



# Coordinated Assessment and Referral System

Monterey & San Benito Counties

POLICIES & PROCEDURES MANUAL

Prepared by the Coalition of Homeless Services Providers

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## Introduction to the Coordinated Entry System (CES)

The Coordinated Entry System (CES) is a consistent, community-wide process to match people experiencing homelessness to community resources that are the best fit for their situation. Homeless individuals and families, also referred to as clients, complete a standard triage assessment survey that identifies the best type of intervention for that household. Participating programs accept referrals from the system, reducing the need for people to travel distances seeking assistance at every provider separately. When participating programs do not have enough space to accept additional referrals from the system, people experiencing homelessness are prioritized for services based on need. In the Monterey/San Benito Counties Continuum of Care (CoC), the Coordinated Entry System is referred to as the Coordinated Assessment and Referral System (CARS).

### Benefits of Coordinated Entry

The Coordinated Entry System:

- Maximizes the efficient utilization of limited resources by connecting people experiencing homelessness to the housing/service program that is the best fit for their situation.
- Reduces the need for people experiencing homelessness to contact multiple programs and complete multiple applications to join waitlists. The Coordinated Entry System assesses people for all participating housing/service programs at the same time.
- Creates a centralized list of available housing in participating programs and a clear communication structure to facilitate regional collaboration in filling vacancies.
- Leverages technology to improve system effectiveness and provide insight into the barriers preventing people experiencing homelessness from entering housing.
- Allows system and program performance data to drive future project development, strengthen systems change efforts, and improve CoC-wide collaboration.

### HUD Requirements and Policies

Under the interim rule for the U.S. Department of Housing and Urban Development's (HUD) CoC program, each CoC must establish and operate a centralized or coordinated assessment system (24 CFR 578.7(a)(8)). HUD defines a centralized or coordinated assessment system, often referred to as a "coordinated entry" system, as "a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool" (24 CFR 578.3). While a Coordinated Entry System is a HUD requirement, it is also a powerful tool for increasing the effectiveness of a homeless response system and all housing and service programs for individuals experiencing homelessness are encouraged to utilize the system regardless of funding requirements.

## Project Overview and Vision

### Project Overview

All individuals and families entering the CARS system complete a CARS Assessment that considers the household's situation and identifies the best type of housing intervention. Assessments are conducted at

CARS participating agencies, a full list of which can be found online. Participating agencies include emergency shelters, service centers, transitional housing programs, permanent housing programs, outreach programs, and many other locations where people experiencing homelessness are likely to first encounter our system of care. This decentralized, or “any door,” system of access maximizes the accessibility of resources and promotes community collaboration. Additionally, CARS is known to institutions (hospitals and jails), public services agencies (health departments, county clinics, human services), faith-based organizations, emergency and crisis support groups (including domestic violence groups), and other community resources such as 211. Many of these organizations are able to directly assess individuals experiencing homelessness, while others serve as information points and can direct those seeking services to the access point that is most appropriate for their situation.

Once assessed, individuals are placed onto a centralized Master List, where they are matched with housing programs for which they may be eligible and prioritized based on need. It is important to note that the CARS Master List is not a “first come, first served” waitlist, but a centralized prioritization list. Participating housing programs, including permanent supportive housing, rapid re-housing, transitional housing, and select housing voucher programs, fill program vacancies based on referrals of eligible households from the Master List with the goal of housing the most vulnerable first. To ensure those most in need are housed first, the Master List is prioritized based on the CARS Assessment score, length of time homeless, and local service priorities (See Attachment B). This matching and prioritization process improves the targeting of housing resources CoC-wide and reduces the need for people experiencing homelessness to seek assistance at every provider separately.

### Local Vision for CARS

Individuals and families experiencing homelessness, or who are at risk of homelessness, in Monterey and San Benito counties will have the opportunity to access the standardized, community-based assessment process and receive timely referrals to the most appropriate housing intervention or service that fits their needs. CARS is meant to be a client-centered, culturally-competent process that respects client choice and dignity while providing timely access to housing resources.

### Target Population

CARS serves all families and individuals who are homeless or at-risk of homelessness as defined under the federal HEARTH Act and its implementing regulations.

### Geographic Coverage

CARS covers the entire CoC area, which includes all of Monterey and San Benito Counties.

## Governance and Partner Roles

### Governance Structure

The Monterey/San Benito Counties CoC governs CARS. As referred to above, the CoC is ultimately responsible for compliance with HUD requirements under the CoC Interim Rule that include:

- Establishing and operating a centralized or coordinated assessment and referral system.

- Meeting the HUD coordinated entry requirements described above, in accordance with the CoC Interim Rule, any other HUD Notice, and any CoC Notice of Funding Opportunity (NOFO).
- Developing a specific policy for how CARS will address the needs of persons fleeing domestic violence, but who are seeking assistance from non-victim service provider programs.
- Establishing and following written standards for CoC assistance.
- Coordinating with ESG recipients in establishing the centralized or coordinated assessment system and CoC written standards.

## Roles & Responsibilities



## Policy Oversight Entity – Leadership Council and CARS Committee

The CARS Committee of the CoC has significant responsibilities that include:

- Meeting monthly to help plan, implement, and operate CARS.
- Serving as a forum for CoC members and participating agencies to engage in the planning, implementation, and operation of CARS. This includes identifying needs and challenges facing CARS and proposing solutions to CARS-related problems.
- Developing specific program policy and technology recommendations for approval by the CoC Leadership Council to improve the effectiveness of CARS.
- Coordinating with the staff of the CARS Management Entity to ensure the system is implemented according to the established policies and community vision.
- Coordinating with the CoC’s Homeless Management Information System (HMIS) lead agency to ensure CARS is incorporated into the HMIS.

- Receiving information from the Evaluation Entity regarding the effectiveness and efficiency of CARS.
- Receiving regular monitoring reports from the CARS Management Entity regarding system performance.
- Assigning members of the Appeals Sub-Committee as needed.
- Establishing participation expectations and performance standards for agencies utilizing CARS.
- Defining the roles and responsibilities of committee leadership positions as decided by Committee members.

### Management Entity – Coalition of Homeless Services Providers

The Coalition of Homeless Services Providers (CHSP) has been selected by the Leadership Council as the CARS Management Entity. The Management Entity is responsible for the day-to-day administration of CARS, including:

- Training Participating Agency staff the community vision for CARS, its policies and procedures, and all relevant HMIS workflows.
- Ensuring the Management Entity maintains proper staffing to fulfill all duties and responsibilities outlined in the Policies and Procedures.
- Managing and overseeing contractors and consultants working on components of CARS.
- Ensuring educational and advertising resources are available to CARS participating agencies and community members.
- Gathering and maintaining up-to-date information regarding services available through CARS.
- Expanding HMIS capacity to fully incorporate all components of CARS.
- Reducing technological barriers for agencies not utilizing the HMIS by providing alternative means through which they may conduct and submit CARS assessments for their clients.
- Administering the CARS Master List, making referrals to available services in accordance with Committee defined timeliness standards and based on prioritization criteria defined through the CARS Policies and Procedures.
- Engaging with homeless service providers and other community resources to enact systems change and increase the resources available through CARS.
- Promoting the wide adoption of standardized screening and assessment processes.
- Developing and updating CARS Policies and Procedures based on the guidance and direction of the Policy Oversight Entity.
- Managing the client eligibility and referral outcome appeals process.
- Coordinating case conferencing for committee-identified cases and special populations to resolve housing placement issues and improve system efficiency.
- Preparing materials for and presenting relevant information at CARS Committee meetings, including quarterly monitoring reports and other items identified by the Policy Oversight Entity.
- Providing reports on CARS performance to elected officials and the public as requested by the Policy Oversight Entity.
- Serving as the primary point of contact for media requests for information associated with CARS.

- Conducting site visits to participating agencies at least annually to provide additional support and verify compliance with CARS Policies and Procedures.

### Evaluation Entity

The Evaluation Entity has important responsibilities to ensure the continual improvement of the system. The Evaluation Entity may not be the Management Entity, and must be approved by the Policy Oversight Entity prior to each annual evaluation. Responsibilities of the Evaluation Entity include:

- Planning the annual Coordinated Entry Evaluation in accordance with HUD guidelines and the CARS Policies and Procedures.
- Collecting and analyzing data related to the effectiveness and efficiency of CARS.
- Identifying policy and process improvements and providing recommendations to the Policy Oversight Entity.

### Implementation Entity – CARS Participating Agencies

All programs that receive CoC, ESG, CESH, SSVF, HEAP, HHAP, or targeted VA funding are required by their funding sources to participate in CARS. All other programs serving persons who are or are at risk of experiencing homelessness are also strongly encouraged to participate in the implementation of CARS. All CARS participating agencies will sign a Memorandum of Understanding outlining the specific expectations for participation. In general, agencies are responsible for:

- Ensuring that clients seeking assistance have prompt access to screening and assessment in accordance to the “any door” model of access (see below for more information on the “any door” model).
- Carrying out the screening and assessment of clients using the standardized CARS assessment tools.
- Referring clients to other resources to address their immediate needs.
- Ensuring training compliance of all agency staff who conduct CARS assessments.
- Following CARS policies and procedures as approved by the Policy Oversight Entity.
- Accepting and promptly acting on client referrals through CARS.
- Participating in case conferencing meetings as requested by the CARS Management Entity to resolve housing placement issues or system effectiveness concerns.
- Ensuring entry of assessment information into the HMIS in accordance with Committee defined timeliness standards.
- Abiding by client eligibility and acceptance determination decisions, including the outcomes of appeals.
- Complying with fair housing legal requirements in all housing transactions and tenant selection plans and procedures.
- Collaborating with other CARS Participating Agencies to reach goals set by the Policy Oversight Entity.

## Overview of System Model

### Importance of a CoC-Wide View

It is very important that participating programs and staff take a CoC-wide view when they assess and serve clients in need. When serving clients with a CoC-wide view in mind, the key question is not “Should we accept this person into our project?” Instead, this question becomes “What housing and service assistance strategy among all available is best for this household?”

### Any Door Model

Because of the diversity and geographic size of the Monterey and San Benito Counties CoC, CARS uses a decentralized “any door” system of access. This benefits people seeking services because they can contact the system at any one of the multiple participating programs in different geographic locations.

The principles of this approach are:

- A client can receive integrated services through any of the participating agencies.
- Clients gain equal access to information and advice about the housing assistance for which they are eligible in order to assist them in making informed choices.
- Participating agencies have a responsibility to respond to the range of client needs pertaining to homelessness and housing, and act as the primary contact for clients who apply for assistance unless or until another provider assumes that role.
- Participating agencies will guide the client in applying for assistance or accessing services from another provider regardless of whether the original provider delivers the specific housing services required by a presenting client.
- Participating agencies will work collaboratively to achieve responsive and streamlined access to services and cooperate to use available resources to achieve the best possible housing outcomes for clients, particularly for those with high, complex or urgent needs.

### Access Point Responsibilities

To ensure easy access to assistance, CARS provides access to assessments, housing, and services from multiple, convenient locations throughout the Monterey and San Benito counties through the “any door” model. The household in need may initiate a request for housing by walking into or calling any participating agency or through contact with a street outreach program.

The minimum requirements for participating agencies in regard to their role as access points are:

- Have user access to HMIS ServicePoint.
- Have at least one staff person trained and authorized both to use of the HMIS and how conduct the Vulnerability Index assessment; this may include a community volunteer who is trained and authorized by the CARS Management Entity, and is connected to a CARS participating agency.
- Enter into an MOU with the CARS Management Entity to establish the participation agreement.
- Agree to comply with CARS policies and procedures, follow community guidelines for conducting assessments, and communicate with the CARS Management Entity regarding CARS staff needs.
- Agree to collaborate with other CARS participating agencies to provide referrals to other community services for people assessed through CARS.

## Low-Barrier Access Standards

### Minimizing Barriers to Housing

Low-Barrier Access Standards are a national best practice strategy and have been adopted by the Monterey and San Benito Counties Continuum of Care. The Low-Barrier Access Standards are policies in which people experiencing homelessness are provided with housing directly with few to no treatment preconditions, behavioral contingencies, or barriers. In light of these goals, agencies should carefully consider any mitigating circumstances or evidence of rehabilitation before denial of admission in cases where program admission may be prohibited. Rehabilitation includes, but is not limited to, evidence that a prohibited act or acts were related to untreated mental illness and/or substance abuse, and that the person is undergoing, has agreed to undergo, or has successfully completed a program of appropriate treatment. Upon consideration of such factors, the program may, on a case-by-case basis, decide not to deny assistance. The goal is to screen people into housing rather than out of housing where possible to help with the process of ending homelessness for all people.

### Low-Barrier Access Standards and CARS

The coordinated entry process is Low-Barrier Access Standards oriented, such that people are housed quickly without preconditions or services participation requirements. As such, lowering barriers to project entry is one of the key goals of CARS. CARS participating agencies and referral receiving projects must continually strive to identify and lower barriers to project entry. The Management Entity provides support to all participating agencies to identify how they can align their processes and programs with Low-Barrier Access Standards.

### Exceptions to Low-Barrier Access Standards

Exceptions may be granted on a case-by-case basis as approved by the CARS Policy Oversight entity. Exceptions that may be made are for state or local restrictions that prohibit projects from serving people with certain criminal convictions or other specified attributes. Such programs are expected to minimize barriers as much as possible and provide supporting documentation that outlines program restrictions. Additionally, the participating agency will create a work plan with the Management Entity outlining a plan to transition the program to Low-Barrier Access Standards in the future.

## Overview of System Core Elements

### Program Enrollment

#### Pre-Screening

As a first step, the individual or family should be asked basic pre-screening questions to determine if they need homelessness assistance, whether they are a member of special population requiring specialized assistance (see below for Unique Procedures for Special Populations).

If the individual or family is not homeless, the assessment process should not be continued. Rather, they should be provided with or directed to other more appropriate services, e.g., prevention services if they are at risk of homelessness.

If the individual or family is in need of homelessness housing assistance, staff should check HMIS to see if they have already received the CARS Assessment in the past year. If not, or if it seems their situation has changed significantly since their last assessment, the assessment should be entered into the HMIS via a CARS Program Entry or Interim Update.

If the individual or family is: fleeing domestic violence (DV) situations or otherwise meets the criteria of category (4) of the definition of homelessness; an unaccompanied youth under 18 years of age; or a veteran of active duty in the U.S. Armed Forces, then the procedures under Unique Procedures for Special Populations below should be followed.

### Problem-Solving and Diversion

Problem-Solving (also known as "Diversion" or "Rapid Resolution") is a crisis response philosophy and approach focused on supporting individuals and families experiencing a housing crisis to quickly identify and access alternative housing resources outside of the homeless crisis response system. By practicing active listening skills through creative conversations, Problem-Solving supports the individual or family in crisis to identify viable temporary or permanent housing resources within their own networks or resources, such as family or friends. In select cases and as a last resort, limited and one-time financial assistance (when available) can enhance an individual or family's success in rapidly connecting to alternative temporary or permanent housing.

Prior to conducting CARS Assessments, CARS Assessors should have discussions with people experiencing or at risk of homelessness regarding diversion opportunities such as natural support and potential housing options. If no diversion opportunities are identified, the participant will be invited to complete the CARS assessment which identifies immediate health and safety needs, potential project eligibility, medical vulnerabilities, and housing assistance needs. As the CARS system is only able to make referrals to resources as they become available, a CARS Assessor may engage an individual experiencing homelessness in problem-solving and diversion several times to identify any alternative options that may expedite a person's entry into a stable housing situation.

### Release of Information and Data Sharing

A standard Release of Information (ROI) covers the CARS assessment. The ROI authorizes the agency to conduct the assessment, enter the information into HMIS, and share the individual or family's information with other participating agencies to facilitate connecting the individual or family with housing and services. The ROI must be signed before any information can be collected and entered into the HMIS.

### Standardized Assessment

CARS uses the CARS Assessment as the standard assessment tool. The assessment tool is built into the HMIS, facilitating a smooth referral process for all clients entered onto the Master List. Agencies that do not have access to the HMIS are able to submit assessments through fax or encrypted email to the CARS Management Entity, or by collaborating with another CARS participating agency that has HMIS access. The assessment is completed with all individuals and families who are homeless under HUD's definition of homelessness, and it can be conducted by trained assessors at any CARS participating agency.

### Conducting the Assessment

If the ROI has been signed, then the assessment can be conducted. The assessment information may be entered directly into the HMIS at the time of the assessment, or it may be completed on paper to provide a more comfortable experience for the client. If completed on paper, the assessment information must

be entered into the HMIS within 24 hours of the assessment unless the agency is a designated victim service provider. (See Unique Procedures for Special Populations below for more information about special assessment procedures for person fleeing DV.)

In order to stay as neutral as possible in the CARS referral process, and to avoid any perception of bias, favoritism, or nepotism, CHSP does not conduct CARS assessment for clients. If a client contacts CHSP for a CARS assessment, CHSP staff will make every effort to give appropriate resource information to the client and direct them to a CARS-participating agency for prompt assessment.

When administering the assessment, assessors should adhere to the following rules:

- Clients may be asked to answer the questions as accurately as possible.
- All questions should be asked, including all linked questions.
- The information gathered and entered should only be through client self-report and not through staff opinion, guesses, or third-party information (except in cases where interpretation and conservatorship are necessary to conducting the assessment).

The assessment should be conducted in a setting that promotes safety, privacy, and confidentiality. Staff conducting the assessment should follow the community guidelines below to explain the assessment process and its benefits. Key points that may be covered include:

- Most responses are “yes” or “no,” or just one word.
- The collected information will be entered into the HMIS. Therefore, they will only need to complete the assessment once, their assessment will go immediately onto the Master List, and they will not have to go around to different agencies to get on separate waiting lists.
- If they have an existing case manager helping them apply for housing, they should continue working with that case manager.
- The assessment will help match them with a recommended housing intervention.
- Due to limited housing availability, it is unlikely that the recommended intervention will be available immediately, so it is important to provide up-to-date contact information for when the intervention does become available. Client should immediately notify any CARS Participating Agency if any of their contact information changes so it can be updated in HMIS and they can be reached when they receive a referral.
- The assessment is voluntary but it is the only way into many housing programs.
- The assessment will be conducted and entered into HMIS only if a client gives consent by signing a ROI.

### Updating Assessments

As long as individuals/families remain homeless, they should complete an assessment annually to capture changes in their circumstances. In addition, individuals/families may complete a new assessment whenever they experience a significant change in their circumstances. Additional and follow-up assessments must be entered into the HMIS as Interim Updates to ensure accurate placement on the CARS Master List.

## Matching and Prioritization

### The Master List – Client List and Housing Program Inventory

The CARS Management Entity maintains a “Master List” in the HMIS that includes:

- A sortable list of clients prioritized by the CARS Assessment score and local population/subpopulation factors as outlined in the Prioritization Matrix (see Attachment B).
- An inventory and basic eligibility information for each participating housing program, including rapid re-housing, housing vouchers, transitional housing, and permanent supportive housing.
- A listing of beds/units that are currently availability or expected to become available.

### Housing Program Eligibility Details and Bed/Unit Availability

Participating agencies use the HMIS to enter each referral receiving program's inventory, basic eligibility criteria, and the current and expected bed/unit availability. The eligibility criteria are used, along with the local eligibility limits, to ensure that only eligible individuals are referred to that program or unit (see Attachment B). All referrals to fill program vacancies are requested using the Referral Request Form on the CHSP website.

As detailed further below, each participating agency's authorized staff person must use the HMIS to update the Master List any time program beds/units become, or are expected to become available. Rapid re-housing programs (RRH) programs indicate whether funding is or will be available for financial assistance, along with the funding sources (e.g., SSVF). In general, participating agencies must work consistently with the CARS and HMIS management entities to make sure their inventory, eligibility, and bed/unit availability information are always up-to-date.

### Dynamic Prioritization

When a housing resource becomes available, the program with the opening will submit a referral request indicating the eligibility requirements for that housing resource. The Master List will be sorted by acuity score. Acuity scores will include the additional points available to households who fit the criteria for the prioritized subpopulations. The household with the highest acuity score, who meets the eligibility criteria for the available resource, will be offered that housing resource.

### Fair Housing and Other Statutory Requirements

CARS takes steps to ensure that client prioritization, matching, and referral to housing opportunities do not violate the non-discrimination requirements of the federal Fair Housing Act, which prohibits discrimination in housing transactions on the basis of race, national origin, sex, color, religion, disability status, and familial status, and do not violate California fair housing law which further prohibits discrimination in housing transactions on the basis of sexual orientation, gender identity, gender expression, marital status, medical condition, ancestry, source of income, age, genetic information, and arbitrary discrimination. The Master List allows filtered searches for subpopulations, priority, and eligibility, while preventing discrimination against protected classes.

## Referral

### Matches for Specific Housing Opportunities

When a PSH, TH bed/unit, or RRH financial assistance becomes available, the prioritized Master List will be filtered by program eligibility criteria to identify the highest priority individual or family who is also eligible for the available intervention. This means that a household with a high overall priority score may

not be referred if they are not otherwise eligible for the referral receiving program. For example, a high-scoring individual will not be referred to family housing, and only veterans will be referred to a program targeting Veterans.

Individual preferences should also be taken into consideration while making referrals to specific programs whenever possible. For example, an individual who is not interested in relocating to Monterey County should not be referred to programs located in Monterey County. It is important, however, that no assumptions be made regarding an individual's preferences based on race, color, national origin, ancestry, religion, sex, age, familial status, presence of children, disability, actual or perceived sexual orientation, gender identity or expression, marital status, source of income, genetic information, or other arbitrary reasons. Additionally, individual preference may not be used to limit program access or restrict program eligibility. As such, all preference considerations must be self-reported from the individual and they must be informed that they may update their preferences at any time.

### Standard Referral Steps

Referral to a receiving program does not signify admission to that program. Rather, the receiving program will carry out its own intake process, including but not limited to an application, verification process, and admission decision. Once a program admission decision has been reached, the receiving program will notify the client and the Management Entity of the referral outcome.

### Receiving Program Responsibilities

Referral receiving programs have significant additional responsibilities within the CARS network of participating agencies. These responsibilities ensure that clients receive services as quickly as possible and referral outcome information is updated in a timely manner. These responsibilities include:

- Taking reasonable steps to notify the client verbally and with a letter of the intake decision within one business day after the completion of the client's application and program intake decision. Where no mailing address can be determined, the letter should be left at the program front desk. Notification letters must also be uploaded to the HMIS.
- Reporting referral outcomes through the HMIS within one month of the referral date, including all contact attempts, scheduled intake appointments, and service transactions.
- Issuing referral outcome notification letters to clients. Regarding the outcome notification letter, receiving programs must:
  - Use the outcome decision letter template provided by the CARS Management Entity.
  - Put the decision letter on the agency letterhead.
  - Ensure the letter is signed and dated by an authorized staff member.
  - Give the first available move-in date if the client is accepted.
  - Include a brief statement of reasons for the denial if the client is rejected.
- Complying with HIPAA privacy rules or any other applicable confidentiality requirements.
- Participating in any case conferencing as requested by the CARS Management Entity to assist in finding a more appropriate referral.
- Accepting client if appeals process overturns denial decision (see below for more information on the Client Appeals Process).
- Keeping the CARS Management Entity apprised of any beds/units that are currently vacant, or that will become vacant, along with relevant programmatic/eligibility details.

- Updating the HMIS promptly and regularly regarding current and upcoming bed/unit availability. RRH programs will indicate whether funding is or will be available for financial assistance, along with funding source (e.g., SSVF).
- Checking email and the HMIS regularly for any referrals that have been made to the program.
- Ensuring that HMIS records are complete, accurate, and timely.

## Policies Regarding Denial of CARS Referrals

### *Expectation that Receiving Program will Accept Referrals*

To ensure system efficiency and the best possible client service, receiving programs are generally expected to accept every referral received from CARS.

### *Declining of Referrals from CARS*

Notwithstanding the above expectation, receiving programs may decline an individual or family referred through CARS if any of the following exceptions are demonstrated:

- There is no appropriate vacancy available.
- The household presents with more or fewer people than the unit is designed for in line with housing standards.
- The individual or family is not eligible under funding source or local eligibility requirements for the program in question (see Attachment C).
- For recovery-based housing programs only: The individual indicates an unwillingness to comply with sober program requirements.
- The program provides documentation that it lacks the resources needed to effectively or safely serve and support the individual or family in question.
- For transitional housing programs only: The client has already graduated from a transitional housing program within the previous two years.
- A client misses two or more appointments during the intake process without extenuating circumstances. See below for more information on Extenuating Circumstances.
- Clients may decline a referral because of program requirements that are inconsistent with their needs or preferences. There are no limitations on this decision.
- Following three contact attempts, the client cannot be contacted regarding the referral.
- The program provides documentation that it is contractually required to serve only clients referred from a sole source or separate process.
- There is a conflict of interest as defined in writing by the receiving agency (e.g., the client is related to a staff or Board member of the receiving agency).

Following a declined referral, the case must be reviewed by the Management Entity. If the receiving entity is found to be in violation of these policies, the accountability measures outlined below will be implemented. If the denial is made in accordance with the exceptions outlined above, the client will be placed back onto the Master List for consideration to other program opportunities. In cases not involving program eligibility where the client has declined the referral, the client may be re-referred to the same program after 90 days.

### *Accountability for Turning Down Referrals*

If a receiving program shows a pattern of declining otherwise acceptable referrals, it will be subject to accountability measures. A “pattern” is defined as two or more instances of declining an otherwise

acceptable referral within a period of 12 months. Aligning with the tiered accountability measures described below, agencies that are out of compliance will receive formal written notification from the CARS Management Entity regarding pattern violations. Following the initial identification of the non-compliance pattern, an agency will be placed on a Tier 1 Accountability Plan. A program will be elevated to a Tier 2 Accountability Plan if there is a subsequent instance of declining an otherwise acceptable referral within 12 months from the notice of the first violation. If additional violations occur within the 12 months period from the first violation notice or if they have failed to take steps to prevent future non-compliance, the participating program will be elevated to a Tier 3 Accountability Plan.

Accountability measures for receiving programs showing violations of this policy will be in progressive tiers as follows:

- Tier 1 (one pattern violation): Agency must participate in a conference with CoC Coordinator to determine reasons and plan to resolve the problem.
- Tier 2 (second pattern violation in 12 months): Agency is required to develop and implement a written Performance Improvement Plan (PIP), which may include staff re-training, internal procedural changes, or identified strategies to prevent future violation. The PIP must be created in collaboration with the CoC Program Manager.
- Tier 3 (any additional pattern of violations within 12 months or evidence of failure to implement the PIP): Lower score in CoC and/or other funding competitions, and potential CoC grant reallocation.

#### *Extenuating Circumstances*

A key goal of the CARS process is to balance the need for process efficiency with the goal of ensuring that clients, who often face considerable challenges, have every opportunity to access and succeed in housing. Thus, clients who decline more than one referral, who miss two or more appointments, or who are late in providing application materials can be excused if there are extenuating circumstances.

“Extenuating circumstances” means circumstances outside of the client’s control preventing the client from accepting the referral, attending an appointment, or providing documentation in a timely manner. This is a case-by-case determination. Examples of extenuating circumstances include:

- Verifiable medical problem or lack of funds preventing accepting of a housing referral.
- Verifiable illness or lack of transportation means preventing attendance at appointment.
- Required documentation not available in time from the source preventing timely provision of application materials.

Extenuating circumstances do not include matters within a client’s control. For example, they do not include a client’s choice or preference for location of housing, unless, for example, a different location is needed for accessibility reasons or safety from domestic violence.

A determination of extenuating circumstances requires the client to provide documentation of the extenuating circumstance where possible or legally allowable and to communicate regularly regarding steps to move forward in the process.

## Program Exit

Individuals seeking housing services will not be exited from the program and removed from the Master List unless one of the below criteria are met:

- The client voluntarily withdraws their participation. This may include not providing an ROI or expressing verbally or in writing that they no longer wish to be considered for CARS services.
- The client is housed and no longer in need of services through CARS. This includes clients who are housed through CARS referrals and those who resolve their homelessness outside of the CARS network of services.
- The client is unreachable. Before a client can be removed from the Master List due to unreachability, a minimum of three contact attempts must be made. These contact attempts cannot be on the same day and should vary in time and method of contact as much as possible. All contact attempts must be documented in the HMIS prior to exiting the client from the program.

Clients who are exited from the CARS program are immediately eligible for re-enrollment should they re-engage with a CARS participating agency. Due to the nature of the Master List, the updated assessment information will prioritize the client based on their updated situation and they will not be de-prioritized for CARS referrals.

## Client's Rights

### Client Appeals Process

Clients referred through CARS who feel that they have been a victim of adverse decisions or discrimination in any point of the CARS process have a right to appeal their referral outcome decisions. The appeals process is as follows:

### Notice of Denial to Applicant

- The above-referenced decision letter will serve as effective written notice of a decision to deny program admission.

### Scheduling a Hearing

- The client must make a request for a hearing in writing and delivered to the CARS Management Entity in person, via mail, or via e-mail. The CARS Management Entity must receive the request within one month of the date of the written notice to deny program admission.
- The CARS Management Entity staff must schedule and send written notice to the client and receiving program director of the hearing within 10 business days after the date of the client's request. The notice to the receiving program director must include a copy of the client's request.

### Hearing Procedures

- The CARS Appeals Sub-Committee will conduct hearings. In all cases, the hearing must be conducted by a person other than one who participated in or approved the denial decision, or a subordinate of this person.

- The client must be given the opportunity to provide written or oral objections to the denial decision, and the receiving program must be given the opportunity to provide written or oral justifications for the denial decision.
- If the client fails to appear for the hearing without extenuating circumstances, the denial decision will be upheld.

### Appeal Decision

- The CARS Appeals Sub-Committee will be responsible for making the final decision on whether or not program admission should be granted or denied.
- In making the decision, the following factors should be evaluated:
  - Were the grounds for denial stated factually in the notice of decision to the client?
  - Were the grounds for the denial decision valid? If there was no basis for the decision in applicable law, regulations, or CARS policies and procedures, then the decision to deny will be overturned.
  - Was there sufficient evidence supporting the grounds for denial? If the evidence proves there were valid grounds for denial, and law or CoC policy requires denial, then the decision to deny will be upheld.
- The CARS Appeals Sub-Committee will provide written notice of the final decision within 10 business days of the hearing to the client and receiving program director, including a statement of the reasons for the decision.
- The bed/unit will not be held open during the appeals process. Should the denial be overturned by the Appeals Sub-Committee, the client will be slotted for the next possible program availability.

### Accessibility

- The appeals process will comply with applicable law on disability, language, and literacy access.
- Accommodation must be offered as required by the law at any and all stages of the appeals process on the basis of disability, language, or literacy.
- Examples of accommodations include but are not limited to: reading of the denial notice to the client, language translation of materials, use of a translation line or service, and provision of assistive listening services.

### Non- Discrimination

CARS does not tolerate discrimination on the basis of any protected class (including actual or perceived race, color, religion, national origin, sex, age, familial status, disability, sexual orientation, gender identity, or marital status) during any phase of the CARS assessment or referral process. All agencies participating in CARS must comply with applicable equal access and nondiscrimination provisions of federal and state civil rights laws. Some projects may be forced to limit enrollment based on requirements imposed by their funding sources and/or state or federal law, but this does not prevent a participating agency from complying with the “any door” policy. For example, a HOPWA-funded project might be required to serve only participants who have HIV/AIDS, but they are still expected to conduct CARS assessments with interested clients or connect them to other agencies that may have programs better suited to their needs where they can receive a CARS assessment.

All such programs will avoid discrimination to the maximum extent allowed by their funding sources and their authorizing legislation. All aspects of the CARS will comply with all Federal, State, and local Fair

Housing laws and regulations. Participants will not be “steered” toward any particular housing facility or neighborhood because of race, color, national origin, ancestry, religion, sex, age, familial status, presence of children, disability, actual or perceived sexual orientation, gender identity or expression, marital status, source of income, genetic information, or other arbitrary reasons.

All locations where participants are likely to access or attempt to access CARS will include signs or brochures displayed in prominent locations informing participants of their right to file a nondiscrimination complaint and containing the contact information needed to file a non-discrimination complaint. The requirements associated with filing a non-discrimination complaint, if any, will be included on the signs or brochures.

### Reasonable Accommodation

CARS will operate in a manner that promotes fair and open access to all available housing and services within CARS. The system shall afford all eligible persons access to CARS processes regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, marital status, immigration status, or limited English proficiency.

Additionally, CARS processes ensure all people experiencing homelessness in different populations and subpopulations including people experiencing chronic homelessness, veterans, families with children, youth, persons involved with the criminal justice system, and persons who are fleeing, or attempting to flee, domestic violence, sexual assault, dating violence, stalking, or other dangerous or life-threatening conditions including human trafficking, will have fair and open access to the CARS process and all participating agencies are expected to make every effort to provide reasonable accommodation to individuals seeking services.

## Unique Procedures for Special Populations

Monterey/San Benito’s Continuum of Care prioritizes families, chronically homeless individuals, those who are fleeing or attempting to flee domestic violence, those who are medically frail, veterans, and those who are unsheltered, and has committed to adopting a Low-Barrier Access Standards approach in CoC/ESG programs. The following are unique procedures for special populations which include chronically homeless individuals, those who are fleeing or attempting to flee domestic violence, veterans, transition-aged youth, and unaccompanied minors. There are no unique procedures for those who are medically frail or unsheltered.

### Families

For homeless families with children under 18, the CoC seeks to:

- mediate/prevent homelessness whenever possible,
- reduce the homeless episode for families through rapid re-housing (RRH) and shelter/transitional housing (TH) focused on moving families from homelessness to permanent housing as soon as possible, and
- permanently house the most vulnerable families, as resources are available.

Information is gathered to determine the “best fit” intervention to prioritize families for more intensive services. Rapid Re-Housing projects serving homeless families with children will strive to place clients into

permanent housing within 30 days of entering homelessness and will not screen out families based on criteria outlined in the Low-Barrier Access Standards policies.

### Chronically Homeless

Chronically homeless individuals are prioritized for Permanent Supportive Housing resources but may also be considered for other housing interventions. Consideration should be given to the impact that other housing interventions may have on a client's chronicity status. In accordance with the goal to place clients into the housing program that best minimizes the individual's likelihood to return to homelessness, chronically homeless individuals should be referred to non-permanent or non-supportive housing interventions if PSH is not available.

Non-chronically homeless individuals with substance abuse and/or mental health disorders who are interested in receiving services for these concerns will be referred to the appropriate residential treatment programs.

### Domestic Violence

Victim and non-victim housing/service agencies must prioritize safety and equitable access to housing/services for persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, while ensuring that client choice is upheld. Therefore, the CARS pre-screen process should include the following "yes" or "no" questions:

- "Are you currently residing in, or trying to leave, an intimate partner who threatens you or makes you fearful?" (If yes, ask the following question):
- "Do you want services that are specifically geared to domestic violence survivors OR do you need a confidential location to stay?"

If the client answers "yes" to both questions, the client must be offered assistance in contacting the appropriate domestic violence assistance provider as follows:

If in San Benito County: Emmaus House 24-Hour Emergency Hotline at 877-778-7978

If In Monterey County: YWCA Domestic Violence Crisis Line at 831-372-6300 or 831-757-1001

If the screening indicates the client may have been sexually assaulted or abused, the client must be offered assistance in contacting the appropriate sexual violence provider as follows:

If in San Benito County: Community Solutions Crisis Hotline at 877-363-7238

If in Monterey County Monterey County Rape Crisis Center at 831-375-4357 or 831-424-4357

In addition, any agency serving as an access point must coordinate with the appropriate victim services provider around safety planning and must participate in any trainings provided on how to carry out appropriate safety planning and how to ensure trauma-informed, culturally appropriate services.

Whether or not the client wishes to be connected to DV services, the client must be offered equitable access to the full housing/services system available through CARS in accordance with all protocols described in this manual. As an additional protection for individuals fleeing domestic violence, program enrollment information will not be shared with all HMIS users. For additional information on how DV client

information is safeguarded in the HMIS, please consult the HMIS Governance Policies and Procedures and the HMIS Security Plan.

To help ensure equitable access while emphasizing safety, victim service providers may elect or not elect to administer the CARS assessment process for clients seeking other housing/services available through CARS. However, the victim service provider should have a standardized policy governing when and how they elect to use the CARS assessment process, and it should have a process for referring the client to another agency that does administer the CARS Assessment. Assessments may be submitted directly to the Management Entity through fax or encrypted email for secure entry onto the Master List if the victim service provider is unable to partner with a CARS participating agency.

For information on Emergency Transfers for clients experiencing DV, see Attachment D.

## Veterans

The screening process will include the following “yes” or “no” questions:

- Have you served on active duty in the Armed Forces of the United States? (If yes, ask the following question):
- Do you want Veteran-specific services?

If the client indicates “yes” to both questions, the Veteran must be referred to the appropriate VA Center for appropriate assessment and services.

If in Monterey and San Benito Counties

- Veterans Transition Center (VTC) at 831-883-8387.
- Nation’s Finest (NF) at 831-375-1184.

If the client does not wish to seek Veteran-specific housing/services, the client will still have access to the housing/services system available through CARS, in accordance with all protocols described in this manual. In such cases the client must be fully informed that the decision not to seek Veteran-specific housing/services may significantly limit his/her chances of receiving timely housing/services and that HUD rules limit access to CoC-funded housing if VA-funded or other Veteran-eligible housing is available to that Veteran.

## Transition-Aged Youth (18-24)

Due to the unique challenges to servicing homeless youth, CARS for Youth (Y-CES) may function differently and distinctly from the rest of CARS. Service-connected TAY (Transitional-Aged Youth) may not be required to have received a vulnerability assessment or be entered into CARS in HMIS to be the subject of case conferencing. Case Conferencing topics will not only include which CARS housing intervention is most appropriate for TAY, but also how to effectively engage the TAY clients so that they qualify for those interventions.

## Unaccompanied Youth (Under 18)

The screening process will include the following “yes” or “no” question:

- Are you under the age of 18?

If the client answers “yes,” the client must be referred to and offered assistance to contact Community Human Services Safe Place for appropriate assessment and services:

- Community Human Services Safe Place at 831-373-4421.

## Administration Requirements for CARS

### Initiation of Program Participation

As mentioned earlier, all programs that receive CESH, CoC, ESG, HEAP, HHAP, SSVF, or targeted VA funding are required by their funding sources to participate in CARS. All other programs serving persons who are experiencing homelessness are strongly encouraged to participate in CARS.

In order to initiate program participation in CARS, interested agencies must contact CHSP at:

(831) 883-3080 OR [info@chsp.org](mailto:info@chsp.org)

Interested agencies will work with the CARS Management Entity on the following steps:

- Obtaining and signing the Memorandum of Understanding agreeing to participate in and comply with all the requirements of CARS (including the CARS Policies and Procedures and any other community guidelines developed by the CARS Management Entity relating to CARS).
- Obtaining user access to the HMIS.
- Having at least one staff person trained and authorized both to use the HMIS and to conduct the CARS Assessment; this may include a community volunteer who is trained and authorized by the CARS Management Entity, and is connected to a CARS participating agency.
- Providing a description of services offered by their agency.
- Provide instructions for clients on how to access CARS Assessments at their agency.

Once the above steps are completed, program participation in CARS can begin.

### Termination of Program Participation

A participating program or agency may terminate participation in CARS by giving written notice to the CARS Management Entity. Due to the importance of community-wide use of the CARS, the CoC expects that the participating agency will communicate with the CARS Management Entity to resolve any issues and barriers to its participation prior to giving written notice. Following receipt of written notice, the CARS Management Entity will notify the CARS Policy Oversight Entity of the agency's withdrawal from CARS participation along with any feedback from the agency to ensure issues and barriers are reduced for other agencies that may be experiencing similar challenges.

Programs and agencies are hereby warned that termination of participation in CARS may also result in the loss of funding from funding sources that require their participation in CARS.

### Training and Authorization of Users

The CARS Assessment can only be conducted by agency staff (or volunteers who are connected to the agency) who have successfully completed training and been authorized by the CARS Management Entity. Trainings are coordinated by CoC staff and include but are not limited to training on:

- Using HMIS ServicePoint
- Completing the Vulnerability Index assessment
- Communicating with clients about CARS and answering their questions.

Initial training is conducted via an online training platform. Once initial training has been completed, newly authorized users are encouraged to attend monthly office hours or request additional training from the CARS Management Entity if they have additional questions.

### Outreach and Advertising

The CARS Policy Oversight Entity will develop a strategy for affirmative marketing of CARS and its waitlist to private and public agencies, including those in the CoC, VA, social service agencies, and local government agencies. The purpose of this outreach is to educate agencies about and provide information on the role of CARS and how these agencies' homeless clients can access CARS.

In addition, the CARS Policy Oversight Entity will develop a strategy for affirmative marketing of CARS and its waitlist directly to unsheltered homeless people throughout the Continuum of Care. This outreach may be conducted in coordination with street outreach programs, the biennial unsheltered point-in-time count, and other public and private agencies that regularly contact unsheltered homeless people. The purpose of this outreach is to ensure that unsheltered persons are prioritized for assistance in the same manner as any other person assessed through CARS.

The CARS Management Entity will support the established marketing strategy by producing advertising materials and coordinating community outreach and recruitment.

### Program Monitoring and Evaluation

The implementation of CARS creates significant opportunities for system-wide improvements to the Monterey and San Benito Counties homeless assistance system. To help ensure that CARS achieves the maximum possible efficiency, effectiveness, and usefulness both for homeless persons and the programs that serve them, the CoC expects adjustments to the CARS processes, policies, and procedures over time. To inform these adjustments, the CARS Management Entity provides monitoring reports to the policy oversight entity quarterly and CARS is evaluated annually. Stakeholders have opportunities to provide feedback and participate in the monitoring and evaluation processes through the CARS Committee and other focus groups coordinated by the evaluation entity.

Although both performance monitoring and CE evaluation rely on the data collected by CARS providers, these two activities serve different purposes. Monitoring, which focuses on system performance, should happen at least quarterly and include reports on key performance indicators identified by the CARS Policy Oversight Entity.

HUD requires the annual evaluation of CARS. The evaluation focuses on the effectiveness and efficiency of the CARS process and should provide recommendations of policy and process improvements. Participating agencies and program participants must also have the opportunity to share feedback regarding their experience with the different stages of CARS processes, including intake, assessment, and referral.

For monitoring and evaluation purposes, effectiveness and efficiency describe the level to which the implementation of the program adheres to the program's written policies and HUD requirements and the

extent to which CARS referrals result in positive housing outcomes. Participating projects include the CESH Program, CoC and ESG-funded shelters and housing programs that are required to participate in CARS, and other publicly and privately funded shelter and housing programs which serve people experiencing homelessness and have elected to participate in CARS. Program participants are households, including unaccompanied children and youth, experiencing homelessness or who have been connected to housing through the CARS process in the last year.

Though HUD does not prescribe the scope or methodology required for the annual CE evaluation, the effectiveness and efficiency of the CE process, feedback about the systems ease of use from participating agencies, feedback from program participant experiences with the program, and a review of referral outcomes should inform the evaluation process and be taken into account in the annual update to the CARS policies and procedures and any updates to the ESG written standards.

In particular, the policy and oversight entity and the CARS Management Entity work together to ensure that:

- An evaluation is conducted at least annually.
- A report on the evaluation's findings is made available to participating agencies in a timely manner.
- Adjustments are made to the CARS policies and procedures based upon evaluation findings.
- Evaluations benefit from a broad and inclusive stakeholder group.

Evaluation efforts are informed by the metrics reviewed, and should be reviewed periodically by the CARS Policy Oversight Entity with input from the CoC and CARS Management Entity. These metrics include indicators that evaluate the effectiveness of CARS itself, such as:

- Wait times for initial contact
- The extent to which timelines and referral timeliness goals are achieved
- Rate of referral acceptance by receiving programs
- Rate of missed appointments for assessments or for housing provider interviews
- Number/percentage of persons declined by more than one provider
- Rate of program admissions not conducted through CARS
- Accuracy and completeness of data on assessment forms.

The metrics also include indicators of CARS impact on CoC system-wide outcomes, such as:

- Reduced client length of stay in emergency shelters
- Reduced waiting lists for all program types
- Program components meet outcome targets for housing stability and increased income
- Reduced chronic homelessness, family homelessness, and youth homelessness
- Reduced homelessness recidivism
- Reduced rate of first-time homelessness

## ATTACHMENTS

A. Definitions

B. Local Housing Eligibility and Prioritization Matrix

C. Local Eligibility Limits by Housing Program Type and Population Matrix

D. Emergency Transfer Policy for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

E. CARS Non-Emergency Transfer Policy

G: CARS Assessment Tool Scoring Summary

## Attachment A: Definitions

**Access Point** – Locations where people can complete the standardized assessment to participate in CARS. Access points often include emergency shelters and drop-in service centers.

**At Risk of Homelessness** – An individual or family who has income below 30% of area median family income for the area, as defined by HUD, and who does not have sufficient resources or support networks immediately available to prevent them from moving into an emergency shelter or other place described in the “homeless” definition (See Exhibit A and Exhibit B), and meets one if the following definitions defined under 24 CFR 578.3 (CoC program) or 24 CFR 576.2 (ESG program). This may also include a child or youth who qualifies as homeless under other Federal programs.

**California Emergency Solutions and Housing (CESH)** - Provides funds for a variety of activities to assist persons experiencing or at risk of homelessness as authorized by SB 850 (Chapter 48, Statutes of 2018). The California Department of Housing and Community Development (HCD) administers the CESH Program with funding received from the Building Homes and Jobs Act Trust Fund (SB 2, Chapter 364, Statutes of 2017)

**Chronic Homelessness** – HUD’s definition of chronically homeless means an individual or family who:

- Chronically Homeless Individual (CHI): For HUD CoC Grants requiring that applicants be chronically homeless, under HUD’s definition, “chronic homelessness” means an individual who lives either in a place not meant for human habitation, safe haven, or in an emergency shelter immediately before entering the institutional care facility.
- In order to meet the CHI definition, the individual also must have been living as described above continuously for 12 months, or on at least four separate occasions in the last three 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.

**Continuum of Care (CoC)** - The Monterey and San Benito Counties Continuum of Care carries out the responsibilities required under HUD regulations, set forth at 24 CFR 578 – Continuum of Care Program. The CoC is comprised of a broad group of stakeholders dedicated to ending and preventing homelessness in Monterey and San Benito Counties. The over-arching CoC responsibility is to ensure community-wide implementation of efforts to end homelessness and ensuring programmatic and systemic effectiveness of the local continuum of care program.

**Diversion**- a strategy that prevents homelessness for people seeking shelter by helping them identify immediate alternate housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to permanent housing. Diversion programs can reduce the number of families becoming homeless, the demand for shelter beds, and the size of program wait lists. Diversion programs can also help communities achieve better outcomes and be more competitive when applying for federal funding. This paper will describe how communities can begin diverting families from entering their homeless assistance systems.

**Emergency Shelter** – Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.

**Emergency Solutions Grant (ESG)** – ESG is a grant program of the U.S. Department of Housing and Urban Development (HUD) that funds emergency assistance for people who are homeless or at-risk of homelessness. ESG grantees are required to participate in CARS.

**Family** – households with one or more adults over 18 and at least one dependent under 18 years of age.

**Homeless** – HUD’s definition of homelessness (24 CFR 578.3) has four categories:

- **Category 1** – Literally homeless individuals/families
- **Category 2** – Individuals/families who will imminently lose their primary nighttime residence with no subsequent residence, resources, or support networks.
- **Category 3** – Unaccompanied youth or families with children/youth who meet the homeless definition under another federal statute.
- **Category 4** – Individuals/families fleeing or attempting to flee domestic violence.

Detailed definition of Category 4: Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, human trafficking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (ii) Has no other residence; and (iii) Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

**Homeless Emergency Aid Program (HEAP)** – A one-time \$500 million block grant program created in 2018. HEAP was established to provide direct assistance to California’s homeless Continuums of Care (CoCs) and large cities to address the homelessness crisis throughout the state.

**Homeless Housing, Assistance and Prevention (HHAP)** – Signed into law on July 31, 2019 by Governor Gavin Newsom. The Homeless Housing, Assistance and Prevention is a \$650 million one-time block grant that provides local jurisdictions with funds to support regional coordination and expand or develop local capacity to address their immediate homelessness challenges.

**Homeless Management Information System (HMIS)** – A local information technology system used to collect data on the provision of housing and services to homeless individual/families.

**Homelessness Prevention** – A program targeted to individuals and families at risk of homelessness. Specifically, this includes those that meet the criteria under the “at risk of homelessness” definition at 576.2, as well as those who meet the criteria in Category 2, 3, and 4 of the “homeless definition and have an annual income below 30% of family median income for the area.

**Low-Barrier Access Standards** – An approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment, or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.

**Housing Interventions** – Housing programs and subsidies, including transitional housing, rapid re-housing, and permanent supportive housing programs, as well as permanent housing subsidy programs (e.g. Housing Choice Vouchers).

**Housing and Urban Development (HUD)** – The United States Department of Housing and Urban Development.

**Literally Homeless** – Category 1 of HUD’s definition of homelessness. Literally homeless means an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning the individual or family has a primary nighttime residence that is a public or private place not meant for human habitation, the individual or family is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by charitable organizations or federal, state, or local government programs), or the individual is existing an institution where s(he) has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

**Master List** – A prioritized list in HMIS of people who have completed the assessment survey and are in need of permanent housing. The list can be sorted by basic eligibility criteria and is prioritized so that individuals and families with the greatest need are housed first.

**Medically Frail** – a designation for individuals with a mental health disorder, an alcohol and/or drug use disorder, AND a physical disability or chronic health condition.

**Permanent Supportive Housing (PSH)** – a type of permanent housing designed for chronically homeless and other highly vulnerable individuals and families who need long-term support to stay housed. Permanent supportive housing provides housing linked with case management and other supportive services. Permanent supportive housing has no time limitation, providing support for as long as needed and desired by the resident.

**Rapid Re-Housing (RRH)** – a type of permanent housing program that provides short-term financial assistance and support to quickly re-house homeless households in their own independent housing. The goal is to quickly move households out of homelessness and back into permanent housing, providing the lightest level of service necessary to assist the household.

**Release of Information (ROI)** – The consent form that individuals/households complete and sign to grant consent for their personal information to be entered into HMIS and used for CARS.

**Transitional Housing (TH)** – Temporary housing with services to facilitate movement of homeless individuals and families to permanent housing within 24 months

**Victim Service Provider** – A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs.

**Unsheltered** – According to the U.S. Department of Housing and Urban Development (HUD), an individual or family is considered *unsheltered* when they reside in a place not meant for human habitation. This

includes locations such as streets, sidewalks, parks, vehicles, abandoned buildings, encampments, or other areas not designed for or ordinarily used as regular sleeping accommodations. This definition is part of HUD's Category 1 for defining homelessness under the **Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act**.

Attachment B: Local Housing Eligibility and Prioritization Matrix

<b>MONTEREY/SAN BENITO COUNTY COORDINATED ASSESSMENT &amp; REFERRAL SYSTEM</b> <b>HOUSING ELIGIBILITY AND PRIORITIZATION MATRIX</b>		
<b>Program Applicability:</b> <ul style="list-style-type: none"> <li>• CoC, ESG, HUD VASH, VA-funded homeless programs – Must participate per federal requirements.</li> <li>• All other homeless programs – Strongly encouraged to participate through participation MOU.</li> </ul>		
PROGRAM TYPE	CLIENT ELIGIBILITY SCREENING CRITERIA	PRIORITIZATION/POPULATION FACTORS
<b>Permanent Supportive Housing (Shared and Non-shared Units)</b>	<ul style="list-style-type: none"> <li>• Literal homelessness (Cat. 1), at imminent risk (Cat. 2) and fleeing domestic violence (Cat. 4)</li> <li>• Verifiable disability</li> <li>• Additional eligibility and prioritization requirements may apply based on other funder requirements</li> <li>• Local client background limitations:                             <ul style="list-style-type: none"> <li>o See Attachment C.</li> </ul> </li> </ul>	<p>Eligible households will be prioritized for Permanent Supportive Housing referrals in the following order:</p> <p><b>Chronicity</b></p> <p>Households will be prioritized first based on chronicity status in the following order:</p> <ol style="list-style-type: none"> <li>1. Chronically homeless households.</li> <li>2. Non-chronically homeless households.</li> </ol> <p><b>Vulnerability</b></p> <p>Households will then be prioritized from highest to lowest assessment score as determined by the standard assessment tool. See Attachment F for explanation of point values.</p> <p><b>Length of Time Homeless</b></p> <p>Households will then be prioritized based on the length of time homeless from longest to shortest.</p>

PROGRAM TYPE	CLIENT ELIGIBILITY SCREENING CRITERIA	PRIORITIZATION/POPULATION FACTORS
<b>Transitional Housing (Shared and Non-shared Units)</b>	<ul style="list-style-type: none"> <li>• Literal homelessness (Cat. 1), at imminent risk (Cat. 2), and fleeing domestic violence (Cat. 4)</li> <li>• Additional eligibility and prioritization requirements may apply based on other funder requirements</li> <li>• Local client background limitations: <ul style="list-style-type: none"> <li>○ See Attachment C.</li> </ul> </li> </ul>	<p>Eligible households will be prioritized for Transitional Housing referrals in the following order:</p> <p><b>Vulnerability</b></p> <p>Households will be prioritized from highest to lowest assessment score as determined by the standard assessment tool. See Attachment F for explanation of point values.</p> <p><b>Length of Time Homeless</b></p> <p>Households will then be prioritized based on the length of time homeless from longest to shortest.</p>
<b>PROGRAM TYPE</b>	<b>CLIENT ELIGIBILITY SCREENING CRITERIA</b>	<b>PRIORITIZATION/POPULATION FACTORS</b>
<b>Rapid Re-Housing</b>	<ul style="list-style-type: none"> <li>• Literal homelessness (Cat. 1), and fleeing domestic violence (Cat. 4)</li> <li>• Additional eligibility and prioritization requirements may apply based on other funder requirements</li> <li>• Local client background limitations: <ul style="list-style-type: none"> <li>○ See Attachment C.</li> </ul> </li> </ul>	<p>Eligible households will be prioritized for Rapid Re-Housing referrals in the following order:</p> <p><b>Vulnerability</b></p> <p>Households will be prioritized from highest to lowest assessment score as determined by the standard assessment tool. See Attachment F for explanation of point values.</p> <p><b>Length of Time Homeless</b></p> <p>Households will then be prioritized based on the length of time homeless from longest to shortest.</p>
<b>PROGRAM TYPE</b>	<b>CLIENT ELIGIBILITY SCREENING CRITERIA</b>	<b>PRIORITIZATION/POPULATION FACTORS</b>

<p><b>Emergency Shelter</b></p>	<ul style="list-style-type: none"> <li>• Literal homelessness (Cat. 1), at imminent risk (Cat. 2), and fleeing domestic violence (Cat. 4)</li> <li>• Additional eligibility and prioritization requirements may apply based on other funder requirements</li> <li>• Local client background limitations: <ul style="list-style-type: none"> <li>o See Attachment C.</li> </ul> </li> </ul>	<p>Eligible households will be considered for Emergency Shelter on a <b>First-come first-serve</b> basis for all emergency shelters except the following:</p> <ul style="list-style-type: none"> <li>• As referred by the County for County-funded shelters serving persons with psychiatric disabilities.</li> </ul>
<p>PROGRAM TYPE</p>	<p>CLIENT ELIGIBILITY SCREENING CRITERIA</p>	<p>PRIORITIZATION/POPULATION FACTORS</p>
<p><b>Prevention</b></p>	<ul style="list-style-type: none"> <li>• At risk of homelessness (ESG Cats. 1 - 3), and at imminent risk (CoC Cat. 2)</li> </ul>	<p><b>Placeholder:</b> A pre-screening process and priorities for referring at risk persons to prevention resources will be developed in the future.</p>

## Attachment C: Local Eligibility Limits by Housing Program Type and Population Matrix

<b>MONTEREY/SAN BENITO COUNTY COORDINATED ASSESSMENT &amp; REFERRAL SYSTEM (CARS) LOCAL ELIGIBILITY LIMITS BY HOUSING PROGRAM TYPE AND POPULATION</b>
<p>The chart below sets forth local housing eligibility limitations for housing programs participating in CARS. *Several of the limitations below are not aligned with the goals of the Low-Barrier Access Standards.</p> <p><b>Not prohibited</b> – a person cannot be denied program admission for this reason.</p> <p><b>May be prohibited</b> – the agency has discretion to accept or deny the person program admission, usually based upon mitigating factors.</p> <p><b>Always prohibited</b> – the person must be denied admission.</p>

Local Housing Eligibility Limits & Definition	Permanent Supportive Housing (PSH)	Transitional Housing (TH)	Rapid Re-Housing (RRH)	Emergency Shelter (ES)
<p><b>A. Violent Criminal Activity In Past 5 Years</b> - includes:</p> <ol style="list-style-type: none"> <li>1. The criminal use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage;</li> <li>2. Criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity (defined as within a three-block radius of the premises); or</li> </ol>	<p><b>PSH Individuals</b> – May be prohibited</p>	<p><b>TH Individuals</b> – May be prohibited</p>	<p><b>RRH Individuals</b> – May be prohibited</p>	<p><b>ES Individuals</b> – May be prohibited</p>
	<p><b>PSH Families</b> – May be prohibited</p>	<p><b>TH Families</b> – May be prohibited</p>	<p><b>RRH Families</b> – May be prohibited</p>	<p><b>ES Families</b> – May be prohibited</p>

<p>3. Criminal activity that threatens the health or safety of property owners, management staff, program staff, volunteers, agents, and persons performing contract functions or other responsibilities on behalf of the program.</p> <p>Evidence must be written and includes:</p> <ol style="list-style-type: none"> <li>1. Conviction for violent criminal activity within the past 5 years</li> <li>2. Any documentation (such as arrest records) that shows evidence of violent criminal activity within the past 5 years (less weight than conviction).</li> </ol>				
<p><b>B. Arson</b> – is the <a href="#">crime</a> of intentionally, deliberately and maliciously setting fire to buildings, <a href="#">wildland</a> areas, dumpsters, vehicles or other property with the intent to cause damage.</p> <p>Evidence must be written and includes:</p> <ol style="list-style-type: none"> <li>1. Conviction for arson within the past 10 years</li> <li>2. Any arrests for arson within the past 10 year</li> </ol>	<p><b>PSH Individuals</b> – May be prohibited</p>	<p><b>TH Individuals</b> – May be prohibited</p>	<p><b>RRH Individuals</b> – May be prohibited</p>	<p><b>ES Individuals</b> – May be prohibited</p>
	<p><b>PSH Families</b> – May be prohibited</p>	<p><b>TH Families</b> – May be prohibited</p>	<p><b>RRH Families</b> – May be prohibited</p>	<p><b>ES Families</b> – May be prohibited</p>

<p>3. Any documentation (such as arrest records) that shows evidence of intentionally, deliberately and maliciously setting fires in the past 10 years (less weight than conviction).</p>				
<p><b>C. Methamphetamine Manufacturing on the Premises</b> – is the illegal manufacture, or intent to manufacture, methamphetamine on the premises occupied by the person.</p> <p>Evidence must be written and includes:</p> <ol style="list-style-type: none"> <li>1. Any conviction of methamphetamine manufacturing.</li> <li>2. Any documentation (such as arrest records) that shows evidence of methamphetamine manufacturing on the premises (less weight than conviction).</li> </ol>	<p><b>PSH Individuals</b> – Always prohibited</p>	<p><b>TH Individuals</b> – Always prohibited</p>	<p><b>RRH Individuals</b> – Always prohibited</p>	<p><b>ES Individuals</b> – Always prohibited</p>
	<p><b>PSH Families</b> – Always prohibited</p>	<p><b>TH Families</b> – Always prohibited</p>	<p><b>RRH Families</b> – Always prohibited</p>	<p><b>ES Families</b> – Always prohibited</p>
<p><b>D. Registered Sex Offender</b> - is a person, male or female, who has been convicted of a crime involving a sexual act where the law requires them to be placed on the Sexual Offender Registry. Tier 1 offenses are typically of a non-violent nature</p>	<p><b>PSH Individuals</b> – Always prohibited if (1) subject to lifetime (Tier 3) registration</p>	<p><b>TH Individuals</b> – Always prohibited if (1) subject to lifetime (Tier 3) registration</p>	<p><b>RRH Individuals</b> – May be prohibited depending on funder restrictions or location,</p>	<p><b>ES Individuals</b> – Always prohibited if (1) subject to lifetime (Tier 3) registration requirement, or (2)</p>

<p>with persons of the age of majority and include registration for a minimum of 15 years. Tier 2 offenses are typically also of a non-violent nature, but involve minors, and require being registered for no less than 25 years. Tier 3 offenses are the most serious; including those convicted of violent and non-violent acts, with minors or adults, and require being for the offender's lifetime.</p> <p>Evidence must be written and includes:</p>	<p>requirement, or (2) depending on location, where legally restricted from living near families, schools, parks, or other restrictions; otherwise <i>not</i> prohibited</p>	<p>requirement, or (2) depending on location, where legally restricted from living near families, schools, parks, or other restrictions; otherwise <i>not</i> prohibited</p>	<p>where legally restricted from living near families, schools, parks, or other restrictions; otherwise <i>not</i> prohibited</p>	<p>depending on location, where legally restricted from living near families, schools, parks, or other restrictions; otherwise <i>not</i> prohibited</p>
<p>1. Listing in a Sexual Offender Registry.</p>	<p><b>PSH Families –</b> Always prohibited if (1) subject to lifetime (Tier 3) registration requirement, or (2) depending on location, where legally restricted from living near families, schools, parks, or other</p>	<p><b>TH Families –</b> Always prohibited if (1) subject to lifetime (Tier 3) registration requirement, or (2) depending on location, where legally restricted from living near families, schools, parks, or other</p>	<p><b>RRH Families –</b> May be prohibited depending on funder restrictions or location, where legally restricted from living near families, schools, parks, or other restrictions; otherwise may be prohibited</p>	<p><b>ES Families –</b> Always prohibited if (1) subject to lifetime (Tier 3) registration requirement, or (2) depending on location, where legally restricted from living near families, schools, parks, or other restrictions; otherwise may be prohibited</p>

	restrictions; otherwise may be prohibited	restrictions; otherwise may be prohibited		
<p><b>E. Current Use of Illegal Drugs</b> – means that a person is currently engaged in the use of illegal drugs as defined in the federal Controlled Substances Act. <i>Currently engaged in the illegal use of a drug</i> means a person has engaged in the behavior recently enough to justify a reasonable belief that there is continuing illegal drug use.</p> <p>Evidence must be written and includes:</p> <ol style="list-style-type: none"> <li>1. Any conviction for illegal drug use in the past 2 years.</li> <li>3. Any documentation (such as arrest records in the past two years) that shows evidence of current illegal drug use (less weight than conviction).</li> </ol>	<p><b>PSH Individuals</b> – May be prohibited</p>	<p><b>TH Individuals</b> – May be prohibited</p>	<p><b>RRH Individuals</b> – May be prohibited</p>	<p><b>ES Individuals</b> – May be prohibited</p>
	<p><b>PSH Families</b> – May be prohibited</p>	<p><b>TH Families</b> – May be prohibited</p>	<p><b>RRH Families</b> – May be prohibited</p>	<p><b>ES Families</b> – May be prohibited</p>
<p><b>F. Alcohol Use on or Around the Premises</b> - means any use or sharing of alcohol in or in the immediate vicinity of the</p>	<p><b>PSH Individuals</b> – Not prohibited</p>	<p><b>TH Individuals</b> – Not prohibited</p>	<p><b>RRH Individuals</b> – Not prohibited</p>	<p><b>ES Individuals</b> – Not prohibited</p> <p>Recovery-Based Programs:</p>

<p>premises occupied by the person.</p> <p>Evidence includes:</p> <ol style="list-style-type: none"> <li>1. Any documented credible evidence of current alcohol use in or around the premises.</li> </ol>	<p>Recovery-Based Programs: May be prohibited</p>	<p>Recovery-Based Programs: May be prohibited</p>	<p>Recovery-Based Programs: May be prohibited</p>	<p>May be prohibited</p>
	<p><b>PSH Families</b> – Not prohibited</p> <p>Recovery-Based Programs: May be prohibited</p>	<p><b>TH Families</b> – Not prohibited</p> <p>Recovery-Based Programs: May be prohibited</p>	<p><b>RRH Families</b> – Not prohibited</p> <p>Recovery-Based Programs: May be prohibited</p>	<p><b>ES Families</b> – Not prohibited</p> <p>Recovery-Based Programs: May be prohibited</p>
<p><b>G. Pattern of Abuse of Alcohol</b> – means a pattern of abuse of alcohol that may threaten the health, safety or right to peaceful enjoyment of the premises by other residents.</p> <p>Evidence must be written and includes:</p> <ol style="list-style-type: none"> <li>1. More than one conviction related to alcohol abuse in the past 2 years</li> <li>2. Any documentation (such as arrest records in the past two years) that shows evidence of current alcohol abuse.</li> </ol>	<p><b>PSH Individuals</b> – May be prohibited</p>	<p><b>TH Individuals</b> – May be prohibited</p>	<p><b>RRH Individuals</b> – May be prohibited</p>	<p><b>ES Individuals</b> – May be prohibited</p>
	<p><b>PSH Families</b> – May be prohibited</p>	<p><b>TH Families</b> – May be prohibited</p>	<p><b>RRH Families</b> – May be prohibited</p>	<p><b>ES Families</b> – May be prohibited</p>

<p><b>H. Abusive, Threatening, or Violent Conduct Toward Staff, Property Management, or Other Residents</b> - includes any verbal or physical conduct, such use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered disrespectful or abusive. <i>Threatening or violent</i> refers to oral or written threats or physical gestures that communicate intent to commit violence, or the actual committing of violence.</p> <p>Evidence includes:</p> <ol style="list-style-type: none"> <li>1. Any documented credible evidence of abusive, threatening, or violent conduct toward staff, property management, or other residents.</li> </ol>	<p><b>PSH Individuals –</b> May be prohibited</p>	<p><b>TH Individuals –</b> May be prohibited</p>	<p><b>RRH Individuals –</b> May be prohibited</p>	<p><b>ES Individuals –</b> May be prohibited</p>
	<p><b>PSH Families –</b> May be prohibited</p>	<p><b>TH Families –</b> May be prohibited</p>	<p><b>RRH Families –</b> May be prohibited</p>	<p><b>ES Families –</b> May be prohibited</p>

## Attachment D: Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

### EMERGENCY TRANSFERS

The Monterey/San Benito CoC is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), Monterey/San Benito CoC allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of Monterey/San Benito CoC to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether Monterey/San Benito CoC has another dwelling unit that is available and is safe to offer the tenant for temporary or permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that Monterey/San Benito CoC and its CoC and ESG-funded providers are in compliance with VAWA.

### KEY TERMS

**Emergency Transfer Plan.** Provides for emergency transfers for victims receiving rental assistance or in units subsidized under a covered housing program.

**External Emergency Transfer.** Emergency relocation of a tenant to another unit where the tenant would be considered a new applicant.

**Internal Emergency Transfer.** Emergency relocation of a tenant to another unit where the tenant would not be a new applicant.

**Safe Unit.** A unit the victim believes is safe.

**Victim.** A victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L.

### ELIGIBILITY FOR EMERGENCY TRANSFERS

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations (24 CFR part 5, subpart L) is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

### **EMERGENCY TRANSFER REQUEST DOCUMENTATION**

To request an emergency transfer, the tenant shall notify the management office of the HUD-funded housing provider that runs the program the tenant is enrolled in, and submit a written request for a transfer to a Safe Unit. The housing provider will provide reasonable accommodations to this policy for individuals with disabilities.

The tenant's written request for an emergency transfer should include either:

- A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under the housing provider's program; OR
- A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

### **CONFIDENTIALITY**

CoC and ESG-funded housing providers operating within the geographic boundaries of Monterey/San Benito CoC will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives their housing provider written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant.

See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about CoC and ESG-funded housing providers' responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

### **EMERGENCY TRANSFER TIMING AND AVAILABILITY**

CoC and ESG-funded housing providers operating within the geographic boundaries of Monterey/San Benito CoC cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. Such housing providers will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. The household shall have priority over all other applicants for the next available, safe internal unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. Monterey/San Benito CoC housing providers may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If a CoC and ESG-funded housing provider operating within the geographic boundaries of Monterey/San Benito CoC has no safe and available units for which a tenant who needs an emergency is eligible, the

housing provider will work with the CARS Management Entity, to assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. The household shall have priority over all other applicants for CoC-funded rental assistance and/or external emergency transfer to TH and PSH projects, provided:

- The household meets all eligibility criteria required by Federal law/regulation or HUD NOFA; and
- The household meets any additional program eligibility criteria or preferences established in accordance with 24 CFR 578.93(b)(1), (4), (6) or (7).
- The individual/family shall retain their original homeless or chronically homeless status for purposes of the transfer.
- At tenant's request, leases can be bifurcated

At the tenant's request, the housing provider will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

### **SAFETY AND SECURITY OF TENANTS**

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

## Attachment E: CARS Non-Emergency Transfer Policy

### PURPOSE

This policy outlines standards and principles for non-emergency transfers of households in supportive housing programs within the CARS. The following policies and procedures are centered in Low-Barrier Access Standards and are designed to support housing retention and prioritize limited resources to meet the varied needs of participants.

### APPLICABILITY & DEFINITION

The Non-Emergency Transfer policy applies to 1) transfers between supportive housing programs, which include Rapid Rehousing and Permanent Supportive Housing, within CARS, that 2) **do not** fall under the Emergency Transfer Policy, such as those for survivors of domestic violence or similar crises. The Non-Emergency Transfer policy applies to all Rapid Rehousing and Permanent Supportive Housing Programs that receive referrals and placements via CARS. The Non-Emergency transfer policy **does not** apply to shallow subsidies, voucher programs, or shelter programs.

Non-Emergency Transfers fall within two general categories:

1. From one Housing Program to another Housing Program of the **same program type** (i.e. RRH to RRH and/or PSH to PSH), and;
2. From one Housing Program to another Housing program of a **different program type** (i.e. RRH to PSH).

### PROCEDURE & APPROVAL PROCESS

All Non-Emergency Transfers must be approved by the CARS Manager or identified designee. If approved for a non-emergency transfer, participants are still required to meet program eligibility criteria and apply for the requested program. Transfer approvals are dependent on housing inventory and openings, require consent from the Head of Household, and will vary depending on the reason identified in the request. The CoC Lead Agency will prioritize and approve transfer requests based on the established prioritization process outlined in the CARS P&P, with consideration for people on the community queue who are awaiting housing and currently experiencing homelessness.

Non-Emergency Transfer Type Overview				
Non-Emergency Transfers within the Same Program Type				
Applicable Program	Agency	Transfer Type	Additional Guidance	Approval Considerations
<b>RRH to RRH</b>	Within the Same Agency	Internal	Internal transfers should be explored <i>before</i> requesting an external transfer.	Approvals based on applicable agency / program managers

and/or PSH to PSH				agreement and capacity.
	To a Different Agency	External	When requesting an external transfer, providers must explain why an internal transfer is not possible.	Approvals based on capacity, existing resources, and reasoning.
<b>Non-Emergency Transfers to a Different Program Type</b>				
Applicable Program	Agency	Transfer Type	Additional Guidance	Approval considerations
RRH to PSH	Within the Same Agency and/or To a Different Agency	External	When requesting an external transfer, providers must explain why an internal transfer is not possible.	Approvals of External RRH to PSH transfers will be made with consideration for people on the community queue who are awaiting housing and currently experiencing homelessness.
			There are four different categories under which an external transfer can be requested: individual or environmental safety or accessibility; household composition; participant needs and defunded projects. Refer to the Request Reasoning Table below for additional details and guidance.	

- **Note: Projects Dedicated to People Experiencing Chronic Homelessness**

If the intended transfer location is dedicated to the chronically homeless:

- o Program participants who met the definition of chronically homeless in effect at the time they entered the original PSH may transfer into a project dedicated to individuals and families experiencing chronic homelessness. Program participants who entered the original PSH project prior to January 16, 2016 are not required to meet the [definition of chronically homeless](#) established in HUD’s [Defining Chronically Homeless Final Rule](#).
- o Program participants who did not meet the definition of chronically homeless that was in effect at the time of program intake maybe served by a CoC-funded PSH program that is not dedicated to serving individuals and families experiencing chronic homelessness (DedicatedPLUS).

## DOCUMENTATION ROLES & RESPONSIBILITIES

To document Non-Emergency Transfers, housing providers must complete the Transfer Request Form within two business days of deciding to request the transfer. This form should include the transfer date, if known or applicable, along with documentation verifying eligibility for the proposed transfer program. The documentation requirements may vary based on transfer reason and program. The CARS Manager or designee will communicate documentation requirements in the Transfer Request Form and/or to the requesting program once a Non-Emergency Transfer Request Form has been received.

Agencies submitting the transfer request must share eligibility documentation with the receiving provider. The receiving provider must verify participant eligibility criteria before enrolling the client into their project.

Both agencies are required to maintain documentation of the process and approval, including:

- Copies of all documentation used to determine eligibility into the original housing program (i.e. Homelessness Certification, Chronic Homelessness Certification, etc.).
- Transfer request as submitted by original housing provider.
- Notification email and HMIS records
- Providers submitting the transfer request must continue to provide services and support to the participant to be transferred, including support in attaining housing or maintaining housing, and to assist with the logistics of the transfer (transportation to appointments, etc.).

**NON-EMERGENCY TRANSFER REQUEST REASONING**

Reason for Transfer Request	Definition	Insufficient Reason
<b>Category 1: Accessibility, Environment Safety, and Safety Concerns Outside of VAWA</b>		
Conflict and Safety Concerns Outside of VAWA	The space has become unsafe for the household that does not qualify for emergency transfer criteria under VAWA Housing Protection. For example, there is violent activity taking place in the building that directly impacts the household or the participant is being harassed by other residents.	Crime in the neighborhood that is not specifically targeting the household or building.
Environmental Safety	The space has become unsafe for the household, including unsafe structural elements that have not or cannot be addressed by the housing provider. For example, building conditions that exacerbate an underlying medical condition.	Preference for a different unit unrelated to environmental safety.
Accessibility Modifications	The household requires accessibility features that cannot be made in the current unit. Examples include: needing a ground floor unit or elevator for wheelchair access, housing conditions that may aggravate a new or existing medical condition such as asthma, or needing an extra bedroom for a caregiver.	Feasible accessibility modifications that can be put into place in the current unit, such as grab bars or a lift.
<b>Category 2: Household Composition</b>		

Change in Household Composition	The household composition has changed, necessitating a larger or smaller unit. This category may include changes in unit size affecting the household’s ability to retain or obtain custody of children, as well as changes for households that go from single-adult composition to a family with children. (See <a href="#">24 CFR §578.75(c)</a> for suitable dwelling size guidance).	Desire for a larger unit that is not required based on household size.
<b>Category 3: Service Level or Participant Needs</b>		
Service Level Needs	The current provider and additional community supports cannot meet the household's needs without a transfer. This option should only be considered after other interventions have been tried. This category may include the need to move from a scattered-site unit to a project-based location, or vice versa, to better accommodate service needs.	The current provider has trouble engaging the participant in services; ongoing conflicts between agency staff and participant; preference for a different provider.
Participant Needs	The household has service or geographical needs that cannot be met in the current housing placement. This may include better transportation access to facilitate employment or education.	Geographic preference that is unrelated to employment or education
Participant Needs Based on Age	Based on the participant’s age, the household may be better served in another program. Examples include: a person who entered a TAY program as a transitional age youth may be transferred to an adult program when they “age out” of the TAY program, and a senior can be transferred into a senior living program that better meets their needs.	Preference for a different provider not related to age.
<b>Category 4: Defunded Projects</b>		
Defunded Projects	H3 will collaborate with agencies with defunded projects to determine the next steps for all households and will inform providers of the necessary steps for transfer approval. At any given time, no more than five consecutive transfers can be made from defunded agencies. Once five matches are made, the next five transfers will exclude households from defunded projects.	

	<p>If a defunded project has a population eligible for a housing intervention where supply exceeds demand, such as having more HUD VASH vouchers available than eligible Veterans, CE will not limit consecutive referrals.</p> <p><i>Transfers related to fleeing violence will always be prioritized, even over transfers from defunded projects.</i></p>
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### NON-EMERGENCY TRANSFER REQUEST DENIAL REASONING

Reason	Definition
Insufficient Transfer Reasoning	The documentation submitted does not meet the threshold criteria demonstrating the need for a transfer to be approved.
No Community Capacity Currently	There are currently no projects within the CoC that have capacity or are expected to have capacity within the near future which could meet the needs outlined in the transfer request.
Current existing resources are not able to meet the request needs	There are currently no projects within the CoC which could meet the participant's identified needs.

For questions related to the Coordinated Entry Non-Emergency Transfer Policy, or assistance with completing a Non-Emergency Transfer Request, please contact the Coordinated Entry System Manager.

### Attachment F: CARS Assessment Tool Scoring Summary

Prioritized Population, Determined using HMIS Standard Intake Form	Point Values
Veterans	2 points
Fleeing or attempting to flee domestic violence	2 points
Families	4 points
Chronically Unhoused (long term homeless)	2 points
Chronically Unhoused (disability)	1 point for single morbidity 2 points for double morbidity  Must also qualify as long term homeless
Medically Frail	3 points
Unsheltered	3 points

Additional Assessment Questions	Point Values
Have you ever had trouble getting or keeping housing because of your race, gender identity, or sexuality?	1 point
Have you ever had trouble getting or keeping a job because of your race, gender identity, or sexuality?	1 point
Have you ever had trouble getting or keeping housing due to your physical needs (ex. medical needs or disability?)	1 point
Have you ever had trouble getting or keeping a job due to your physical needs (ex. medical needs or disability?)	1 point