

FY2017 CONTINUUM OF CARE HOMELESS ASSISTANCE COMPETITION REQUEST FOR PROPOSAL INSTRUCTIONS

INTRODUCTION

The City of New Bedford is now accepting proposals for Continuum of Care (CoC) Homeless Assistance funding from the U.S. Department of Housing and Urban Development (HUD) for both renewal and new projects. HUD publishes a CoC Notice of Funding Availability (NOFA) for each funding year. The FY2017 NOFA has not been published to date. HUD has issued several notices in anticipation of the NOFA:

January 31, 2017: HUD FY2017 NOFA Policy Requirements and General Sections: https://www.hudexchange.info/resources/documents/FY-2017-NOFA-Policy-Requirements-and-General-Section.pdf

April 10, 2017: HUD FY2017 CoC General Information Notice: <u>https://www.hudexchange.info/resource/5308/fy-2017-coc-program-registration-notice/</u>

In anticipation of the NOFA, to allow time for the local review and decision-making process, the city is publishing this Request for Proposal (RFP). The city reserves the right to publish additional information subject to NOFA guidelines. A single, consolidated submission of all selected projects in New Bedford Continuum of Care will be submitted to HUD by the City of New Bedford. Funding will be derived from Federal Fiscal Year 2017 allocations of HUD funds and is subject to funding availability under the NOFA. The city reserves the right to request that applicant organizations submit adjusted project budgets based on the amount of funding made available by HUD.

THIS RFP IS SUBJECT TO MODIFICATION AS MAY BE REQUIRED TO COMPLY WITH THE HUD NOFA.

REQUEST FOR PROPOSAL DEADLINE: JUNE 16, 2017 @ 3:00PM

Agencies desiring to submit renewal and/or new projects must submit a completed application packet including required attachments to the city by 3:00pm on June 16, 2017. Submit all documents in PDF electronic format (preferably by email) to the City of New Bedford's Department of Planning, Housing and Community Development, (DPHCD) attention Jennifer Clarke, Deputy Director, either via e-mail jennifer.clarke@newbedford-ma.gov or in person at the Department of Planning, Housing and Community Development, 608 Pleasant Street, New Bedford, Massachusetts.

FUNDING

The total amount of funding estimated to be available for Renewal Projects from HUD is **\$1,684,939**, which is based on the amount of currently funded projects which are eligible for renewal funding also referred to as the pro rata need determined by HUD. It is anticipated that **\$90,000** may be available through a Permanent Housing Bonus and **\$45,000** for re-allocation. Submission procedures are described below.

New projects can be funded only through reallocation from existing projects or through a bonus funding process, as described below. New project activities are limited by HUD to Permanent Supportive Housing, Rapid Re-Housing, Homeless Management Information Systems, and Coordinated Intake and Assessment Programs.

HUD PROGRAM INFORMATION

All parties intending to apply for funding are strongly encouraged to review the program regulations, including those organizations that are currently or were previously funded. Proposals that do not conform to the regulations will not be considered for funding. The regulations for the Continuum of Care Program may be found at this link: https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/

NOFA TIMELINE FY2017			
May 31, 2017	DPHCD issues RFP for renewals and new projects		
June 16, 2017	RFP Due Date for renewals and new projects to City of New Bedford		
TBD	Performance Review Committee (PRC) Meeting/Project Review		
TBD	HSPN Meeting to review and approve Application Review Committee recommendations for new projects, renewal projects and priority rankings.		
TBD	2017 Ranking and Selection Results posted on Network website and sent to project applicants in writing		
твр	Any and all appeals due to DPHCD by 12:00pm. Agencies that have appealed will be notified in writing prior to the NOFA application submission		
TBD	All applicants to submit a PDF file to DPHCD of the e-snaps application by 4:00pm		
TBD	CoC Application Submitted to HUD in <i>e-snaps</i> . Any rejected applicants may submit <i>e-snaps</i> Solo Application directly to HUD		

I. BACKGROUND

Similar to past years, all applications for funding will be vetted, evaluated and ranked by the CoC – Homeless Service Provider Network (HSPN) Performance Review Committee (PRC) ratified by the HSPN membership and eventually submitted to HUD via the e-snaps system. The Department of Planning Housing and Community Development (DPHCD) will act as the Collaborative Applicant and submit an application for funds on behalf of the New Bedford Continuum of Care (CoC) for renewal and any new projects identified through the Request for Proposal (RFP).

When considering renewal projects for award, HUD will review information in the Line of Credit Control System (LOCCS), Annual Performance Reports (APRs), information provided from the local HUD/CPD Field Office that includes monitoring reports and audit reports as applicable.

HUD also reviews performance standards on prior grants, and assess a project on the following criteria using a pass/fail basis:

- 1. The project applicant's performance against plans and goals established in their initial application as amended;
- 2. Project applicants must demonstrate all timeliness standards for grants being renewed, including that standards for the expenditure of grant funds have been met;
- 3. The project applicant's performance in assisting program participants to achieve and maintain independent living and record of success, except HMIS dedicated projects are not required to meet this standard; and
- 4. Evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a drastic reduction in the population served, has made program changes without prior HUD approval, or has lost a project site. These conditions may result in the rejection of an application from the competition.

HUD reserves the right to reduce or reject a funding request from the project applicant for the following reasons:

- 1. Outstanding obligation to HUD in arrears or for which a payment schedule has not been agreed upon;
- 2. Audit finding(s) for which a response is overdue or unsatisfactory;
- 3. History of inadequate financial management accounting practices;
- 4. Evidence of untimely expenditures on prior award;
- 5. History of other major capacity issues that have significantly impacted the operation of the project and its performance;
- 6. Timeliness in reimbursing subrecipients for eligible costs. HUD will consider a project applicant as meeting this standard if it has drawn down grant funds at least once per month; and
- 7. History of serving ineligible persons, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

It is anticipated that HUD, similar to last year, will be requiring CoCs to rank all projects applying for grant funds in e-snaps. To ensure that CoCs have the opportunity to prioritize their projects locally in the event that HUD is not able to fund all renewals. HUD is requiring that CoCs rank projects within 2 tiers, similar to last year's NOFA.

All questions regarding this application should be directed to Jennifer Clarke, Deputy Director of the City of New Bedford Department of Planning, Housing, and Community Development via e-mail <u>jennifer.clarke@newbedford-ma.gov</u> or by telephone 508.979.1500.

Eligible Populations:

Permanent Supportive Housing (PSH):

- All projects must dedicate 100% of units to chronically homeless individuals and/or families, as defined by HUD.
- Project applicants must demonstrate that they will first serve the chronically homeless according to the order of priority established in Notice CPD-14-012: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons.
- Disabilities: All projects must serve exclusively disabled households as defined by HUD.

Rapid Re- Housing (RRH):

- All projects must serve 100% literally homeless families and/or single adults coming from emergency shelters and/or unsheltered locations or meeting the criteria of paragraph (4) of the HUD definition of homeless.
- Persons in transitional housing are not eligible for either project type, even if they met the criteria described above prior to entering the Transitional Housing Program, unless they meet the criteria of category 4 definition of homelessness. A household would meet category 4 of the definition of homeless if they are fleeing or attempting to flee from domestic violence and meet all other requirements, regardless of where they are residing.

Joint Transitional Housing (TH) and Rapid Re-Housing (RRH) Component Projects:

 Individuals and families experiencing homelessness (more details will be available subsequent to the release of the FY2017 CoC NOFA).

KEY INFORMATION

- a. Threshold Requirements All projects must meet threshold criteria shown in the application package.
- b. Eligible activities under the Continuum of Care regulations include: acquisition of property, rehabilitation of property, new construction, leasing, rental assistance, supportive services, operating costs, homeless management information system (HMIS) costs, project administrative costs, relocation, indirect costs, and CoC planning costs. However, project types are limited to the program components described below.
- c. New projects may only be funded through reallocation of funds from existing projects or through the Permanent Housing Bonus process. HUD strictly limits the type of projects for which reallocated or bonus funds may be used.
- d. All projects will be limited to requests for one year of assistance, unless a different term is required by HUD. Upon expiration, projects may be renewed subject to HUD requirements, local priorities, satisfactory performance, and availability of funds.

II. SCORING

A. ALL PROJECTS—NEW (INCLUDING REALLOCATIONS) and RENEWALS

Every project being reviewed as a part of the FY2017 competition will first be evaluated against threshold criteria as articulated in this section. Every project must meet the threshold criteria in order to be considered for scoring. Those projects not meeting the threshold criteria as determined by the City of New Bedford's DPHCD will not be scored or considered for funding.

Threshold criteria is as follows:

THRESHOLD CRITERIA
 Program will serve 100% chronically homeless individuals and families; (only Permanent Supportive Housing (PSH) and Rapid Re-Housing (RRH) projects will be considered for funding under this RFP).
 Timeliness in the expenditure of grant funds.
 Project Applicant is in good standing with HUD.
 Proposed program budget requests no less than 70% of the total program funding for leasing, rental assistance, or operating costs. No more than 30% of the total program funding may be used for ELIGIBLE supportive services costs.
 Application demonstrates a plan for rapid implementation/seamless continuation of the program.
 Applicant articulates how program participants are connected to, and assisted with, a range of mainstream resource service systems.
 Renewal program must be a current and active participant in the CoC's HMIS and its Coordinated Assessment System, the CALL; new programs must agree to participate in both systems if funded.
 Applicant has positive performance against plans and goals established in the initial application, as amended.
 Application packet is complete.

B. RENEWAL PROJECTS

Renewal projects may score up to 100 points maximum based on information provided in the application, previous APR reporting, HMIS and the HUD LOCCS system. Specific scoring criteria for renewal projects is as follows:

The following questions will assist in evaluating Programs:

	EVALUATION CRITERIA QUESTIONS
1.	Are there any unresolved monitoring or audit findings on HUD Continuum of Care Program grants?
	If yes, explain:
2.	Does the applicant currently have any unresolved fiscal, reporting, or program issues with any of its funding sources? Yes No N/A
	If yes, explain:
3.	Has the applicant drawn down funds at least quarterly through the course of your prior and current renewal grant terms? Yes No N/A
4.	Has the applicant drawn down funds within 90 days of the expiration of prior renewal grant terms?
	☐ Yes ☐ No ☐ N/A
5.	Is the applicant's performance consistent against plans and goals established in the initial application? Yes No N/A
	If not, explain:
6.	Has there been a drastic reduction in population served by the applicant or program changes made by the applicant without prior HUD approval? Yes No N/A
	If yes, explain:
7.	HMIS Participation: %

Scoring Criteria : Renewal Projects

GOALS	PERFORMANCE STANDARD	%	SCORING	COMMENTS	POINTS
Data Quality Agency's thoroughness in ensuring all data is collected and entered into HMIS.	Based on APR Q7		0 omissions = 10 1%-10% = 6 11%-20%= 4 21%> = 0		
Goal = No Omissions					
Unspent Funds 9/01/2015 - 8/31/2016	HUD LOCS		0% = 15 1-5%=10 6-10%= 5 10%> = 0		
HMIS Participation	Based on APR Q6		Prorated up to 10 points		
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. Goal 85%	<u>Based on APR Q36a –</u> <u>Measure 1</u> 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. <u>Based on APR Q36a –</u>		≥85%=15 80%-84%= 10 65%-79%= 6 55%-64%= 3 ≤55%= 0		
2. Increase Total Income Persons will maintain or increase earned and unearned income. Goal 85% (Includes wages and mainstream resources)	<u>Measure 2a</u> 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.		≥85%= 15 75%-84%= 10 65%-74%= 6 50%-64%= 3 ≤49%= 0		
3. Increase earned Income Adults will obtain or maintain employment income. Goal 20%	Based on APR Q36a – <u>Measure 2b</u> 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.		≥20%= 15 10%-19%= 10 5%-9%= 5 ≤5%= 0		

Scoring Criteria : Renewal Projects (Continued)

GOALS	PERFORMANCE STANDARD	%	SCORING	COMMENTS	POINTS
4. Utilization Rate Program operates at full capacity, with low vacancy rate, and quickly fills vacancies. Goal 90%	Based on APR Q10 – Q11 Average daily utilization rate during the operating year.		≥90%= 10 70%-89%= 7 51%-69%= 4 ≤50%= 0		
5. Chronic Homeless Percentage of actual PSH beds dedicated to those who are chronically homeless. Goal 100%	<u>Based on APR Q5 –</u> <u>Chart 5b</u> The # of actual chronically homeless beds divided by the total number of actual beds.		Prorated up to 10 points for 100% of CH Beds.		
TOTAL POSSIBLE POINTS <i>for</i> RENEWAL PROJECTS				100	

Scoring for New Projects begins on page 8.

C. NEW PROJECTS

Consideration for funding of new projects, including those created as a result of reallocation, will be based on the following performance objectives:

- Agency Experience and Capacity (20 point maximum)
- Project Quality
- (40 point maximum)
- Match and Leveraged Resources (20 point maximum)
- Fiscal Management (20 point maximum)

New projects may score up to 100 points maximum based on information provided in the application including attachments of required materials. Specific scoring criteria for new projects is as follows:

STANDARDS AND SCORING			
Agency Experience and Capacity. Applicants demonstrating extensive experience in administering HUD or other federal funds, and providing the proposed service and/or serving the proposed population will receive 20 points.	20		
 Project Quality. Each application will be scored on the overall quality of the project, and the extent to which the applicant can clearly demonstrate the following: <u>Housing First (15 points)</u>: Applicants may receive up to 15 points based on the extent to which the Permanent Supportive Housing Bonus project will follow a Housing First model/low barrier approach. 			
 <u>Chronic Homeless (15 points)</u> Projects serving at least 85% of beds dedicated to chronic homeless will receive 15 points. <u>Mainstream Services (5 points)</u>: Applicants may receive up to 5 points based on the extent to which the project is fully leveraging mainstream resources for supportive services. 	40		
 Low Barrier (5 points): Projects demonstrating low barriers to program admission and flexible participation policies designed to retain program participants will receive 5 points. 			
Match and Leveraged Resources. Projects demonstrating leveraging of at least 200% of the HUD request will receive 20 points. Projects demonstrating leverage of at least 150% of the HUD request will receive 10 points.	20		
Fiscal Management. To receive maximum points, applicants must demonstrate history of financial stability, including prompt expenditure of program funds, and no outstanding audit or HUD monitoring findings.	20		
TOTAL POSSIBLE POINTS <i>for</i> NEW PROJECTS	100		

D. PROPOSAL SELECTION

The Performance Review Committee (PRC) of the Homeless Service Provider's Network (HSPN) will complete the review and evaluation process and present a recommendation for funding approval to the HSPN at the HSPN meeting. Agencies that do not meet the threshold score or who are not recommended for funding may appeal and address the members of the COC PRC Appeal Panel based only on the following guidelines (agencies recommended or only partial funding are not eligible to request an appeal):

- If the project is not selected for funding, the agency has the right to appeal, provided that the appeal is based upon violations of program regulations. For example, reviewing members did not consistently follow the scoring criteria and process, as detailed above or there was a conflict of interest that prevented a fair review of the proposal.
- No appeals will be heard on the basis of funding level.

E. ELIGIBLE POPULATIONS TO BE SERVED

All projects MUST serve homeless and/or chronically homeless persons. HUD defines "<u>chronically homeless</u>" as an unaccompanied homeless individual with a disabling condition, or a family with at least one (1) adult member who has a disabling condition, who has either been continuously homeless for a year or more or has had at least four (4) episodes of homelessness in the past three (3) years.

F. RANKING PROCESS

It is highly likely that HUD will once again require CoCs list all projects that are approved to submit project applications to HUD, in order of priority as determined by the CoC. Further, CoCs should place all new and renewal project applications that the CoC determines are high priority, high performing, and meet the needs and gaps as identified by the CoC in Tier 1. HUD will first select projects in Tier 1 before selecting any projects in Tier 2. Then, HUD will select projects in Tier 2.

Lower ranked projects may be selected for funding above higher ranked projects, consistent with HUD's selection priorities.

The CoC renewal application components and narratives serve to:

- 1. Confirm the capacity of agencies to provide CoC funded programs;
- 2. Provide information on program delivery in order to evaluate performance and meeting HUD priorities for scoring and ranking of projects by the PRC; and
- 3. Provide project level narrative to be utilized in the CoC Program Application (former 'Exhibit 1'). HUD will limit renewal grants to one (1) year of funding. Renewal Project Applications that request multiple years of funding will be reduced to one (1) year grant amounts.

Renewal projects must meet minimum project eligibility, capacity, timeliness, and performance standards. HUD will review information in the LOCCS; Annual Performance Reports (APRs); and information provided from the HUD local /CPD Field Office, including monitoring reports and A-133 audit reports as applicable, as well as performance standards on prior grants, and assess a project on the following criteria using a pass/fail basis:

- Applicant's performance against plans and goals;
- Timeliness standards;
- Applicant's performance in assisting program participants to achieve and maintain independent living and record of success;
- Financial management accounting practices;
- Timely expenditures;
- Capacity;
- Timeliness; and
- Eligible activities.

Resources and Information available:

HUD Homelessness Resource Exchange: http://www.hudhre.info/

HUD Supportive Housing Program Desk Guide: <u>http://www.hudhre.info/index.cfm?do=viewShpDeskguide</u> HUD e-snaps Training and Resources Page: <u>http://www.hudhre.info/esnaps/</u>



United States Interagency Council on Homelessness The Housing First Checklist

Housing First is a proven method of ending all types of homelessness and is the most effective approach to ending chronic homelessness. Housing First offers individuals and families experiencing homelessness immediate access to permanent affordable or supportive housing. Without clinical prerequisites like completion of a course of treatment or evidence of sobriety and with a low threshold for entry, Housing First yields higher housing retention rates, lower returns to homelessness, and significant reductions in the use of crisis services and institutions. 1 Due its high degree of success, Housing First is identified as a core strategy for ending homelessness in *Opening Doors: the Federal Strategic Plan to End Homelessness* and has become widely adopted by national and community-based organizations as a best practice for solving homelessness.

Housing First permanent supportive housing models are typically designed for individuals or families who have complex service needs, who are often turned away from other affordable housing settings, and/or who are least likely to be able to proactively seek and obtain housing on their own. Housing First approaches also include rapid re-housing which provides quick access to permanent housing through interim rental assistance and supportive services on a time-limited basis. The approach has also evolved to encompass a community-level orientation to ending homelessness in which barriers to housing entry are removed and efforts are in place to prioritize the most vulnerable and high-need people for housing assistance.

As Housing First approaches become adopted more widely, the need for clarity increases around what the Housing First approach entails and how to know whether a particular housing program or community approach is truly using a Housing First approach. Robust tools and instruments are available which can quantitatively assess and measure a housing program's fidelity to Housing First, and recent research has attempted to rigorously evaluate Housing First implementation.2 For quick screening, policymakers and practitioners will benefit from this practical, easy-to-use guide to identify and assess the implementation of the core components of the Housing First approach.

How to Use this Tool

This tool is intended for use by policymakers, government officials, and practitioners alike to help make a basic assessment of whether and to what degree a particular housing program is employing a Housing First approach. Use this tool as a checklist that can be reviewed during a site visit, program audit, or program interview, or as a guide when reviewing funding applications or reviewing a program's policies and procedures.

The tool is broken down into two sections: a checklist of the core and additional elements of Housing First at the housing program or project level and a checklist of elements of Housing First at the community-level. Users of this tool should be aware that this tool assesses Housing First adoption along a spectrum, rather than as a simple *yes/no* or *pass/fail*. This tool is also not intended to serve as or supplant a more comprehensive housing and program quality assessment tool, but may supplement or be used in conjunction with such tools.

¹ Lipton, F.R. et. al. (2000). "Tenure in supportive housing for homeless persons with severe mental illness," Psychiatric Services 51(4): 479-486. M. Larimer, D. Malone, M. Garner, et al. "Health Care and Public Service Use and Costs Before and After Provision of Housing for Chronically Homeless Persons with Severe Alcohol Problems." *Journal of the American Medical Association*, April 1, 2009, pp. 1349-1357. Massachusetts Housing and Shelter Alliance. (2007). "Home and Healthy for Good: A Statewide Pilot Housing First Program." Boston.

² Tsemberis, S. (2010). Housing First: The Pathways model to end homelessness for people with mental illness and addiction. Center City, MN: Hazelden. The National Center on Addiction and Substance Abuse at Columbia University. (2012). Unlocking the door: An implementation evaluation of supportive housing for active users in New York City. New York. http://www.casacolumbia.org/upload/2012/20121907casahope2full.pdf

Housing First at the Program/Project Level

Core Elements:

- Admission/tenant screening and selection practices affirm the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, and participation in services.
- Applicants are seldom rejected on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that indicate a lack of "housing readiness."
- Housing accepts referrals directly from shelters, street outreach, dropin centers, and other parts of crisis response system frequented by vulnerable people experiencing homelessness.
- Supportive services emphasize engagement and problem-solving over therapeutic goals. Services plans are highly tenant-driven without predetermined goals. Participation in services or program compliance is not a condition of permanent supportive housing tenancy. Rapid rehousing programs may require case management as condition of receiving rental assistance.

QUICK SCREEN:

Is Permanent Supportive Housing (PSH) Housing First?

- 1) Are applicants required to have income prior to admission?
- 2) Are applicants required to be "clean and sober" or "treatment compliant" prior to admission?
- 3)Are tenants able to be evicted for not following through on their services and/or treatment plan?
 - If the answer is "yes" to any of these questions, the program is <u>not</u> Housing First.

Use of alcohol or drugs in and of itself (without other lease violations) is not considered a reason for eviction.

Additional Elements Found in Advanced Models:

- Tenant selection plan for permanent supportive housing includes a prioritization of eligible tenants based on criteria other than "first come/first serve" such as duration/chronicity of homelessness, vulnerability, or high utilization of crisis services.
 - Tenants in permanent supportive housing given reasonable flexibility in paying their tenant share of rent (after subsidy) on time and offered special payment arrangements (e.g. a payment plan) for rent arrears and/or assistance with financial management (including representative payee arrangements).
 - Case managers/service coordinators are trained in and actively employ evidence-based practices for client/tenant engagement such as motivational interviewing and client-centered counseling.
 - Services are informed by a harm reduction philosophy that recognizes that drug and alcohol use and addiction are a part of tenants' lives, where tenants are engaged in non-judgmental communication regarding drug and alcohol use, and where tenants are offered education regarding how to avoid risky behaviors and engage in safer practices.
 - Building and apartment unit may include special physical features that accommodate disabilities, reduce harm, and promote health among tenants. These may include elevators, stove-tops with automatic shut-offs, wall-mounted emergency pull-cords, ADA wheelchair compliant showers, etc.

Housing First at the Community Level

Emergency shelter, street outreach providers, and other parts of crisis response system are aligned with Housing First and recognize their roles to encompass housing advocacy and rapid connection to permanent housing. Staff in crisis response system services believes that all people experiencing homelessness are housing ready.

- Strong and direct referral linkages and relationships exist between crisis response system (emergency shelters, street outreach, etc.) and rapid re-housing and permanent supportive housing. Crisis response providers are aware and trained in how to assist people experiencing homelessness to apply for and obtain permanent housing.
- Community has a unified, streamlined, and user-friendly community-wide process for applying for rapid rehousing, permanent supportive housing and/or other housing interventions.
- Community has a coordinated assessment system for matching people experiencing homelessness to the most appropriate housing and services, and where individuals experiencing chronic homelessness and extremely high need families are matched to permanent supportive housing/Housing First.
- Community has a data-driven approach to prioritizing highest need cases for housing assistance whether through analysis of lengths of stay in Homeless Management Information Systems, vulnerability indices, or data on utilization of crisis services.

Policymakers, funders, and providers collaboratively conduct planning and raise and align resources to increase the availability of affordable and supportive housing and to ensure that a range of affordable and supportive housing options and models are available to maximize housing choice among people experiencing homelessness.

- Policies and regulations related to permanent supportive housing, social and health services, benefit and entitlement programs, and other essential services support and do not inhibit the implementation of the Housing First approach. For instance, eligibility and screening policies for benefit and entitlement programs or housing do not require the completion of treatment or achievement of sobriety as a prerequisite.
- Every effort is made to offer a transfer to a tenant from one housing situation to another, if a tenancy is in jeopardy. Whenever possible, eviction back into homelessness is avoided.

PROGRAM NAME:	
AGENCY NAME:	
DATE:	