



County of Riverside Continuum of Care

WRITTEN STANDARDS

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Riverside Continuum of Care (CoC) Written Standards for Providing Continuum of Care Assistance

The Riverside County CoC is responsible coordinating and implementing a system-wide approach to meet the needs of the population and subpopulation experiencing homelessness within the geographic area of Riverside County. Both the Emergency Solution Grant Rules and Regulations (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rules state that the CoC, in consultation with recipients of ESG program funds within the geographic area,

- (1) Establish and consistently follow written standards for providing CoC assistance.
- (2) Establish performance targets appropriate for population and program type.
- (3) Monitor recipient and sub-recipient performance.

In accordance with Title 24 of the Code of Federal Regulations (24 CFR) Part 578, the Riverside County CoC has developed the following written standards. In conjunction with 24 CFR Part 578, these standards will apply to all projects that receive HUD and ESG funding.

The goal of these standards is to synthesize key elements of the HUD regulations with the processes and priorities of the Riverside County CoC to ensure that the CoC programs are administered fairly and methodically. The goals of the written standards are to:

- Assist with the coordination of service delivery across the geographic area and will be the foundation of the county-wide coordinated entry system.
- Assist in assessing individuals and families consistently to determine program eligibility.
- Assist in administering programs fairly and methodically.
- Establish common performance measurements for all CoC components.
- Provide the basis for the monitoring of all CoC and ESG funded projects.

These written standards include policies and procedures for evaluating individuals' and families' eligibility for assistance for

1. Permanent Supportive Housing (PSH)
2. Rapid Re-Housing (RRH)
3. Transitional Housing (TH)
4. Emergency Shelter (ES)
5. Street Outreach (SO)
6. Homelessness Prevention (HP)

All programs that receive ESG or CoC funding are required to abide by these written standards. The CoC strongly encourages programs that do not receive either of these sources of funds to accept and utilize these standards.

CoC and ESG Coordination

These written standards have been developed in conjunction with ESG recipients (Riverside County Economic Development Agency (EDA), City of Riverside, and the City of Moreno Valley), the CoC Collaborative Applicant and with service providers to allow for input on standards, performance measures and the process for full implementation of the standards throughout the CoC from the perspective of those organization that are directly providing homeless and housing services, Permanent Supportive Housing (PSH), Rapid Re-Housing (RRH), Emergency Shelter (ES), and Transitional Housing (TH). The CoC Written Standards have been approved by the CoC, the County and City ESG recipients.

These written standards will be reviewed and revised at least annually. Revisions that would affect the Coordinated Entry process would be made as soon as possible. The Riverside County CoC will continue to build upon and refine this document.

Housing First Model

Irrespective of the program type, all HUD and ESG funded programs are required to utilize a housing first approach to housing assistance. The housing first approach incorporates a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold). Emergency Shelter, Transitional housing and supportive service only projects may be considered to be using a housing first model if they operate with low-barriers, work to quickly move people into permanent housing, do not require participation in supportive services, and, for transitional housing projects, do not require any preconditions for moving into the transitional housing (2015 HUD CoC NOFA).

Coordinated Entry System

To minimize barriers to housing access and ensure timely placement, all CoC and ESG subrecipients are required to participate in and receive referrals through Riverside County's Coordinated Entry System (CES). The CES uses a no-wrong door approach in which homeless individuals who engage with any agency within the Riverside County CoC are entered into the system. This system ensures that every homeless individual is known by name, provides assistance based on individual's unique needs, and ensure that housing matches are the

right fit. See Appendix B, Riverside County CoC Coordinated Entry System (CES) Policies & Procedures.

Universal Assessment

All individuals will be assessed using a comprehensive, universal assessment tool called the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT) which is useful for initial triage and entry assessment. This tool guarantees that individuals' levels of need and eligibility determinations are made in an informed and objective manner.

Homeless Management Information System

All subrecipients are required to participate in the Homeless Management Information System (HMIS) per the ESG and CoC Interim Rule (24 CFR 576 and 578). HMIS provides an opportunity to document homelessness and helps to ensure coordination between service providers while avoiding duplication of services and client data.

Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Funded Programs

The Riverside County Continuum of Care non-discriminatory policy, regarding the U.S. Department of Housing and Urban Development (HUD) final rule regarding equal access to Community Planning and Development (CPD) funded programs regardless of sexual orientation, gender identity, and marital status, will ensure that individuals are aware of their rights to equal access to CPD funded programs.

Thus, all CPD funded programs, including Continuum of Care and Emergency Solutions Grant funded programs, must comply with the following requirements:

- Determine client eligibility for housing regardless of sexual orientation, gender identity, or marital status, and must not discriminate against clients who do not conform to gender or sex stereotypes (i.e., because of gender identity);
- Grant equal access to CPD funded programs or facilities consistent with client gender identity, and provide client's family with equal access;
- **MUST NOT** ask clients to provide anatomical information or documentation (i.e. ID), physical, or medical evidence of gender identity; and
- Take non-discriminatory steps when necessary and appropriate to address privacy concerns raised by any residents or occupants.

These requirements are identical to those provided by HUD in a notice for continuums of care to adopt: see <https://www.hudexchange.info/resources/documents/Notice-on-Equal-Access-Rights.pdf>.

In accordance with the guidance provided by HUD in 24 CFR 5 in the Federal Register, vol. 81, No. 183, all CPD funded programs will

“post on bulletin boards and in other public spaces where information is typically made available a notice entitled “Equal Access Regardless of Sexual Orientation, Gender Identity, or Marital Status for HUD’s Community Planning and Development Programs.”

The post will include the requirements noted above.

In addition, all CPD funded programs will adhere to the requirements concerning record keeping in 24 CFR 5, which states that

“providers must document and maintain, for a period of 5 years, records of compliance with the requirements of this rule regarding establishing or amending policies and procedures.”

Written Standards for Permanent Supportive Housing (PSH)

The Riverside County CoC-PSH program provides permanent housing and supportive services to individuals and families with a disability, prioritizing those who are chronically homeless. The program is designed to reintegrate this highly vulnerable population into the community by addressing their basic needs for housing and providing ongoing support. There are two key components of the Riverside County CoC-PSH program: permanent housing and supportive services.

Using a housing first approach, program participants are provided with rapid access to permanent housing with minimal preconditions. Good credit or rental history are not required to receive housing. Tenants can remain in their homes as long as the basic requirements of tenancy are met—paying the rent (as applicable), not interfering with other tenants’ use of their homes, not causing property damage, etc. This ensures participants have a private and secure place to make their home, just like other members of the community, and provides them with a stable foundation from which they can pursue their goals.

Chronically Homeless Definition

A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the **last 3 years**, where the cumulative **total length of the four occasions equals at least 12 months**; Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.
- ii. If the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility.

Eligible Clients

Eligible clients must also meet eligibility criteria as defined in the NOFA under which the program was funded.

For dedicated permanent supportive housing beds, when a participant exits the program, the bed must be filled by another chronically homeless participant unless there are no chronically homeless persons located within the CoC's geographic area. This concept only applies to permanent supportive housing projects. (24 CFR 578.3, 2015 HUD CoC NOFA).

For permanent supportive housing beds within a CoC's geographic area that are not currently dedicated specifically for use by the chronically homeless, CoCs and projects are strongly encouraged to prioritize the chronically homeless in non-dedicated permanent supportive housing beds as they become available through turnover. This concept only pertains to permanent supportive housing projects (24 CFR 578.3, 2015 HUD CoC NOFA).

PSH Performance Benchmarks

All PSH providers should meet or exceed project quality goals established by HUD and CoC guidelines which include the following:

- At least 80 percent of project participants either remained in permanent housing or exited to permanent housing;
- At least 20 percent or more of project participants have employment income (or other sources such as SSI and/or SSDI, for those who are not employable);

- At least 54 percent of project participants increased their income from sources other than employment in a given operating year;
- At least 56 percent of project participants obtained mainstream benefits; and
- 100 percent of the project participants came from the street or other locations not meant for human habitation, emergency shelters, or safe havens.

In addition, PSH providers must:

- Implement a housing first approach.
- Fill vacant beds with only chronically homeless persons.

Prioritizing Chronically Homeless

PSH is not a one-size-fits-all approach and should only be offered to those households that truly need that level of support. Thus, in order to use our limited resources in the most effective means possible, the Riverside County CoC is committed to prioritizing those most in need through an established order of priority. Within that order of priority, all CoC-PSH funded programs are required ensure compliance with the “chronically homeless” definition and to fill vacant beds with chronically homeless individuals (CPD-16-011 (7/25/16)).

The Riverside County CoC has developed an order of priority to establish a uniform process for prioritizing placement into PSH through the CES. The overarching intent of this order of priority is to ensure that chronically homeless persons with the longest lengths of time homeless and the most severe service needs are prioritized for housing.

- 1) **First Priority**—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness 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.

CoC Records

In addition to the records required in 24 CFR 578.103, Riverside County CoC documents and maintains the following documentation:

1. Evidence of written standards that incorporate the priorities in Section III. of this Notice, as adopted by the CoC;
2. Evidence of a standardized assessment tool; The use of a standardized assessment tool may be evidenced by written policies and procedures referencing a single standardized assessment tool that is used by all CoC Program-funded PSH recipients within the geographic area.
3. Evidence that the written standards were incorporated into the coordinated assessment policies and procedures.

Recipient Recordkeeping Requirements

In addition to the records required in 24 CFR 578.103, recipients of Riverside County CoC Program-funded PSH that is required by grant agreement to document chronically homeless status of program participants in some or all of its PSH beds must maintain the following records:

1. Written Intake Procedures
2. Evidence of Chronically Homeless Status

Leasing Requirements

Leasing projects involve the leasing of property or portions of property (including single units) not owned by the recipient for use in providing PSH or supportive services. With leasing projects, the lease is between the subrecipient and the landowner while the occupancy agreement or sublease is between the subrecipient and program participant. Leasing funds may be used to pay up to 100% of the costs of leasing a structure. When electricity, gas, and water are included in the rent, these utilities may be paid from leasing funds. If the landlord does not provide utilities, these utility costs are an operating cost, except for supportive service facilities. Leasing funds cannot be used to lease units or structures owned by the recipient, sub-recipient, or their parent, subsidiary, or affiliated organization. HUD has the authority, however, to grant an exception to the ownership clause for good cause.

PSH Written Standards #1 – No Designated Length of Stay

Program participants are provided housing without a designated length of stay that permits them to live as independently as possible.

Consistent with the definition of permanent housing in section 401 of the McKinney-Vento Act and § 578.3 of this interim rule, the permanent housing component is community-based housing without a designated length of stay that permits formerly homeless individuals and families to live as independently as possible. The interim rule clarifies that Continuum of Care funds may be spent on two types of permanent housing: permanent supportive housing for persons with disabilities (PSH) and rapid rehousing that provides temporary assistance (i.e., rental assistance and/or supportive services) to program participants in a unit that the program participant retains after the assistance ends.

Leasing and Occupancy Agreements

A key component in CoC leasing and rental assistance is leasing and occupancy agreements. All participants must have a signed agreement outlining the terms of their housing. Two individuals in a shared housing situation must have their own lease and their own bedroom unless the two individuals are presented together as a household.

PSH Written Standards #2 – Lease Agreement

The program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long.

HUD clarifies that to be permanent housing, “the program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long.” HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause, assists program participants in obtaining stability in housing, even when the rental assistance is temporary (CFR 578.77).

Rental Assistance & Restrictions

Rental assistance grants are differentiated from leasing grants in that these grants provide rental assistance to eligible persons for permanent housing. For rental assistance grants, the lease is between the program participant and the landowner or sub lessor. Grant funds may

be used for permanent supportive housing rental assistance. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.

PSH Written Standards #3 – Restricted Assistance and Disabilities

Permanent supportive housing can only provide assistance to individuals with disabilities and families in which one adult or child has a disability.

Supportive Services

Once in housing, program participants have access to the support services that they need and want to live as independently as possible. Although PSH is designed for people who need supportive services, accepting these services is not a condition of housing. A person's home is a place to live rather than a treatment setting. As such, supportive services are voluntary, but can and should be used to persistently engage tenants and ensure housing stability. Tenants receive assistance in defining their needs and preferences through annual assessments of service needs and individualized support plans that reflect those preferences. On-site residential supervision is provided as needed to facilitate the adequate provision of supportive services to the residents (CFR 578.37).

PSH Written Standards #4 – Supportive Services

Supportive services designed to meet the needs of program participants must be made available to the program participants.

PSH Written Standards #5 – Duration of Supportive Services Assistance

Supportive services to enable program participants to live as independently as possible must be provided throughout the duration of their residence.

Recipients and subrecipients may require the program participants to take part in supportive services that are not disability-related services provided through the project as a condition of continued participation in the program. Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication, which are provided to a person with a disability to address a condition caused by the disability. Notwithstanding this provision, if the purpose of the project is to provide

substance abuse treatment services, recipients and subrecipients may require program participants to take part in such services as a condition of continued participation in the program (CFR 578.75).

Supportive services are voluntary, but can and should be used to persistently engage tenants to ensure housing stability - Supportive services are proactively offered to help tenants achieve and maintain housing stability, but tenants are not required to participate in services as a condition of tenancy. Techniques such as harm reduction and motivational interviewing may be useful. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-judgmental communication while motivational interviewing may be useful in helping households acquire and utilize new skills and information.

PSH Written Standards #6 – Supportive Services Agreement

Program participants may be required to take part in supportive services that are not disability-related services (including substance abuse treatment services) provided through the project as a condition of continued participation in the program. However, HUD tends to believe that these kind of requirements can be barriers and should be rare and minimal if used as all.

Housing Quality Standards (HQS)

Under the CoC Program, all housing that is leased with Continuum of Care program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the applicable Housing Quality Standards (HQS) under 24 CFR 982.401 of this title, except that 24 CFR 982.401(j) applies only to housing occupied by program participants receiving tenant-based rental assistance.

HQS dictates that, at a minimum, the unit must have a living room, a kitchen, and a bathroom. HQS requirements also dictates that the bathroom must be contained within the unit, afford privacy (usually meaning a door, although no lock is required), and be for the exclusive use of the occupants. Additionally, the unit must have suitable space and equipment to store, prepare, and serve food in a sanitary manner. This includes a requirement for an oven and stove or range, a refrigerator of appropriate size for the family, and a kitchen sink with hot and cold running water. Hot plates are not acceptable substitutes for stoves or ranges. However, a microwave oven may be used in place of a conventional oven, stove, or range if the oven/stove/range are tenant supplied or if microwaves are furnished in both subsidized and unsubsidized units in the building or premises.

The CoC Program also allows for shared housing/roommate situations in projects with leasing or rental assistance funds. **Each household must have the bedroom size that fits their household size. In other words, 2 individuals in a shared housing situation must have their own lease, and their own bedroom. The only situation where 2 people would be sharing one bedroom would be if they presented together as a household.**

PSH Written Standards #7 – One Person per Bedroom

Two individuals in a shared housing situation must have their own lease and their own bedroom unless the two individuals are presented together as a household.

Program Income

Program income includes the following (CFR 578.97):

- (a) Defined. Program income is the income received by the recipient or subrecipient directly generated by a grant-supported activity.
- (b) Use. Program income earned during the grant term shall be retained by the recipient, and added to funds committed to the project by HUD and the recipient, used for eligible activities in accordance with the requirements of this part. Costs incident to the generation of program income may be deducted from gross income to calculate program income, provided that the costs have not been charged to grant funds.
- (c) Rent and occupancy charges. Rents and occupancy charges collected from program participants are program income. In addition, rents and occupancy charges collected from residents of transitional housing may be reserved, in whole or in part, to assist the residents from whom they are collected to move to permanent housing.

PSH Written Standards #8 – Program Income

Program income generated from rent and occupancy charges may be collected from program participants and added to funds committed to the project by HUD and used for eligible program activities.

Calculating Occupancy Charges and Rent

Calculating occupancy charges and rent (b) (1) (2) (3) notes the following about occupancy agreements (CFR 578.77):

(b) Calculation of occupancy charges. Recipients and subrecipients are not required to impose occupancy charges on program participants as a condition of residing in the housing. However, if occupancy charges are imposed, they may not exceed the highest of:

(1) 30 percent of the family's monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses);

(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 the payments (adjusted in accordance with the family's actual housing costs) is specifically designated by the agency to meet the family's housing costs, the portion of the payments that is designated for housing costs.

PSH Written Standards #9 – Calculating Occupancy Charges and Rent

If occupancy charges are imposed, they may not exceed the highest of: 1) 30 percent of the family's monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child-care expenses); 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 the payments (adjusted in accordance with the family's actual housing costs) is specifically designated by the agency to meet the family's housing costs, the portion of the payments that is designated for housing costs.

Recipients or subrecipients must examine a program participant's income initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant. Adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified (CFR 578.77).

PSH Written Standards #10 – Examining Program Participant's Initial Income

A program participant's initial income must be examined at least annually to determine the amount of the contribution toward rent payable by the program participant and adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified.

As a condition of participation in the program, each program participant must agree to supply the information or documentation necessary to verify the program participant's income. Program participants must provide the recipient or subrecipient with information at any time regarding changes in income or other circumstances that may result in changes to a program participant's contribution toward the rental payment (CFR 578.77).

Recordkeeping Requirements

In order to use our limited resources in the most effective means possible, the Riverside County CoC has established uniform recordkeeping requirements for all PSH grant recipients. These requirements ensure compliance with HUD's definition of homelessness, chronic homelessness, and the recordkeeping requirements set forth in CFR 578.103 and Notice CPD-16-011. The following documentation of annual income must be kept by recipient or subrecipient:

- (i) Income evaluation form specified by HUD and completed by the recipient or subrecipient; and
- (ii) Source documents (e.g., most recent wage statement, unemployment compensation statement, public benefits statement, bank statement) for the assets held by the program participant and income received before the date of the evaluation;
- (iii) To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period; or
- (iv) To the extent that source documents and third-party verification are unobtainable, the written certification by the program participant of the amount of income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

PSH Written Standards #11 – Verifying Program Participant's Initial Income

Each program participant must agree to supply the information or documentation necessary to verify the program participant's income.

Recalculating Occupancy Charges and Rent

In order to use the resources of the Riverside County CoC in the most effective means possible, the Riverside County CoC has established uniform recordkeeping requirements for all PSH grant recipients. These requirements ensure compliance with HUD's definition of homelessness, chronic homelessness, and the recordkeeping requirements set forth in 24 CFR 578.103 and Notice CPD-16-011. All records must be retained for the greater of 5 years.

Income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Recipients and subrecipients must examine a program participant's income initially, and if there is a change in family composition (e.g., birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly."

PSH Written Standards #12 – Recalculating Occupancy Charges and Rent

If there is a change in family composition (e.g., birth of a child) or a decrease in the resident's income during the year, the resident may request an interim reexamination, and the occupancy charge will be adjusted accordingly.

Termination of Assistance

PSH program recipients may terminate assistance to a participant who violates program requirements or conditions of occupancy utilizing a formal process that recognizes the due process of law. Recipients may resume assistance to a participant whose assistance has been terminated.

Recipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all circumstances in determining whether termination is appropriate in the most severe cases.

PSH Written Standards #13 – Termination of Assistance

Assistance may be terminated to a program participant who violates program requirements or conditions of occupancy by providing a formal process that recognizes the due process of law.

Determining Written Standards for Rapid Rehousing (RRH)

Rapid rehousing is considered permanent housing. Rapid Re-housing is an intervention designed to move homeless individuals and families into permanent housing as quickly as possible. Rapid Re-housing programs focus on eliminating barriers to moving individuals and families quickly into permanent housing by providing housing location services and financial assistance for housing related expenses (e.g. rent arrears, ongoing rental assistance, moving costs). Rapid Re-housing services are designed with a housing first approach to get individuals and families in permanent housing and keep them stable once they are there.

In Riverside County, Rapid Re-Housing is a critical strategy for ending homelessness for households with children due to the shortage of affordable housing. It is also a high priority for single adults who assess as self-sufficient and can address affordability through a combination of shared housing and increasing income.

Types of rapid rehousing assistance include:

- Rental assistance;
- Case management;
- Supportive services; and
- Security deposits.

Eligible Clients

Eligible clients must meet HUD's Category 1 definition of homelessness which is:
Individuals and families who lack a fixed, regular, and adequate nighttime residence:

- 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, etc.
- 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);
- 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; or
- An individual fleeing or attempting to flee domestic violence if also literally homeless;

Eligible clients must also meet eligibility criteria as defined in the NOFA under which the program was funded.

RRH Performance Benchmarks

All RRH providers should meet or exceed project quality goals established by HUD and CoC guidelines which include the following:

- At least 80 percent of project participants either remained in permanent housing or exited to permanent housing;
- At least 20 percent or more of project participants have employment income (or other sources such as SSI and/or SSDI, for those who are not employable);
- At least 54 percent of project participants increased their income from sources other than employment in a given operating year;
- At least 56 percent of project participants obtained mainstream benefits; and
- 100 percent of the project participants came from the street or other locations not meant for human habitation, emergency shelters, or safe havens.

In addition, RRH providers must:

- Implement a housing first approach.

Prioritizing Rapid Rehousing

Recently, HUD provided guidance for rapid rehousing in terms of prioritizing subpopulations. HUD noted in a SNAPS In Focus: Rapid Re-Housing As a Model and Best Practice, August 6, 2014, that

Rapid re-housing can be effective for many populations, such as families with children, youth aging out of foster care, domestic violence survivors, single adults, and veterans, but should be targeted to those households that would not be able to get out of homelessness without the assistance. It is particularly a key strategy for achieving the Opening Doors goal of ending family, youth, and child homelessness by 2020 (*SNAPS In Focus: Rapid Re-Housing As a Model and Best Practice, 8/6/14*).

Rapid re-housing should prioritize people with more challenges, including those with no income, poor employment prospects, troubled rental histories, and criminal records. Providers should link participants with community resources that will help them achieve longer-term stability and well-being. Now is the time for communities to be working together to establish written standards for administering rapid re-housing and thinking strategically about how this type of assistance will be used most effectively within the CoC (*SNAPS In Focus: Rapid Re-Housing As a Model and Best Practice, 8/6/14*)."

Rapid re-housing is an effective intervention for many different types of households experiencing homelessness, including those with no income, with disabilities, and with poor

rental history. The majority of households experiencing homelessness are good candidates for rapid re-housing. The only exceptions are households that can exit homelessness with little or no assistance, those who experience chronic homelessness and who need permanent supportive housing, and households who are seeking a therapeutic residential environment, including those recovering from addiction.

The Riverside County CoC will prioritize the following subpopulations:

- 1) families with children
- 2) domestic violence survivors
- 3) single adults
- 4) veterans that can exit homelessness with little or no assistance, those who experience chronic homelessness and who need permanent supportive housing, and households who are seeking a therapeutic residential environment, including those recovering from addiction.

Lease Requirements

In compliance with HUD requirements, Riverside County CoC clarifies that to be permanent housing, the program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long. HUD has determined that requiring a lease for a term of at least one year that is renewable and terminable only for cause, assists program participants in obtaining stability in housing, even when the rental assistance is temporary.

RRH Written Standards #1 – Lease Agreement

The program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long.

Rental Assistance

The Riverside County CoC and ESG funds may provide supportive services and/or **short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance**, as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing (CFR 578.51, 578.53).

RRH Written Standards #2 – Rental Assistance

Program participants may receive short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance.

Riverside County CoC and ESG programs may set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, and/or a maximum number of times that a program participant may receive rental assistance. The recipient or subrecipient may also require program participants to share in the costs of rent. For the purposes of calculating rent for rapid rehousing, the rent shall equal the sum of the total monthly rent for the unit and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located (CFR 578.37).

RRH Written Standards #3 – Amount of Rental Assistance

Standards for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following guidelines:

- **The maximum amount of rent that a participant will pay can be up to 100% of the rental amount;**
- **The maximum percentage of income paid by participants towards rent at program completion shall be no more than 50%. However, in certain circumstances, on a case-by-case basis, there may be participants whose rental share may exceed 50% of the rent based on their financial circumstances. In general, the goal will be that participants pay generally no more than 50% of their income in rent;**
- **100% of the cost of rent in rental assistance may be provided to program participants. However to maximize the number of households that can be served with rapid re-housing resources, it is expected that the level of need will be based on the goal of providing only what is necessary for each household to be stably housed for the long term;**
- **The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.**

RRH Written Standards #4 – Duration of Assistance

Program participants may receive up to 24 months of rental assistance. However, it is expected that program participants will only receive the level of assistance necessary to be stably housed for the long-term.

Grant funds may be used for rental assistance for homeless individuals and families. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources (CFR 578.51).

RRH Written Standards #5 – Receiving Rental Assistance through Other Sources

Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.

Security Deposits

Grant funds may be used for security deposits in an amount not to exceed 2 months of rent. An advance payment of the last month's rent may be provided to the landlord, in addition to the security deposit and payment of first month's rent (CFR 578.51).

RRH Written Standards #6 – Security Deposits including Last Month's Rent

Program participants may receive funds for security deposits in an amount not to exceed 2 months of rent.

Case Management

The Riverside County CoC has defined case management as a collaborative process that assesses, plans, implements, coordinates, monitors, and evaluates the options and services required to meet the client's health and human service needs. It is characterized by advocacy, communication, and resource management and promotes quality and cost-effective interventions and outcomes. Case management focuses on housing stability and placement, with an emphasis on the arrangement, coordination, monitoring, and delivery of services related to housing needs and improving housing stability.

A meeting with a case manager is required in order to receive RRH assistance, although it is not necessarily the first step. Some communities might have a screening, intake, assessment and eligibility determination process that precedes assignment to a case manager, while other communities will have case managers performing the eligibility task. Regardless of the arrangement, the meeting with the case manager should be regarded not only as a program requirement, but also as an early opportunity to help a household improve its housing stability during and beyond the period of RRH assistance.

RRH Written Standards #7 – Case Management

Program participants must meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability.

Supportive Services

Continuum of Care funds may provide **supportive services**, as set forth in § CFR 578.53, and/or short-term (up to 3 months) and/or medium-term (for 3 to 24 months) tenant-based rental assistance, as set forth in § CFR 578.51(c), as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing.

RRH Written Standards #8 – Supportive Services

Program participants may receive supportive services as set forth in § 578.53 (see Appendix B)

RRH Written Standards #9 – Duration of Supportive Services

Program participants may receive supportive services for no longer than 6 months after rental assistance stops.

Re-evaluating Participants

In compliance with HUD requirements, CoC and ESG programs must re-evaluate, not less than once annually, that the program participant lacks sufficient resources and support networks necessary to retain housing without Continuum of Care assistance and the types and amounts of assistance that the program participant needs to retain housing. The recipient or subrecipient may require each program participant receiving assistance to notify the recipient or subrecipient of changes in the program participant's income or other circumstances (e.g., changes in household composition) that affect the program participant's need for assistance. When notified of a relevant change, the recipient or subrecipient must reevaluate the program participant's eligibility and the amount and types of assistance that the program participant needs (CFR 578.37).

RRH Written Standards #10 – Re-evaluation

Program participants must be re-evaluated, not less than once annually, in order to determine whether program participants lack sufficient resources and support networks necessary to retain housing without Continuum of Care assistance and the types and amounts of assistance that the program participant needs to retain housing.

Determining Written Standards for Transitional Housing (TH)

Transitional housing means housing, where all program participants have signed a lease or occupancy agreement, the purpose of which is to facilitate the movement of homeless individuals and families into permanent housing within 24 months or such longer period as HUD determines necessary. The program participant must have a lease or occupancy agreement for a term of at least one month that ends in 24 months and cannot be extended (CFR 578.3).

Riverside County CoC understands that there are families and individuals who need more assistance than rapid re-housing offers but who do not qualify for permanent supportive housing. Transitional housing should be reserved for those populations that most need that type of intervention – programs that serve domestic violence survivors and youth and those that provide substance abuse treatment come to mind first – rather than being used either as a holding pattern for those that really need permanent supportive housing or those that need less intensive interventions (SNAPS Weekly Focus (9/18/2013)).

Eligible Clients

Individuals and families defined as Homeless under the following categories are eligible for assistance in TH projects:

- Category 1 – Literally Homeless
- Category 2 – Imminent Risk of Homelessness
- Category 4 – Fleeting/Attempting to Flee Domestic Violence

HUD's Category 1 definition of homelessness is:

Individuals and families who lack a fixed, regular, and adequate nighttime residence:

- 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, etc.;
- 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.

Eligible clients must also meet eligibility criteria as defined in the NOFA under which the program was funded. The 2015 HUD CoC NOFA states that recent research shows that transitional housing is generally more expensive than other housing models serving similar populations with similar outcomes. HUD also recognizes that transitional housing may be an effective tool for addressing certain needs such as:

- housing for underage homeless youth;
- safety for persons fleeing domestic violence; and
- assistance with recovery from addiction.

TH Performance Benchmarks

The Riverside County CoC strongly encourages sub-recipients to carefully review the transitional housing projects for cost-effectiveness, performance, and for the number and type of eligibility criteria to determine if rapid re-housing might be a better model for the CoC's geographic area.

All TH providers should meet or exceed project quality goals established by HUD and CoC guidelines which include the following:

- At least 80 percent of project participants exited from transitional housing to permanent housing;
- At least 20 percent or more of project participants have employment income (or other sources such as SSI and/or SSDI, for those who are not employable);
- At least 54 percent of project participants increased their income from sources other than employment in a given operating year; and
- At least 56 percent of project participants obtained mainstream benefits.

In addition, TH providers are required to answer “yes” as to whether the program implements a housing first approach.

Prioritizing Transitional Housing

The Riverside County CoC prioritizes TH as follows (2015 HUD CoC NOFA):

- 1) Domestic violence survivors and youth ages 18 – 24 will be prioritized for transitional housing if they are not assessed as chronically homeless.¹
- 2) All chronically homeless individuals and families will not be served through transitional housing unless other housing is not available (Coordinated Entry Brief, pg. 5).² Such households will be served by permanent supportive housing through a Housing First approach.

Leasing Requirements

Riverside County program participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months (CFR 578.51).

TH Written Standards #1 – Lease Agreement

The program participant must have a lease or occupancy agreement for a term of at least one month that ends in 24 months and cannot be extended.

Transitional housing facilitates the movement of homeless individuals and families to PH within 24 months of entering TH. Grant funds may be used for acquisition, rehabilitation, new construction, leasing, rental assistance, operating costs, and supportive services (CFR 578.37).

TH Written Standards #2 –Duration of Leasing Agreement

The lease with program participant “must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.”

Written Standards for Emergency Shelters (ES)

Eligible Participants are Individuals and families who are homeless. Essential services apply to persons in emergency shelters, renovating buildings to be used as emergency shelters, and operating emergency shelters.

Eligible Clients

Homeless clients entering into the emergency shelter system must meet the HUD criteria for homelessness as either:

- literally homeless (Homeless Category 1);
- at imminent risk of homelessness (Homeless Category 2);
- homeless under another federal statute (Homeless Category 3); or
- fleeing/attempting to flee domestic violence (Homeless Category 4).

In addition, ES providers must:

- Implement a housing first approach.

Prioritization and Referral

Emergency shelters will prioritize individuals/families that:

- Cannot be diverted; and
- Are literally homeless; and
- Can be safely accommodated in the shelter; and

- Are not in need of emergency medical or psychiatric services or are a danger to self or others.

Also note the following:

- Emergency Shelters cannot discriminate per HUD regulations.
- There are no requirements related to ID, income or employment;
- Transgender placement is based on self-identification of gender.

ES Written Standards #1 – Length of Stay

Maximum length of stay for is 90 days.

Written Standards for Street Outreach (SO)

The Riverside County Continuum of Care(CoC), ESG program and the Coordinated Entry System understands the importance of Street Outreach efforts in our community to identify and assist the most vulnerable homeless and chronically homeless individuals and families. The CoC defines Street Outreach as follows:

Street Outreach (SO) provides “essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility (24 CFR 576.101).”

SO Written Standard #1 – Engagement

Engage unsheltered homeless persons.

Unsheltered persons are engaged for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. Engagement includes locating, identifying, and building “relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social

services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs (24 CFR 576.101).

SO Written Standard #2 – Emergency Health Services

Link to emergency health services.

Emergency health services include direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living. ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services (24 CFR 576.101).

SO Written Standard #3 – Mental Health Services

Link to emergency mental health services.

Emergency mental health services are direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living. ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community. Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. (24 CFR 576.101).

SO Written Standard #4 – Transportation

Provide transportation.

Transportation includes transporting unsheltered people to emergency shelters or other service facilities are also eligible. Transportation includes travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section (24 CFR 576.101).

SO Written Standard #5 – Street Outreach Contacts

Street outreach contacts will be entered into the Coordinated Entry Systems (CES).

As indicated in the System Performance Measure #7: Destination Classification (<https://www.hudexchange.info/resource/4966/system-performance-measure-7-destination-classification/>) promotes successful placement from Street Outreach & Successful Placement in Retention of Permanent Housing, and a street outreach entry in HMIS at the first contact. The entry will begin the process of entering homeless persons engaged by Street Outreach workers into the Coordinated Entry System.

SO Written Standard #6 – Measuring street exits

Measuring street outreach services that help people exit the streets.

As noted in System-wide performance measure #7: Successful Placement from Street Outreach & Successful Placement in Retention of Permanent Housing, “We are measuring 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 we know that people living on the street and other places not meant for human habitation are at an increased risk of death. In this part of the measure a lot of places in addition to permanent housing are considered successful destinations, such as emergency shelter, foster care, temporarily staying with family or friends, safe havens, and transitional housing.

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.” The Riverside County Coordinated Entry System (CES) will function as the process that connect chronically homeless and homeless individuals and families for individuals identified by Street Outreach Teams to the Continuum of Care (CoC) and Emergency Grants Solutions (ESG) permanent housing programs – Permanent Supportive Housing and Rapid Rehousing. Through the implementation of the Riverside County CoC CES Policies and Procedures, CoC and ESG funded permanent housing programs must accept referrals from the CES.

SO Written Standard #7 – Collaboration

Collaboration amongst all Continuum of Care agencies, Community Street Outreach, and Coordinated Entry Street Outreach for the benefit of serving chronically homeless, and homeless individuals and families in Riverside County.

Written Standards for Homelessness Prevention (HP)

The Riverside County CoC Homelessness Prevention (HP) program provides supportive services to prevent persons from becoming homeless in a shelter or an unsheltered situation. Funding may also be used to help such persons regain stability in their current housing or other permanent housing.

Eligible Clients

Basic Eligibility Requirements

- **Initial Consultation & Eligibility Determination:** The household must receive at least an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and the appropriate type of assistance needed. Clients must meet one of the following definitions of homelessness:
 1. Literally homeless
 2. At imminent risk of homelessness
 3. Homeless under federal status
 4. Fleeing/attempting to flee domestic violence
- **Income:** The household's total income must be below 30 percent of Area Median Income (AMI)
- **Housing Status:** Case files must document the current housing status of the household at application. Housing status will be verified through third party verification whenever possible. Self-certification of housing status will be considered on a case by case basis.
- **Riverside County Residency:** All households receiving prevention or rapid re-housing assistance under ESG must be residents of Riverside County at time of application.
- **Lack of identifiable financial resources and/or support networks:** In order to receive ESG rental financial assistance, applicants must also demonstrate the following:
 1. No appropriate subsequent housing options have been identified;
 2. The household lacks the financial resources to obtain immediate housing or remain in its existing housing; and
 3. The household lacks support networks needed to obtain immediate housing or remain in its existing housing.

The following guidelines apply to Homelessness Prevention.

FINANCIAL ASSISTANCE	SERVICES
Moving costs	Housing search & placement
Rent application fees	Housing Stability Case Management
Last month's rent	Mediation
Utility payments –up to 24 mos. pmts or 6 mos. Arrears	Credit repair
Security deposit –equal to no more than 2 mos. Rent	Legal Services
Utility Deposits	

<i>Types of Rental Assistance</i>	<i>Length of Assistance</i>
1. Short Term Rental Assistance	up to 3 Months
2. Medium Term Rental Assistance	4 to 24 Months
3. Payment of Rental Arrears months, including any late fees	One-time payment up to 6 on the Arrears

HP Performance Standards

Based on standards and goals of the local Continuum of Care, Riverside County is proposing the following performance standards for the Emergency Solutions Grant and CoC programs:

- a. A reduction in the number of homeless individuals and families seeking emergency shelter services.
- b. Expected Outcome: At least 35% of participants assisted will remain in permanent housing six (6) months after the last assistance.

A. *Policies and Procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.*

The ESG and CoC program requires coordination among participating agencies. All subrecipients in Riverside County are experienced homeless providers with a

demonstrated track record in fiscal management and the provision of housing and supportive services targeted to homeless households. Additionally, the project administration agreement with subrecipients will require coordination among agencies receiving funds to administer emergency shelter, essential services, homelessness prevention, re-housing services, and related assistance, and access to mainstream services and housing providers for clients.

Participation in the Continuum of Care

ESG and CoC funded agencies have easy access to membership in the Continuum of Care. The Continuum of Care has over 100 member organizations including homeless service providers, veteran service representatives, churches and government organizations. The Continuum of Care meets on a regular basis and shares information about services among participating agencies.

Required Client Information and Referrals

To further facilitate collaboration and information sharing, ESG and CoC funded agencies will be required to provide the following information and referrals to program participants:

- 2-1-1 hotline for social services
- Social security benefits
- Cal-Works and other income security programs provided by DPSS
- Cal-Fresh (formerly known as Food Stamps) assistance
- Low Income Energy Assistance Programs
- Affordable housing information
- Employment assistance and job training programs
- Health care and mental health services
- Services for victims of domestic violence
- Veteran services
- Specialized services such as legal services, credit counseling

B. Policies and Procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals that will receive re-housing assistance.

Once it is determined that the household meets the basic eligibility guidelines noted above the household will be assessed for the appropriate form(s), level, and duration of financial assistance. The results of this assessment will be formalized in a Housing/Financial Assistance Plan that is signed by both the applicant and the case manager.

Homeless Prevention Assistance

Homeless prevention assistance will be targeted to households who are at risk of losing their present housing and becoming homeless. While there are many people who are housed and have a great need for rental assistance, not everyone will become homeless without assistance. A risk assessment will be used to assess the household's level of crisis and prioritize those who are at greatest risk of becoming homeless. The assessment tool will include vulnerability criteria including but not limited to; income, housing history, food security, childcare, health care, life skills, and other special needs. Due to the limited amount of funding, assistance will be provided on a first come, first served basis, if the applicant meets the eligibility and risk assessment criteria.

- C. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.***

Limitations on Assistance – Homeless Prevention

Riverside County's rental assistance is intended to stabilize individuals and families who have recently endured difficult financial circumstances that have led them into homelessness or who are at imminent risk of becoming homeless. For homeless prevention assistance, the rental assistance consists of short term rental assistance (3 months); extended under certain circumstances to medium term rental assistance (for an additional 3 months). The total maximum length of assistance is 6 months. Not every individual or family in need of rental assistance is a candidate for homelessness prevention or rapid re-housing assistance. Rental assistance is not a substitute for Section 8 rental assistance or a permanent rental subsidy, but a tool to help stabilize families or individuals who are at imminent risk of becoming homeless and lack any other resources to help them stabilize their housing situation.

As a general rule, an individual or household should pay approximately 30% of their income towards rent. This requirement may be waived on a case-by-case basis for extreme circumstances. The rental assistance will consist of the remaining portion of the rent, up to \$1,000 (excluding the clients' contribution towards the rent).

Clients are required to be reassessed at regular intervals to monitor progress and levels of self-sufficiency. If a client requires assistance beyond the three month mark, the ESG rental subsidy will be reduced and the client will be required to pay a larger portion of the rent

- D. Standards for determining how long a particular participant will be provided with rental assistance and whether the amount of that assistance will be adjusted over time.***

Rental assistance consists of short term (up to 3 months) to medium term (up to 6 months) rental assistance to allow individuals or families who have recently encountered

a financial crisis that has led them into homelessness or at imminent risk of homelessness, to gain housing stabilization. Since the program consists of temporary assistance aiming at rapid stabilization of households, clients are required to contribute a portion of their income towards rent. Clients with no potential to earn income may not be suitable candidates for this type of assistance, unless other subsidies can be accessed after the rental assistance expires.

Clients assisted under homelessness prevention assistance are eligible to receive the rental assistance for up to 3 months if they meet income eligibility during the 3 month period and comply with the case management requirements of the program. At the end of the third month, clients must be re-assessed to determine if the client's rental assistance needs to be extended for an additional 3 month period. If the rental assistance is extended for an additional 3 months, the rental assistance will be reduced and/or adjusted over the remaining time.

Clients assisted under Rapid Re-housing assistance are eligible to receive rental and utility assistance for up to 6 months if they meet income eligibility during the 6 month period. Re-housing clients must be evaluated at regular intervals during the assistance period. Monthly case management is highly recommended. The rental assistance should be reduced gradually and the client's portion of the rent should be increased during the 6 month assistance period.

- E. Standards for determining the type, amount, and duration of housing stabilization and /or relocation services to provide a program participant, including the limits, if any, on homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance; maximum number of months the program participant receives assistance; or the maximum number of times the program participant may receive assistance.***

*Reasonableness Clause

The Riverside County Continuum of Care (CoC) will determine each fiscal year the maximum amount of total homelessness prevention or re-housing assistance that can be given to clients in a given fiscal year and reserve the right to limit established limits as needed. Benefit amount of assistance must be reasonable as determined by the CoC.