MD-514
Written Standards for Service Delivery

MARYLAND
BALANCE OF STATE
CONTINUUM OF CARE

INTRODUCTION

BACKGROUND AND PURPOSE

Under 24 CFR §578.7(a)(9) of the Continuum of Care (CoC) Interim Rule of 2012, authorized by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), the U.S. Department of Housing and Urban Development (HUD) requires that the Maryland Balance of State Continuum of Care (MD BoS CoC) establish Written Standards that govern the following for projects funded through the Continuum of Care Program, in consultation with Emergency Solutions Grant (ESG) Program recipients:

- Policies and procedures for evaluating household eligibility for assistance [24 CFR §578.7(a)(9)(i)]
- Policies and procedures to determine and prioritize which eligible households will receive transitional housing assistance [24 CFR §578.7(a)(9)(ii)]
- Policies and procedures to determine and prioritize which eligible households will receive rapid rehousing assistance [24 CFR §578.7(a)(9)(iii)]
- Standards for determining the portion of rent each project participant must contribute while receiving rapid rehousing assistance [24 CFR §578.7(a)(9)(iv)]
- Policies and procedures to determine and prioritize which eligible households will receive permanent supportive housing assistance [24 CFR §578.7(a)(9)(v)]
- Where the Continuum is designated as a high-performing community, as described in subpart G of the CoC Interim Rule of 2012, the CoC must also establish policies and procedures consistent with 24 CFR 576.400(e)(3)(vi), (e)(3)(vii), (e)(3)(viii), and (e)(3)(ix)

The purpose of the Continuum of Care Program is to promote a community-wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effective utilization of mainstream resources for homeless households; and optimize self-sufficiency among individuals and families experiencing homelessness.

By establishing Written Standards for Service Delivery (referred to throughout this document as the CoC Written Standards), the MD BoS CoC seeks to achieve the vision of the Continuum of Care Program and reach the following goals:

- Unify the vision and strategy for ending homelessness across the MD BoS CoC's geographic area
- Implement effective, evidenced-based practices for homeless assistance projects
- Provide uniformity across projects in the MD BoS CoC's geographic area
- Demonstrate that projects are accountable to individuals and families experiencing homelessness
- Ensure project compliance with HUD regulations

WRITTEN STANDARDS OVERVIEW

The MD BoS CoC's Written Standards are designed for use by homeless services providers receiving
federal and state funding within the nine-county area comprising the MD BoS CoC (see Appendix A for
a map). While other non-federal and state funded agencies within the MD BoS CoC's geographic area
serving people experiencing homelessness are highly encouraged to utilize the standards, only those
agencies receiving CoC Program, ESG Program and State HSP program funds are mandated to comply
with the standards contained in this document.

This document provides a detailed listing of the projects that comprise the MD BoS CoC's Homeless
Response System and outlines the standards to which all projects must adhere.

A CoC is a systematic response to homelessness that ensures that homelessness is prevented
whenever possible or, if it cannot be prevented, it is a rare, brief and non-recurring experience. To
effectively serve the most vulnerable individuals and families, it is imperative that CoC services and
projects align their practices and collaborate to provide seamless and effective permanent housing
interventions. The MD BoS CoC Written Standards support this goal by defining project goals and
increasing transparency in service delivery.

The purpose of this document is to establish policies and procedures for evaluating eligibility for
designated project types found across the MD BoS CoC, prioritizing participants for homelessness
assistance, determining the duration of assistance and defining the minimum or maximum financial
contribution of households receiving rental assistance. This document also includes overarching Core
Expectations, Universal Standards and Guiding Principles that apply to all projects within the CoC.

Definition of terms found throughout the Written Standards may be found in Appendix B.

WHO MUST FOLLOW THE MD BoS CoC WRITTEN STANDARDS

The intent of this document is to standardize the quality and type of services households expect to
receive from homeless service projects across the MD BoS CoC's geographic area. Regardless of where
a household experiencing homelessness presents, the goal of the MD BoS CoC is to ensure that the
individual or family can expect to receive the same standard of services from providers in each area.

With this goal in mind, all CoC, ESG and Maryland HSP-funded projects must comply with the MD BoS CoC Written Standards to the extent that their grant agreement allows. It is highly recommended that projects that do not receive federal or state funding follow the MD BoS CoC Written Standards to further the CoC's goals of transparency, equal access to quality projects and service standardization. Additionally, should a project not currently receiving federal or state funding wishes to apply in future, alignment with the MD BoS CoC Written Standards will ensure that the project is following best practices and ensure compliance.

Although the Written Standards contain guidance for distinct project types, projects are still limited in the services and financial assistance they provide by their grant agreements, funding capacity and federal regulations.

Any program that feels it may be unable to meet the requirements of this document may request a waiver from the Continuum of Care. All requests will be considered by CoC Leadership for final determination.

To submit a waiver request, please send a request to the CoC Help Desk for consideration.

KEY PARTNERS

CONTINUUM OF CARE

A Continuum of Care (CoC) is a geographically based group of representatives who carry out the planning responsibilities required by the U.S. Department of Housing and Urban Development's (HUD) CoC Program. The responsibilities include coordinating and implementing a system designed to meet the needs of the populations experiencing homelessness across the CoC.

MARYLAND BALANCE OF STATE CONTINUUM OF CARE

The Maryland Balance of State Continuum of Care (MD BoS CoC) represents nine suburban and rural counties. The MD BoS CoC is responsible for coordinating and implementing the CoC's homelessness response system, which includes approximately 125 homeless programs, including emergency shelters, transitional housing, rapid rehousing and permanent supportive housing programs. The CoC can serve over 2,300 people experiencing homelessness on any given day.

LOCAL HOMELESSNESS COALITIONS

The nine counties in the Maryland BoS CoC are divided into seven Local Homelessness Coalitions (LHCs). LHCs plan and coordinate local and regional homeless service systems and are responsible for working with the MD BoS CoC to ensure all HUD homeless program requirements and CoC priorities are met. Each LHC designated representatives to serve on the CoC Board of Directors to ensure equitable geographical representation as CoC policy is developed and implemented.

The LHCs in the BoS CoC include:
- Allegany County
- Cecil County
- Frederick County

- Garrett County
- Harford County
- Washington County
- Southern Maryland (Calvert, Charles, and St. Mary's Counties)

HMIS

The Homeless Management Information System (HMIS) is a centralized database that must be used by all federal and state-funded projects to record client and project-level data. HMIS data is a valuable resource with the capacity to integrate and deduplicate data across projects in the CoC. HMIS aggregate data is used to understand the size, characteristics and needs of the homeless population at the client, project and community level.

All CoC homelessness projects participating in HMIS must abide by HMIS Policies and Procedures, which include policies related to system security and client confidentiality, as well as CoC processes for complying with all federal regulations related to the creation and maintenance of an HMIS. Participating projects must also comply with the CoC Data Quality Standards which outline expectations and requirements.

The only exception to the HMIS participation requirement is for designated domestic violence and victim service providers who are prohibited from entering client data into an HMIS. These providers must instead use a designated comparable database to collect all client and project level data elements to meet all HUD and other funding requirements.

MARYLAND DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

The Maryland Department of Housing and Community Development (DHCD) fulfills several key roles within the Maryland BoS CoC. DHCD serves as the Lead Agency and Collaborative Applicant for the Maryland BoS CoC and is responsible for submitting the annual CoC Competition consolidated application and project priority listing to HUD. DHCD also serves as the Homeless Management Information System (HMIS) Lead Agency, which includes the role of HMIS grantee and HMIS administrator. In this capacity, DHCD administers the state's homeless assistance programs – the Homeless Solutions Program (HSP) – as well as the state's allocation of federal Emergency Solutions Grant (ESG) funding.

WHO MAKES DECISIONS

Homeless response systems are often governed by multiple layers of rules, regulations, funding requirements, best practices and local resources.

Understanding why the CoC may have certain policies or rules often depends on the funding source or overarching governing body.

The Federal and State Governments both provide funding opportunities for homeless services programming but also establish legislation and regulations that pertain to specific funding streams. Regulatory organizations, such as HUD and MD DHCD, have the authority to create specific rules, funding eligibility and client eligibility rules, and establish mechanisms that determine how funds will be awarded to providers. Further, local governments have the authority to set zoning and occupancy rules that could impact the delivery of homeless services.

The CoC and Coordinated Entry Process have additional levels of rulemaking, including interpreting legislation to ensure that processes, procedures and system operations are compliant with all applicable rules and regulations. They may also set CoC level goals, priorities, establish funding competitions, standards of care for service delivery, workflow and local policies related to operating programs.

CoC Providers are typically the organizations carrying out the day to day operations and have the authority to establish agency level policy and procedures.

Roles in Homeless Services

Federal Government

US Congress
- Create federal homeless service funding (e.g. CoC & ESG)
- Pass anti-discrimination housing laws (e.g. Fair Housing & Civil Rights)

HUD
- Establish regulations for federal funds
- Set eligibility standards (e.g. chronic homelessness)
- Determine eligible spending activities
- Create NOFO for federal funding allocations

State Government

Maryland General Assembly
- Pass state legislation on housing discrimination (e.g. MD HOME Act)
- Create state homeless service funding (e.g. HSP)

DHCD
- Serve as CoC Lead Agency
- Administer HSP funding
- Create regulations for use of state funds

Local Government

Municipal Government / Housing Authority
- Set zoning regulations and building occupancy rules and regulations that may impact homeless services

MD Balance of State

CoC Governance
- Oversee annual competition for homeless service funding
- Monitor program and system performance for compliance
- Set CoC-wide priorities
- Oversee Coordinated Entry
- Manage the Homeless Management Information System (HMIS)
- Create standards for project service delivery

Coordinated Entry

CE Lead
- Manage the By Name List
- Determine client referral process
- Ensure eligibility based on criteria
- Oversee assessment data
- Establish local level policy based on housing availability

CoC Providers

Local Providers
- Implement programming to provide housing and services for households experiencing homelessness
- Set agency level policies and procedures for program operations (e.g. grievances, appeals and shelter rules)

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CORE EXPECTATIONS

All projects in the MD BoS CoC must adhere to the following Core Expectations:

- **ADHERE TO MD BOS COC POLICIES AND PROCEDURES**, as well as any requirements found in grant agreements for each year a project receives CoC Program funding
- **PARTICIPATE IN HMIS** and comply with the MD BoS CoC HMIS Policies and Procedures
- Projects serving survivors **OF DOMESTIC VIOLENCE ARE PROHIBITED BY VAWA FROM ENTERING CLIENT DATA INTO HMIS** and must enter data into a comparable database that complies with HUD's standards
- **PARTICIPATE IN THE LOCAL COORDINATED ENTRY SYSTEM (CES)** and follow the MD BoS CoC Coordinated Entry Policy and Procedures. *Exception: Homelessness Prevention projects are not currently integrated into the MD BoS CoC Coordinated Entry system*
- **USE A HOUSING FIRST APPROACH.** Housing First is an approach to homeless assistance that prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions such as sobriety or a minimum income threshold. Projects using a Housing First approach often have supportive services; however, participation in these services is based on the needs and desires of project participants
- Operate within a philosophy of **FACILITATING PARTICIPANT CHOICE, AUTONOMY AND DIGNITY**
- **ABIDE BY AND ADOPT FEDERAL, HUD AND COC POLICIES** including, but not limited to the Americans with Disabilities Act (ADA), the Fair Housing Act, HUD's Equal Access to Housing Final Rule, the MD BoS CoC's Non-Separation of Families policy, and the McKinney-Vento regulations pertaining to the Education of Homeless Children and Youth
- **FOLLOW HUD'S PREFERRED ORDER OF DOCUMENTATION** when evaluating and documenting participant eligibility
- **PARTICIPATE** in MD BoS CoC meetings and training as available
- **ABIDE BY AND CONSISTENTLY APPLY THESE WRITTEN STANDARDS**

FUNDING PROGRAMS OVERVIEW

CONTINUUM OF CARE PROGRAM

The Continuum of Care (CoC) Program funds projects that provide housing and supportive services to households experiencing homelessness, including both individuals and families. Projects funded under the CoC Program seek to assist households with attaining and sustaining permanent housing as quickly as possible.

In the MD BoS, CoC Program funds are currently used to support more than approximately 35 Permanent Supportive Housing, Rapid Rehousing, Joint Transitional Housing-Rapid Rehousing, Supportive Service and HMIS projects.

CoC-funded projects will be subject to project monitoring to ensure compliance with the Written Standards for Service Delivery as well as all HUD and CoC regulations and requirements.

Emergency Solutions Grant Program

The Emergency Solutions Grant (ESG) Program supports emergency shelter, rapid rehousing and homelessness prevention activities.

ESG funds can be used for a variety of services, including Homeless Prevention, Street Outreach, Emergency Shelter, Rapid Rehousing (short- or medium-term Rental Assistance, Housing Search and Placement, Utility Arrears and Housing Stability Case Management) and HMIS. The Homelessness Prevention component includes various housing relocation and stabilization services and short- and medium-term rental assistance. The Maryland Department of Housing and Community Development is a recipient of HUD ESG Program funds and administers this award to subrecipients in the MD BoS CoC.

MD Homeless Solutions Program

The Homelessness Solutions Program (HSP) serves as a statewide response to address the issue of homelessness in Maryland, providing technical support and funding to Continuums of Care (CoCs) and Local Homeless Coalitions (LHCs). HSP funds can be used for Street Outreach, Emergency Shelter, Rapid Rehousing, Homeless Prevention, Permanent Supportive Housing Case Management, HMIS and Administrative Costs.

Other Funding Sources

In addition to grant funding specifically designated for homeless services, there are additional funding sources that specifically target designated populations within the Continuum of Care. Examples include

DEPARTMENT OF VETERANS AFFAIRS: manages funding sources similar to the CoC and ESG grants but targeting households with U.S. military service background. These programs include:
   a. Supportive Services for Veteran Families (SSVF): similar to RRH
   b. Grant Per Diem (GPD): similar to transitional housing
   c. HUD Veteran Affairs Supportive Housing (HUD-VASH): similar to PSH

HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA): manages funding sources of varying models that specifically targets housing needs of those living with HIV/AIDS.

RUNAWAY AND HOMELESS YOUTH PROGRAM (RHY): manages funding sources similar to CoC and ESG grants, but targets youth experiencing homelessness.

PROJECTS FOR ASSISTANCE IN TRANSITION FROM HOMELESSNESS (PATH): manages funding to provide services for people with serious mental illness (SMI) experiencing homelessness.