

ST. CLAIR COUNTY ILLINOIS CONTINUUM OF CARE PROGRAM STANDARDS



CoC IL-508 - St. Clair County, Illinois

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St. Clair County Illinois Continuum of Care Homeless Program Standards

The U.S. Department of Housing and Urban Development (HUD) via Emergency Solutions Grant Rules and Regulations (ESG) and- the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rules The McKinney-Vento Homeless Assistance Act, As Amended by S. 896 Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 requires that Continuum of Care (COC) establish and consistently follow written standards for providing Continuum of Care assistance. These Standards outline the requirements set forth by the Code of Federal Regulations 24 CFR Part 578. The St. Clair County Illinois Continuum of Care (SCC COC) has developed these standards to fulfill requirements and to help end homelessness.

Topics related to eligible costs and activities within federal and state funding sources, Grant Close-Out procedures, Performance Evaluation, Homeless Management Information System (HMIS) participation requirements, and specific Homeless Action Council (HAC) guidelines are not addressed in these Written Standards. For detailed information on these topics, please refer to the applicable funding source documentation , grant close-out instructions, HMIS policies and the Homeless Action Council (HAC) Bylaws.

Standards for All Projects

These standards apply to all HUD funded COC projects, i.e., Emergency Shelter (ES), Transitional Housing (TH), Rapid Re-housing (RRH), and Permanent Housing (PSH). All projects should adhere to the standards outlined in the following sections. Where there –is some variations in applicability by project type, those variations will be noted in the project type-specific sections. Although the following standards apply to all SCC COC homeless projects, these standards are not exhaustive in terms of outlining all federal or state homeless program funding requirements, as noted above. Organizations operating HUD funded homeless projects must ensure they read, understand, and comply with all program regulations. All SCC CoC homeless programs required to comply with these standards and must update all relevant organizational and program documents to reflect compliance within six (6) months of the release of the standards.

All projects are expected to utilize their resources funded for St. Clair County in St. Clair County unless there is good cause to go outside of the County (i.e. a DV situation). The agency may approach the COC Collaborative Applicant and Homeless Action Council (HAC) Board of Directors if there are extenuating circumstances to utilize funds outside of the St. Clair County COC area. Any changes to applications should be brought to the SCC COC Collaborative Applicant and Homeless Action Council (HAC) Board of Directors. For more details, refer to the HOMELESS ACTION COUNCIL OF ST. CLAIR COUNTY BYLAWS for more information ([Appendix C](#)) .

Continuum of Care Program, Supportive Housing Program and Department of Human Services Compliance

SCC COC homeless projects funded through HUD's Continuum of Care Program (CoC) must ensure they are operating in compliance with the 24 CFR Part 578. Projects funded through Illinois Department of Human Services (IDHS) must ensure they are in compliance with all relevant state regulations. These regulations can be located at [IDHS: Search](#).

Non-Discrimination

Anti-Discrimination Policy

All recipients and subrecipients of CoC program ESG program funding in St Clair County shall comply with all applicable non-discrimination laws and regulations, including those enforced by the U.S. Department of Housing and Urban Development (HUD) or any other applicable funding source, and shall ensure that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity funded in whole or in part by HUD and/or any other applicable funding source.

Definition of 'Family'

The federal definition of 'family' set forth by 24 CFR 5.403 for purposes of receiving assistance from certain programs is as follows:

- Family includes, but is not limited to, regardless of marital status, actual or sex, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

There may be exceptions for programs funded through special initiatives under the annual CoC Competition. Some of these initiatives may have specific eligibility requirements or definitions that slightly differ from the standard CoC family definition.

Protections for Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

The Violence Against Women Act (VAWA) Final Rule (24 CFR Part 5 Subpart L) establishes essential protections across HUD's covered programs. It ensures that survivors are not denied assistance as applicants, nor evicted or have their assistance terminated as tenants, due to their status as victims of domestic violence, dating violence, sexual assault, or stalking.

Efforts must be made to safeguard the rights, privacy, and safety of survivors of domestic violence, dating violence, sexual assault, or stalking (hereafter referred to as "domestic violence survivors"). To protect survivors in such situations, the final rule prohibits any denial, termination, or eviction that is directly related to the applicant or tenant being a victim of domestic violence, dating

violence, sexual assault, or stalking, provided the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy.

All St. Clair County Continuum of Care (SCC CoC) HUD-funded projects must maintain written policies and procedures that comply with the [Violence Against Women Act \(VAWA\)](#) , including provisions for emergency transfers in accordance with [24 CFR Part 5 Subpart L](#) .

Leases, subleases, or occupancy agreements for tenants receiving assistance under the CoC or ESG Programs must include VAWA addendums that clearly outline the applicable statutory protections outlined in [24 CFR Part 5 Subpart L](#) .

Program Operations and Components

Staffing in CoC Funded Programs

SCC COC funded programs must be adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants. Each agency of CoC-funded programs must have a policy outlining staff roles, responsibilities, and expectations. These policies must:

- Clearly define staff roles and responsibilities to prevent duplication of services and ensure accountability.
- Establish minimum qualifications and competencies for each role to promote effective service delivery.
- Provide training and professional development opportunities to enhance staff skills and knowledge.
- Ensure adequate supervision and support for program staff to maintain service quality and compliance with CoC standards.

Participation in Coordinated Entry

SCC COC HUD funded projects must participate in the SCC COC Coordinated Entry process and follow the CoC's Coordinated Entry Policies and Procedures related to creating and maintaining a prioritization list. Coordinated entry is a centralized and streamlined system for accessing housing and support services to end homelessness in a community and is required by HUD for all CoCs as stated in [24 CFR 578.7](#) of the CoC Program Interim Rule. SCC CoC has a single designated point of access to coordinated entry at the St. Clair County Housing Resource Center (HRC), 19 Public Square, Suite 200, Belleville, IL 62220. Coordinated Entry / HRC staff use the CoC's Coordinated Entry Assessment Tool, specifically the Risk Frailty Scoring Matrix, to determine the severity of service needs for homeless individuals. If available, information about a homeless person's use of local crisis services can supplement the assessment, providing a more comprehensive understanding of their severity of need. Individuals in need of assistance can call 618-825-3330, 24 hours a day, to access emergency services. The only exceptions are for persons fleeing domestic violence, who may contact the Violence Prevention Center's 24-hour crisis hotline at 618-235-0892. In addition, the Violence Prevention Center of Southwestern IL will follow the same prioritization procedure with the sole focus on survivors of domestic violence.

SCC COC HUD funded projects must abide by all approved SCC COC Coordinated Entry policies and procedures. Please visit the St. Clair County webpage to locate the IL-508 COORDINATED ENTRY SYSTEM POLICY AND PROCEDURES for the Saint Clair County Continuum of Care. [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#)

Match

All CoC funded program projects are required to provide matching funds set forth by [24 CFR 578.73](#). The minimum match requirement is 25% of the total award, excluding any amounts designated for leasing. Leasing funds do not require a match; however, all other funds awarded for a leasing project are subject to the 25% match requirement.

- Match can be provided in the form of cash and/or in-kind services.
- All matching funds, whether cash or in-kind, must be used for eligible and allowable CoC Program costs as outlined in [24 CFR Part 578 Subpart D -- Program Components and Eligible Costs](#) for the specific project type.
- A match commitment must be documented on the official letterhead of the agency providing the match.
- In-kind services require a Memorandum of Understanding (MOU) on agency letterhead, to be completed before the start of the operating year. The MOU must clearly state that the services will be provided during the operating year.
- Only services explicitly listed in the MOU will be considered eligible match.

Recipients and/ or subrecipients are required to submit match documentation, including amounts, with their monthly invoice. The submitted match must align with the match commitment letter, and if in-kind services are used, they must correspond to the services defined in the Memorandum of Understanding (MOU). Each monthly invoice must specify both the match for the month and the cumulative match-to-date.

If a recipient and/ or subrecipient agency wishes to modify the committed match, the agency must submit a written request to the Collaborative Applicant and Board of Directors. This request must include:

- The reason for the change
- Details of the new match source
- The funding amount

Cash Match

Cash match occurs when a recipient and/or subrecipient uses non-CoC Program grant funds to cover eligible costs, including staff time for eligible activities.

Required Documentation

A written commitment on the committing agency's letterhead, signed and dated by an authorized representative, must include:

- Amount of cash committed to the project
- Date the cash will be available
- Grant and fiscal year to which the cash match will be applied
- Allowable activities the cash match will fund
- Tracking records following general accounting principles (e.g., general ledger entries)
- Source documentation proving that the cash match was spent on eligible activities

In-Kind Match

In-kind match occurs when non-cash contributions of goods, services, or property that support eligible program activities and meet the CoC match requirement.

In-Kind Property Documentation

For in-kind contributions of property, equipment, or goods, the following documentation is required:

- *A commitment letter from the donating entity*
- *Tracking records demonstrating that the donated items were received and utilized for the project or its participants during the grant term*

Please refer to [CoC Match - Overview - HUD Exchange](#) for more guidance.

Housing Search, Landlord Recruitment, and Landlord Engagement

To support rapid and successful placement into permanent housing, all programs must provide or coordinate housing search and landlord engagement services. These services must reflect Housing First principles, emphasizing participant choice, reducing barriers, and supporting housing stability.

Housing Search

Upon project enrollment, participant housing preferences must be obtained and housing search services initiated without delay. Participants are encouraged to take an active role in their search, and programs must support empowerment and choice throughout the process.

Programs must:

- Provide housing referrals or allow participants to search independently if they choose.
- Remain involved in landlord communications even if the participant initiates contact.
- Provide participants with education and scripts to aid in approaching landlords.
- Aim to complete a minimum of three housing viewings within the first 30 days of enrollment.

Landlord Recruitment

Programs must maintain professional and clear communication with landlords. At lease-up, staff must:

- Provide the landlord with staff contact information and communication protocols;
- Clarify that agency staff are not on-call 24 hours and that landlords should first contact the tenant directly for non-emergency issues;
- Direct landlords to call 911 in the case of police or medical emergencies.
- Non-emergency contacts from landlords should be acknowledged by program staff within 1–3 business days.

Occupancy, Rent Calculations and Utility Allowance

Occupancy Agreements and Leases

Recipients and/or subrecipients must ensure that all program participants residing in housing have signed occupancy agreements, leases, or subleases in place.

Calculation of Occupancy Charges

Occupancy charges are not required for program participants. However, if they are imposed, they must not exceed the highest of the following:

- 30% of the family's monthly adjusted income, considering factors such as:
 - Family size
 - Age of family members
 - Medical expenses
 - Child-care expenses
- 10% of the family's monthly income
- The portion of welfare assistance designated by a public agency for housing costs, adjusted in accordance with actual housing expenses.

Income Determination:

- Income must be calculated in accordance with [24 CFR 5.609 -- Annual income](#) and [24 CFR 5.611 -- Adjusted income](#).
- Initial income examination is required
- If a participant experiences a change in family composition (e.g., birth of a child) or a decrease in income, they may request an interim reexamination, and the occupancy charge will be adjusted accordingly.

Resident Rent Contributions

- Rent Amount
 1. Each program participant receiving rental assistance must contribute toward rent as outlined in section 3(a)(1) of the U.S. Housing Act of 1937 ([42 U.S.C. 1437a\(a\)\(1\)](#)).

2. Income calculations must follow [24 CFR 5.609 -- Annual income](#) and [24 CFR 5.611 -- Adjusted income](#).
- Income Review
 1. Recipients and/or subrecipients must conduct an initial income examination and an annual income review to determine the participant's rent contribution.
 2. Adjustments must be made whenever income changes are identified.
 - Income Verification
 1. As a condition of participation, each program participant must provide documentation to verify income.
 1. Participants must report any income changes or other relevant circumstances that could impact their rent contribution.

Please refer to [CoC Rent Calculation - Overview - HUD Exchange](#) for more guidance

Rent Reasonableness

Rental assistance is only provided if the total rent for the unit complies with HUD's standard of rent reasonableness. Recipients and subrecipients should determine rent reasonableness by considering the gross rent of the unit, including:

- The location of the unit
- The quality of the unit
- The size of the unit
- The type of the unit
- The age of the unit
- The amenities, maintenance, and utilities to be provided by the owner

Comparable rents for similar units in the area, determined by:

- Comparing rental amounts for similar units based on size, condition, and amenities in the local rental market

For more information on how to determine rent reasonableness, refer to [Rent Reasonableness and Fair Market Rent Under the Continuum of Care Program](#) and [24 CFR 578.51](#).

Establishing Reasonable Monthly Utility Consumption

Under HUD [Notice CPD-17-11](#), guidance is provided on the utility allowance and reimbursement for projects funded under the Continuum of Care (CoC) Program and Emergency Solutions Grants (ESG) Program. Recipients and/or subrecipients must ensure that reasonable monthly utility consumption amounts are determined for program participants. The calculation of these amounts must adhere to the local Public Housing Authority (PHA) schedule of utility allowances.

Utility Allowance

- Recipients and subrecipients must use the local Public Housing Authority (PHA) utility allowance schedule to determine reasonable monthly utility consumption for program participants.
- The utility allowance is based on unit size and the utilities the participant is responsible for paying.
- If a program participant receives rental assistance and is required to pay utilities separately, the recipient or subrecipient must deduct the appropriate utility allowance from the participant's total rent responsibility.

Utility Reimbursement

- If a program participant's rent contribution (based on 30% of adjusted monthly income) is less than the utility allowance, the difference must be reimbursed to the participant to cover utility costs.
- The recipient or subrecipient is expected to provide the utility reimbursement directly to the utility provider on their behalf.

Housing Inspections

Housing 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 standards under [24 CFR 5.703](#), except that the carbon monoxide detection requirement at [24 CFR 5.703 \(b\)\(2\) and \(d\)\(6\)](#) shall not apply. For housing occupied by program participants receiving tenant-based rental assistance, [24 CFR Part 35](#), subparts A, B, M, and R apply. For housing that receives project-based or sponsor-based rental assistance, [24 CFR Part 35](#), subparts A, B, H, and R apply. For residential property where funds under this program are used for acquisition, leasing, services, or operating costs, [24 CFR Part 35](#), subparts A, B, K, and R apply. Additionally, for tenant-based rental assistance, individual unit leases, and sponsor-based rental assistance when not all units in a building are or will be assisted, the standards apply only to the unit itself, the pathways for entering and exiting the unit to the public way, and the building's shared areas.

Inspection Requirements

- Initial Inspection: Before any assistance is provided on behalf of a program participant, the recipient or subrecipient must physically inspect each unit to ensure compliance with [24 CFR 5.703](#). Assistance will not be provided for units that fail to meet these standards unless the owner corrects all deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected.
- Annual Inspections: Recipients or subrecipients must inspect all units at least annually during the grant period to ensure continued compliance with [24 CFR 5.703](#).
- Exemptions: The requirements in [24 CFR 5.705](#) through [24 CFR 5.713](#) do not apply

Suitable Dwelling

- The dwelling unit must have at least one bedroom or living/sleeping room for every two persons.
- Children of opposite sex, except for very young children, may not be required to occupy the same bedroom or living/sleeping room.
- If household composition changes during the term of assistance, recipients and subrecipients may relocate the household to a more appropriately sized unit, ensuring continued access to necessary supportive services.

Each agency of CoC-funded programs must have a policy outlining their adherence to above regulations.

Lead Based Paint Policy

All CoC funded programs must comply with federal regulations regarding lead-based paint hazards. All recipients and subrecipients must adhere to the following regulations to protect program participants, particularly households with children under the age of six and pregnant individuals, from exposure to lead-based paint hazards:

- The Lead Disclosure Rule ([24 CFR Part 35 Subpart A](#))
- The Lead-Safe Housing Rule ([CFR Part 35 Subpart B](#))
- The Lead Renovation, Repair, and Painting (RRP) Rule ([40 CFR Part 745 Subpart E](#))

Each agency of CoC-funded programs must have a policy outlining their adherence to above regulations.

Please refer to [Appendix C](#) for more guidance

Environmental Review

Continuum of Care (CoC) Program recipients must correctly identify the level of environmental review required for their CoC Program projects. Recipients of HUD funding must conduct environmental reviews to ensure compliance with federal environmental laws, thereby protecting both the environment and community health. CoC projects must adhere to HUD's procedures and standards, assessing environmental impacts and complying with NEPA and other relevant laws as outlined in [24 CFR Part 58](#). This regulation provides guidelines for entities assuming HUD's environmental responsibilities, detailing how to conduct environmental reviews for HUD-assisted projects. More information and resources can be found at: [CoC Program Environmental Review Resources - HUD Exchange](#)

Homeless Program Eligibility

Persons served by SCC COC homeless projects must be defined as homeless according to HUD's Homeless definition set forth 24 CFR 578.3.

The Homeless definition is comprised of four categories:

- Category 1:** Literal homelessness is further defined as homeless individuals/families who lack a fixed, regular, and adequate nighttime residence, meaning:
- i. Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation, such a place not meant for human habitation
 - ii. Living in emergency shelter or transitional housing designated to provide temporary living arrangements (including hotel/motel stays paid for by charitable or government programs)
 - iii. Exiting an institution where the individual resided for less than 90 days and where the individual entered the institution immediately from emergency shelter (including hotel/motel stays paid for by charitable or government programs) or an unsheltered location
- Category 2:** Individuals/families who will imminently (within 14 days) lose their primary night-time residence with no subsequent residence AND no resources or support networks
- Category 3:** Unaccompanied youth or families with children/youth who meet the homeless definition under another federal statute and 3 additional criteria (HUD has not granted any SCC COC homeless projects permission to serve households defined as homeless under category 3)
- Category 4:** Individuals/families fleeing or attempting to flee domestic violence with no subsequent residence AND no resources or support networks

Not all SCC COC homeless projects are permitted to serve people defined as homeless under all four categories of the Homeless definition.

Program Eligibility Reference Chart

The Program Eligibility Chart is intended as a quick reference. For further explanations on the program eligibility description, population, specializations, time frame, etc., see the program standards in this document.

Program Type	Category 1: Literally Homeless	Category 2: Imminent Risk of Literal Homelessness	Category 3: Unaccompanied Youth or Families with Children/Youth	Category 4: Fleeing/Attempting to Flee Domestic Violence (DV)
Homeless Prevention		✓		✓

Program Type	Category 1: Literally Homeless	Category 2: Imminent Risk of Literal Homelessness	Category 3: Unaccompanied Youth or Families with Children/Youth	Category 4: Fleeing/Attempting to Flee Domestic Violence (DV)
Emergency Shelters	✓	✓		✓
Transitional Housing	✓	✓		✓
Rapid Re-housing	✓	✓		✓
Permanent Supportive Housing	✓			✓

More detailed information and official HUD guidance on the homeless definition and program eligibility can be found at [CoC Program Toolkit - Introduction to the CoC Program - HUD Exchange](#)

Recertification

All CoC program participants must undergo a recertification process at least annually, in accordance with 24 CFR 578.77. Participants must be recertified at least once every 12 months from the date of initial enrollment or last recertification. During recertification, the following criteria must be reviewed and documented:

- **Income Eligibility:**
Verification of all household income sources to ensure compliance with HUD income limits.
- **Homelessness Status (if applicable):**
Confirmation that the participant still meets program eligibility requirements.
- **Housing Stability:**
Assessment of the participant's ongoing need for assistance and case management services.
- **Compliance with Program Requirements:**
Review of participant engagement in required services, lease compliance, and other program expectations.

Documentation and Recordkeeping Requirements

To ensure compliance with all applicable requirements, SCC COC homeless projects must establish and maintain policies and procedures. Internal policies and procedures should outline program design and are to be provided to the SCC COC Collaborative Applicant at the beginning

of each calendar year and/ or upon request. These policies and procedures are essential for making sure that Continuum of Care (CoC) program funds are used appropriately. Additionally, maintaining sufficient records is crucial for enabling HUD to verify that all requirements are being met. Set forth by the Interim Rule ([24 CFR 578.103.](#)), documentation and record keeping include the following:

Organizational Recordkeeping Requirements

SCC COC maintain the following records at the organizational level:

- **Standard Operating Procedures:**
maintain procedures for ensuring that program funds are used in accordance with all applicable requirements
- **Conflict of Interest Policies:**
maintain conflict of interest policies; organizational, or funding entity conflict of interest requirements
- **Homeless Consumer Participation:**
maintain evidence that at least one homeless or formerly homeless individual sits on the board of directors or other equivalent policymaking entity

Grant-Specific Recordkeeping Requirements

SCC COC Hud funded homeless projects must also maintain the following records pertaining to their specific projects:

- **Project-Specific Policies and Procedures:**
maintain policies and procedures regarding documentation of program participant eligibility and all other aspects of program operation to ensure compliance and consistency with all federal and state regulations.
- **Services Provided:**
document the types of supportive services provided to participants and the amount spent on those services, as well as evidence that ongoing assessment of overall service needs was offered and/or provided.
- **Housing Quality Standards:**
where required to be conducted, retain documentation demonstrating that HQS inspections were completed for units paid for with leasing or rental assistance funds.
- **ESG Minimum Habitability Standards for Emergency Shelters and Permanent Housing:**
where required to be conducted, retain documentation demonstrating that habitability inspections were completed for ESG-funded projects
- **Match:**

maintain records of the source and use of all cash and in-kind contributions used to satisfy federal/state match requirements. These records must further indicate the grant/project and fiscal year for which the matching contributions were provided. (You can find more information regarding Match requirements at [CoC Match - Match Requirements - HUD Exchange](#))

- **Homeless Status:**

Acceptable evidence of homeless status as set forth in 24 CFR 576.500.

- **Chronically Homeless Status:**

Maintain and follow written intake procedures to ensure compliance with the chronically homeless definition in 24 CFR 578.3. This includes:

- **Evidence of Homeless Status :**

- HMIS records, written observations, written referrals, or certifications by individuals seeking assistance.

- **Evidence of Disability:**

- Written verification from licensed professionals, Social Security Administration, disability checks, intake staff observations, or other HUD-approved documentation.

- **Institutional Care Facilities:**

- Documentation of stays in institutional care facilities and evidence of homeless status prior to entry.

- **At Risk of Homelessness Status:**

Maintain records that establish “at risk of homelessness” status for individuals or families receiving homelessness prevention assistance.

- **Program Participant Records:**

Keep records for each program participant documenting eligibility, services provided, and compliance with program requirements.

- **Confidentiality and Security:**

Develop and implement written procedures to ensure the security and confidentiality of records containing protected identifying information.

- **Special Provisions for Domestic Violence Programs:**

Projects providing confidential domestic violence housing and services are exempt from filling vacancies through CES but can access resources through Coordinated Entry Access Points.

- **Compliance with Civil Rights:**

Ensure compliance with applicable civil rights and provide program participants with information on their rights and remedies under federal, state, and local laws.

Program Participant Recordkeeping Requirements

SCC COC HUD funded homeless projects must document and maintain records related to participant eligibility and the services provided to participants. An overview of these requirements is as follows:

- **Homeless Status :**

Projects maintain records documenting acceptable evidence of participants' homeless status in compliance with 24 CFR 576.500 (b) which requires compliance with the order of priority for obtaining evidence:

1. *Third-party documentation*,
 - Example: HMIS record, documentation on letterhead from a shelter or transitional housing (TH) project
2. Intake worker observations,
 - Example: Intake worker's observation
 - Case workers must document their due diligence in attempting to obtain third-party written verification before relying on oral verification
3. Certification from the person seeking assistance
 - Allowed only if neither third-party written nor third-party oral verification could be obtained
 - Case workers must document all efforts made to obtain third-party verification before accepting self-certification

Lack of third-party documentation must not prevent an individual or family from:

- Being immediately admitted to emergency shelter
- Receiving street outreach services
- Being admitted to shelter or receiving services from a victim service provider

Records contained in an HMIS (Homeless Management Information System) or a comparable database used by victim service or legal service providers are acceptable forms of third-party documentation and intake worker observations, provided that:

- The HMIS retains an auditable history of all entries, including:
 - a. The person who entered the data
 - b. The date of entry
 - c. The change made

HMIS prevents overrides or changes to the original entry dates.

- **Other Program Eligibility Verification:**

document compliance with any other program eligibility criteria, such as disability status

- **Services and Assistance Provided:**

homeless projects must keep records for all program participants that outline the service provided, including:

- Evidence that, at minimum, an annual assessment of service needs was completed (certain programs require more frequent assessment)
 - In cases of participant termination from a program, the project must demonstrate that it followed all applicable federal requirements
- **Annual Income:** when any kind of rent is paid by program participants or when program eligibility is based in part on income, the homeless project must keep the following documentation of annual income:
 - Income evaluation form (some programs require that specific forms be completed)
 - Source documents (wage statements, bank statements, etc.)
- **Chronically Homeless Status:**
Maintain and follow written intake procedures to ensure compliance with the chronically homeless definition in 24 CFR 578.3. This includes:
- **Evidence of Homeless Status:**
HMIS records, written observations, written referrals, or certifications by individuals seeking assistance.
- **Evidence of Disability:**
Written verification from licensed professionals, Social Security Administration, disability checks, intake staff observations, or other HUD-approved documentation.
- **Institutional Care Facilities:**
Documentation of stays in institutional care facilities and evidence of homeless status prior to entry.
- **At Risk of Homelessness Status:**
Maintain records that establish “at risk of homelessness” status for individuals or families receiving homelessness prevention assistance.
- **Confidentiality and Security:**
Develop and implement written procedures to ensure the security and confidentiality of records containing protected identifying information.
- **Special Provisions for Domestic Violence Programs:**
Projects providing confidential domestic violence housing and services are exempt from filling vacancies through CES but can access resources through Coordinated Entry Access Points.
- **Compliance with Civil Rights:**
Ensure compliance with applicable civil rights and provide program participants with information on their rights and remedies under federal, state, and local laws.

*Please refer to the **Internal Wellness Checklist for the Continuum of Care (CoC) Program** in Appendix C for more guidance. All agencies must have required documentation in files.*

Privacy and Confidentiality

CoC- funded programs must abide by and have a policy outlining the federal confidentiality regulations set forth by 24 CFR 574.440.

Homelessness Prevention Standards

The purpose of Homelessness Prevention (HP) projects is to prevent individuals and families who are at greatest risk of homelessness from becoming literally homeless.

Homelessness Prevention Eligibility

Homelessness Prevention (HP) projects must serve persons who meet category 2 or 4 of HUD's homeless definition, as outlined in the previous section, or persons who meet HUD's definition of At-Risk of Homelessness set forth by 24 CFR 578.3. Providers should remember that the individuals/families defined as At-Risk of Homelessness must meet all of the following criteria:

- Meet income requirements set by federal or state funder
- Do not have sufficient resources or support networks immediately available to prevent literal homelessness, as defined in 24 CFR Part 578; and
- Meet at least one of the following seven conditions:
 - Moved two or more times due to economic reasons in 60 days prior to application for assistance
 - Living in home of another due to economic hardship
 - Losing housing within 21 days after application date
 - Live in hotel/motel not paid for by charitable organizations or federal/state/local government programs
 - Live in severely overcrowded unit as defined by the US Census Bureau
 - Exiting publicly funded institution or system of care
 - Live in housing associated with instability and increased risk of homelessness, as defined in the Con Plan

Providers should remember that to be defined as homeless under category 2 of HUD's homeless definition, individuals/families must be imminently losing their housing AND have no subsequent residence identified AND lack resources or supports to obtain other permanent housing.

All of this must be documented as outlined in the Documentation and Recordkeeping Requirements section and must comply with the regulations set forth in the Interim Rule (24 CFR 578.103).

Housing First in Homelessness Prevention

All SCC COC homeless assistance projects must follow a Housing First approach. For Housing Prevention (HP) projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry

- Reducing barriers to entry
 - HP projects must minimize any barriers to entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility requirements and population prioritizations. HP projects should screen people applying for prevention assistance to identify people with greater vulnerabilities and/or urgency, i.e., closer to becoming literally homeless, to prioritize applicants for assistance when demand exceeds resources
 - HP considers those households already in doubled-up situations, rather than households residing in their own rental unit, as more at risk for literal homelessness. Doubled-up households being forced out of their current housing situation should be prioritized over those in their own rental unit.

Housing First in Program Design

- Voluntary Supportive Services
 - HP projects must offer services to program participants on a voluntary basis. However, HP projects may require program participants to meet with case managers on a regular basis for purposes of working through plans/steps related to overcoming immediate and direct housing barriers and securing/maintaining housing.
- Housing Focused Assistance
 - HP projects' primary goal is to prevent literal homelessness as quickly as possible, regardless of other personal issues or concerns.
 - HP financial assistance (i.e., rental assistance) is individualized and flexible. This means, for example, that HP projects do not have a policy of providing only one month of financial assistance. All HP projects should assess program participants' need to determine their individualized amount of financial assistance and the duration of that assistance.

Emergency Shelter Projects Standards

The purpose of Emergency Shelter (ES) projects is to provide temporary shelter to households who are homeless and have no other housing options or resources to obtain housing.

Emergency Shelter Eligibility

Emergency shelter (ES) projects must serve persons who meet category 1, 2, or 4 of HUD's homeless definition, as outlined in 24 CFR Part 578. Providers should remember that to be defined as homeless under category 2 of HUD's homeless definition, individuals/families must be imminently losing their housing AND have no subsequent residence identified AND lack resources

or supports to obtain other permanent housing. All of these must be documented as described in the previous section.

ES projects that serve families must comply with HUD's requirements related to the definition of family as outlined earlier in this document, and they must keep families intact.

All of this must be documented as outlined in the Documentation and Recordkeeping Requirements section and must comply with the regulations set forth in the Interim Rule (24 CFR 578.103).

Housing First in Emergency Shelters

All SCC COC homeless assistance projects must follow a Housing First approach. For ES projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry

- Diversion
 - ES projects should divert people/households with other housing options or resources away from shelter and offer immediate linkage to homelessness prevention resource where needed, desired, and available.
- Reducing barriers to entry
 - ES projects must minimize any barriers to entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility requirements.
 - ES projects should not have policies that prohibit, or limit returns to the project for more than 30 days immediately after client exit, except for cases in which a program participant poses a danger to other residents or staff. Persons experiencing homelessness should be provided with shelter when needed.

Housing First in Program Design

- Voluntary Supportive Services
 - ES projects may offer supportive services to program participants on a voluntary basis. ES projects may require program participants to meet with case managers on a regular basis for purposes of working through plans/steps related to overcoming immediate and direct housing barriers and securing housing.
- Housing Focused Assistance
 - ES projects' primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns.

Transitional Housing Projects Standards

The purpose of Transitional Housing (TH) projects is to facilitate the movement of homeless individuals and families to permanent housing as quickly as possible. TH projects should be targeted to persons who have been assessed as not being able to quickly resolve their homelessness

on their own, but who do not have needs great enough to necessitate placement into Permanent Supportive Housing.

Transitional Housing Eligibility

All TH projects must serve persons who meet category 1, 2, or 4 of HUD's homeless definition set forth by 24 CFR 578.3.

TH projects serving category 2 homeless should remember that to be defined as homeless under category 2 of HUD's homeless definition individuals/families must be imminently losing their housing AND have no subsequent residence identified AND lack resources or supports to obtain other permanent housing.

All of this must be documented as outlined in the Documentation and Recordkeeping Requirements section and must comply with the regulations set forth in the Interim Rule (24 CFR 578.103).

Transitional Housing Prioritization

TH projects should be targeted to persons who have been assessed as not being able to quickly resolve their homelessness on their own, but who do not have needs great enough to necessitate placement into Permanent Supportive Housing. Coordinated Entry should further screen homeless applicants to identify people with greater vulnerabilities and prioritize those applicants for assistance.

Housing First in Transitional Housing

All SCC COC homeless assistance projects must follow a Housing First approach. For TH projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry

- Reducing barriers to entry
 - TH projects must minimize any barriers to applicant's entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility and prioritization requirements.
 - TH projects should prioritize for assistance those persons with greater vulnerabilities.

Housing First in Program Design

- Voluntary Supportive Services
 - TH projects must offer supportive services to program participants on a voluntary basis. However, TH projects may require program participants to meet with case

- managers on a regular basis for purposes of evaluating the extent to which participants have ongoing need for the TH project assistance.
- Housing Focused Assistance
 - When screening applicants for admission into the TH project, Coordinated Entry must assure that applicants are linked with TH assistance when:
 - TH is desired by the applicant
 - TH is most appropriate to meet health and safety needs of the applicant
 - No permanent housing solutions (with or without services) are available that similarly or better meet the desires and needs of the applicant
 - TH projects' primary goal is to safely place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns.

Rapid Re-Housing Projects Standards

The purpose of Rapid Re-Housing (RRH) projects is to move homeless individuals and families out of emergency shelter (and, in some cases, out of TH) to permanent housing as quickly as possible. Each COC-partnered agency should adapt at minimum the following standards. Each agency can include more details in their own policies and procedures.

Rapid Re-Housing Eligibility

Per the HEARTH Act and the Continuum of Care Program Interim Rule, eligibility for Rapid Rehousing is satisfied by membership in Categories 1, 2, and 4.

Participants must enter from:

- A place not meant for human habitation- cars, parks, sidewalks, and abandoned buildings;
- An emergency shelter or government/charity-funded motel (emergency voucher);
- A Safe Haven (as defined by HUD);
- One of the above places but temporarily – for no more than 90 days– in an institution;
- Transitional Housing for homeless people and originally came from the streets or emergency shelter;
- Persons being evicted within fourteen days and no subsequent residence has been identified and lacks resources and support network to access housing
- Youth/families who are homeless under other Federal Statutes (Category 3); eligibility depends on the specific program or funding stream

Eligibility for Rapid Re-Housing (RRH) and other homelessness assistance programs may be restricted or subject to exceptions based on the specific criteria outlined in the Notice of Funding Opportunities (NOFOs).

All of this must be documented as outlined in the Documentation and Recordkeeping Requirements section and must comply with the regulations set forth in the Interim Rule (24 CFR 578.103).

Rapid Re-Housing Prioritization

Where possible, RRH projects should be targeted to individuals and households who are unable to resolve their homelessness on their own but do not have service needs so great as to necessitate movement into TH or PSH. Within this targeted population, RRH providers should prioritize for assistance those people with greater vulnerabilities and less likelihood of exiting homelessness “but for” rapid re-housing assistance, RRH projects should strive to serve as many appropriate participants as possible, adjusting the duration and amount of assistance in order to meet the individualized needs.

Additionally, in cases where an eligible homeless Veteran has been identified, and that Veteran is not eligible for VA programs; RRH providers should prioritize the homeless Veteran for assistance.

Housing First in Rapid Re-Housing

All SCC COC homeless assistance projects must follow a Housing First approach. For RRH projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry

- Reducing barriers to entry
 - RRH projects must minimize any barriers to homeless persons/households’ entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility (and any population prioritization) requirements. RRH projects should prioritize for assistance those persons with greater vulnerabilities. This may be determined, in part, through completion of the CoC’s coordinated entry assessment tool

Housing First in Program Design

- Supportive Services
 - RRH projects must offer supportive services to program participants. RRH projects will require program participants to meet with case managers.
 - Participants will be required to meet a minimum of once a month 24 CFR 578.37(a)(1)(ii)(F). Clients should execute a client service agreement prior to admittance in the program acknowledging and understanding the requirements, i.e. detailing the participant’s role and expectations such as income documentation, case management, rent calculations. Meetings are for but not limited to ensuring the household is making progress on their housing plan and/or is stable in housing.
- Housing Focused Assistance

- RRH projects' primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns. To that end supportive services should be tailored to the client's needs as they pertain to obtaining and retaining permanent housing.
- RRH financial assistance, i.e., rental assistance may be individualized and flexible. Please see the following section for details about SCC COC standards related to the provision of RRH financial assistance

Determining Rental Assistance Provided

All SCC COC RRH projects must adhere to the following standards to determine the amount and duration of RRH assistance that can be provided to program participants.

1. Amount and Duration of Rental Assistance

- SCC CoC RRH projects provide time-limited, individualized financial assistance to help participants obtain and retain permanent housing.
- Financial assistance is provided at the minimum necessary amount and duration to avoid an immediate or near-term loss of housing.
- The length of rental assistance is determined by client need.

2. Rental Subsidies & Client Contributions

- Rental subsidies are based on client income.
 - Initial assistance can cover up to 100% of rent, depending on client income.
 - Clients will pay a percentage of their income toward rent, with 30% as the goal.
- Declining Assistance Model:
 - Rental assistance decreases in steps based on a fixed timeline determined by the program.
 - The goal is for households to "graduate" from the program once:
 1. They no longer meet eligibility requirements, per the funding source, or
 2. A Case Manager determines assistance can be terminated, whichever comes first.
 - Regular assessment tools should be used to evaluate the need for continued assistance.
 - Agencies must document their selected method in policies and procedures (see Appendix A – Rapid Rehousing Toolkit for examples).

3. Maximum Duration of Assistance

- Assistance must end by 24 months, per 24 CFR 578.37(a)(1)(ii)(C).

4. Move-in Assistance

- Move-in assistance is targeted to households assessed as able to maintain housing after support ends.
- The amount of move-in assistance is determined by the program within the limits of the funding source.
- Move-in assistance may be provided as:
 - One-time assistance, or
 - In tandem with Rental Assistance/Rental Subsidies.

5. Supportive Services Post-Assistance

- Participants may receive eligible supportive services for up to 6 months after rental assistance ends 24 CFR 578.37 (a)(10)(ii)(D).
- If housing stability remains uncertain, case managers are encouraged to keep the client file open and continue providing supportive services (24 CFR 578.37 (a)(1)(ii)(E)).

6. Annual & Ongoing Assessments

- Annual assessments are required, with supporting documentation.
- Participants may be assessed more frequently, such as quarterly or when status changes.
 - Status changes must be documented with appropriate records, including:
 - Pay stubs
 - Bank statements
 - SSDI/SSI letters
 - Cash app transactions
 - Written receipts
 - Uber/DoorDash earnings printouts, etc.
- Annual assessments must document:
 - Reason for continued assistance (e.g., lack of funds/resources).

Refer to Appendix A for additional resources on Rapid Rehousing

All of this must be documented as outlined in the Documentation and Recordkeeping Requirements section and must comply with the regulations set forth in the Interim Rule (24 CFR 578.103).

Permanent Supportive Housing Projects Standards

Permanent Supportive Housing Eligibility

All SCC COC PSH projects must serve persons who meet category 1 of HUD's homeless definition AND are diagnosed with a disability. More detailed information can be found in the following sections regarding who should be *prioritized* for PSH.

PSH Eligibility When Fleeing DV (category 4 of the homeless definition)

SCC COC PSH projects can serve disabled individuals/households fleeing DV (category 4 of the homeless definition), but the people fleeing DV must reside in a shelter or TH immediately prior to entering the PSH project. Persons fleeing DV cannot enter PSH directly from a housed situation.

PSH projects are NOT permitted to serve individuals or families who are imminently at risk of losing their housing (category 2 of the homeless definition).

PSH Eligibility for Chronically Homeless

For PSH projects dedicated to or prioritizing chronically homeless, category 1 of the homeless definition ONLY includes individuals and families who are sleeping in a place not meant for human habitation or living in an emergency shelter (and meet all other elements of the chronically homeless definition). Although non-chronic dedicated PSH projects are technically permitted to serve persons/households currently in TH, communities and providers should keep in mind that *requiring* persons to move in TH prior to entering PSH contradicts system and project-level Housing First practices. This is discussed in more detail in the following *Housing First I Permanent Supportive Housing* section.

The definition of chronically homeless is as follows:

- a) An individual who: is considered a “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)). This includes:
 - 1. Is currently homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; AND
 - 2. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years where the combined occasions total a length of time of 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.
- b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph a of this definition before entering that facility: or
- c) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all the criteria in paragraph A of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

More detailed information about HUD's final rule on the definition of chronically homeless can be found at [Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\): Defining Chronically Homeless Final Rule - HUD Exchange](#).

All of this must be documented as outlined in the Documentation and Recordkeeping Requirements section and must comply with the regulations set forth in the Interim Rule (24 CFR 578.103).

Disability evidence protocol:

Pursuant to 24 CFR 578.103(4)(i)(b)1-5, acceptable evidence of disability includes:

- (1) Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently.
- (2) Written verification from the Social Security Administration.
- (3) The receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation)
- (4) Other documentation approved by HUD; or
- (5) Intake staff recorded observation of disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence in paragraph © (1), (2), (3), or (4) of this section.

Priority Policy for Permanent Housing Placements

Recipients of CoC Program grants should adhere to the following priorities while serving identified target populations. For example, a Permanent Supportive Housing (PSH) project that targets homeless persons with serious mental illnesses should follow the priorities to the extent that targeted persons meet the criteria. If there are no persons with a serious mental illness that meet the criteria of chronically homeless, the grantee should follow the priorities in Section 3 for persons with a serious mental illness.

The St. Clair County Illinois Continuum of Care recognizes that some persons – particularly those living on the streets or in places not meant for human habitation – require significant engagement prior to accepting housing. Grantees should not let units remain vacant indefinitely while waiting for a chronically homeless person to accept an offer of PSH.

1. Priority for Dedicated PSH Units for Persons and Families Experiencing Chronically Homeless

All grantees of projects with Permanent Supportive Housing units that are dedicated for persons and families experiencing chronic homelessness¹ shall prioritize these units based on:

- a) The length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter; and
- b) The severity of the individual's or family's service needs.

2. Priority for All Other PSH Units – Prioritized for Chronically Homelessness

All grantees of projects with Permanent Supportive Housing units that are not dedicated for persons and families experiencing chronic homelessness shall prioritize every unit for persons and families experiencing chronic homelessness. Within the category of chronic homelessness, these units shall be prioritized based on:

- a) The length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter; and
- b) The severity of the individual's or family's service needs.

3. Priority for Non-Chronic Homelessness

When there are no chronically homeless individuals and families within the CoC's geographic area that can be housed in a vacant unit, all grantees shall follow the following order of priority for housing placements:

- a) **First Priority: Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs.** An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.
- b) **Second Priority: Homeless Individuals and Families with a Disability with Severe Service Needs.** An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when

¹ "Chronic Homelessness" is as currently defined by the US Department of Housing and Urban Development.

prioritizing households that meet this order of priority, but there is not a minimum length of time required.

c) 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. An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

- d) Fourth Priority: Homeless Individuals and Families with a Disability Coming from Transitional Housing.** An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

Housing First in Permanent Supportive Housing

All SCC COC homeless assistance projects must follow a Housing First approach. For PSH projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry

- Reducing barriers to entry
 - PSH projects must minimize any barriers to homeless persons/households entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility (and any prioritization) requirements.
 - PSH projects must assess people applying for the project to identify people with greater vulnerabilities to prioritize applicants for assistance, based on the order of priority outlined in the preceding section

Housing First in Program Design

- Voluntary Supportive Services

- PSH projects must offer supportive services to program participants on a voluntary basis. However, PSH projects may require program participants to meet with case managers on a regular basis for purposes of ensuring the household is stable in housing and has ongoing need for services.
- PSH projects should work with program participants on a regular basis to identify a plan for assessing for reduced supportive service needs and possible movement onto a non-PSH affordable housing option when/if the program participant desires.
- Standard Lease Agreement
 - PSH projects must ensure that there is a standard lease agreement in place between the landlord/property manager and the program participant.
- Housing Focused Assistance
 - PSH projects' primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, but they are also tailored to the client's needs as they pertain to obtaining and retaining permanent housing

Refer to [Appendix B](#) for additional resources on Permanent Supportive Housing

Permanent Supportive Housing Program Occupancy and Rent Requirements

1. Lease Agreements
 - All CoC-funded PSH programs must ensure that participants have a lease agreement that:
 - Is at least one year in duration.
 - Is renewable per program regulations.
2. Participant Rent Contribution
 - Participants in PSH rental assistance programs are required to pay the higher of:
 - 30% of their monthly adjusted income, or
 - 10% of their gross monthly income (including utilities).
 - Zero-Income Participants:
 - If a participant has zero income, they are not required to pay rent.
 - Their supportive services partner must work with them to secure income (earned or unearned) as soon as possible.
 - HUD Rent Calculation Compliance:
 - Under no circumstances can a tenant be charged more than the HUD-established rent calculation standard.
3. Occupancy Charges for Leasing Programs
 - Participants in leasing programs may be charged an occupancy charge based on:
 - 30% of the monthly adjusted income, or
 - 10% of the family's gross income, or

- The portion of the family’s welfare assistance designated for housing.
- 4. Participant Re-Evaluation Requirements
 - Participants must be re-evaluated at least once per year.
 - Early re-evaluation may occur if there is a change in participant status.
- 5. Prioritization of Chronically Homeless Individuals & Families
 - CoC-funded PSH projects are strongly encouraged to:
 - Prioritize or dedicate beds for chronically homeless individuals and families.

All of this must be documented as outlined in the Documentation and Recordkeeping Requirements section and must comply with the regulations set forth in the Interim Rule (24 CFR 578.103).

Program Standards Reference Chart

The Program Standards Chart is intended as a quick reference For further explanations on the program eligibility description, population, specializations, time frame, etc. see the program standards in this document.

Category	Homeless Prevention (HP)	Emergency Shelter (ES)	Transitional Housing (TH)	Rapid Rehousing (RRH)	Permanent Supportive Housing (PSH)
Eligibility	Category 2 or 4 Meet HUD’s definition of At-Risk of Homelessness	Category 1, 2, or 4 Category 2 requires imminent risk of homelessness, no subsequent residence, and lack of resources.	Category 1, 2, or 4 Category 2 requires imminent risk of homelessness, no subsequent residence, and lack of resources	Category 1, 2, or 4 Category 2 requires imminent risk of homelessness, no subsequent residence, and lack of resources	Category 1 or 4 Individuals/families with disabilities and chronic homelessness are prioritized.
Housing First at Program Entry	Minimize barriers to entry. Prioritize those at higher risk of homelessness.	Minimize entry barriers. Provide shelter without additional requirements.	Minimize barriers. Prioritize those with greater vulnerabilities who do not need PSH	Prioritize households with urgent needs and those who would benefit most from housing first.	Prioritize individuals with chronic homelessness and disabilities.

Category	Homeless Prevention (HP)	Emergency Shelter (ES)	Transitional Housing (TH)	Rapid Rehousing (RRH)	Permanent Supportive Housing (PSH)
Housing First in Program Design	Voluntary supportive services. Housing-focused assistance (flexible rental assistance).	Voluntary supportive services. Housing-focused assistance (quick permanent housing).	Voluntary supportive services. Housing-focused assistance (screen for need for TH).	Housing-focused assistance. Quick transition to permanent housing.	Housing-focused assistance. Ongoing supportive services to maintain housing stability.
Prioritization	Prioritize those with greater vulnerabilities or closer to becoming homeless.	Prioritize households with no other housing options or resources.	Prioritize those unable to resolve homelessness quickly but not needing PSH	Prioritize those with urgent needs and who will benefit from rapid housing.	Prioritize chronically homeless individuals or families with disabilities.
Rental Assistance	Yes (flexible, individualized based on need).	No rental assistance provided, as the goal is temporary shelter.	Yes (flexible, individualized based on need).	Yes (financial assistance provided for rent and utilities).	Yes (rent is subsidized long-term for qualified individuals).
Leasing Applicable	Not applicable; HP projects don't lease properties.	Not applicable; ES projects provide temporary shelter only.	Yes (leases may be used for temporary housing units).	Typically provide financial assistance for housing costs.	Yes (leases are used for long-term, permanent housing).

Transfer Policy

The SCC CoC believes that transfers between projects should be rare but acknowledges that there are safety, access, and legitimate programmatic reasons to transfer a household. After exhausting all other options, transfers should be utilized to avoid a project exit that would result in a return to homelessness. The SCC CoC Coordinated Entry System has developed and implemented clear policies and procedures regarding transfers. These policies and procedures can be reviewed in the CoC's Coordinated Entry Policies and Procedure [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#). All transfers must follow the outlined Coordinated Entry Transfer Policy and Process.

For other circumstances requiring grant transfers, please refer to the Steps for Grant Transfer policy, located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#)

Homeless Program Termination Policies and Procedures

Per HUD's Interim Rule ([24 CFR 578.91](#)) COC funded programs must have termination policies and procedures that ensure that participant termination is limited to only the most severe cases. These termination policies and procedures must include the following:

- Due Process
 - In terminating assistance to a program participant, the program must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of the law. This process must consist of:
 - Providing participants with a written copy of the program rules and termination process before participant begins receiving assistance
 - Providing written notice to the participants containing a clear statement of the reasons for termination
 - A review of the decision by another staff person (who did not make initial decision), wherein participants may present written or oral objections to the termination
 - Prompt written notice of the final decision to participants
- Programs must examine all extenuating circumstances in determining when violations are serious enough to warrant termination to help ensure that assistance is only terminated in the most extreme cases.
- Termination from a program does not bar the program from providing further assistance later to the same household

Displacement and Relocation

As outlined in [24 CFR 578.83](#):

Minimizing Displacement

The organization shall take all reasonable steps to minimize the displacement of individuals, families, businesses, nonprofit organizations, and farms as a result of projects undertaken. Efforts to minimize displacement may include, but are not limited to:

- Assessing project alternatives to reduce displacement impact.
- Implementing strategies to preserve existing affordable housing.
- Engaging affected communities early in the planning process.
- Coordinating with local agencies to explore mitigation efforts such as in-place rehabilitation and phased development to allow continued occupancy.

Temporary Relocation

When temporary relocation is necessary, the organization shall ensure that displaced individuals and families:

- Receive adequate notice and counseling regarding their rights and available assistance.
- Are provided suitable temporary housing that meets safety and livability standards and is located in reasonable proximity to their original residence.
- Do not incur significant out-of-pocket expenses related to the relocation.
- Have the opportunity to return to their original housing, when feasible, after project completion

Relocation Assistance for Displaced Person

Individuals, families, businesses, nonprofit organizations, and farms that are permanently displaced shall be provided relocation assistance in accordance with applicable federal, state, and local laws. Relocation assistance shall include:

- Advisory services: Counseling on available housing options, financial assistance programs, and other relevant resources.
- Financial assistance: Reimbursement for moving expenses, security deposits, and, where applicable, replacement housing payments.
- Housing placement assistance: Efforts to locate comparable replacement housing within a reasonable timeframe.
- Support services: Additional aid, as necessary, to ensure successful transition into new housing or business locations.

Education Policy

Consistent with the CoC Program Interim Rule 24 CFR 578.23, all CoC and ESG funded programs assisting families with children or unaccompanied youth must abide by the St. Clair County IL 508 EDUCATION POLICY which is located at St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development (RC Version: 9.13.3.0).

Each agency of CoC-funded programs must have a policy outlining their adherence to above regulations.

Grievances and Appeals

Agency Grievances and Appeals Policy and Procedures

Each agency o CoC-funded programs must have a policy outlining a grievances and/or appeals process. If any party feels aggrieved, they should have access to a written grievance or appeal policy that details the necessary steps and procedures for addressing and resolving grievances and appeals.

SCC CoC Grievances and Appeals Policy and Procedures

If the aggrieved party cannot obtain an adequate resolution through the initial grievance process with the agency, they can submit a grievance/appeal to the HAC Board of Directors.

1. Filing the Appeal:

- Submit all grievances/appeals in writing to the St. Clair County CoC/HAC Board of Directors Chairman (St. Clair County Intergovernmental Grants Department 19 Public Square, Suite 200 Belleville, IL 62220)

2. Documenting the Appeal:

- The Chairman will document the information received at the time the appeal is filed.

3. Investigating the Complaint:

- The investigation of the complaint will be completed within 60 working days of the appeal being filed with the Chairman.

4. Communicating the Results:

- The results of the investigation and the recommendations made by the Board of Directors will be sent in writing to the client.
- A copy of the report will be filed at the Housing Resource Center.

Protocol for Immigration Enforcement Requests

Each agency of CoC-funded programs should have a policy outlining the guidance for responding to federal immigration authorities' requests. The policy should follow State and Federal laws and not prohibit or restrict compliance with 8 U.S.C. § 1373 in any way. For additional information: [8 U.S.C. 1373 - Communication between government agencies and the Immigration and Naturalization Service - Content Details - USCODE-2023-title8-chap12-subchapII-partIX-sec1373](#)

Grant Management and Compliance

Grant Applications/ Agreements

Application Process

The CoC Program grant application process occurs annually within a framework established by HUD and is administered by the CoC through the collaborative applicant. HUD issues a Notice of Funding Opportunity (NOFO), detailing available funding and application procedures for the CoC. Upon release of the HUD NOFO, as the collaborative applicant, the St. Clair County Illinois Intergovernmental Grants Department (SCC IGD) issues a request for new and renewal programs to apply for funding. Applicants must follow the process established by the CoC for seeking new or renewal funding. Successful applicants are included in the CoC's collaborative application submitted to HUD. HUD provides public notice and notification to approved CoC Program application. SCC IGD directly notifies subrecipients of funded programs. SCC IGD serves as the collaborative applicant for the CoC and has grant agreements with subrecipients to administer each project at the local level for individuals, youth, and families experiencing homelessness. SCC IGD

will contract directly with each funded subrecipient agency once all grant requirements and conditions are met to provide housing and services. For more information and guidance, please refer to 24 CFR 578.19 -- Application process and 24 CFR 578.23 -- Executing grant agreements.

Agreement Modifications

Any modifications to the application or grant agreement must be submitted to the Collaborative Applicant and the Board of Directors for review and approval. All changes should be communicated and thoroughly reviewed to ensure alignment with funding requirements and organizational policies.

Faith-Based Providers

Religious or faith-based organizations may be eligible to receive funding through the Continuum of Care (CoC). Faith-based organizations that receive CoC funding may do so without compromising their independence, autonomy, or the expression of their religious beliefs and character. These organizations are free to continue their religious mission, including the definition, development, practice, and expression of their beliefs, provided that program funds are not used for explicitly religious activities such as worship, religious instruction, or proselytization.

Any religious organization receiving CoC funds, is entitled to the following:

- Retain independence from federal, state, and local governments.
- Continue carrying out its mission.
- Use space within its facility to provide CoC Program-funded services without the requirement to remove religious symbols or art.
- Retain authority over its internal governance.
- Retain religious terms in its organization's name, select board members on a religious basis, and include religious references in its mission statement and governing documents.

These provisions ensure the equal participation of faith-based organizations in HUD programs in line with the implementation of Federal Register :: Equal Participation of Faith-Based Organizations in HUD Programs: Implementation of E.O. 13559.

Financial Management

Under the CoC Program Interim Rule 24 CFR Part 578, CoC-funded programs must maintain financial management policies and procedures. Recipients and subrecipients are encouraged to refer to Chapter 34 of the CPD Monitoring Handbook and the regulations in 24 CFR Part 200, which outline uniform administrative requirements, cost principles, and audit requirements for federal awards.

Code of Conduct/ Conflict of Interest

Procurement

For the procurement of property (goods, supplies, or equipment) and services, CoC- funded programs must abide by and have a policy outlining the standards of conduct and conflict-of-interest requirements under 2 CFR 200.317 and 200.318.

Organizational and Other Conflict

CoC- funded programs must abide by and have a policy outlining the federal conflict of interest regulations set forth by 24 CFR 578.95.

For more information on the Code of Conduct/ Conflict of Interest Policy for the HAC, please refer to St. Clair County Illinois Homeless Action Council Of St. Clair County Bylaws which is located at St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development (RC Version: 9.13.3.0).

Anti-Lobbying

CoC funded programs are strictly prohibited from using federal funds to engage in lobbying activities. In compliance with the Anti-Lobbying Act (31 USC 1352) , CoC funded programs may not use federal funds to engage in lobbying efforts aimed at influencing the outcome of federal or state legislation, or to influence any government official or employee regarding the awarding or extension of federal contracts, grants, or loans. For additional guidance, please refer to 24 CFR 91.225 – Certifications and 24 CFR Part 87 -- New Restrictions on Lobbying.

Drug-Free Workplace

The award and administration of HUD grants and cooperative agreements must comply with the Office of Management and Budget (OMB) guidance implementing the portion of the Drug-Free Workplace Act of 1988 (41 U.S.C. 701-707) (referred to as the Act in this part) that applies to grants set forth in 2 CFR Part 2429 . Each agency of CoC-funded programs must have a policy outlining the elements of a Drug-Free Workplace. For more information regarding which sections of the Federal Regulations applies, refer to 2 CFR 182.115.

Economic Opportunities for Low- and Very Low-Income Persons

Under Section 3 of the Housing and Urban Development Act of 1968 (12 USC 1701u), as implemented by 24 CFR Part 75, Continuum of Care (CoC) programs must ensure that economic opportunities generated by HUD financial assistance are directed to low- and very low-income persons, particularly those receiving government housing assistance or residing in the project's community. Section 3 requirements apply to CoC-funded projects when they involve:

- Housing construction or substantial rehabilitation.
- Public construction activities exceeding HUD's monetary threshold for Section 3 applicability.
- Other activities that meet the definition of "housing and community development assistance" under HUD regulations

For more guidance, please visit [Section 3 - HUD Exchange](#).

Monitoring

Compliance monitoring will be conducted by the Collaborative Applicant and Consultant(s) to evaluate general administration and program operations. This process allows for assessing how projects implement these guidelines and identifying areas that may require additional resources or training to meet regulations, Policies & Procedures, Written Standards, and best practices. The primary goal of monitoring is to ensure compliance, identify and prevent deficiencies, and design corrective actions to improve or strengthen the performance of CoC funded programs. The Collaborative Applicant, Consultant(s), and Rank & Review Committee will regularly share information and discuss program performance to ensure that the monitoring process is comprehensive, transparent, and aligned with the program's goal. Details of compliance monitoring by the Collaborative Applicant are outlined in the Policy and Procedure Manual for Compliance Monitoring, available on [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#).

Terminology and Definitions

Applicant	An eligible applicant designated by the Continuum of Care to apply for assistance on behalf of that Continuum.
At Risk of Homelessness	An individual or family with income below 30% of the median, lacking support to prevent homelessness, and meeting specific conditions like recent displacement, living in overcrowded housing, imminent eviction, or exiting an institution. Also includes children and youth qualifying as homeless under federal statutes.
Centralized or Coordinated Assessment System	A process designed to coordinate intake, assessment, and referrals for housing and services across a geographic area.
Chronically Homeless	A homeless individual with a disability who has been homeless continuously for 12 months or on at least 4 occasions in the last 3 years, or a family where the head of household meets these criteria. Institutional stays of under 90 days do not break the homelessness period.
Collaborative Applicant	The entity designated by the Continuum of Care to apply for a grant on behalf of the Continuum for planning funds.
Continuum of Care (CoC)	A group of stakeholders working to address homelessness, including nonprofits, governments, social services, and housing agencies.
Developmental Disability	A severe, chronic disability that manifests before age 22, leading to significant limitations in major life activities, requiring long-term individualized support.
Eligible Applicant	A private nonprofit, state, or local government entity eligible to apply for Continuum of Care funds.
Emergency Shelter	Defined under 24 CFR part 576 as a facility that provides temporary housing for homeless individuals and families.
Fair Market Rent (FMR)	The rent values published annually by HUD to determine subsidy levels.
Homeless	Individuals or families lacking a stable nighttime residence, imminently losing housing, youth meeting federal homeless definitions, or those fleeing domestic violence without resources for permanent housing.
Homeless Management Information System (HMIS)	The information system designated by the CoC to track homelessness data per HUD requirements.

Homeless Prevention	Programs designed to prevent individuals and families from becoming homeless by providing short-term financial assistance and supportive services.
Housing First	A homeless assistance approach that prioritizes providing permanent housing to individuals and families as quickly as possible, without preconditions such as sobriety or participation in treatment programs.
Permanent Housing	Housing without a set length of stay, including permanent supportive housing and rapid rehousing. Requires a lease of at least one year, renewable monthly, and terminable only for cause.
Permanent Supportive Housing	Permanent housing with supportive services for individuals with disabilities to live independently.
Program Participant	An individual or family receiving assistance through the Continuum of Care program.
Project	A group of eligible activities funded by the CoC, including rental assistance, supportive services, or capital investments in housing.
Rapid Rehousing (RRH)	A housing intervention that provides short-term rental assistance and supportive services to help people quickly exit homelessness and stabilize in permanent housing.
Recipient	An applicant that signs a grant agreement with HUD.
Subrecipient	A nonprofit, state, or local government entity that receives a subgrant from a recipient to carry out a project.
Transitional Housing	Temporary housing designed to facilitate movement into permanent housing, with leases or occupancy agreements of up to 24 months.
Victim Service Provider	A nonprofit focused on services for victims of domestic violence, dating violence, sexual assault, or stalking, including shelters and crisis centers.
U.S. Department of Housing and Urban Development (HUD)	A federal agency responsible for national policies and programs related to housing and urban development, including funding and regulations for homelessness assistance, public housing, and initiatives.
The McKinney-Vento Homeless Assistance Act	A federal law providing funding for homeless programs, including emergency shelters, transitional housing, and supportive services. It defines homelessness and requires schools to ensure education access for homeless children and youth.

Lobbying	Activities aimed at influencing government decisions or legislation. HUD prohibits the use of federal funds for lobbying efforts related to grant applications or funding decisions.
Monitoring	HUD's process of reviewing grant recipients and subrecipients to ensure compliance with funding regulations, program requirements, and performance benchmarks.
Violence Against Women Act (VAWA)	A federal law that provides protections for survivors of domestic violence, dating violence, sexual assault, and stalking, including housing protections for victims in HUD-assisted programs.

Appendix A

Rapid Rehousing Guidance

This document contains information and guidance to help recipients understand the purpose and requirements related [Section 578.37 of the CoC Program Interim Rule](#) and its components.

If you are new to the CoC Program, please refer to the following resources for an introduction to the program components as outlined in the CoC Program Interim Rule.

- [Introductory Guide to the CoC Program - HUD Exchange](#)
- [CoC Program Toolkit - HUD Exchange](#)
- [Continuum of Care \(CoC\) Program Eligibility Requirements - HUD Exchange](#)
- [NAEH_RapidRehousingToolkit.pdf](#)
- [CoC Program Components - Rapid Re-housing \(RRH\) - HUD Exchange](#)
- [eCFR :: 24 CFR 578.37 -- Program components and uses of assistance.](#)

Appendix B

Permanent Supportive Housing Guidance

This document contains information and guidance to help recipients understand the purpose and requirements related [Section 578.37 of the CoC Program Interim Rule](#) and its components.

If you are new to the CoC Program, please refer to the following resources for an introduction to the program components as outlined in the CoC Program Interim Rule.

- [Introductory Guide to the CoC Program - HUD Exchange](#)
- [CoC Program Toolkit - HUD Exchange](#)
- [Continuum of Care \(CoC\) Program Eligibility Requirements - HUD Exchange](#)
- [CoC Program Components - Permanent Supportive Housing \(PSH\) - HUD Exchange](#)
- [eCFR :: 24 CFR 578.37 -- Program components and uses of assistance.](#)
- [CoC and ESG Additional Requirements - PSH Retention - HUD Exchange](#)
- [Sample Chronic Homelessness Documentation Checklist - HUD Exchange](#)

Appendix C

To access the following policies and procedures, along with other helpful information, please visit the Saint Clair County website:

[St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#)

- St. Clair County Illinois Homeless Action Council Of St. Clair County Bylaws
- East Saint Louis/ Belleville/ Saint Clair County Continuum of Care Il 508 Homeless Management Information Systems (HMIS) Policies and Procedures Manual
- Saint Clair County Continuum of Care Il 508 Coordinated Entry System Policy and Procedures
- St. Clair County Intergovernmental Grants Department/Community Development LEAD POLICIES AND PROCEDURES
- The Policy and Procedure Manual for Compliance Monitoring
- St. Clair County Continuum of Care- HUD Match Requirements

To access additional information and resources, please visit the HUD exchange website:

[CoC: Continuum of Care Program - HUD Exchange](#)

[FY 2013 CoC Start Up Training: Program Components](#)

[HUD-Wellness-Checklist-for-CoC-Programs.pdf](#)

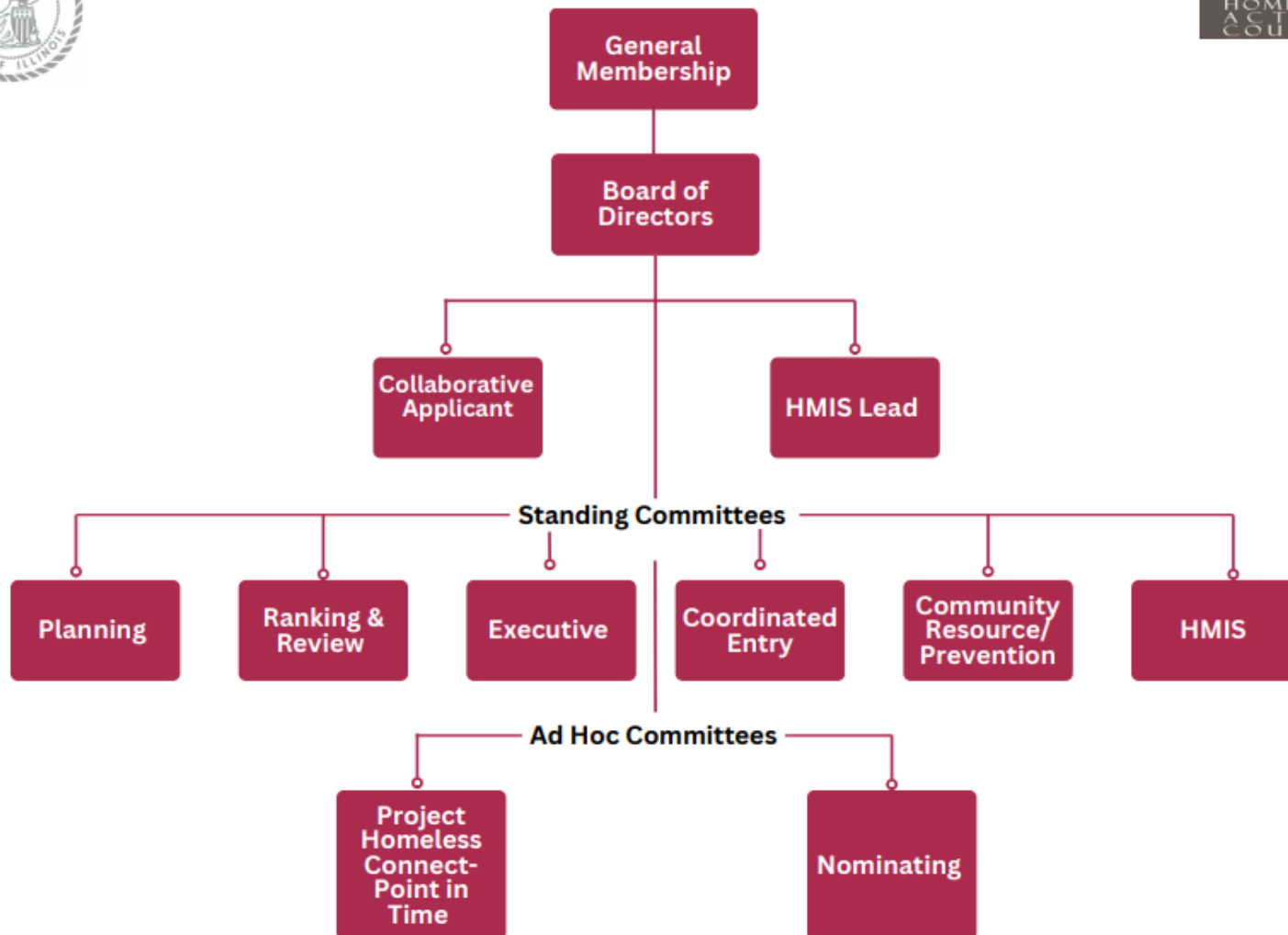
[Lead-Based Paint - HUD Exchange](#)

[Utility Allowance Final CLEARED VERSION](#)

[CPD Monitoring Handbook \(6509.2\) | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

Appendix D

ST CLAIR COUNTY HOMELESS ACTION COUNCIL



Revision History

Revision Date	Description
8/26/21	Adopted
6/28/22	Revision
1/24/23	Revision
6/28/23	Revision
7/25/23	Recertifications (Page 21)
9/26/23	Rapid Rehousing Section
6/24/2025	Comprehensive update to all sections

