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# CAMBRIDGE CONTINUUM OF CARE COC PROGRAM STANDARDS

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## A. Introduction

The Cambridge Continuum of Care (CoC) is responsible for coordinating and implementing a system to address the needs of both people experiencing homelessness and those who are at risk of homelessness within the City of Cambridge. The [Emergency Solutions Grant \(ESG\) Program Interim Rule](#) and the [Continuum of Care Program Interim Rule](#) state that the CoC must, in consultation with recipients of ESG Program funds within its geographic area, establish and consistently follow written standards for providing CoC assistance.

All projects receiving CoC Program funding from the U.S. Department of Housing and Urban Development (HUD) in the Cambridge CoC are required to abide by these written standards. Projects that do not receive CoC funding are encouraged to adopt these standards. These standards will:

- Ensure that persons experiencing homelessness in the City will be given standardized information and support to access and maintain permanent housing;
- Establish community-wide expectations on the operation, quality, and equity of CoC funded projects; and
- Ensure project transparency across the City of Cambridge; and
- To make the most efficient use of limited funds.

## B. General Requirements

1. All CoC funded projects are required to receive referrals from Cambridge Coordinated Access Network (C-CAN), excepting victim service providers, which may use a separate coordinated entry process, per 24 CFR 578.23(c)(9) and (11), which otherwise requires all Continuum of Care projects to participate. PSH and RRH projects will work with C-CAN to determine project-specific eligibility and amount and type of assistance project participants need to regain stability in permanent housing.
2. CoC funded projects must verify and document each project participant's eligibility for CoC assistance.
3. CoC projects must connect participants to mainstream resources in and outside of the CoC including housing, social services, employment, education and youth programs for which participants may be eligible. Participants must also be connected to other Federal, State, local, and private assistance available to assist the participant in obtaining housing stability including: Medicaid; SNAP; WIC; Unemployment Benefits; SSI/SSDI; TAFDC/EAEDA; Federal, State, or local subsidized housing; any other program or assistance available to meet the needs of the participant and allow that person to obtain and maintain permanent housing. CoC projects are responsible for conducting an ongoing assessment of the supportive services needed by project participants and coordinating services to ensure long-term housing stability.
4. CoC funded projects must abide by the following termination procedure in order to preserve project participants' rights:
  - a. Provide participants with a complete list of project rules and consequences for violation of those rules prior to enrollment;
  - b. Examine all extenuating circumstances surrounding the decision to terminate and opt to terminate only in the most severe cases;
  - c. Provide written notice to participant containing a clear statement of the reason for termination;
  - d. Allow the participant to (1) request that the decision to terminate be reviewed by someone other than the person who made the initial termination decision or a subordinate of that person, and (2) present oral or written statements objecting to the termination;
  - e. Issue prompt written notice of the final, post-review decision; and

- f. Inform terminated participant that the termination does not mean that he or she cannot seek services from the CoC funded service provider in the future.
5. CoC projects that serve households with children:
    - a. Have a staff person designated as the educational liaison that will ensure children are enrolled in school and connected with appropriate services in the community, including early childhood programs such as Head Start, Part C of the Individuals with Disabilities Education Act, and the McKinney Vento education services;
    - b. Not discriminate on the basis of age and/or gender of children when considering housing options. To prohibit involuntary family separation, the age and gender of a child under 18 cannot be used as a basis for denying any family's admission to a project.
  6. CoC projects must abide by Federal, State, and Local Civil Rights, Disabilities laws, and the Violence Against Women Act.
  7. HUD-funded projects shall not engage in or require as a part of project services, inherently religious activities such as worship, religious instruction. These activities may be conducted separately from project services and must be voluntary for project participants.
  8. CoC funded Transitional and Permanent Housing projects shall provide Program Participants with a HUD-approved Notice of Occupancy Rights Under the Violence Against Women Act. The HUD approved form is available from HUD here: <https://www.hud.gov/sites/documents/5380.docx> and on the Cambridge CoC website here: <http://cambridgecoc.org/violence-against-women-act-vawa-resources>. Subrecipient is responsible for ensuring that the Notice is complete and up-to-date when provided to Program Participants.
 

The Notice shall be provided when a Program Participant:

    - a. is denied permanent housing or transitional housing;
    - b. is admitted to permanent housing or transitional housing;
    - c. receives notification of eviction; and
    - d. is notified of termination of assistance.
  9. CoC funded projects must adopt and follow policies and procedures that conform to HUD's program rules and these Written Standards. Policies and procedures must cover the following topics:
    - a. *Coordinated Entry participation*: a policy for receiving referrals from C-CAN and reporting vacancies to C-CAN including identification of the project staff position(s) responsible for C-CAN participation.
    - b. *Eligibility*: the complete list of project eligibility criteria including how each criterion will be evaluated and documented.
    - c. *Service delivery*: policies and procedures for delivering services to project participants including the full array of services available.
    - d. *Project rules*: a complete list of all rules and the consequences for violating those rules.
    - e. *Termination procedure*: the complete process for initiation of termination proceedings, making appeals, and issuing a final termination decision.
    - f. *Document collection*: a list of documents that must be collected from project participants; how often they must be collected; the priority with which documents will be received (i.e. third-party documentation over self-certification); and a retention policy (5 years after the expenditure of all funds from the grant under which the project participant was served).
    - g. *HMIS participation*: the process by which releases of information are collected and information is entered into the Homeless Management Information System (HMIS) in a timely manner. For more information on HMIS participation requirements, projects should review the HMIS Policies and Procedures.
    - h. *Confidentiality policy*: a policy describing how project participant records will be kept confidential and physically secure as well as the process by which project participant information will be released to third parties (i.e. a policy on how releases of information are collected and used).

- i. *Fiscal policies and procedures*: policies and procedures describing procedures and responsibilities for approving CoC expenses and requests for reimbursement; and documentation procedures to show: that CoC funds are spent on allowable costs in accordance with requirements for eligible activities; records of the source and use of contributions made to satisfy the matching requirement described in § 578.73 of the CoC Interim Rule; and records of the receipt and use of program income.
- j. *Conflicts of interest*: a policy describing compliance with the organizational conflicts of interest requirements described in § 578.95 of the CoC Interim Rule.
- k. *Homeless participation*: a policy describing compliance with the homeless participation requirements described in § 578.75(g) of the CoC Interim Rule.
- l. *Affirmatively furthering fair housing*: a policy describing how the project affirmatively markets housing and services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities.
- m. *Protections for victims of domestic violence, dating violence, sexual assault, or stalking*: a policy describing procedures to comply with the requirements set forth in § 578.99(j) of the CoC Interim Rule, including procedures to notify participants of rights under the Violence Against Women Act (VAWA); contract, lease and occupancy agreement provisions; bifurcation; and adherence to the Cambridge CoC's emergency transfer plan.

## C. Occupancy Standards and Inspection Requirements

All CoC funded housing units must meet applicable federal, state and local safety, sanitary and habitability requirements. All housing units must meet the applicable Housing Quality Standards (HQS) for the component type.

1. The CoC grant subrecipient must physically inspect each unit to ensure that the unit meets HQS.
2. Assistance shall not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the subrecipient verifies that all deficiencies have been corrected.
3. Subrecipients must inspect all units at least annually during the grant period to ensure that the unit continues to meet HQS.
4. All housing units must be a suitable dwelling size.

## D. HMIS Requirements

All CoC funded projects must collect, record, and make available to the CoC's HMIS Lead Agency (Cambridge Department of Human Service Programs) data that is necessary to determine: (1) unduplicated counts of the number of homeless individuals and families accessing service; (2) demographic characteristics of homeless individuals and families; and (3) patterns of service use within the community.

To fulfill this requirement, CoC projects shall participate in one of the following instances of HMIS: (1) Cambridge HMIS; (2) ASIST HMIS.

## E. Recordkeeping Requirements

All CoC funded projects must keep the following documentation relative to their CoC project:

1. Agency Level: Subrecipient shall collect and retain Agency-level records related to the following:
  - a. Documentation of Non-profit Status

- b. Conflicts of Interest
  - c. Homeless Participation
  - d. Annual Audit
  - e. Certificate of Authority
  - f. Accounting policy
2. Project Level: Subrecipient shall retain documentation of the following project-level policies and procedures:
    - a. Required Policies and Procedures
    - b. Job Descriptions
    - c. A written confidentiality/privacy notice, a copy of which should be made available to participants if requested.
    - d. Use of the CoC's coordinated entry system (C-CAN)
    - e. Use of HMIS
    - f. Records of all emergency transfers requested, and the outcomes of such requests (must be retained for 3 years).
  3. Participant Level: Subrecipient must collect and keep the following records as a part of the Project Participant file:
    - a. Project participant eligibility including homeless or chronic homeless status and disability.
    - b. Service delivery including (1) assessment of project participant service needs; (2) connection to mainstream benefits and services; and, (3) the amount and type of assistance offered to and received by project participants.
    - c. Initial and annual inspection of housing units showing that minimum habitability standards are met.
    - d. Evidence that housing unit rents are rent reasonable (in relation to rents being charged for comparable unassisted units in the same market).
    - e. Evidence showing that the housing unit size is suitable for household composition (i.e. the unit has enough bedrooms to allow children of different genders over age five to have separate bedrooms).
    - f. When required, evidence of proper income calculation.
    - g. HMIS Release of Information.
    - h. Proof that Notice of Occupancy Rights Under the Violence Against Women Act was provided to participants in transitional and permanent housing.
    - i. Records must be retained for the appropriate amount of time as prescribed by HUD.
  4. All projects must keep the following financial records:
    - a. Documentation of all costs charged to the grant.
    - b. Documentation that funds were spent on allowable costs.
    - c. Documentation of the receipt and use of program income.
    - d. Documentation of compliance with expenditure limits-including Fair Market Rent-and deadlines.
    - e. Retain copies of all procurement contracts as applicable.
    - f. Documentation of amount, source and use of match contribution.

## F. Standards for Providing CoC Assistance

The standards described in this section specify community-wide standards and expectations for the provision of CoC assistance. All CoC funded projects must consistently follow these standards, and other community providers are encouraged to adopt the same standards.

### 1. TRANSITIONAL HOUSING

Transitional Housing (TH) facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering TH. At this time, there are no TH projects funded by the CoC Program in the

Cambridge CoC; however, these standards remain as a guide for any future or non-CoC funded TH projects within the CoC.

a. Eligibility Criteria

Households defined as Homeless under Category 1 (Literally Homeless), 2 (Imminent Risk of Homelessness) or 4 (Fleeing/Attempting to Flee Domestic Violence) of HUD's Homeless definition.

b. Assessment & Accessing Assistance

All households presenting as homeless in the Cambridge CoC should be assessed through the CoC's Coordinated Entry system (C-CAN). The assessment process evaluates eligibility and prioritization for Transitional Housing projects, and refers prioritized households to any available Transitional Housing vacancies within the CoC. Households seeking assistance can be assessed by C-CAN staff:

- i. At the Cambridge Multi-Service Center;
- ii. At scheduled field-based access points (schedule online at [www.cambridgecoc.org/cambridgecan](http://www.cambridgecoc.org/cambridgecan)); or
- iii. By requesting a meeting with a mobile assessment team member (617-349-7715) or [cambridgeCAN@cambridgema.gov](mailto:cambridgeCAN@cambridgema.gov)).

The standardized C-CAN assessments for people experiencing homelessness include the Cambridge Streamlined Assessment and the Family VI-SPDAT, designed to quickly assess severity service needs and produce scores that are used to prioritize households for housing and services. The Cambridge Streamlined Assessment score ranges from 0 to 14, with higher scores indicating greater levels of vulnerability and severity of service needs. The Family VI-SPDAT score ranges from 0 to 22, with higher scores indicating greater levels of vulnerability and severity of service needs.

c. Prioritization

Households are prioritized for TH vacancies based on the following, progressive factors. household may be selected for a referral without each factor being considered; a factor is only applied in so far as there are still households with equal priority following the previous factor.

- i. Special Considerations under VAWA: Households fleeing domestic violence who qualify for an emergency transfer from a CoC funded TH project shall have priority over all other applicants for TH provided that the household meets all eligibility criteria required by Federal law or regulation or HUD Notice of Funding Availability; and the household meets any additional criteria established in accordance with 24 CFR 578.93(b)(1),(4),(6), or (7). The household shall retain their original homeless status for purposes of the transfer.
- ii. Duration of Homelessness: Households are ordered by their total duration of homelessness, as reported within standard HUD enrollment data from HMIS, with those having the longest duration prioritized first.
- iii. Date of C-CAN enrollment: As per CPD-17-01 II.B.3, if multiple eligible households still maintain equal priority after the above factors have been considered, those households will be ordered based on their date of enrollment in the C-CAN CHMIS project, with the earliest date corresponding to the highest priority. If a household has had more than one C-CAN enrollment, their earliest enrollment date will be used for this purpose.

d. Minimum Standards

In addition to meeting the general standards for providing CoC assistance, TH providers must meet the following project specific minimum standards:

- i. Maximum length of stay should not exceed 24 months.
- ii. Assistance in transitioning to permanent housing must be provided.
- iii. Supportive services must be offered throughout the duration of stay in TH.
- iv. Participants in TH must enter into a lease or occupancy agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.
- v. CoC funded TH projects must provide accurate and up-to-date information on vacancies and eligibility criteria for the project (gender specific, individuals/families, etc.).

## 2. RAPID REHOUSING (RRH)

CoC funded Rapid Rehousing (RRH) is a type of medium-term Tenant Based Rental Assistance (TBRA) that provides intensive, targeted supportive services to quickly stabilize participants in permanent housing. The goal of RRH is for participants to maintain permanent housing after time limited rental assistance and supportive services end.

a. Eligibility Criteria

Households defined as Homeless under Category 1 (Literally Homeless) and coming directly from streets or emergency shelters or Category 4 (Fleeing/Attempting to Flee Domestic Violence) of HUD's Homeless definition.

b. Assessment & Accessing Assistance

All households presenting as homeless in the Cambridge CoC should be assessed through the CoC's Coordinated Entry system (C-CAN). The assessment process evaluates eligibility and prioritization for RRH projects, and refers prioritized households to any available RRH vacancies within the CoC. Households seeking assistance can be assessed by C-CAN staff:

- i. At the Cambridge Multi-Service Center;
- ii. At scheduled field-based access points (schedule online at [www.cambridgecoc.org/cambridgecan](http://www.cambridgecoc.org/cambridgecan)); or
- iii. By requesting a meeting with a mobile assessment team member (617-349-7715) or [cambridgeCAN@cambridgema.gov](mailto:cambridgeCAN@cambridgema.gov)).

The standardized C-CAN assessments for people experiencing homelessness include the Cambridge Streamlined Assessment and the Family VI-SPDAT, designed to quickly assess severity service needs and produce scores that are used to prioritize households for housing and services. The Cambridge Streamlined Assessment score ranges from 0 to 14, with higher scores indicating greater levels of vulnerability and severity of service needs. The Family VI-SPDAT score ranges from 0 to 22, with higher scores indicating greater levels of vulnerability and severity of service needs.

c. Prioritization

Households are prioritized for CoC RRH vacancies based on the following, progressive factors. A household may be selected for a referral without each factor being considered; a factor is only applied in so far as there are still households with equal priority following the previous factor.



- i. Special Considerations under VAWA: Households fleeing domestic violence who qualify for an emergency transfer from a CoC funded RRH project shall have priority over all other applicants for RRH provided that the household meets all eligibility criteria required by Federal law or regulation or HUD Notice of Funding Availability; and the household meets any additional criteria established in accordance with 24 CFR 578.93(b)(1),(4),(6), or (7). The household shall retain their original homeless status for purposes of the transfer.
- ii. Assessment Score: If the vacancy is for an individual, households are ordered by their Cambridge Streamlined Assessment score, with those receiving the highest score (those with the highest severity of service needs) prioritized first. If the vacancy is for a family, those households receiving the highest score (those with the highest severity of service needs) prioritized first.
- iii. Date of C-CAN enrollment: As per CPD-17-01 II.B.3, if multiple eligible households still maintain equal priority after the above factors have been considered, those households will be ordered based on their date of enrollment in the C-CAN CHMIS project, with the earliest date corresponding to the highest priority. If a household has had more than one C-CAN enrollment, their earliest enrollment date will be used for this purpose.

d. Minimum Standards

In addition to meeting the general standard for providing CoC assistance, CoC RRH providers must meet the following project specific minimum standards:

- i. Participation in a RRH project cannot exceed 24 months.
- ii. Rental Assistance does not need to be provided consecutively.
- iii. Services that must be provided include landlord outreach, assessment of housing barriers, financial assistance, and case management.
- iv. Participant must meet with a case manager at least once per month while enrolled in the project. Meeting may be by phone, at the housing unit, or at any other location designated by the project staff and/or participant.
- v. Participants may receive up to six months of supportive services after rental assistance has ceased.
- vi. CoC funded RRH projects must provide accurate and up-to-date information on vacancies and eligibility criteria for the project (gender specific, individuals/families, etc.).

RRH Rental Assistance Standards

- i. Typical length of assistance: up to 24 months.
- ii. All participants receiving rental assistance subsidies must contribute a minimum of 30% of their monthly adjusted household income toward their monthly rent. This tenant rent contribution may be adjusted at any time based on changes to household income, including, but not limited to, each annual reassessment.
- iii. Maximum amount of assistance is determined by rent reasonableness of appropriate-sized unit for household x 24 months (maximum period of rental assistance). Evidence of rent reasonableness must be documented in the client file and must be demonstrated by comparison of at least three comparable units. Rent reasonableness can be documented with apartment listings available publicly or provided by the landlord. Subrecipients are advised to develop standardized forms to document rent reasonableness that comply with the CoC rules and Agency's policies and procedures on document collection. More information on Rent Reasonableness can be found here: <https://files.hudexchange.info/resources/documents/CoC-Rent-Reasonableness-and-FMR.pdf>.

### 3. PERMANENT SUPPORTIVE HOUSING

Permanent Supportive Housing (PSH) is community-based housing for households with disabilities, the purpose of which is to provide supportive services and housing without a designated length of stay.

#### a. Eligibility Criteria

- i. Households defined as Homeless under Category 1 (Literally Homeless) or Category 4 (Fleeing/Attempting to Flee Domestic Violence) of HUD's Homeless definition.
  - a. Households coming from TH must have originally come from the streets or emergency shelter
  - b. Households must have an individual member with a disability
- ii. Projects with beds dedicated for chronically homeless persons must also evaluate and document eligibility for the Chronic Homeless definition.

#### b. Assessment & Accessing Assistance

All households presenting as homeless in the Cambridge CoC should be assessed through the CoC's Coordinated Entry system (C-CAN). The assessment process evaluates eligibility and prioritization for RRH projects, and refers prioritized households to any available RRH vacancies within the CoC. Households seeking assistance can be assessed by C-CAN staff:

- i. At the Cambridge Multi-Service Center;
- ii. At scheduled field-based access points (schedule online at [www.cambridgecoc.org/cambridgecan](http://www.cambridgecoc.org/cambridgecan));  
or
- iii. By requesting a meeting with a mobile assessment team member (617-349-7715) or [cambridgeCAN@cambridgema.gov](mailto:cambridgeCAN@cambridgema.gov).

The standardized C-CAN assessments for people experiencing homelessness include the Cambridge Streamlined Assessment and the Family VI-SPDAT, designed to quickly assess severity service needs and produce scores that are used to prioritize households for housing and services. The Cambridge Streamlined Assessment score ranges from 0 to 14, with higher scores indicating greater levels of vulnerability and severity of service needs. The Family VI-SPDAT score ranges from 0 to 22, with higher scores indicating greater levels of vulnerability and severity of service needs.

#### c. Prioritization

Households are prioritized for CoC PSH vacancies based on the following, progressive factors. A household may be selected for a referral without each factor being considered; a factor is only applied in so far as there are still households with equal priority following the previous factor.

Special Considerations under VAWA: Households fleeing domestic violence who qualify for an emergency transfer from a CoC funded PSH project shall have priority over all other applicants for PSH provided that the household meets all eligibility criteria required by Federal law or regulation or HUD Notice of Funding Availability; and the household meets any additional criteria established in accordance with 24 CFR 578.93(b)(1),(4),(6), or (7). The household shall retain their original homeless status for purposes of the transfer.

- i. Presumptive Chronic Homelessness: Households are ordered by presumption of Chronic Homeless status based on standard HUD enrollment data from HMIS, with those indicated as Chronically Homeless prioritized first.
- ii. Assessment Score: If the vacancy is for an individual, households are ordered by their Cambridge Streamlined Assessment score, with those receiving the highest score (those with the highest severity of service needs) prioritized first. If the vacancy is for a family, those households receiving the highest score (those with the highest severity of service needs) prioritized first.

- iii. Duration of Homelessness: Households are ordered by their total duration of homelessness, as reported within standard HUD enrollment data from HMIS, with those having the longest duration prioritized first.
- iv. Date of C-CAN enrollment: Finally, as per CPD-17-01 II.B.3, if multiple eligible households still maintain equal priority after the above factors have been considered, those households will be ordered based on their date of enrollment in the C-CAN CHMIS project, with the earliest date corresponding to the highest priority. If a household has had more than one C-CAN enrollment, their earliest enrollment date will be used for this purpose.

The CoC's prioritization process allows for a match to be made between vacancies with funding-imposed eligibility requirements and households meeting those eligibility criteria. For example, when a PSH vacancy arises for a unit limited to female clients, the highest priority female client will be prioritized even though there may be higher priority male clients on the PSH waiting list.

#### d. Minimum Standards

- i. CoC funded PSH projects must provide accurate and up-to-date information on vacancies and eligibility criteria for the project (gender specific, individuals/families, etc.).
- ii. All CoC-funded PSH projects must fill vacancies for all beds and units via C-CAN referrals, which will provide referrals from a waitlist prioritized by length of time homeless and severity of service needs.
- iii. There can be no predetermined length of stay for a PSH program
- iv. Supportive services designed to meet the needs of participants must be made available to participants throughout the duration of stay in PSH. However, participation is not mandatory and cannot be a condition of tenancy.
- v. Participants in PSH must enter into a lease agreement for an initial term of at least one year. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months
- vi. PSH programs should utilize Housing First approaches.

## G. Future Review, Updates and Amendments

These written standards are not only intended to be specific and detailed, addressing unique eligibility requirements for the housing and service resources available, but they are also relevant in the Continuum's work today. To ensure the relevancy of these standards against HUD requirements, the CoC's homeless population and both local and national targeting priorities, the CoC will regularly review and update these written standards.

- a. Changes/ Updates: The CoC Program Standards will be reviewed annually. Proposed changes/updates will be brought to the Cambridge CoC Board of Directors for approval.
- b. When reviewing these standards in the future, the CoC's consideration may include:
  - i. Provider feedback on the current written standards;
  - ii. Project participant feedback on the coordinated entry process;
  - iii. The effectiveness and appropriateness of housing and services for current project participants;
  - iv. The CoC's success at meeting the performance standards in Section 427 of the McKinney-Vento Act;
  - v. Changes in the characteristics of the homeless population within the CoC; and
  - vi. Changes in the housing and service resources available in the CoC.