

**Ithaca/Tompkins County Continuum of Care
Written Standards**



Ending homelessness together.

Updated and Approved May 2026

Introduction

The NY-510 Continuum of Care (CoC) is responsible for coordinating and implementing a system to meet the needs of the populations and subpopulations experiencing homelessness within the geographic area of Ithaca and Tompkins County. Both the *Emergency Solutions Grants (ESG) Rules and Regulations* and the *Homeless Emergency Assistance and Transition to Housing (HEARTH) Continuum of Care Program Interim Rules* state that the CoC, in consultation with the recipients of ESG program funds within the geographic area, are responsible for (1) establishing and consistently following written standards for providing Continuum of Care assistance, (2) establishing performance targets appropriate for population and program type, and (3) monitoring recipient and sub recipient performance.

The written standards have been established to ensure that persons experiencing homelessness who enter programs throughout the CoC will be given consistent information and support to access and maintain permanent housing. **All programs that receive ESG or CoC funding are required to abide by these written standards.** Agency program procedures should reflect the policy and procedures described in this document. The CoC strongly encourages programs that do not receive either ESG or CoC funds, but participate in the CoC, and who may apply for funding in the future, to accept and utilize these written standards.

The majority of these standards are based on the ESG and/or HEARTH Interim Rules, however, in keeping with the goals and objectives of *Home, Together: Tompkins*, all activities provided through the agencies of the CoC should further the mission of preventing or ending homelessness, with a special focus on enhancing service delivery to households with severe service needs.

In addition to the services provided by each agency, each funded program will play a role in connecting participants to mainstream services, which are services not specifically designed for homeless households. All CoC and ESG funded agencies agree to coordinate their services with other providers for the benefit of their participants. Examples of these programs include, but are not limited to: The Department of Housing and Urban Development (HUD) public housing programs, Section 8 tenant assistance programs, Supportive Housing for Persons with Disabilities, HOME, Temporary Assistance for Needy Families, Medicaid, Head Start, Social Security Disability, Social Security Disability Insurance and SNAP.

¹ <https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>

These standards are in place to:

- Establish community-wide expectations in the operations of projects within the community;
- Ensure that the system is transparent to households and agencies;
- Establish a minimum set of standards and expectation for the quality of each project; and
- Create consistency and coordination between recipients' projects

These written standards were approved by the CoC Governing Council on TBD and the CoC General Body on TBD. The written standards will be reviewed and revised as needed, at a minimum once per year. Agreement to abide by the written standards will be required to participate in the process of acquiring ESG or CoC funds.

Program Requirements

System-wide Requirements

1. In providing or arranging for housing, shelter or services, the program will **prioritize needs identified by** the individual or family experiencing homelessness.
2. The program will **provide assistance in accessing suitable housing**, including but not limited to: street outreach, advocacy, rental assistance, housing search and placement, housing stability case management, and permanent housing.
3. The program will **align with *Home, Together: Tompkins* and current Department of Housing and Urban Development's priorities**, including priorities for ending homelessness among specific subpopulations.
4. The **Coordinated Entry process for adults (25 and older) and youth (18-24) will be used for screening** households for permanent supportive housing, transitional housing, and rapid re-housing projects.
5. The program **will participate in the Coordinated Entry process and utilize the community waitlist** to fill openings in their program. The program will abide by the Coordinated Assessment Policy and Procedure Manual attached to this document.
6. Each housing and case management program **must be aware and inform households of the educational rights of children and unaccompanied youth in their programs**. Clear, accessible materials explaining their rights should be provided to applicable households. Program staff will collaborate with McKinney-Vento liaisons or other school officials to coordinate educational services. Program staff will highly encourage school attendance and will work with households to address any barriers to regular attendance. If attendance and truancy concerns are noted, program staff will communicate /coordinate with school staff.
7. Each program in the CoC will **provide accurate and up-to-date eligibility information for the program** (e.g., gender specific, individuals, families). Each agency will provide information to the Coordinated Entry Lead.
8. Each program will **make language and translation services available for clients** when needed by utilizing available services, such as a language line.
9. Each program funded with ESG or CoC funds **is required to participate in the Homeless Management Information System (HMIS)** and meet minimum data quality standards.

Case Management Services

1. The frequency of case management services will vary based on program participant needs. **Initial contacts with the participant will typically be at least weekly and continued contacts will be at least monthly.**
2. Case management services include but are not limited to: developing an individualized housing/service plan, assistance with obtaining and maintaining housing, counseling, employment referrals, education, referral and coordination of services, accessing mainstream benefits, and coordinating with schools.
3. Case management service plans will **incorporate the participants' expectations and choices** for short- or long-term goals.
4. Together, the program and program participants will develop a schedule for reassessing the individualized service plan. **The reassessments will occur at least quarterly.**

Personnel

All programs should be adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants.

1. The agency selects, for its program staff, only those employees and/or volunteers with appropriate knowledge, or experience, for working with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability.
2. The program **provides training to all paid and volunteer staff** on both the policies and procedures employed by the program and on specific skill areas as determined by the program.
3. All paid and volunteer service staff participate in **ongoing training and development to further enhance their knowledge and ability to work with individuals and families experiencing homelessness** and/or other issues that put individuals or families at risk of housing instability. Examples of training topics include, but are not limited to, harm reduction, trauma informed care, housing first and racial justice.
4. **All programs funded with CoC or ESG funds are required to enter program data in HMIS².** For programs that use HMIS, all HMIS users must abide by the standard operating procedures found in the HMIS Policies and Procedures manual. Additionally, users must adhere to the privacy and confidentiality terms set forth in the User Agreement.
5. Case supervisors review current cases and individual service plans on a regular and consistent basis to ensure quality, coordinated services.
6. The program must designate one or more staff person(s) to be trained on the Coordinated Assessment process and provide specific times a trained staff person will be available to assess referred clients.

System-wide Orientation for the Continuum of Care

1. Projects, emergency shelters, safe havens and street outreach are aligned and recognize their roles to encompass housing advocacy and rapid connection to permanent housing. **Staff in crisis response and outreach operate under the philosophy that all people experiencing homelessness can live in housing**
2. •Strong and direct referral linkages and relationships exist between street outreach and emergency shelters and rapid re-housing, transitional housing and permanent supportive housing. **Outreach teams and frontline staff are aware and trained in how to assist people experiencing homelessness to apply for and obtain permanent housing.**
3. The CoC has a **unified, streamlined, and user-friendly community-wide coordinated entry process** for applying for supportive housing and services. • The CoC has a coordinated assessment system for matching individuals and families experiencing homelessness to the most appropriate housing and services.
4. The CoC has a **data-driven approach to prioritizing the highest needs cases for housing assistance** whether through analysis of lengths of stay in HMIS, vulnerability indices, or data on utilization of emergency services.
5. The CoC coordinates policymakers, funders, service providers and people with lived experience to collaboratively conduct planning and align resources to increase availability of affordable and supportive housing and to ensure the range of affordable and supportive housing options and models are available to maximize housing choice among people experiencing homelessness.
6. **CoC membership agency policies and regulations related to permanent housing, social and health services, benefit and entitlement programs, and other essential services, support and do not inhibit the implementation of the Housing First approach.** For instance, eligibility and screening policies for benefit and entitlement programs or housing do not require the completion of treatment or achievement of sobriety as a prerequisite.

Low Barriers to Program Admission

1. Program admission and tenant screening and selection practices **promote acceptance regardless of their sobriety or use of substances, or completion of treatment.**
2. Applicants are not rejected on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that indicate a lack of “housing readiness”. Although applicants may be rejected

due to convictions for violence criminal activity, agencies make all efforts possible to remove barriers to program enrollment. A rejection is only appropriate when an applicant presents a direct threat to the health and safety of program staff and residents and that threat cannot be ameliorated.

3. Low Barrier **accepts referrals directly from shelters, street outreach, drop-in centers and other emergency responses** frequented by vulnerable people experiencing homelessness.
4. **Supportive services emphasize engagement and problem-solving over therapeutic goals.** Service plans are highly tenant-driven without predetermined goals. Participation in services or program compliance is not a condition of permanent supportive housing tenancy. Rapid re-housing and transitional housing may require case management as a condition of receiving rental assistance as required by state or federal funding.
5. Alcohol drug use in and of itself, without other lease violations, is not considered a reason for eviction.



Equal Access and Gender Identity Anti-discrimination Policy

In February 2012, the Department of Housing and Urban Development (HUD) introduced its final rule entitled “Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity” (2012 Equal Access Rule). This rule would ensure the equal access of HUD-funded housing programs to families and individuals regardless of their marital status, sexual orientation or gender identity.

In 2016, HUD amended this rule, as it did not explicitly state how individuals who identify as transgender would be accommodated in temporary, emergency shelters, and other buildings and facilities used for shelter, that have physical limitations or configurations that require and that are permitted to have shared sleeping quarters or shared bathing facilities. This new rule, entitled “Equal Access in Accordance with an Individual’s Gender Identity in Community Planning and Development Programs” ensures that all HUD-funded programs provide equal access to facilities and services provided to individuals in accordance with the individual’s gender identity, and in a manner that affords equal access to the individual’s family.

The rule also prohibits inquiries about the sexual orientation or gender identity of an applicant or occupant for the purpose of determining program eligibility. HUD-funded programs can inquire about the sex of an applicant or occupant where the housing provided, or to be provided is a temporary, emergency shelter that involves the sharing of sleeping areas or bathrooms. HUD programs can make an inquiry about the sex of an applicant or occupant for the purposes of determining the number of bedrooms to which the household is entitled.

Continuum of Care Policy

In accordance with the rule outlined above, all CoC-funded programs are required to adhere to this anti-discrimination policy which states that **all CoC-funded programs are open to all eligible individuals regardless of actual or perceived sexual orientation or gender identity**. Additionally, individuals will not be required to submit proof of their gender identity in order to access housing or services provided by CoC-funded programs. In order to ensure that individuals are aware of their rights, the CoC requires all CoC-funded programs to post on bulletin boards and in other public spaces where information is typically made available a notice that outlines the program's commitment to ensuring equal access regardless of gender identity.

Non CoC-Funded Programs

All CoC member agencies and potential applicants agree to adhere to the anti-discrimination policy as outlined above.

Affirmatively Furthering Fair Housing

In January 2023, HUD published its new proposed rule entitled “Affirmatively Furthering Fair Housing”³. This rule aims to remedy the effects of the long history of discrimination in housing by requiring program participants to submit an Equity Plan to HUD every five years. That plan, which must be developed following robust community engagement, would contain their analysis of fair housing issues confronting their communities, goals, and strategies to remedy those issues in concrete ways, and a description of community engagement. The proposed rule would then require program participants to incorporate goals and strategies from their accepted Equity Plans into subsequent planning documents (e.g., Consolidated Plans, Annual Action Plans, and Public Housing Agency Plans).

Non CoC-Funded Programs

All CoC member agencies and potential applicants agree to adhere to the policy as outlined above.

³ https://www.hud.gov/press/press_releases_media_advisories/hud_no_23_013 11

Record Keeping Requirements for All Projects

System-Wide Recordkeeping Requirements

- All records containing personally identifying information must be kept secure and confidential
- Programs must have written confidentiality/privacy notice a copy of which should be made available to participant if requested
- Documentation of homelessness (following HUD's guidelines)
- A record of services and assistance provided to each participant
- Documentation of any applicable requirements for providing services/assistance Documentation of coordinated assessment system
- Documentation of use of HMIS
- Records must be retained for the appropriate amount of time as prescribed by HUD (if applicable)

Financial Recordkeeping Requirements

- Documentation for all costs charged to the grant
- Documentation that funds were spent on allowable costs
- Documentation of the receipt and use of program income
- Documentation of compliance with expenditure limits and deadlines
Retain copies of all procurement contracts as applicable
- Documentation of amount, source and use of resources for each match contribution

Occupancy Standards for All Programs

All housing units, including scattered site programs owned and managed by private landlords, must meet applicable state and local government health and safety codes and have current certificate of occupancy for the current use and meet or exceed the following minimum standards adopted by the Ithaca/Tompkins CoC: • Clean dwelling that is free of mold and mildew, garbage;

- Extermination of vermin (e.g., roaches, bed bugs, and rodents), including in common areas;
- Adequate hot, cold, and potable drinking water;
- Adequate heat in all living areas;
- Doors with adequate working locks;
- Functioning smoke & CO detectors;
- Exterior walls, doors, and windows that are intact and reasonably insulated;
- Exterior windows and doors that can be opened and closed;
- Access to a clean and functional refrigerator, stove, and toilet; and • For households with children aged 6 or under, no chipping or peeling paint in the unit or common areas; and if there is any lead paint, full disclosure is necessary.

HUD Requirements

System-wide HUD Requirements

All CoC-funded projects are expected to be familiar with and adhere to all HUD requirements for the CoC Program as described in the CoC Program Interim Rule⁴, applicable notices, and CoC Program NOFO(s)⁵ under which the program is funded. This includes, but is not limited to:

- participant eligibility
- prioritization
- allowable activities and costs
- site control
- match requirements
- Fair market rent changes
- terms of commitment, repayment of grants, and drawdowns
- limitation on use of grant funds to house persons identified as homeless under federal law
- termination of assistance to program participants
- Fair Housing and Equal Opportunity
- recordkeeping requirements
- grant and project changes
- Other applicable federal requirements as explained in the CoC program interim rule

Serving Families in Homeless Projects

CoC funded projects serving families must ensure they comply with HUD's Equal Access Rule which outlines the federal definition of 'family' for purposes of receiving assistance from certain programs. For the CoC program, 'family' is defined as:

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

System Performance Measures

A critical aspect⁶ of the McKinney-Vento Homelessness Assistance Act (the "Act") as amended, is a focus on viewing the local homeless response as a coordinated system

⁴ <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/> ⁵

<https://www.hudexchange.info/programs/e-snaps/fy-2017-coc-program-nofa-coc-program-competition/>

⁶ <https://nche.ed.gov/legislation/mckinney-vento/>

of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community. To facilitate this perspective, the ACT now requires communities to measure their performance as a coordinated system in addition to analyzing performance by specific projects or project types.

To this end, the Act established a set of criteria for HUD to use that requires all CoCs to report their system-level performance to HUD. The intent of this criteria, or system performance measures, is to encourage CoCs and ESG program recipients, as well as all other homeless assistance stakeholders in the CoC, to regularly measure their progress in meeting the needs of the people experiencing homelessness in their community and to report this progress to HUD.

With the 2015 CoC funding round, HUD therefore introduced a series of system performance measures each COC to provide reporting that aggregates data from each individual program in response to a series of performance based elements describing the efficacy of the CoC. The following provides the resulting system performance measures that each program -- emergency, rapid rehousing, transitional and permanent housing-- will similarly be measured, as applicable to program type. These measures are subject to change per HUD and/or guidance from the CoC. Programs are responsible for reporting their progress to the CoC annually or upon request. CoC-funded programs are aware that failure to meet these standards may result in a loss of funding through the CoC program competition.

Project Performance Measures

Whereas system performance measures are intended to provide a snapshot into the homeless response system as an entire coordinated initiative, project performance measures take a closer look at each project or potential project type within the CoC. The standards provided in this section highlight eligibility criteria, minimum standards, operational standards and the goals and performance standards set forth by this CoC in assessing and evaluating each project's performance individually.

Emergency Shelters

Eligibility Criteria for Assistance

- Participants must meet the HUD definition of homelessness
- Currently, individual shelter programs have their own eligibility criteria. At entry, this may be based on the sub-population served, i.e., age, gender, family composition, severity of behavioral health issues, etc.
- Standard outcomes: (Goals identified here are subject to change per HUD and/or CoC guidance)

Rapid Re-Housing

Rapid re-housing is an intervention designed to help individuals and families exit homelessness quickly by returning to permanent housing without preconditions. Additionally, the resources and services provided are tailored to the unique needs of the household being assisted.

There are three core components that together constitute a rapid rehousing program, all of which must be available in some way in order to have a rapid re-housing program. Although RRH programs must have each of the three components available, it is not required that a single entity provide all three services. Similarly, it is not required that any one household utilize all three in order to consider using RRH.

RRH core components include the following: Housing identification, rent/move-in assistance (financial) and RRH case management services. Actions constituting these components are presented as follows:

Eligibility Criteria for Assistance

- Participants must meet the HUD definition of homelessness
- Participants must be residing in an emergency shelter or residing in a place not meant for human habitation
- Participants will generally have a minimum of 4-7 identifiable barriers to accessing/ retaining permanent housing
- Household income must be at or below <50% of AMI
- Participants must be able to produce required documents at intake or within 30 days
- All participants must be screened into programs using the most recent version of Coordinated Assessment Tool

Transitional Housing

Transitional Housing (TH) facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering TH.

Eligibility Criteria for Assistance

- Participants must meet the HUD definition of homelessness
- Participants will have a VI score of 4-7
- All referrals for TH will go through the Coordinated Entry process

Permanent Supportive Housing

Under the HEARTH Interim Rule Permanent Housing (PH) is one of the eligible program components. Permanent housing is community based housing, the purpose of which is to provide housing without a designated length of stay. Permanent

Supportive Housing (PSH) is one of the two types of PH eligible for CoC Program Competition.

Eligibility Criteria for Assistance

- Participants must meet the HUD definition of homelessness
- PSH units are prioritized for chronically homeless individuals and families
- Participants will have a VI score of 8 or higher.
- All referrals to PSH shall come through the Coordinated Entry process
- There can be no predetermined length of stay
- Supportive services designed to meet the needs of program participants must be available to the program participant throughout the duration of the stay in PSH
- Each PSH program in the CoC will provide up-to-date information on eligibility criteria for the program

Chronic Homeless Prioritization for Permanent Supportive Housing

In accordance with HUD notice CDP-14-012, issued 7/28/14, the Ithaca/Tompkins County Continuum of Care (CoC) hereby establishes the following **order of priority for utilization of the inventory of CoC Program-funded Permanent Supportive Housing**.

Prioritized for Chronically Homeless:

1. Chronically homeless individuals or families with the longest history of homelessness and with the most severe service needs/vulnerabilities.
2. Chronically homeless individuals or families with the longest history of homelessness
3. Chronically homeless individuals or families with the most severe service needs
4. All other chronically homeless individuals or families

Not Prioritized for Chronically Homeless:

1. Homeless individuals or families where a household member has a disability with the most severe service needs
2. Homeless individuals or families where a household member has a disability with a long period of continuous or episodic homelessness
3. Homeless individuals or families where a household member has a disability coming from places not meant for human habitation, safe havens or emergency shelter
4. Homeless individuals or families where a household member has a disability coming from transitional housing

Severe Service Needs are defined by the United States Department of Housing and Urban Development as any combination of one or more of the following factors:

1. facing significant challenges or functional impairments, including any physical, mental, developmental or behavioral health disabilities regardless of the type of disability, which require a significant level of support in order to maintain permanent housing (this factor focuses on the level of support needed and is not based on disability type)
2. high utilization of crisis or emergency services to meet basic needs, including but not limited to emergency rooms, jails, and psychiatric facilities
3. experiencing a vulnerability to illness or death
4. having a risk of continued or repeated homelessness
5. having a vulnerability to victimization, including physical assault, trafficking, or sex work
6. currently living in an unsheltered situation or having a history of living in an unsheltered situation

