



Continuum of Care Standards for the City of New Bedford



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Continuum of Care Standards for the City of New Bedford

Introduction

The Continuum of Care (CoC) is responsible for coordinating and implementing a system by which it agrees to abide in order to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of the Continuum, that being the City of New Bedford. Both the Emergency Solutions Grant (ESG) Rules and Regulations and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rules state that the Continuum of Care (CoC), in consultation with recipients of Emergency Solutions Grants program funds within the geographic area, (1) establish and consistently follow written standards for providing Continuum of Care assistance, (2) establish performance targets appropriate for population and program type, and (3) monitor recipient and sub-recipient performance.

These CoC Standards (as amended) for the City of New Bedford are this continuum's adopted guidelines for such consistency, targets and performance and are intended to compliment and reflect the CoC's Performance Management Plan developed by the City's Department of Planning, Housing & Community Development.

All programs that receive ESG or CoC funding in the City of New Bedford are required to abide by these written standards. In addition, in order to achieve the highest level of efficiency and performance throughout the New Bedford Continuum, the CoC strongly encourages programs that do not receive either of these sources of funds to accept and utilize these written standards.

These written standards have been established to ensure that persons experiencing homelessness who enter programs throughout the CoC will be given similar information and support to access and maintain permanent housing.

These Continuum of Care Written Standards will:

- Establish community-wide expectations on the operations of projects within the community.
- Ensure that the system is transparent to users and operators.
- Establish a minimum set of standards and expectations in terms of the quality expected of projects.
- Assist with the coordination of service delivery across the geographic area and will be serve as the foundation of for the 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; and
- Provide the basis for the monitoring of all CoC and ESG funded projects.

These Continuum of Care Standards for the City of New Bedford have been developed in conjunction with ESG recipients and with CoC and other community service providers to allow for input on standards, performance measures and the process for full implementation of the standards throughout the CoC so as to ensure the prospective of those organizations that are directly providing homeless housing and services, Emergency Shelter (ES), Permanent Supportive Housing (PSH), Rapid Re-Housing (RRH) and Supportive Service Only (SSO) programs. Adopted coordinated entry operational protocols were also reviewed and considered in the development and amendment of these written standards to ensure consistency between systems and expectations.

General Requirements for all Programs

- Programs providing housing for those experiencing homelessness must use the CoC's coordinated intake system, "The CALL," for the intake of all program participants working cooperatively with that coordinated entry system as it relates to the determination of eligibility and amount and type of assistance needed to regain stability in permanent housing.
- Programs must coordinate with other targeted homeless services within the CoC
- Programs must coordinate with mainstream resources in and outside of the CoC including housing, social services, employment, education and youth programs for which participants may be eligible
- Programs must have written policies and procedures, reviewed and updated as may be needed annually, and must consistently apply them to all participants
- Programs that serve households with children:
 - ✓ Must have a staff person designated as the educational liaison that will ensure that children are enrolled in school and connected with appropriate services in the community, including early childhood program such as Head Start, Part C of the Individuals with Disabilities Education Act, and the McKinney Vento education services
 - ✓ Must not use the age and gender of a child under age 18 as a basis for denying any family's admission to a project that provides shelter for families with children
- Programs receiving ESG and/or CoC funding must participate in HMIS (Homeless Management Information System); programs providing housing and/or services in some way to individuals and families experiencing homelessness are strongly encouraged to participate in HMIS to ensure ease of client assistance, greater system coordination, service delivery and data excellence.
 - ✓ Programs must meet minimum HMIS data quality standards
 - ✓ Programs providing Domestic Violence or Legal Services may opt out of HMIS participation but must utilize a comparable database to collect HUD required data elements to be reported in the aggregate rather than at the client level
- Program rules and regulations adopted by each program should be designed in the spirit of inclusion rather than as grounds for denial or termination. Programs should exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.
- Programs must have a formal written procedure for terminating assistance to a participant that recognizes the rights of the participant(s) involved.
 - ✓ Programs must demonstrate the use of judgment in examining all extenuating circumstances in determining that a violation should result in termination.
 - ✓ Every effort should be made to allow the participant to remain in the program; termination should only be exercised in the most severe cases.
 - ✓ Termination does not necessarily preclude assistance at a future date.

- Programs must make known that use of the facilities and services are available to all on a nondiscriminatory basis
- Programs may not engage in inherently religious activities such as worship, religious instruction or proselytization as part of the programs or services funded under the CoC or ESG. These activities can be conducted but must be separate and voluntary for program participants.

Recordkeeping Requirements for All Programs

- Participant records containing personally identifying information must be kept secure and confidential.
- Participant Recordkeeping Requirements shall include:
 - ✓ A written confidentiality/privacy notice, a copy of which should be made available to participants if requested
 - ✓ Documentation of homelessness (following HUDs guidelines)
 - ✓ A record of services and assistance provided to each participant
 - ✓ Documentation of any applicable requirements for providing services/assistance
 - ✓ Documentation of use of coordinated assessment system
 - ✓ Documentation of use of HMIS
 - ✓ Records must be retained for the appropriate amount of time as prescribed by HUD
- Financial Recordkeeping Requirements shall include:
 - ✓ Documentation for all costs charged to the grant
 - ✓ Documentation that funds were spent on allowable costs
 - ✓ Documentation of the receipt and use of program income
 - ✓ Documentation of compliance with expenditure limits and deadlines
 - ✓ Retain copies of all procurement contracts as applicable
 - ✓ Documentation of amount, source and use of resources for each match contribution

Occupancy Standards for All Programs

- All housing units, including scattered site programs owned and managed by private landlords, must meet applicable state or local government health and safety codes and have current certificate of occupancy for the current use and meet or exceed the following minimum standards: (For more details refer to ESG regulations 24 CFR 576.403 (b) Minimum Standards)
 - ✓ Buildings must be structurally sound to protect from the elements and not pose any threat to health and safety of the residents
 - ✓ Must be accessible in accordance with Section 504 of the Rehabilitation Act, the Fair Housing Act and the Americans with Disabilities Act where applicable
 - ✓ Must provide an acceptable place to sleep and adequate space and security for themselves and their belongings
 - ✓ Each room must have a natural or mechanical means of ventilation
 - ✓ Must provide access to sanitary facilities that are in operating condition, private and clean
 - ✓ Water supply must be free of contamination
 - ✓ Heating/cooling equipment must be in working condition
 - ✓ Must have adequate natural or artificial illumination and adequate electrical resources to permit safe use of electrical appliances
 - ✓ Food preparation areas must have suitable space and equipment to store, prepare and serve food in safe and sanitary manner
 - ✓ Building must be maintained in a sanitary condition

- ✓ Must be at least one smoke detector in each occupied unit of the program; and where possible near sleeping areas. The fire alarm system must be designed for hearing-impaired participants. There must be a second means of exiting the building in case of fire or other emergency.

The Program, Record Keeping and Occupancy Standards as represented above apply to all programs regardless of the type of services/housing that they provide. Below are the minimum standards that apply to each specific component of the homeless system in addition to the above.

System Performance Measures that are Continuum-Wide

A critical aspect of the McKinney-Vento Homeless Assistance Act, (the “Act”) as amended, is a focus on viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community. To facilitate this perspective the Act now requires communities to measure their performance as a coordinated system in addition to analyzing performance by specific projects or project types.

To this end, the Act established a set of criteria for HUD to use that require all CoCs to report their system-level performance to HUD. The intent of this criteria or “system performance measures, is to encourage CoCs and ESG program recipients, as well as all other homeless assistance stakeholders in the CoC, to regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress to HUD.

With the 2016 CoC funding round, HUD therefore introduced a series of system performance measures requiring each CoC to provide reporting that aggregates data from each individual program in response to a series of performance based elements describing the efficacy of the CoC. The following provides the resulting system performance measures that each program—emergency, rapid rehousing, transitional and permanent housing—will similarly be measured, as applicable to program type. *(These measures and correlating goals are subject to change per HUD and/or guidance from the City’s Department of Planning, Housing & Community Development [DPHCD]. Programs are responsible for confirming these measures and goals periodically with DPHCD.)*

RELEVANT PROJECT TYPE*					SYSTEM PERFORMANCE MEASURES and CoC GOALS	
	ES	RRH	TH	PH		
1	X	X	X	X	Length of Time Persons Remain Homeless <ul style="list-style-type: none"> ▪ Average length of time homeless previous to entering ES in days. Goal: ≤240 ▪ Average length of time homeless previous to entering TH in days. Goal: ≤240 	
2	X	X	X	X	Returns to Homelessness <ul style="list-style-type: none"> ▪ Measurement of clients exiting from any project type to a permanent housing destination in the date range two years prior to the production of the system performance report as follows: <ul style="list-style-type: none"> ○ Percentage of those exiting from ES who returned to homelessness. Goal: 25% ○ Percentage of those exiting from RRH returning to homelessness. Goal: 10% ○ Percentage of those exiting from TH returning to homelessness. Goal: 10% ○ Percentage of those exiting from PH returning to homelessness. Goal: 5% 	
3	X		X		Number of Homeless Persons <ul style="list-style-type: none"> ▪ Measurement of the change in the CoC’s total annual count of sheltered ES and TH homeless persons in HMIS. This metric only has relevance in the aggregate, as such, individual projects are not expected to use this measure. 	

System Performance Measurement chart, continued.

RELEVANT PROJECT TYPE*					SYSTEM PERFORMANCE MEASURES and CoC GOALS
ES	RRH	TH	PH		
4		X	X	X	Employment and Income Growth for Persons in CoC Programs during the reporting period <ul style="list-style-type: none"> ▪ Measurement of the percentage of adults (among stayers) who increased their earned income. Goal: 10% ▪ Measurement of the percentage of adult stayers who increased their non-employment cash income. Goal: 75% ▪ Measurement of the percentage of adult stayers who increased their total income Goal: 85% <hr/> <ul style="list-style-type: none"> ▪ Measurement of the percentage of adults (among leavers) who increased their earned income. Goal: 15% ▪ Measurement of the percentage of adult leavers who increased their non-employment cash income. Goal: 85% ▪ Measurement of the percentage of adult leavers who increased their total income. Goal: 95%
5	X	X	X	X	Number of Persons who Become Homeless for the First Time <ul style="list-style-type: none"> ▪ Measurement of the percent of active participants in ES and TH projects who were not previously enrolled in HMIS. Goal: 15% ▪ Measurement of the percent of persons entering ES, TH and PH with no prior enrollment in HMIS. Goal: 20%
6					Reserved.
7	X	X	X	X	Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing. <ul style="list-style-type: none"> ▪ Measurement of the change in exits to permanent housing destinations. Goal: 60% ▪ Measurement of the change in exits or retention of permanent housing. Goal: 75%

* NOTE: Project type boxes denoting an “x” identify performance measures relevant to each particular type of housing within the New Bedford CoC. Supportive service only projects such as coordinated entry do not, themselves, get counted, and since there is no formal Street Outreach project within the CoC, no column has been provided for it.

Project Performance Measures

Whereas system performance measures are intended to provide a snapshot into the homeless response system as an entire coordinated initiative, project performance measures takes a closer look at each project within the CoC. The standards provided in this section highlight eligibility criteria, minimum standards, operational standards and the goals and performance standards set by this CoC in assessing and evaluating each project’s performance, individually.

Emergency Shelters

Evaluating Eligibility for Assistance--Eligibility Criteria:

- Participants must meet the HUD definition of homelessness
- Currently, each individual shelter/program has its own eligibility criteria. At entry, this may be based on the sub-population served, i.e. – age, gender, family composition, severity of behavioral health issues, etc. Once Coordinated Entry System is established all referrals to shelters and assessment for type and level of services will come through that system.
- DV programs will be exempt from participating in the coordinated entry system due to issues of confidentiality and homeless youth (12 – 18 yrs. of age).

Minimum Standards:

- Minimum hours of operation 8PM – 7AM
- Staff supervision whether paid or volunteer must be provided during hours of operation of program
- Provide a minimum of one meal per day
- A minimal amount of personal information must be collected to establish a daily client roster to be kept in case of emergency and/or building needs to be evacuated
 - ✓ At intake each participant shall be informed of evacuation procedures.
 - ✓ Maps/diagrams of exits should be prominently placed throughout the facility
 - ✓

Standard Outcomes: *(Goals identified here are subject to change per HUD and/or DPHCD guidance).*

GOALS	PERFORMANCE STANDARD
1. Housing Stability - Households exit shelter timely. Goal: 85%	The % of persons who's length of stay is no longer than 40 days
2. Increase Total Income - Persons will maintain or increase earned (wages) and unearned (mainstream resources) income. Goal 54%	The % of persons age 18 or older who increased their total (from all sources) as of the end of the operating year or program exit
3. Exit to Permanent Housing Goal 20%	The % of persons age 18-61 who exit to permanent housing as of the end of the operating year or program exit.
4. Utilization Rate - Program operates at full capacity, with low vacancy rate, and quickly fills vacancies. Goal 90%	Average daily utilization rate during the operating year.
5. HMIS - Program maintains adequate data quality in HMIS	See Data Quality Report

Rapid Re-Housing (RRH)

Rapid Re-Housing is an intervention designed to help individuals and families exit homelessness quickly by returning to permanent housing without preconditions (including, but not limited to, sobriety, employment, absence of a criminal record, or income). Additionally, the resources and services provided are tailored to the unique needs of the household being assisted.

There are three core components that together constitute a rapid rehousing program, all of which must be available in some way in order to have a rapid re-housing program. Although RRH programs must have each of the three components available, it is *not* required that a single entity provides all three services. Similarly, it is also not required that any one household utilize all three in order to be considered using rapid rehousing.

Rapid Rehousing core components include the following: Housing Identification, Rent/Move-In Assistance (Financial) and Rapid Re-housing Case Management and Services. Actions constituting these components are presented on the following page:

Housing Identification	Rent/Move-In Assistance	Rapid Re-housing Case Management and Services
<ul style="list-style-type: none"> Recruit landlords to provide housing opportunities for individuals and families experiencing homelessness. Address potential barriers to landlord participation such as concern about short term nature of rental assistance and tenant qualifications. Assist households to find and secure appropriate rental housing. 	<ul style="list-style-type: none"> Provide assistance to cover move-in costs, deposits, and the rental and/or utility assistance (typically six months or less) necessary to allow individuals and families to move immediately out of homelessness and to stabilize in permanent housing. 	<ul style="list-style-type: none"> Help individuals and families experiencing homelessness identify and select among various permanent housing options based on their unique needs, preferences, and financial resources. Help individuals and families experiencing homelessness address issues that may impede access to housing (such as credit history, arrears, and legal issues). Help individuals and families negotiate manageable and appropriate lease agreements with landlords. Make appropriate and time-limited services and supports available to families and individuals to allow them to stabilize quickly in permanent housing. Monitor participants' housing stability and be available to resolve crises, at a minimum during the time rapid re-housing assistance is provided. Provide or assist the household with connections to resources that help them improve their safety and well-being and achieve their long-term goals. This includes providing or ensuring that the household has access to resources related to benefits, employment and community-based services (if needed/appropriate) so that they can sustain rent payments independently when rental assistance ends. Ensure that services provided are client-directed, respectful of individuals' right to self-determination, and voluntary. Unless basic, program-related case management is required by statute or regulation, participation in services should not be required to receive rapid re-housing assistance.

Evaluating Eligibility for Assistance--Eligibility Criteria:

- Participants must meet the HUD definition of homelessness
- Participants must be in an emergency shelter or residing in a place not meant for human habitation
- Participants will generally have a minimum of 4-7 identified barriers to accessing/retaining permanent housing
- Household income must be at or below <50% AMI
- Participants must be able to produce required documents at intake or within 90 days:
- All participants must be screened in to programs based on adopted Coordinated Intake Procedures including the use of the most recent version of the V-SPDAT assessment tool

Minimum Standards

- Maximum participation in a rapid rehousing program cannot exceed 24 months
- Services that must be provided include landlord outreach, assessment of housing barriers, financial assistance, and case management
- Support services must be provided throughout the duration of stay in housing
- In accordance with HUD regulations 24 CFR Part 578, participants may receive eligible supportive services for no longer than 6 months after rental assistance stops.

Length of Rental Assistance, Amount Limits, Amount of Assistance, Limits on Assistance

- Typical length of assistance: 12 months
- Extensions may be approved up to 24 months
- Length of assistance - After program exit for at least 6 months, participants can re-enroll once.
- All participants receiving rental assistance subsidies must contribute a minimum of 30% of their monthly adjusted household income towards their monthly rent. This tenant rent contribution may be adjusted at any time based on changes to household income, including, but not limited to at each 90 day reassessment. There is no minimum rent requirement and tenant rent contribution may be zero, for households with no income.
- Maximum amount of assistance Determined by Fair Market Rent of appropriate-sized unit for Household
 - Fair Market Rent x 24 months lifetime maximum
 - Maximum number of months the program participant receives assistance
 - Assistance approved in 3-month increments, with reassessment every 90 days.
 - Average rental assistance to be 12 months.
 - Extensions can be approved up to 24 months
- Maximum number of times the program participant may receive assistance
 - Twice, the original enrollment and no more than one return enrollment.

GOALS	PERFORMANCE STANDARD
1. Housing Stability - Persons residing in rapid rehousing will remain in this housing for a minimum of 1 year or exit to other permanent housing. <p style="text-align: right;">Goal 85%</p>	The % of persons who remain in the PH program as of the end of the operating year or exited to PH during the operating year.
2. Increase Total Income - Persons will maintain or increase earned and unearned income. <i>(Includes wages and mainstream resources)</i> <p style="text-align: right;">Goal 85%</p>	The % of persons age 18 and older who maintain or increased their total income(from all sources) as of the end of the operating year or program exit.
3. Increase earned Income - Adults will obtain or maintain employment income. <p style="text-align: right;">Goal 20%</p>	The % of persons age 18 – 61 who maintained or increased their income(i.e. employment income) as of the end of the operating year or program exit.
4. Utilization Rate - Program operates at full capacity, with low vacancy rate, and quickly fills vacancies. <p style="text-align: right;">Goal 90%</p>	Average daily utilization rate during the operating year.
5. Program maintains adequate data quality in HMIS	See Data Quality Report

Transitional Housing

Transitional Housing (TH) facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering TH. At this time there are no TH programs funded under the ESG or CoC programs in the New Bedford CoC; however, these standards remain as a guide for any future non-funded TH programs within the CoC.

Evaluating Eligibility for Assistance--Eligibility Criteria:

- Participants must meet the HUD definition of homelessness
- Participants will generally have a minimum of 6-9 identified barriers to accessing/retaining permanent housing

Minimum Standards

- Maximum length of stay cannot exceed 24 months although rapid placement within 90 days or less from TH programs into permanent housing is the target turnaround time.
- Assistance in transitioning to permanent housing must be provided
- Support services must be provided throughout the duration of stay in transitional housing
- 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

Accessing Transitional Housing Programs

- All referrals for TH programs will come through The CALL Coordinated Entry System
- Each TH program in the CoC will provide accurate and up-to-date information on eligibility criteria for the program; ie. – gender specific, individuals/families

GOALS	PERFORMANCE STANDARD
1. Housing Stability - Households exiting transitional housing will move directly to permanent housing. Goal: 75%	% of persons who exited to permanent housing(subsidized or unsubsidized) during the operating year
2. Increase Total Income - Persons will maintain or increase earned (<i>wages</i>) and unearned income. (<i>includes mainstream resources</i>) Goal 54%	The % of persons age 18 or older who increased their total(from all sources) as of the end of the operating year or program exit
3. Increased Earned Income – Persons who increased employment income. Goal 20%	The % of persons age 18-61 who increased their income(i.e. employment income) as of the end of the operating year or program exit.
4. Utilization Rate - Program operates at full capacity, with low vacancy rate, and quickly fills vacancies. Goal 90%	Average daily utilization rate during the operating year.
5. Program maintains adequate data quality in HMIS	See Data Quality Report

Permanent Supportive Housing

Under the HEARTH Interim Rule Permanent Housing (PH) is one of the eligible program components. Permanent housing is community-based housing, the purpose of which is to provide housing without a designated length of stay. Permanent Supportive Housing is one of the two types of Permanent Housing eligible for CoC Homeless Assistance Program funding.

Evaluating Eligibility for Assistance--Eligibility Criteria:

- Participants must meet the HUD definition of homelessness
- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability
- Participants will generally have a minimum of 9-12 identified barriers to accessing/retaining permanent housing

All referrals to permanent supportive housing shall come through the CALL coordinated entry system.

Minimum Standards

- There can be no predetermined length of stay for a PSH program
- Supportive services designed to meet the needs of the program participants must be made available to the program participants throughout the duration of stay in PSH
- Program participants in PSH must enter into a lease agreement for an initial term of at least one year. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months
- Turnover beds in PSH projects will be prioritized for the chronically homeless
- PSH programs will utilize housing first approaches

Accessing PSH Programs

- All referrals for PSH programs will come through The CALL Coordinated Entry System
- Each PSH program in the CoC will provide accurate and up-to-date information on eligibility criteria for the program; ie. – gender specific, individuals/families

GOALS	PERFORMANCE STANDARD
<p>1. Housing Stability - Persons residing in permanent housing will remain in this housing for a minimum of 1 year or exit to other permanent housing.</p> <p style="text-align: right;">Goal 85%</p>	The % of persons who remain in the PH program as of the end of the operating year or exited to PH during the operating year.
<p>2. Increase Total Income - Persons will maintain or increase earned (<i>wages</i>) and unearned income. (<i>includes mainstream resources</i>)</p> <p style="text-align: right;">Goal 85%</p>	The % of persons age 18 and older who maintain or increased their total income(from all sources) as of the end of the operating year or program exit.
<p>3. Increase earned Income - Adults will obtain or maintain employment income.</p> <p style="text-align: right;">Goal 20%</p>	The % of persons age 18 – 61 who maintained or increased their income(i.e. employment income) as of the end of the operating year or program exit.
<p>4. Utilization Rate - Program operates at full capacity, with low vacancy rate, and quickly fills vacancies.</p> <p style="text-align: right;">Goal 90%</p>	Average daily utilization rate during the operating year.
<p>5. Program maintains adequate data quality in HMIS</p>	See Data Quality Report

Prioritization

Determining and Prioritizing which eligible individuals and families will receive assistance

The New Bedford CoC and its member agencies providing services and permanent housing for those experiencing homelessness shall prioritize individuals and families as follows:

PERMANENT HOUSING for those who are experiencing homelessness	
Priority Level	Description
1	Individuals and families who are chronically homeless with the longest histories of homelessness, disabilities and most severe service needs. Of these, veterans, families and unaccompanied youth shall have the highest priority within this category.
2	Individuals and families who are chronically homeless with disabilities and service needs. Of these, veterans, families and unaccompanied youth shall have the highest priority within this category.
3	Individuals and families who are chronically homeless with disabilities. Of these, veterans, families and unaccompanied youth shall have the highest priority within this category.
4	Individuals and families who are homeless with the longest history of homelessness, disabilities and most severe service needs. Of these, veterans, families and unaccompanied youth shall have the highest priority within this category.
5	Individuals and families who are homeless with disabilities and service needs. Of these, veterans, families and unaccompanied youth shall have the highest priority within this category.
6	Individuals and families who are homeless with disabilities. Of these, veterans, families and unaccompanied youth shall have the highest priority within this category.

The New Bedford CoC and its member agencies providing services and rapid rehousing for those experiencing homelessness shall prioritize individuals and families as follows:

RAPID REHOUSING for those who are at risk of homelessness	
Priority Level	Description
1	Individuals and families with higher barriers to housing and higher service needs who are waiting to obtain another permanent housing subsidy.
2	Individuals and families with lower barriers to housing and less service needs who are expected to stabilize in permanent housing with no additional assistance.

For those who are at risk of becoming homeless, the following priorities shall be observed and diversion shall be used as the first method of intervention:

For those who are at risk of homelessness	
Priority Level	Description
1	Individuals and families who spend the night in an emergency shelter or on the streets without assistance. Of these, veterans, families and unaccompanied youth shall have the highest priority within this category.
2	Individuals and families who have the most severe service and housing needs. Of these, veterans, families and unaccompanied youth shall have the highest priority within this category.
3	Individuals and families who have service and housing needs. Of these, veterans, families and unaccompanied youth shall have the highest priority within this category.

In addition to the foregoing priorities for both those who are experiencing homelessness and those who are at risk of homelessness, individuals (and their children as may be appropriate) who are victims of domestic violence, dating violence, sexual assault and/or stalking and in need of *immediate shelter and safety planning* shall be considered before all others in those programs equipped to address such needs and immediate safety issues (typically emergency and/or transitional programs for victims).

These written standards and prioritization descriptors are intended to align with, and fully include, the U.S. Department of Housing & Urban Development’s CPD-16-11 Notice dated July 25, 2016 regarding “...Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing.” The City of New Bedford’s CoC adopts this Notice and incorporates it as part of its written standards.

In establishing these priorities and by updating these written standards on August 18, 2016, the New Bedford CoC hereby formally acknowledges its commitment to the four major goals articulated in *Opening Doors: Federal Strategic Plan* as amended: Ending chronic homelessness by 2017, Ending veterans homelessness by 2017, ending family and youth homelessness by 2020 and setting a path to ending all homelessness and additionally

Future Review, Updates and Amendments

These written standards are not only intended to be specific and detailed, addressing unique eligibility requirements for the housing and service resources available, but they are also relevant in the Continuum’s work today. To ensure the relevancy of these standards against HUD requirements, the CoC’s homeless population and both local and national targeting priorities, the CoC will regularly review and update these written standards.

Changes to forms: The Continuum of Care Program Standards Group will meet quarterly. Proposed changes to forms will be brought to this quarterly meeting. Changes will be considered and agreed to by working consensus. Any conflicts will be discussed and resolved in person. The relevant Emergency Solutions Grants or Continuum of Care regulations will rule first. On other issues working consensus will be the required process for resolving disputes. If no consensus can be found within a reasonable length of time, the majority will rule.

When reviewing these standards in the future, the CoC's consideration may include:

- Provider feedback on the current written standards
- Program participant feedback on the intake/coordinated entry process
- The effectiveness and appropriateness of housing and services for current program participants
- The CoC's success at meeting the performance standards in Section 427 of the McKinney-Vento Act
- Changes in the characteristics of the homeless population within the CoC
- Changes in the housing and service resources available