



Delaware Continuum of Care

Permanent Supportive Housing Written Standards

Due to the impact of COVID-19, temporary changes have been made to the DE CoC's PSH standards. The goal of the changes is to ensure that our community's prioritization and implementation of PSH:

- Is as responsive as possible to the changing needs of the community
- Prioritizes those most vulnerable to the impacts of COVID-19

Given the unpredictability inherent in the COVID-19 pandemic response and recovery, these standards are temporary and are subject to review and change at any time by the CoC Board.

In accordance with HUD regulations (24 CFR Part 578), the Delaware Continuum of Care (DE CoC) has developed the following written standards for the provision of Permanent Supportive Housing (PSH) assistance in Delaware. The standards contained herein adopt the order of priority and recordkeeping requirements as outlined in HUD Notice CPD-16-11.

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 housing quality standards (HQS) under 24 CFR 982.401 of this title, except that 24 CFR 982.401(j) applies only to housing occupied by program participants receiving tenant-based rental assistance.

These standards apply to PSH projects funded by the U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Program and located in jurisdictions covered by the DE CoC. In addition to compliance with the standards contained herein, Delaware PSH programs must comply with 24 CFR Part 578 (HEARTH Interim Rule) and the applicable CoC Program NOFA.

PSH Participant Eligibility

To be eligible for DE CoC PSH assistance, at initial evaluation households must:

1. Demonstrate literal homelessness (i.e., HUD Category One), and
2. Meet HUD's definition of Chronically Homeless¹ (as contained in the CoC Program Interim Rule 24 CFR 578.3), and
3. Have a completed VI-SPDAT on file (Vulnerability Index – Service Prioritization Decision Assistance Tool), and

4. Are referred to the PSH program through Delaware's coordinated entry system, Centralized Intake.

PSH Participant Prioritization

100% of PSH beds in Delaware are dedicated or prioritized for the chronically homeless. A homeless household that does not meet the HUD definition of chronic homelessness may be eligible for PSH assistance in Delaware only if outreach efforts have been conducted and there are no other households in Delaware who meet the chronic homeless definition that are eligible for the available PSH assistance (e.g. a PSH unit is available for singles, and there are no chronically homeless singles in Delaware). This would require documentation at the agency level, CoC level and approval from the CoC Board through a simple majority vote. The documentation would be required to meet the criteria set forth by HUD in CPD-16-11 Section IV. If approved, the Delaware CoC will revise its PSH standards to ensure that households that do not meet the chronically homeless definition are prioritized for PSH according to CPD16-11 Section III. B.

Until such time, the Delaware CoC will prioritize chronically homeless veteran households for PSH who are ineligible for VA-funded supportive housing, or who are unable to access VA supportive housing resources due to lack of availability.

After chronically homeless veteran households, the Delaware CoC will prioritize households for PSH assistance utilizing the order of priority as outlined in HUD Notice CPD-16-11 on July 2016 for all PSH beds that are dedicated or prioritized for the chronically homeless.

Order of Priority:

1. Chronically Homeless households that are determined to be at highest risk of serious complications due to COVID-19. This criterion includes age (people over the age of 60) and people with medical conditions that put them at higher risk of serious health complications or death if exposed (heart condition, moderate to severe respiratory condition or lung disease, diabetes, pregnancy, immunocompromised, or other serious medical condition).
2. Chronically Homeless Veteran Households who are ineligible for VA-funded supportive housing or who are unable to access VA supportive housing resources due to lack of availability
3. Chronically homeless households with the Longest Histories of Homelessness and Most Severe Service Needs
4. Chronically Homeless households with the Longest Histories of Homelessness
5. Chronically Homeless households with the Most Severe Service Needs
6. All Other Chronically Homeless meeting the *HUD Definition of Chronically Homeless*

HUD Definition of Chronically Homeless:

- 1) 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 for a cumulative total of 12 months or more; and
 - i. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), posttraumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;
- 2) 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 (1) of this definition, before entering that facility; or
- 3) 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 of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Recordkeeping Requirements

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The administrator of Centralized Intake in Delaware (Housing Alliance Delaware) will keep in its policies and procedures that the CoC's PSH Standards are to be followed by Centralized Intake in process of coordinating and making referrals for clients to PSH.

The Centralized Intake administrator will make referrals to PSH according to the order of priority outlined in this document from a single by-name prioritized list.

The Centralized Intake administrator will continue to offer all prioritized households available units for which they are eligible until the household is permanently housed. Households will never be forced to accept housing, nor will they lose their priority if they decline a housing opportunity.

The Centralized Intake administrator will partner with street outreach providers in Delaware to ensure that the highest need households are prioritized for available PSH.

The administrator of Centralized Intake in Delaware will utilize the VI-SPDAT as the community's standardized assessment tool to determine severity of service needs.

All Board votes (or votes by other approved groups or committees) to adopt or edit these standards will be kept on file by the CoC Lead Agency.

Recipient Requirements In compliance with HUD Notice CPD-16-11

Recipients of HUD CoC PSH funds in Delaware must keep on record and implement an intake procedure in their CoC funded PSH project that establishes a written priority for obtaining evidence of a household’s homeless status of: (1) 3rd party documentation (including a CMIS record), (2) intake worker observation, and (3) certification from person seeking assistance.

Recipients of HUD CoC PSH funds in Delaware must keep on record evidence of each household’s chronic homeless status, including length of time homeless and disability status.

Recipients of HUD CoC PSH funds in Delaware must keep on record evidence of the household’s literal homeless status.

To ensure full compliance with these requirements, recipients should consult HUD Notice CPD-16-11.

| Record of Updates and Changes | | |
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| DATE | CHANGES | NOTES |
| March 2015 | Adopted by CoC Board | CoC Board E-Vote |
| October 2015 | PSH Standards Revised to prioritize CH Vets over other CH households with similar severity of services needs and length of time homeless | CoC Board E-Vote |
| July 2016 | Updated to include adoption of recordkeeping requirements in HUD Notice CPD-14-012 | CoC Board E-Vote |
| July 2017 | Updated to include adoption of HUD Notice CPD-16-11. | CoC Board Vote |
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