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| **Policy / Procedure**: Prioritization of PSH and Chronically Homeless | SC-CHAP letters |
| **Procedure Number**: 311 |
| **Date Approved by SCCHAP**: 7/12/2016 |
| **Date of Last Revision/Review**: 6/1/2016 |

**Purpose:** To develop a prioritization process for CoC funded PSH beds to ensure that our chronically homeless and homeless persons with disabilities are housed in permanent housing as quickly as possible.

**Policy:** Permanent Supportive Housing (PSH) projects provide housing and supportive services to assist homeless persons with disability to live independently. The goal of this policy is to ensure that chronically homeless individuals and families are prioritized for placement in CoC PSH programs.

**Procedures:**

In order to be eligible for permanent supportive housing, the individual/family must:

1. be homeless; and
2. be a member of a household that has at least one documented disabled adult or minor living with an adult legal guardian; and
3. be a member of a low income household

It is the goal of the CoC to serve those homeless individuals and families with the most severe service needs in our PSH programs.

**Order of Priority for dedicated or prioritized for CH PSH Beds**:

1. Chronically homeless individuals and families with the longest history of homelessness coming from safe haven, place not meant for human habitation or emergency shelter and have the most severe needs
2. Chronically homeless individuals and families with the most severe needs
3. Chronically homeless individuals and families with the longest history of homelessness
4. All other chronically homeless individuals and families

Dedicated or prioritized chronic homeless PSH are required to follow the above priority when selecting program participants. For PSH beds prioritized or dedicated to the chronically homeless, the individual or head of household must meet the definition of chronically homeless. For clarification refer to 24CFR 578.3 or HUD Notice CPD-14-012.

**Order of Priority for non-dedicated CH PSH Beds**:

1. Homeless individuals and families with a disability long periods of homelessness and the most severe service needs
2. Homeless individuals and families with a disability and severe service needs.
3. Homeless individuals and families with disability coming from places not meant for human habitation, Safe Haven or shelter without severe service needs.
4. Homeless individuals and families with a disability coming from transitional housing.

Non dedicated and non-prioritized PSH grantees are encouraged to offer PSH to chronically homeless individuals and families first. Minimally, however, PSH grantees must place eligible households in an order that prioritizes those who would benefit the most beginning with those most at risk of becoming chronically homeless. For eligibility in non-dedicated and non-prioritized PSH serving non-chronically homeless households, any household member with a disability may qualify the family for PSH. For those PSH grant programs that are not dedicated or prioritized, but target homeless persons with serious mental illness, should follow the order of priority above to the extent in which those clients meet the critieria.

**Assessment:**

The VI-SPDAT (Vulnerability Index-Service Prioritization Decision Assistance Tool) will be used as a standardized, coordinated assessment tool to provide an initial, comprehensive assessment of the needs of individuals and families. The VI-SPDAT will be done for all clients entering shelter (unaccompanied minors in emergency shelters are exempt) to help prioritize which clients should receive what type of housing assistance; determine the intensity of case management services; the sequence of clients receiving those services and in the greatest need of intervention. In the event a full SPDAT is required, the Housing Assessment and Resource Agency will be contacted to complete the client assessment.

**Prioritized Client Wait List:**

A single wait list will be developed based on the coordinated assessment for individuals and families deemed chronically homeless and qualifying for PSH. An Interagency Services Team (IST) has been established and will meet bi-weekly to establish priority and risk factors. Clients will be served, based on the order of priority for dedicated or prioritized for CH PSH beds and non-dedicated CH PSH beds criteria listed above. The IST will include representatives from all PSH grant holders, PATH Outreach and the HARA Coordinator.

**Recordkeeping Requirements:**

Each CoC funded PSH with dedicated or prioritized CH beds is required to document chronically homeless status of its program participants and must have:

1. Written intake procedures
2. Evidence of chronically homeless status
3. Evidence of duration of homelessness or at least 4 separate episodes of homelessness over 3 years
4. Evidence of diagnosis of one or more of the following (severity of need):
	1. Substance use disorder
	2. Serious mental illness
	3. Developmental disability
	4. Post-traumatic stress disorder
	5. Cognitive impairments, or
	6. Chronic physical illness or disability

CoC funded PSH recipients must have the documentation required on file for review by the CoC to demonstrate compliance with the above requirements.

**Definitions for Clarification:**

**Homeless**:

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

* An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
* An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
* An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

**Disabled:**

A person shall be considered to have a disability if he or she has a disability that:

* Is expected to be long-continuing or of indefinite duration;
* Substantially impedes the individual’s ability to live independently;
* Could be improved by the provision of more suitable housing conditions; and
* Is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, posttraumatic stress disorder, or brain injury.
* A person will also be considered to have a disability if he or she has a developmental disability, as defined by HUD.
* 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).

**Chronically Homeless:**

An individual who:

* Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
* 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 one year or on at least four separate occasions in the last 3 years; and
* Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;
* An individual 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 met all of the criteria in paragraph (1) of this definition, before entering that facility; or
* A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

**Severity of Service Needs:**

* History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; or
* Significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing.
* No income
* Substance abuse disorder
* Criminal record
* Victims of Domestic Violence
* LGBTQ
* Chronic health, behavioral or mental health challenges or functional impairments requiring significant level of support

Reference:

* HUD Notice: CPD-14-012 Issued July 28, 2014 *Prioritizing Persons Experience Chronic Homelessness and other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status*
* 24 CFR Parts 578