Member may represent the Collaborative Applicant organization.
- D. Three (3) appointed publicly elected officials or their alternates include one (1) County of Ventura Board Supervisor, one (1) West County jurisdiction official, and one (1) East County jurisdiction official. Terms are noted in the above section 6.02.
- E. Three (3) seats will be designated for law enforcement representatives serving as Homeless Liaison Officers or Deputies. This will include one (1) County of Ventura Sheriff representative, one (1) West County jurisdiction representative, and one (1) East County jurisdiction representative. Terms are noted in the above section 6.02.
- F. Sectors include:

Advocates
Affordable Housing Developers
Businesses
Faith-based Organizations
Governments
Homeless/Formerly Homeless
Hospitals (Public or Private)
Law Enforcement
Mental Health Agencies (including substance abuse)
Nonprofit Homeless Assistance Providers
Organizations that serve Veterans
Public Housing Authorities
Organizations that serve unaccompanied youth
Social Service Providers
Universities (public or Private)
Victim Service Providers

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6.05. PROCESS FOR BOARD SELECTION

- A. Nominations of Governance Board Members will be accepted from full Alliance Membership;
- B. The Nominating Committee (Section 7.02E) will reach out to candidates to confirm willingness to serve and verify qualifications. The Nominating Committee members may not nominate themselves and shall not be eligible to be nominated;
- C. Results of nominations are reviewed by the Nominating Committee to ensure that adequate representation is available for each of the required constituencies (community sectors, subpopulations, geography);
- D. The Board will select nominees annually based on recommendations of the Nominating Committee and fill vacancies as needed;
- E. The full Alliance voting membership shall be asked to ratify the slate of new Board Members in its entirety at the annual meeting;

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- F. Board composition is reviewed annually;
- G. Members of the Board serve as liaisons to other community stakeholders;
- H. Election of the Board Members should be staggered to ensure continuity; half will be up for election each year;
- I. Regular attendance and participation in Board activities is required. Members of the Governance Board must actively participate in two (2) of the most recent four (4) meetings in order to remain in good standing. Members failing to meet the attendance and participation standard shall be subject to removal and replacement.

6.06. BOARD MEMBER SELECTION CRITERIA

Alliance Board Members are selected to represent various constituencies. In order to adequately represent that constituency, Board Members shall meet basic qualifications including the following:

- A. Meet eligibility to be a voting Member;
- B. Sufficient knowledge and a working relationship with the constituency group;
- C. Capacity to read and assess detailed information;
- D. Ability to work effectively on a team;
- E. Capacity to consider the benefit of the Alliance as a whole;
- F. Ability to meet the timelines/demands of funding sources;
- G. Respectful acknowledgement of the rights of homeless persons; and
- H. Eligible to conduct business with a governmental entity (i.e., not debarred or suspended).

6.07. BOARD MEMBER PROXY REPRESENTATIVE CRITERIA

Alliance Board Members may designate a proxy representative to have representation in their absence.

The following criteria is required:

- A. Board members are expected to attend at least 50% of the scheduled meetings during a calendar year.
- B. Each Board member will designate one proxy representative with the eligibility to vote.
- C. Changes in proxy representative shall represent the same sector or organization as the Board member.
- D. Each proxy representative shall represent the same sector or organization as the Board member.
- E. Board members or their designated proxy representatives must be present at the Board meeting to vote on items.
- F. The VC CoC Nominating Committee will consider the attendance of Board members when considering applications to renew terms for Board membership annually.

6.07. BOARD ELECTIONS AND TERMS OF OFFICE

- A. As provided for in [Section 6.05.E](#), Board Membership is determined annually by election by a majority vote of the existing Board Membership and is ratified by the full Alliance voting Membership at its annual meeting.
- B. The term of the Governance Board shall be January 1 through December 31.
- C. Except for the initial Governance Board, Members will serve two-year terms subject to re-election with one-half of the seats subject to election each year.

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- D. There is an established 5 term limit (10 year max) for all Board Members, with the exception of the Ex-Officio representative.
- E. In the event of a vacancy, the Governing Board may appoint such qualified person(s) necessary to fill the vacancy. The person(s) appointed shall serve the unexpired term of the previous Board Member and is subject to re-election by the Board and ratification by the full Alliance voting membership.

6.08. BOARD CODE OF CONDUCT

The Members of the Alliance Board are entrusted with specific responsibilities related to use of public funds invested in addressing a serious community concern, homelessness. Members are expected to observe the highest standards of ethical conduct in the execution of these responsibilities. In the performance of their duties, Alliance Board Members are expected to carry out the mandate of the Alliance to the best of their ability, and to maintain the highest standards of integrity for actions with other members of the Board, Alliance representatives, service recipients, service providers, and members of the public.

6.09. GENERAL CONDUCT

Members of the Board are expected to conduct themselves with courtesy and respect, without harassment, physical or verbal abuse. Personal relationships should not result in special considerations, including bias or favoritism that influence the performance of their official duties in a manner contrary to the interest of the broader Alliance. Board Members are expected to exercise adequate control and supervision over matters for which they are individually responsible.

6.10. STEWARDSHIP OF RESOURCES

Board Members must assure that the resources entrusted to them are used for conducting official business only. Members of the Alliance Board must abide by the Conflict of Interest Policies established for Board operations herein ([Sec. 6.18](#)).

6.11. PROTECTION OF CONFIDENTIAL INFORMATION

In line with this Charter of the Alliance, Board Members have a responsibility to protect any confidential information provided to, or generated by, the activities of the Board. Board Members shall not use confidential information of the Alliance for any purpose or disclose such confidential information to any third party, except as necessary to perform their duties and responsibilities as members of the Governance Board.

6.12. PUBLIC STATEMENTS AND MEDIA RESPONSE

When making public statements or speaking to the media on issues related to homelessness, members of the Board shall make clear whether they are speaking in their own name or on behalf of the Alliance.

6.13. REVIEW OF VIOLATION OF THE CODE OF CONDUCT CHARGES

When an allegation of misconduct is received by the Governance Board, an Ethics Review Committee will be assembled. This committee may not exceed three (3) members and must include a minimum of

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two (2) persons from the official Alliance membership. The Ethics Review Committee shall conduct a review of the matter and make a recommendation to the Governance Board for resolution. The Governance Board shall not be bound by the Ethics Review Committee's recommendation.

If requested by a majority, the Committee may also give guidance to the Alliance concerning other aspects of conduct, including actions of staff, consultants or other persons charged with implementation of duties relative to the responsibilities of the Board.

6.14 BOARD LEADERSHIP

At the last meeting each calendar year, the Board will select a Chair to preside over the meeting and Vice-Chair to conduct meetings in the absence of the Board Chairperson. The Vice-Chair will preside over the meeting and officiate business in circumstances where the conduct of the Chair has been formally challenged, or in instances when the Chair must recuse him/herself.

6.15 DOCUMENTATION

The Alliance shall conduct and transact business in a fair and transparent manner. To this end, the Board shall maintain records of the Alliance actions, considerations, and decisions and make them available to members of the public in accordance with the [Public Records Act for the State of California](#) and the [Ralph M. Brown Act](#). Except in unusual circumstances or as required to protect the Board, the Alliance, or member agencies from pending legal action, meeting of the Board will be open to members of the public wishing to observe. If a visitor to the Board meeting is verbally or physically disruptive to the proceedings, they may be asked to leave.

6.16 RESPONSE OF THE BOARD TO COMMUNITY CONCERNS/OBLIGATION TO REPORT

Upon receipt of a written concern, the Alliance Governance Board, the Chairperson in consultation with one additional Board Member who is assigned to that duty will determine what action to take. The chairperson must report complaints and actions to the Governance Board monthly. Members must exercise adequate control and supervision over matters for which they are individually and collectively responsible, and shall take such measures as are necessary and appropriate in considering the concern of the community.

6.17 ABILITY TO CONDUCT BUSINESS/DEBARMENT OR SUSPENSION

Members of the Alliance Board must be eligible to transact business with federal and local government. At the time of nomination and at least annually thereafter, potential members of the Board must be cleared through the public registry listing persons and businesses that are barred from, or suspended from transacting business with federal, state, or local government.

6.18. CONFLICT OF INTEREST AND RECUSAL POLICY

- A. No member of the Alliance shall vote, and may not participate in, any matter which creates a conflict of interest, as defined in this Section. If a voting member has a conflict of interest, that member shall recuse his or herself from the vote and discussion.
- B. The Alliance voting membership shall conduct decision-making in accordance with [24 CFR parts 84](#) or [85](#) for non-profit organizations and state, local, and government agencies that receive

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federal funds. The Alliance voting member must also meet the conditions set forth in the [Interim Rule, Section 578.95\(b\)](#).

- C. To assure compliance with these regulations, the Alliance established policies to protect against conflicts of interest that may arise among Board members or organizational agents for their personal or organizational benefit in excess of the minimal value ([Section 6.19.C](#)).
- D. No voting member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to that individual or to any organization that the voting member has any financial interest or is otherwise employed or directly affiliated.
- E. An Organizational Member conflict of interest arises when, because of activities or relationships with other persons or organizations, the recipient or sub-recipient is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance under this part, or when an individual's or an entity's objectivity in performing work with respect to any activity assigned under this part is or might be otherwise impaired.
- F. An Organizational Member conflict of interest arises when a Board Member is also specifically associated with an applicant organization and participates in any decision of the Board or other entity concerning the award of the grant, or provision of other financial benefits to the organization that such member represents. It would also arise when an employee, recent employee, board member, or family member of a recipient or sub-recipient organization participates in the tasks associated with making reasonable and objective determinations in carrying out the responsibilities of the Board. Examples of conflict of interest include the determination of rent reasonableness under [§578.49\(b\) \(2\) and §578.51\(g\)](#); housing quality inspections of property under [§578.75\(b\)](#) that the recipient, sub-recipient, or related entity owns; participation in ongoing business ventures/partnerships, or participation in evaluation determination of awards.
- G. Recommendations may include items that present a conflict of interest for the majority of Governance Board members. In such cases, the recommendation comes to the full Alliance membership for ratification. Actions brought for ratification may be rejected / appealed by the full Alliance membership if the Governance Board was not authorized to consider and bring forward a recommendation; if the action is not permitted, or if the action otherwise violates regulations or laws governing the issue under consideration. A call for rejection or appeal of an action brought forward for ratification must include the basis for such action. Refusal to ratify the recommendation must be substantiated and subsequently supported by a two-thirds (66%) vote of the eligible voting members present.

6.19. FINANCIAL CONFLICTS OF INTEREST – GIFTS

- A. Prohibits the solicitation and acceptance of gifts by Board members (or by the organizations that they represent) that provide benefit in excess of minimal value from persons, organizations, or corporations with vested interest in the outcomes of decisions made by the Board on behalf of the Alliance or its member agencies.
- B. Board members shall not participate in the selection, award, or evaluation of a contract if the conflict of interest exists. A conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ, or employed during the prior six (6) months, has a financial or other interest

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in the organization under consideration for an award, or evaluation. Board members will not solicit monetary value from funded recipients, sub-recipients, contractors, or vendors.

- C. Board Members will not accept gratuities from funded recipients, sub-recipients, contractors, or vendors except for unsolicited gifts of nominal value. It is determined that a conflict of interest does not exist when the value of the gift is an unsolicited item of nominal value (less than \$15) and such gifts are not repeated more than twice annually. The Board member must maintain a record of gifts received, including source, date, value, and type of gift.

6.20. RESTRICTIONS ON PROCUREMENT AND PROVISION OF SERVICE

- A. Board members may not personally and substantially benefit from participation on the Alliance Board. [The Procurement Integrity Act U.S.C. §2104](#); (“PIA”) provides guidance on activities that constitute personal and substantial benefit. Examples of activities that may violate the PIA include but are not limited to:
- Drafting, reviewing, or approving the specification or statement of work for which the individual intends to apply;
 - Preparing or developing a solicitation that the individual or an organization that the individual has a formal relationship with; evaluating bids or proposals that will be awarded to the individual or an associated entity;
 - Selecting a source; negotiating price or terms and conditions; or
 - Reviewing and approving an award from which the individual or the associated entity will derive any financial benefit.
- B. Board members are not to receive preference in the execution of the business of the Alliance or the services provided by the Alliance. For example, the Board member or their family must be granted services or access to support through the regular, established processes without special consideration.

6.21. OBLIGATION TO DECLARE POTENTIAL CONFLICT OF INTEREST

To avoid apparent conflicts of interest, Board members will declare any real or potential conflicts of interest or the appearance of such conflicts. The person must disclose this information before participating in the deliberation and decision-making or evaluation process. This policy applies to both personal and organizational conflicts.

6.22. TERMINATION POLICY

Any Board Member, Individual Member of the Governance Board or the entire Governance Board may be removed by the vote of two-thirds (66%) of the Alliance voting membership.

6.23. PARLIAMENTARY PROCEDURE

[Robert’s Rules of Order Abridged-Revised](#) will guide the process during meetings of the Alliance.

6.24. QUORUM

- A. A quorum shall consist of 50% plus one of eligible voters for the Alliance membership meetings;
- B. No business may be officially transacted without a quorum.

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ARTICLE VII. ADVISORY COMMITTEES

7.01. COMMITTEES AND TASK GROUPS

- A. Each Committee will have a Chairperson and a Vice-Chairperson or Co-Chairperson elected by Committee members annually.
- B. Each Committee will establish regular recurring meetings and publish an annual calendar on the Alliance website.
- C. Each Committee will distribute a written agenda to all Committee members prior to each meeting and post written agenda on the Alliance website to each meeting.
- D. Each Committee will record meeting minutes of each official committee meeting and publish on the Alliance website.
- E. Each Committee may meet at any time during the intervals between Alliance meeting at a location determined by the Committee members, or at the request of the Governance Board. Each Committee Chair will report the results of its meeting to the Alliance at quarterly meetings.
- F. Each Committee will mirror the attendance and voting privileges of the full memberships. In order to maintain attendance and voting privileges at the Advisory Committee level, Committee members shall attend two (2) of the most recent four (4) Advisory Committee meetings.
- G. The Committee Chair person is responsible for timely notification of meetings, and will have the authority to call Committee meetings, to determine that a quorum is present, and to determine who has met eligibility to majority vote on matters before the Committee, provided that reasonable notice is given to all members of the Committee.
- H. Alliance staff, with assistance from Committee Chair, shall be responsible for tracking attendance and maintain compliance with these rules.
- I. The Governance Board may, by majority vote of a quorum, create sub-committees necessary for the proper and efficient functioning of the Alliance as long as these committees do not interfere with or duplicate the duties of any existing committee.
- J. The Board can establish a Task Group to achieve specific or time-limited objectives.
- K. The Governance Board may, by a majority vote of a quorum, abolish a Task Group, or Committee, except for an Advisory Committee, if such committee is established pursuant to this Section, if it is determined to be unnecessary for the proper and efficient functioning of the Alliance.

7.02 STANDING ADVISORY COMMITTEES

The Alliance has established several Standing Advisory Committees that are responsible for ongoing work and providing advice on key issues and community initiatives. These Standing Advisory Committees are needed each year and are established for ongoing, long-term activities. The following Advisory Committees are established as Standing Advisory Committees that incorporate members of the full membership and may only be disbanded by a change to this Charter approved by a direct action of the full Alliance voting membership.

- A. Housing and Services Committee
 - a. Work with public and private agencies to promote and increase awareness of residential and non-residential programs, services, and existing permanent housing resources that make up the Ventura County Homeless Continuum of Care system;

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- b. Promote coordination between organizations who serve the homeless and at-risk homeless populations;
 - c. Provide education and advocacy on behalf of the target population to promote the mission of the Alliance;
 - d. Provide recommendations on best practices of housing and services and property management for existing and new CoC Permanent Supportive Housing programs.
 - 1. Veterans “One Team” Case Conferencing Subcommittee
 - a. Provide housing prioritization and referral to VA funded housing, transitional housing, emergency shelter, Permanent Supportive housing, and services.
 - b. Facilitate to support all services, ensuring a thorough yet expedient discussion with a goal to develop a service plan for all Veterans with a particular focus on those with the most significant barriers to housing.
 - 2. Youth Case Conferencing Subcommittee
 - a. Provide housing prioritization and referral to CoC housing, transitional housing, emergency shelter, Permanent Supportive housing, and services.
 - b. Facilitate to support all services, ensuring a thorough yet expedient discussion with a goal to develop a service plan for all Youth with a particular focus on those with the most significant barriers to housing.
- B. Data Performance and Evaluation Committee
- a. In collaboration with the HMIS Lead Agency, establish and oversee a process to evaluate performance of CoC Program and Emergency Solutions Grant recipient agencies; and
 - b. Review applications and make funding recommendations to the Governance Board to promote the most effective and efficient allocation of these grant funds.
- C. Homeless Management Information System (HMIS) and Coordinated Entry Steering Committee
- a. The HMIS Lead Agency facilitates the Ventura County HMIS Steering Committee;
 - b. The HMIS Lead Agency drafts annual goals and a strategic plan in accordance with the Alliance Strategic Plan, for approval by the HMIS Steering Committee;
 - c. The Collaborative Applicant and HMIS MOU details the roles and responsibilities of the HMIS Lead Agency and the CoC Collaborative Applicant;
 - d. Membership includes broad representation of the service provider types in the Continuum’s HMIS;
 - e. All major HMIS initiatives, including HMIS Policies and Procedures, are reviewed and approved by the Steering Committee and then presented to the Governance Board for approval;
 - f. Provide information and guidance on issues related to the implementation of the HMIS to the full Alliance membership; and
 - g. Regularly monitor HMIS data quality, performance metrics, and operational standards.
- D. Public Information and Outreach Committee
- a. Inform full CoC Alliance membership on progress towards meeting strategic goals and outcomes and any initiatives that impact the County’s homeless housing providers and service agencies;

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- b. Develop public information messages and strategies to raise awareness of issues around homelessness in Ventura County;
 - c. Conduct public outreach to raise awareness; and
 - d. Facilitate community meetings to present updates on key issues such as the results of the annual Point-in-Time Count, key information regarding annual HUD priorities for ending homelessness, and issues critical to the community, such as shelters and affordable housing needs.
- E. Nominations/Selection Committee
- a. Evaluates and recommends changes to improve the Governance Board representation structure and ensure it is operating in an optimum way to meet the mission;
 - b. Reviews Board Member nominations, solicitation responses and provides recommendations to the Board;
 - c. Reviews the governance Charter and provides recommendations to the Board and Full Membership body; and
 - d. Develops strategies and approaches to engage new Alliance members to expand membership of underrepresented sectors in the Region.
- F. Youth Action Board Committee
- a. Youth committee comprised of homeless and formerly homeless youth to serve as advisory group with the goal of preventing and ending youth homelessness
 - b. Advises Housing and Services Committee of gaps in services for youth.
 - c. Youth member may be appointed to represent advisory group on CoC Board.

7.03. TASK GROUPS

Periodically, the Alliance needs to complete specific, time-limited tasks in order to comply with regulatory demands or to advance the goals and objectives of the full body. At the request of the Governance Board, selected group of members and community volunteers may be asked to form a temporary Task Group to complete the identified task. These groups perform specific functions associated with completion of the task and are guided by and report to one of the established Alliance groups, which may include the full Alliance, the Governance Board, or a standing Advisory Committee. Task Groups are temporary in nature and are not expected to offer continuous or year-round support to the Alliance.

ARTICLE VIII. INTERAGENCY COUNCIL ON HOMELESSNESS (IACH)

8.01. OVERVIEW

[The Ventura Council of Governments \(VCOG\)](#), in their role as Interagency Council on Homelessness for the County of Ventura, will receive reports from the Board no less than annually. It is anticipated that the IACH will take these reports on the progress to prevent and end homelessness back to their respective jurisdictions for their consideration.

ARTICLE IX. EMPLOYMENT STATUS

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9.01. OVERVIEW

By virtue of service on the Governance Board, the full Alliance body, Advisory Committees, Interagency Council, and/or other action groups are not deemed employees of the Alliance nor its Infrastructure Organization(s) and are not entitled to benefits or compensation from member agencies as a result of their service to the Alliance.

ARTICLE X. INFRASTRUCTURE ORGANIZATION(S)

10.01. OVERVIEW

In order to realize collective impact and provide centralized infrastructure with dedicated staff and a structured process that leads to a common agenda, shared measurement, continuous communication, and mutually reinforcing activities among all participants, the Alliance will utilize an Infrastructure Organization(s) to assume operational responsibilities for the Alliance and beyond.

10.02. SELECTION PROCESS

- A. A Selection Committee, comprised of members of the Alliance and Board Members, will use a solicitation process to identify and evaluate candidates;
- B. Submissions may include proposals from the Full Membership Body;
- C. A single organization assuming all responsibilities is preferred but not required;
- D. Legal structure of the Infrastructure Organization is not being identified or recommended; rather the formal selection process will be open;
- E. The Selection Committee will submit recommendations to the Governance Board.
- F. The Board can accept one of the recommendations or reject all of the recommendations and instruct the Selection Committee to continue to search. Final selection and approval rests with the Governance Board;
- G. If suitable candidates are not identified through the solicitation process, the Selection Committee may recommend the full Alliance membership or Governance Board create its own entity;
- H. The Governance Board will complete a formal performance evaluation of the Infrastructure Organization(s) every year.

10.03. INFRASTRUCTURE ORGANIZATION(S) RESPONSIBILITIES

- A. Serve as HUD Collaborative Applicant;
- B. Submit HUD CoC Program applications;
- C. Submit other funding applications;
- D. Contract or hire staff;
- E. Conduct funded project monitoring and performance evaluation;
- F. Report progress to full Alliance membership and Governance Board;
- G. Support Governance Board and Advisory Committees;
- H. Implement initiatives as directed by the Governance Board to enhance Alliance performance;
- I. With Advisory Committees, monitor best practice homeless initiatives and make recommendations;
- J. Expand and maintain Alliance membership through proactive engagement of key stakeholders, outreach to and coordinate with other community groups, new member orientation, creation

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of outreach materials including but not limited to interactive website, social media campaigns, and community education;

- K. Serve as Fiscal Agent for infrastructure financial support;
- L. Serve as, or contract with HMIS Lead;
- M. Plan and conduct Point-in-Time Count;
- N. Operate HMIS System and/or ensure compliance;
- O. Monitor data quality;
- P. Data Reports (Housing Inventory Chart, Annual Homeless Assessment Report, other publications, and performance reports);
- Q. Follow HMIS Policies and Procedures; and
- R. Serve as the Point of Contact for the community.

10.04. DESIGNATING HMIS LEAD

The HMIS administering agency and/or the applicant/sponsor of an Alliance dedicated HMIS project grant is an agent of the Alliance, manages HMIS operations on behalf of the Ventura County Region and provides HMIS administration functions at the direction of the Alliance. Active participation by Alliance members, either through committee/sub-committee structure or other meetings, in the management of the HMIS process, including establishing policies, procedures and protocols for privacy, data sharing protocols, data analysis, reporting, data integrity/validity, is essential to the viability and success of the HMIS.

The Alliance has endorsed the concept of a central HMIS system that is capable of integrating and storing data. An integrated data system is a requirement of HUD CoC and ESG Program funding. Policies for compliance with the applicable HUD regulations will be developed and reviewed at least bi-annually by the Alliance and HMIS Lead.

10.05. DESIGNATING COLLABORATIVE APPLICANT

The Alliance will designate an eligible legal entity to complete the HUD CoC Program application, referred to as the Collaborative Applicant. The Collaborative Applicant is responsible for collecting and combining the required application information from all applicants and projects and submitting this combined HUD CoC Program application on behalf of the Alliance. The Collaborative Applicant is the only applicant that is able to apply for HUD planning funds to support the Alliance in carrying out all of its responsibilities. The Collaborative Applicant provides these functions on behalf of the broader Alliance. The Alliance Board always retains responsibility, including the final approval of the application.

10.06. DESIGNATED POINT OF CONTACT

The Governance Board annually reviews and recommends a designated HUD Point of Contact (POC) to the Alliance using a similar process. Designation of the POC also takes into consideration two critical aspects: 1) the POC must have functional knowledge, access, and regular communication with the internal structures of the Collaborative Applicant organization; 2) to be effective, the POC must possess a comprehensive understanding of the HUD regulations and detailed procedures associated with compliance with the CoC, ESG, and VASH programs.

10.07. TERMINATION POLICY

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The Governance Board will conduct and document an annual review of the Infrastructure Organization(s). The review shall include an assessment of the organization's capacity to fulfill HUD mandated functions and fiscal accountability. If the review is unsatisfactory, the organization will provide the Board a written corrective action plan within 30 days. The Governance Board will conduct a subsequent review 90 days following the original unsatisfactory annual review to determine if the corrective action plan is being followed and that performance is improving. If the Governance Board determines the Infrastructure Organization's performance continues to be unsatisfactory, the Governance Board may remove the underperforming Infrastructure Organization by a two-thirds (66%) vote.

ARTICLE XI. RELATIONSHIPS WITH OTHER HUD-FUNDED CONSTITUENCIES

11.01. EMERGENCY SOLUTIONS GRANT (ESG) ENTITLEMENT AREAS

Emergency Solutions Grants (ESG) are awarded to the Ventura County ESG entitlement areas "ESG Area" by the U.S. Department of Housing and Urban Development (HUD) for the purpose of providing Essential Services and Shelter Operations to persons who are homeless or at risk of being homeless in the ESG entitlement Areas. The ESG Area makes these funds available to local service providers, as well as itself, via a Request for Proposals (RFP) process upon notification from HUD of the amount of ESG funds allocated to the ESG Area for the program year. The public notification of the RFP is placed in local newspaper, on the ESG Area websites and electronically distributed by the Continuum of Care homeless service providers. The ESG Area may reserve up to 7.5 percent of the HUD award to administer the program.

The Alliance directly participates with jurisdictions that are directly funded by HUD ESG, with the California State Department of Housing and Community Development for the areas in the Region that are eligible for State ESG funds, and with non-entitled areas that prepare Consolidated Plans. In each case, the Alliance consults with the jurisdiction to develop cooperative plans and strategies that leverage ESG and other resources to provide Emergency Shelter, Prevention, and Rapid Re-Housing (RRH) services.

The Alliance assists the ESG Area in coordinating the prioritization and use of funds. This coordination includes each ESG Area covered by the State of California and the ESG Areas in the Region. The Alliance, as the CoC entity, is responsible for assisting with the evaluation of ESG project performance.

In cooperation with Alliance, the ESG Area determines, based on the amount of funding received and the need of the client, the level of assistance and the duration of assistance that a household can receive.

The Alliance participates in setting local priorities, reviewing and rating proposals, certifying need, and annual review of ESG programs.

The general goal of ESG is to assist families and individuals out of homelessness by providing financial support for rental assistance, payment of utilities, transportation services and other essential services deemed eligible by HUD and necessary for the continued housing of a homeless or at risk of becoming homeless persons, and/or families. ESG can be used to fund local homeless emergency shelter operations or physical rehabilitation of certain properties used for serving homeless persons.

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To this end, the ESG Areas and the Alliance have established the following cross-jurisdictional strategies for use of the ESG funds in ways that:

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- A. Further the accomplishment of actions identified in the Consolidated Plan of each jurisdiction.
- B. Foster greater access to permanent housing, especially helping people access housing that is affordable at 30% Area Median Income.
- C. Leverage existing resources to achieve the match and case management requirements and to avoid duplication of services.
- D. Coordinate across jurisdictions for development of standardized eligibility and assessment standards and by convening semiannual regional planning meetings.
- E. Support federal and local goals for priority populations, including but not limited to veterans, persons with disabilities, families and others.
- F. Allow for variations in ESG entitlement programs that respond to the needs of resources of the individual jurisdictions.
- G. Comply with eligibility and verification requirements and locally established standards (HMIS, housing status, habitability standards, homeless, definitions, etc.).
- H. Allows each program to take responsibility for program administration including compliance with public notice requirements and timely reporting.
- I. Encourages all sub recipients to participate in collaborative assessment, coordinated entry, data management, and reporting systems established by the Alliance in accordance with HEARTH regulations.
- J. Supports timely and accurate data collection and reporting through contractual obligations with sub recipients and through establishing common standards for vendor relationships with the HMIS Lead.

The Alliance plan for ESG assistance recognizes the three (3) ESG Areas contained in the Ventura County Region (Ventura County, City of Oxnard and the areas eligible for State of California ESG funds). The Alliance works to avoid a duplication of services to ensure sub recipients do not receive multiple grants for the same services in a single service area. Sub recipients serving multiple areas may receive ESG support from the corresponding ESG Area to serve eligible clients from that service area.

ESG sub recipients are responsible for assuring the provision of matching resources. The Alliance encourages sub recipients to leverage additional resources for effective operation of ESG programs. The Alliance consults with ESG Areas and sub recipients to coordinate plans for effective use of funds. HUD CoC Program-funded organizations are required to report the sources of match and leverage funds annually. These resources are verified through an annual review of agency Independent Audit as conducted in accord with HUD regulations.

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11.02. ESG PROJECT RECIPIENTS AND SUBRECIPIENTS

ESG project recipients may include non-profit organizations, public housing agencies, or governmental entities that receive HUD CoC program funding. Recipients have a grant agreement with and receive funding directly from HUD; sub recipients have agreements with and receive funding from recipients.

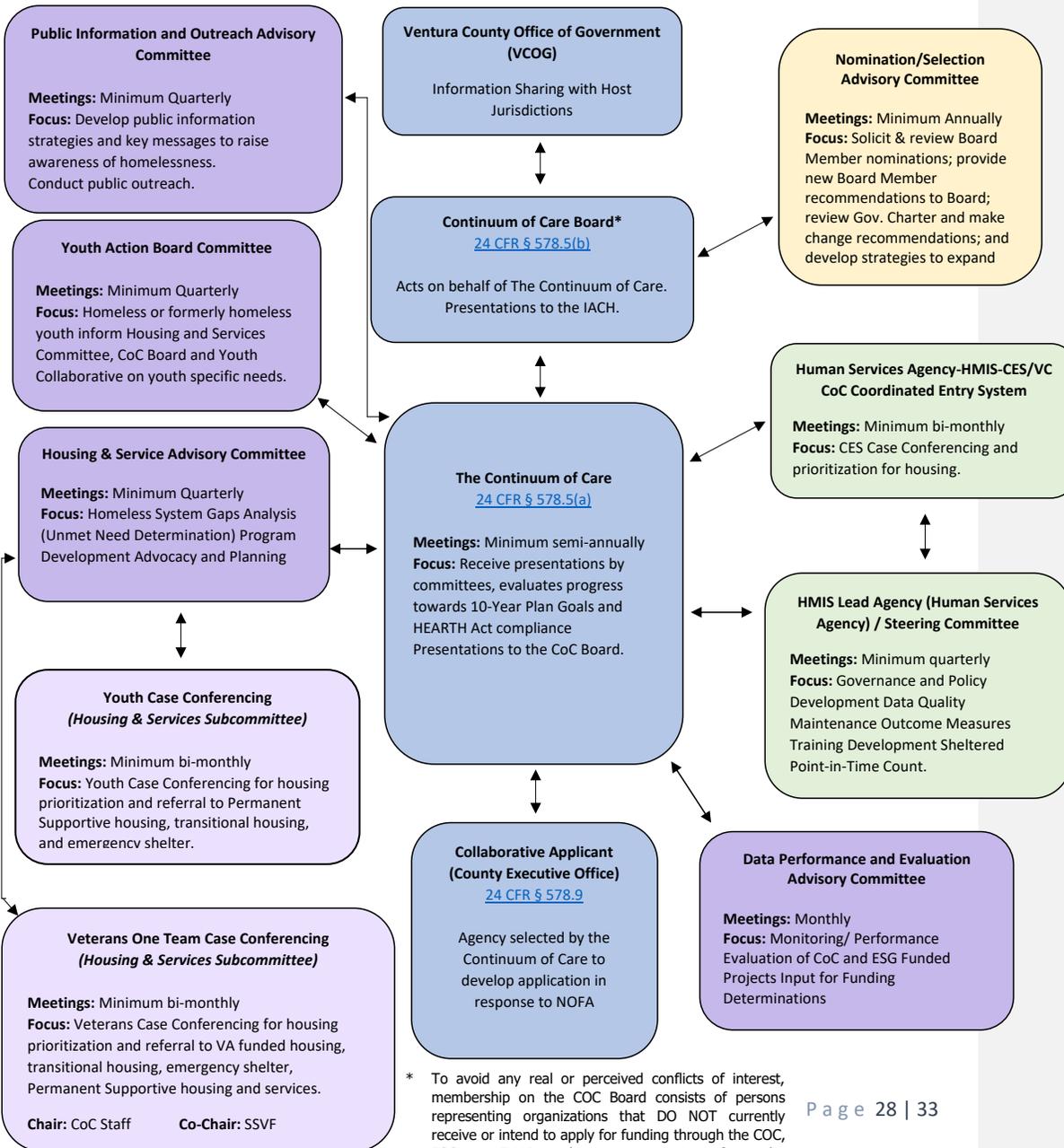
ESG recipient and sub recipient organizations must certify to the following eleven (11) program assurances concerning:

- A. Confidentiality;
- B. Consistently with the applicable consolidated Plan;
- C. Discharge policies and protocols;
- D. Education assurances for households with children;
- E. Essential services;
- F. HMIS participation;
- G. Inclusion of homeless persons in decision-making and Section 3 activities as practicable;
- H. Restrictive covenants for facilities receiving ESG funds for renovation or major rehabilitation;
- I. Matching funds;
- J. Safe and sanitary facilities; and
- K. Supportive services.

ESG recipient organizations must meet additional requirements established annually by contractual agreement with the ESG Area for participation in Alliance review and reporting requirements for project evaluation.

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EXHIBIT A – VENTURA COUNTY COC ALLIANCE GOVERNANCE STRUCTURE



* To avoid any real or perceived conflicts of interest, membership on the CoC Board consists of persons representing organizations that DO NOT currently receive or intend to apply for funding through the CoC, ESG or EHAP, unless representatives from the subpopulations served by these organizations cannot be recruited as board members.

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EXHIBIT B – CoC ALLIANCE SEPARATION OF DUTIES MATRIX

xx indicates lead for task

Tasks	The Alliance	Gov. Board	Data Performance and Evaluation	Housing and Service System Coordination	Public Information Outreach	Youth Action Board Committee	HMIS Steering Committee	CoC Collaborative Applicant
1 Conduct sheltered count							x	xx
2 Conduct unsheltered count	x						x	xx
3 Complete Housing Inventory Chart							x	xx
4 Complete Point-in-Time Chart							x	xx
5 Planning/Implementing/evaluating Housing First	x			xx				
6 Planning/Implementing/evaluating Rapid Re-housing	x			xx				
7 Planning/Implementing/evaluating Coord. Assessment System			x	xx			x	x
8 Planning/Implementing/evaluating street outreach plan	x			xx				
9 Planning/Implementing/evaluating homeless prevention plan	x			xx				
10 Ensure goals of Operating Doors are incorporated in CoC goals:	x				xx			
Preventing and ending family homelessness	x				xx			
Preventing and ending chronic homelessness	x				xx			
Preventing and ending youth homelessness	x				xx	x		
Preventing and ending veteran homelessness	x				xx			
Preventing and ending all homelessness	x				xx			
11 Ensure that CoC's goals are in Consolidated Plan(s), Housing Elements, Hsg Authority Action Plans, & other planning docs	x				xx			
12 Ensure that Public Housing Authorities are involved in CoC goals				xx	x			
13 Ensure increase PH and PSH housing stability			xx					
14 Ensure increase income from employment			xx					
15 Ensure income from other cash resources			xx					
16 Ensure increase non-cash mainstream resources			xx					
17 Reduce length of time homeless			x			x	x	
18 Prevent recidivism			x			x	x	
19 Monitor performance of HUD CoC funded renewals			xx				x	x
20 Assist underperforming HUD CoC funded renewals			x					xx
21 Reallocate and renew HUD CoC funded projects	x	xx	x					x
22 Coordinate local Request for Proposals	x	x						xx
23 Coordinate project review, ranking, present to CoC Board		x	xx					x
24 Consult with Emergency Solutions Grant recipients concerning allocation of funds & performance evaluation			x		xx		x	
25 Complete Grant Inventory Worksheet								xx
26 Ensures coordination with other Federal, State, County, local, and private resources		xx	x		x			
27 Identify other sources of funding for supportive services to reduce CoC program funds to pay for such costs	x			xx	x			
28 Ensure equal opportunity and affirmatively further fair housing		xx			x	x		x
29 Ensure educational assurances for hmis children				xx				
30 Coordinating services and safe housing for victims of DV				xx				
31 Implementation of Affordable Care Act				x	xx			
32 Review written complaints		xx						x
33 Adopt and evaluate Governance Charter annually	xx	x						x
34 Recruit CoC Members	xx	x						

Descriptions:

The Alliance: (quarterly) To be collaborative of City staff, other public agency staff, private non-profit organizations, and other community organizations who are committed to preventing and ending homelessness in the County of Ventura; to implement a community-based collaborative and coordinated system utilizing best practices to assist persons experiencing homelessness and those of at risk of homelessness to obtain housing, mainstream resources, and supportive services necessary to achieve self-sufficiency; to ensure funding resources are maintained; leverage additional funds; and assure fair distribution of resources throughout Ventura County based on areas of greatest need.

CoC Board: (monthly) Makes decisions on behalf of The Alliance.

HMIS Steering Committee: (quarterly) Develop and monitor the HMIS Charter, which includes a process for decision making around the HMIS and establishes roles and responsibilities of the CoC Collaborative Applicant and the HMIS Lead Agency. Provide information and guidance on issues related to the implementation of the HMIS. Regularly monitor data quality, performance metrics, and operational standards.

Data Performance and Evaluation Committee: (quarterly) Establish and oversee a process to evaluate performance of CoC Program and Emergency Solutions Grant funded agencies. Review applications and make funding determinations to promote the most effective and efficient allocation of these grant funds.

Data Performance and Evaluation Committee: (quarterly) Establish and oversee a process to evaluate performance of CoC Program and Emergency Solutions Grant funded agencies. Review applications and make funding determinations to promote the most effective and efficient allocation of these grant funds.

Housing and Service System Coordination: (quarterly) Conduct Homeless System Gaps Analysis (Unmet Need), System Evaluation and Redesign, Program Development, Research of Systems Development and Best Practices, Advocacy and Planning

Public Information and Outreach: (quarterly) Inform members of The Alliance on progress towards meeting strategic goals and any initiatives that impact the County's homeless housing providers and service agencies. Develop public information messages and strategies to raise awareness of issues around homelessness in the County.

CoC Collaborative Applicant: The agency selected by The Alliance to develop and submit an application in response to HUD's CoC NOFA.

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EXHIBIT C – CoC INFRASTRUCTURE ORGANIZATION

Continuum of Care Lead Agency/Collaborative Applicant

The CoC Lead Agency is the County Executive Office and designated as the primary applicant for State and Federal funds made available to Continuums of Care; The CoC Lead Agency serves as staff to the Continuum of Care Board, Alliance and Standing Advisory Committees and assists with overseeing the full responsibilities of the Continuum including operating the Continuum of services including the coordinated entry system and coordinated entry system access point focusing on subpopulations that benefit from a tailored approach, such as the Veterans One Team Case Conferencing and Youth Case Conferencing.

HMIS Lead Agency

The HMIS Lead Agency is the County of Ventura Human Services Agency responsible for managing the HMIS system consistent with HUD requirements. The HMIS lead in partnership with the CoC is responsible for reviewing, revising, and approving a privacy plan, security plan and data quality plan for the HMIS and ensuring consistent participation of recipients and subrecipients in the HMIS. The Human Services Agency has also been designated by the VC CoC as a lead on the Coordinated Entry System (CES) with the integration of CES in HMIS.

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EXHIBIT D – CoC ALLIANCE MEMBERSHIP

Ventura County Continuum of Care Alliance Membership	
Organization/Individual	Sector
A Community of Friends	Affordable/ Supportive Housing Developer
Aegis Treatment Centers	Substance use treatment
American Medical Response (AMR)	Emergency services
Area Agency on Aging	Senior
Area Housing Authority of Ventura County	Affordable Housing
Brian Padrick	Advocate
Buddy Nation	Pet Services
Cabrillo Economic Development Corp	Affordable/Supportive Housing Developer
Cal Lutheran	University
California Rural Legal Assistance (CRLA)	Legal
California State University Channal Islands	University
Carolyn Briggs	Advocate
Casa Pacifica	Youth Transitional Housing
Catholic Charities	Social Services
City of Camarillo	Local Govt
Child Development Resources	Social Services/ Childcare Resources
City of Fillmore	Local Govt
City of Moorpark	Local Govt
City of Ojai	Local Govt
City of Oxnard	Local Govt
City of Oxnard--Housing Dept	Affordable/Supportive Housing Developer
City of Port Hueneme	Local Govt
City of Santa Paula	Local Govt
City of Santa Paula - Housing Authority	Rental Housing Programs
City of Simi Valley	Local Govt
City of Thousand Oaks	Local Govt
City of Ventura	Local Govt
City of Ventura – City Proactive Outreach Program	Public safety/social services
Coalition for Family Harmony	Victim Services Provider
Community Action of Ventura County	Homeless Services
Community Memorial Hospital	Hospital
County of Ventura Healthcare Agency, Behavioral Health Adult Clinics	Medical Services
County of Ventura Healthcare Agency, Behavioral Health PATH/R.I.S.E.	Behavioral Services

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County of Ventura Healthcare Agency, One stop/Whole Person Care/Hospital Case Management	Homeless Health Services
County of Ventura Homeless Liaison Unit	Social Services
County of Ventura Human Services Agency	Social Services
County of Ventura Human Services Agency, Area Agency on Aging	Senior Services
County of Ventura Human Services Agency, Homeless Services	Homeless Services
County of Ventura Human Services Agency, VCHMIS	Homeless Information System
County of Ventura Human Services Agency, RAIN Bridge Housing Program	Homeless Services
County of Ventura Human Public Defender's Office	Legal Services
CSUCI	University
David Courtland	Advocate
Diversity Collective	LGBTQI+
Downtown Ventura Partners	Business
Dyer Sheehan Group	Real Estate Consulting
First 5 Ventura County	Youth
Federal Emergency Management Agency	Federal Agency
Gold Coast Health Plan	Healthcare
Gold Coast Veterans Foundation	Veteran
Goodwill Industries of Vta and SB Counties	Employment Services
Harbor House	Homeless Services
Help of Ojai	Social Services
Hospital Association of Southern California	Healthcare
House Farm Workers	Advocates
Housing Authority of the City of San Buenaventura	Affordable/Supportive Housing Developer
Housing Trust Fund Ventura County	Affordable Housing Development
Independent Living Resource Center	Disability services
Interface Children & Family Services	youth, social services, re-entry, DV
Jess Weihe	Community member
Jewish Family Services	Social Services
Khepera House	Substance Use
Kingdom Center, Gabriel's House	Emergency shelter/transitional living
Lutheran Social Services	Support Services
Many Mansions	Affordable/Supportive Housing Developer
Mercy House	Homeless Services
MESA Farm	Youth Transitional Housing
National Health Foundation	Healthcare
Ojai Valley Family Shelter	Homeless shelter
One Step a la Vez	Youth, social services

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Oxnard College	Education
Oxnard Housing Authority	Affordable/Supportive Housing Developer
Oxnard Library	Public facility
Pacific Clinics--TAY Tunnel	Behavioral Health/TAY
Pam Marshall	Advocate
Partnership for Safe Families	Family
Peggy Rivera	Advocate
People's Self Help Housing	Affordable/Supportive Housing Developer
Project Understanding	Social Services
Public Defender	Legal
River Community Church	Homeless Services
Rescue Mission	Homeless Services
Salvation Army	Homeless Services
Salvation Army Supportive Services for Veteran Families Vta/SBA county	Veteran Homeless Services
Samaritan Centers	Homeless Services
Santa Paula Housing Authority	Affordable/Supportive Housing Developer
Sarah's House Maternity Home	Homeless Services
SCAN Health plan	Healthcare
Simi Valley Adventist	Healthcare
Shelter Care Resources	Homeless Services
SPIRIT of Santa Paula	Homeless Services
Step Up Ventura	Homeless children
The City Center	Homeless Services
Tenderlife Maternity Home	Homeless Services
The Kingdom Center/Gabriel's House	Homeless Services/Emergency Shelter
The Nature Conservancy	Environmental advocacy
The Partnership for Safe Families	Persons with Lived Experience Advisory Group
The Ventura County Rescue Mission	Emergency shelter
Turning Point Foundation	Homeless Services/ Behavioral Health
United Way of Ventura County	Funder
U.S. VETS	Veterans
Urban Initiatives	Housing Non-Profit
VC Housing Trust Fund	Funder
Ventura Chamber of Commerce	Business
Ventura College	Education
Ventura County Behavioral Health	Behavioral Health/Substance Use
Ventura County Community College District	Education
Ventura County Community Foundation	Housing Non-Profit
Ventura County Healthcare Agency	Healthcare

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Ventura County Library	Public facility
Ventura County Military Collaborative	Veterans
Ventura County Office of Education	Education
Ventura County Public Health	Healthcare
Ventura County Public Defender	Criminal justice
Ventura Social Services Task Force	Advocates
Veteran Affairs-HUD VASH	Housing and Homeless Services
Wakeland Housing & Development	Affordable/Supportive Housing Developer
Waypoint Station LLC	Advocate
Workforce Development Ventura County	Employment
Ventura County Sherriff's Department	Law Enforcement/ Homeless Liaison Unit
Ventura County Probation	Public Safety
Ventura County Medical Center	Hospital
St. Johns/Dignity Health	Hospital
City of Ventura Police Dept	Law Enforcement
City of Oxnard Police Dept	Law Enforcement
City of Simi Valley Police Dept	Law Enforcement
City of Port Hueneme Police Dept	Law Enforcement
City of Santa Paula Police Dept	Law Enforcement
Forever Found	Human Trafficking prevention
VC District Attorney's Office	Law Enforcement
Family Justice Center	Victim Services