

Rapid Rehousing (RRH) and Transitional Housing and Rapid Rehousing Joint Component (TH-RRH) Youth Project Written Standards

Joint Component Projects

The US Department of Housing and Urban Development (HUD) created the TH-RRH joint component to allow communities to address a gap in supportive housing programming. HUD's Statement on TH-RRH explains: "Communities should establish performance benchmarks appropriate for a project's target population and encourage them to prioritize people with high needs, especially those who are unsheltered...have higher barriers to exiting homelessness and are more likely to be victims of violence or harm." The RICoC's Youth Action Board and Board of Directors believe this joint component can address a gap in supportive housing with the State of Rhode Island for Transitional Aged Youth (aged up to age 25) and those fleeing violence and have created these written standards for TH-RRH projects operating within the State.

Goals of Written Standards of TH-RRH for Youth Programs

The RICoC generally operates under the belief that many people who are traditionally assisted in long-term congregate transitional housing could be served more efficiently in permanent housing programs. However, since its transition to permanent housing programs, ongoing gaps analysis has indicated that an option to choose transition to permanent housing programs, may be appropriate for some people, including unaccompanied LGBTQ+, BIPOC, immigrant/refugee, disabled, and pregnant or parenting youth who are unable to live independently or who prefer a congregate setting with access to a broad array of wraparound services and survivors of domestic violence and other forms of severe trauma who many prefer the security and onsite services of a congregate setting. To address this gap, the RICoC has selected the joint TH-RRH project within its DV Bonus and its Youth Homelessness Demonstration (YHDP) funding to ensure transition-aged youth have opportunities for supportive housing that aligns with the services model they choose.

These standards are a framework of policy requirements that providers implementing TH-RRH program policies and procedures within Rhode Island must incorporate into their programs. These are intended to be a baseline; programs are strongly encouraged to develop upon this structure with their person-centered, population-specific, wrap-around services to best serve the youth and young adults engaging in their TH-RRH program.

Additionally, to ensure that all youth-serving programs of the same project type align with written standards, these standards also apply to all CoC-funded RRH programs that are youth-serving but are not joint component projects.

Guiding Principles for Effective Practice

The United States Interagency Council on Homelessness (USICH) core principles of effective practices provide guidance in planning, monitoring, and enhancing YHDP-funded projects, including the development of the Coordinated Community Plan (CCP). These operating principles align with and reflect many traditional beliefs and current understanding regarding inclusion, equity, and just practice with, and for, Rhode Island youth, their families, and our communities. Strategies to monitor and establish accountabilities will be designed and implemented for each principle. All YHDP-funded projects will be required to implement programs and interventions that incorporate these principles and to present their plans for continuous quality improvement (CQI) – including how youth have and will be part of program

design, implementation, and CQI; this will be reflected in their performance review. What follows is a description of how our community will live into these commitments in each part of our system, from governance to entry to exit, in order to create the system young people deserve and in which they can and will thrive. The principles, practices, and considerations we will weave into our practice include:

- Equity
- Positive youth development
- Trauma-informed and healingcentered care
- Social integration
- Family engagement

- Housing First
- Youth choice
- Unsheltered youth
- Individualized, client-driven support
- Coordinated entry

Equity

A commitment to: consider and measure racial inequities and other disparities in the risks for, and experiences of youth and young adults experiencing homelessness

How we will live into our commitment to Equity

Required/Must Have

- The RICoC Equity Committee will analyze youth data and recommend policies and practices to remedy disparities which are based on race, ethnicity, gender, sexual orientation, age, disability, foster care experience, parenting status, experience with trafficking, etc.
- Accountability measures will be identified to ensure this goes beyond data analysis and training and move toward ways to address disparities being baked into the funding/system evolution and program implementation
- Agencies will need to monitor the practice of established policies to ensure consideration of the needs of the most marginalized populations are being proactively addressed in practice.
 (E.g. warm and welcoming places and staff, providing access to translators, gender-neutral bathrooms.)
- Ensure that access to services (physical locations and electronic resources) are accessible to everyone--offer closed captioning for virtual events/meetings; affirming identities and culture inclusive of race, sexual orientation, neurodiversity, gender identity/expression, disability, etc.; flexibility on timeline/schedules; when services are not accessible, providers are able to enact modifications that remove service barriers.
- Ensure that the YHDP provider workforce has been trained on diversity so that they treat

- individuals with dignity and respect. Include training on how to provide both competent and culturally relevant care across all vulnerable populations. Training will be led by youth leaders who are paid appropriately.
- Provide opportunities for youth to offer program feedback and share their experiences, with strong protections for youth to ensure there is no backlash from the programs/staff. Also providing staff protection from the consequences of misinformation.
- Providing direct service staff opportunities to report on and share their experiences, with protection from retaliation.

Recommended/ Must Consider

- Advocacy on local, state, and federal levels to abolish discriminatory legislation as well
 as putting in place legislation that protect marginalized populations and enable equitable
 practices.
- Use of restorative and transformative justice practices within program/organization
- Youth assessment and engagement tools include explicit considerations for those historically marginalized and/or impacted by system level disparities
- Create a continuous improvement process that assesses implementation to continually enhance and evolve practices to enhance equity and dismantle the practices that result in disparities.

Positive Youth Development (PYD)

A commitment to: integrate best practices of PYD in the youth homelessness response (focus on relationships, strengths, youth as co-creators & leaders, inclusive; able to experiment, try and fail without life-altering consequences, harm reduction)

How we will live into our commitment to PYD

Required/Must Have

- Clear expectations for YHDP providers that are connected to funding
- Youth as partners in decision-making at every level and in every component of the system
- Youth input and feedback used to make program improvements/changes
- Community building included in the process and project design
- Relationship-focused approach
- Accommodating a full range of needs/access beyond housing itself
- Targeted Universalism
- Use strengths-based models of care and eliminate punitive program practices that limit opportunities for youth to try and fail without life-altering consequences
- Ensure youth have access to and understanding of a range of information and resources in order to have more knowledge on the topic, enabling them to provide feedback and contribute to decisions on the given issue
- Centering holistically on the needs of young people to set them up for success full
 programmatic design, supportive services, technological services, life skills, mental health,
 etc.
- Remove deficit-based (blamed-based) language and thinking; be clear that homelessness is a failure of the system and not a failure/reflection of the individual
- Being mindful of adultism ensuring to create a space that at minimum is welcoming to youth, and as often as possible is youth-lead and youth-centered

Recommended/ Must Consider

- Youth are valued and compensated as experts in their own lives and how systems affect them
- Focus on dynamic youth mental health and well-being for youth success and thriving as well as how homelessness affects youth mental health

• Youth are offered and supported to engage as leaders in a variety of ways in the YHDP and other youth-specific initiatives, as well as all elements of the homeless system

Trauma Informed Care (TIC)

A commitment to: integrate TIC into youth homelessness response (culturally grounded, healing as restoration of identity, focuses on wellbeing we want vs symptoms to suppress, strengths-focused, harm reduction approach)

How we will live into our commitment to TIC

Required/Must Have

- Develop system-wide standards for TIC; review protocols and training received by case managers, system coordinators, program leads, etc.
- Peer support to discuss issues--show you're not alone, place to give voice to your experience and get support--is integrated in program design
- Abolitionist-driven intervention that minimizes (or completely removes) punishment-based, systemically oppressive methods
 - O Addressing shelter/program models that perpetuate punishment-based methods
 - Adding TIC training when training peer supports and other peer positions
- Training and technical assistance to planners and partners who interact with youth to include an understanding of trauma in their work to integrate knowledge of trauma and its effects into policies, procedures and practices
- Hold organizations accountable (Youth Action Board) to provide trauma-informed training, to implement trauma-informed practices, and to sustain those practices.
- Universal screening for trauma history and strengths as part of coordinated entry and program intake
- YHDP projects required to show how they'll integrate TIC (assess and develop individualized plans, emphasize physical and emotional safety, promote personal control; build skills and coping mechanisms, etc.)
- YHDP agencies will have referral process to trauma specific treatments available and will demonstrate practicing TIC principles--Safety, Trust, Choice, Collaboration & Empowerment
- TIC principles will be integrated in trainings and project monitoring
- Providing strong support system--people who youth can go to for healing and restoration
- Supervision, support and training for youth workers (case managers, etc.) to ensure they are working in and providing trauma informed environments
- Youth have voice and agency in determining the appropriateness of family reunification and/or reconciliation
- Provide opportunities to youth to offer program feedback and share their experiences, with strong protections for youth to ensure there is no backlash from the programs/staff. Also providing staff protections from the consequences of misinformation.
- Providing direct service staff opportunities to report on and share their experiences, with protections from retaliation.

Recommended/ Must Consider

- Removing any barrier that stands between access to good trauma-informed health care and diagnosis.
- Use of restorative and transformative justice practices within program/organization

Family Engagement

A commitment to: strategies to strengthen, stabilize, or reunify families.

How we will live into our commitment to Family Engagement

Required/Must Have

- Use broad definition and understanding of family guided by youth choice
- Safety and youth choice in reconciliation and/or reunification with family of origin
- Locate shelters/housing in diverse locations that allow youth to maintain ties to social supports and avoid school disruption
- YHDP projects required to support reconnection with family, as defined by youth (calls, visits, mediation, locating family, etc.); invite youth to establish family engagement goals as part of individual plans; training on how to establish boundaries with family and friends
- Integrate exploration of natural supports and use of family engagement in every aspect of system; begin with natural support exploration in CES/diversion appointments; consistent outreach to viable permanent connections
- Short-term crisis housing models that provide opportunities for youth/families to have a break and create plans for healing/repair; Include within the continuum using host home model as part of the continuum ("Cool Beds")
- Ensure options for youth with no or minimal family (however they define it) support; ensure connections to family across state lines
- Build a social network and community support into the design of all programs Recommended/ Must Consider
 - Use two/multi-generation models that work to improve economic security, improved relationships, connections to employment and education pathways (approach to services that consider the needs of the entire family for example a parenting youth and their child having wraparound supports)
 - Build robust connections to family mediation and reconciliation support services to reduce family conflict

Housing First

A commitment to: strategies to offer youth immediate access to safe, secure and stable housing without preconditions (without proving that they're "ready" for housing).

How we will live into our commitment to Housing First

Required/Must Have

- Require all YHDP housing programs to commit and adhere to Housing First principles including low or no-barrier access to safe and stable housing
- Eliminate barriers to housing, and leave room for error and mistakes without life-altering consequences
- Information and support will be given to landlords, host homes and community partners regarding Housing First principles
- Training to and oversight of participating agencies on Housing First principles, expectations and requirements
- Providers incorporate strategies to solicit and consider youth feedback to ensure lived experiences with providers align with commitment to Housing First principles
- Eliminate the ability of programs to "cherry pick" who gets housing
- Expand and enhance housing navigation and case management (particularly by peers and those with lived experience of homelessness) services to allow youth to access housing quickly by eliminating barriers to housing (ID, paperwork, etc.)
- Establish a landlord and tenant program for youth focusing on relationship building, maintaining housing, and restorative practices/responses to housing agreement infractions.
- Ensuring access to housing for post-secondary students who have no other options for school breaks (winter, summer, etc.)

Recommended/ Must Consider

- Help people get more resources to get housing and keep housing--case workers, more housing options
- Provide access to ongoing support and services for as long as needed (diversion & aftercare
 wraparound services) to establish stability, recover from trauma, build life skills, connect to
 education and employment, establish healthy connections, and create strong linkages with
 community resources
- Explore opportunities to ensure that for youth who need housing, the system identifies appropriate housing first and works out how it's paid for/program model while our system adopts housing first in policy, we believe that in reality/implementation, coordinated entry and the various programs serving youth and their unique eligibilities end up acting as barriers to rapid access to housing

Unsheltered Homelessness

A commitment to: address and decrease unsheltered youth homelessness

How we will live into our commitment to address Unsheltered Homelessnes s

Required/Must Have

- Street, virtual, and place-based outreach focused on engaging unhoused youth and young adults
- Drop-in spaces that offer lockers, showers, laundry facilities, food/kitchen, computer access, and opportunities for social engagement, social worker or access to external services
- Youth outreach workers co-locate with other youth service organizations to reach youth not engaged with outreach or housing providers
- Providing youth with safety planning support exploring temporary housing options
- Provide peer and case management support to youth and young adults, particularly those who do not identify family and other social supports
- Expand identification and support within the schools and after-school setting
- Create a contact person within each diversion department to liaison with non-profits and other youth-led organizations.

Recommended/ Must Consider

• Provide diversion programs through state agencies that work with youth (DCYF, DOC)

Youth Choice

A commitment to: youth having choices about which providers and interventions they'll engage with; youth having options and self-determination regarding the kind of housing youth need and the extent and nature of supports and services they access; harm reduction approach

How we will live into our commitment to Youth Choice

Required/Must Have

- Rated service experiences will be reviewed by YAB, YHDP Steering Committee, YHDP
 Project Review Committee; those service providers with multiple or notably bad reviews
 will be addressed and held to some standard of accountability, up to and including loss of
 funding for unresolved issues
- Programs specify the youth they're serving--race, LGBTQ+ youth, parenting youth, young people with disabilities, etc. and be sure that their safety is prioritized and that they're housed and served in a space that is affirming and comfortable; all spaces should be affirming and create safety for the most marginalized/oppressed (universal design)

- Learn from kinship care/elder care (allowing youth to identify a family member, friend, or mentor to live with) and to provide this person some financial assistance to give them the resources they need to provide housing/board.
- Develop a variety of flexible housing options, including dorm-like transitional housing with services on site that allows time to build skills and finances before they move into permanent housing; and provides access to those services without requiring participation in the housing program.
- YHDP projects will be required to incorporate youth choice as a service policy and practice that will allow youth to exercise choice in all the following--goals and priorities, housing location and type, who they live with, supportive services and programs they access; projects will be encouraged to incorporate training in evidence-based practices that have a focus on youth choice such as Motivational Interviewing, Stages of Change and Healing Centered Engagement YHDP agencies required to commit to youth having the power/choice in the development and implementation of their services
- Employment and education services developed based on personal interest and motivations; ongoing support services will include connections to agencies and individuals that honor and reflect the identities of youth and young adults
- Peer navigators that make connections to resources/supports

Recommended/ Must Consider

• Develop youth resource listing/electronic hum that young people can add to and rate their experiences with service providers

Individualized, Client-Driven Support

A commitment to: flexibility to accommodate unique needs of each person and respond to different needs for service type, intensity, and length of support.

How we will live into our commitment to Individualize d and Client-Driven Support

Required/Must Have

- CES screening tools, referral processes and policies will serve to ensure that individual needs are identified and addressed
- YHDP agencies commit to developing individualized and client-driven supports based on the unique identities and cultures of youth and young adults, built upon the strengths, competencies and desires of each individual served; provide regular training and support to organizations to establish and maintain individualized and client-driven supports
- Client-driven processes defined and monitored for each program, and included in youth feedback processes
- Case management approach that integrates lived experience to build trust, relationships, and shared experience/peer support
- Culturally competent and linguistically diverse staff and peers to meet clients where they are and who understand culture and lived experience
- CES and individual intervention/goal-setting tools made for youth, reviewed by youth, and used by youth
- Co-locate support services in affirming, culturally relevant, community-based spaces
- Evaluation process for clients to provide feedback without retaliation (and for case managers to provide feedback); a client and case manager relationship that doesn't click is OK--we need enough providers to be able to find a better fit for someone

Recommended/ Must Consider

- Dedicated resource bank of committed, quality, and trained providers that remains at the ready to meet unique and diverse needs of clients
- Develop process to match culturally competent & diverse case managers with clients
- Provide supports for practice specific to both core and other cities, as well as those

intended to be use with/for specific populations vs for general population

Social and Community Integration

A commitment to: offer meaningful opportunities for participation in community activities and the creation and/or strengthening of social supports

How we will live into our commitment to Social and Community Integration

Required/Must Have

- Housing located within community and close physical proximity to services/resources
- Assess and include social and community inclusion in individual plans
- Dedicated all-inclusive youth led and mentor supported spaces for social connecting inside and outside of the core cities (particularly making sure non-core city youth are connected)
- Providers demonstrate youth leadership within programs to determine rules, procedures for intake and
- engagement, and program components
- Establish intra- and inter-agency opportunities to attend events and activities, become oriented to community-based resources, and otherwise support social integration; develop a system-wide calendar of such supported engagement events; young adults hired as curators of these experiences, including organizing events, identifying community collaborators, promoting opportunities, etc.
- Services and activities that support access to natural supports; engagement in meaningful
 activities through connection to community, education and employment; advocacy and
 system change to address inequities in access, inclusion and belonging, particularly for
 those holding marginalized identities
- Include mentoring and peer-based interventions; use tech and social media to connect youth to supports and networks combined with harm-reduction training or coaching in use of technology
- Peer navigators are paid living wages to make connections to affirming, culturally relevant community activities
- Providers outline strategies to connect youth to their identified supports (family, friends, teachers, mentors, and others) in Rhode Island or elsewhere
- YHDP providers adapt/adopt policies and practices to include youth and young adults as partners in decision-making--staff, volunteers, committee and board members.
- Transportation assistance (Lyft/Uber/ridesharing, shuttles, RIPTA)
- Require all YHDP projects to collect, report and address health and wellbeing measures Recommended/ Must Consider
 - Advance policy that helps increase social inclusion (public transit, tenant rights, right to shelter, etc.)
 - Develop a youth resource listing that young people can add to and rate their experiences with
 - Advocate for youth participation requirements and/or policies in local city/town boards, committees, etc. to empower youth and provide decision-making authorities

Coordinated Entry System (CES)

A commitment to: ensuring the coordinated entry process (how youth get connected to resources when they request housing assistance) incorporates youth needs and is youth appropriate.

How we will live into our commitment

Required/Must Have

 CES and individual intervention/goal-setting tools made for/by youth, reviewed by youth, and used by youth

to Youth-Centric Coordinated Entry

- Review & update CES policies and procedures and guidelines; the YAB and YHDP Steering Committee will review the effectiveness of CES quarterly
- Create youth specific coordinated entry tools and processes in collaboration with youth
- Make sure schools and other youth serving agencies understand and can refer youth to an access point
- Train all case managers/direct care staff in conducting screening for under age 18 and 18-24-year-olds as well as DV situations and safety planning
- Keep a youth only by-name list, updated weekly, reviewed in case conferencing regularly
- Progressive intake and screening process that goes at youth person's pace; develop a screening tool that youth can self-administer
- Cast a wider net of folks who are door to CES--no wrong door approach. Create
 coordinated entry protocols and trainings to meet unique needs of different populations;
 ensure services delivery is provided in safe space with refinements based on youth
 feedback
- Ensure that schools and other youth serving agencies understand the CES process and can refer youth to an access point (CES training at scale)
- Develop a way to prioritize youth under the age of 18 to crisis or permanent housing as appropriate
- Develop and deliver trainings on youth-specific coordinated entry, diversion, navigation and housing
- Develop additional strategies for linking youth to community activities, peer mentoring and navigation, volunteer opportunities, creative endeavors, education and workforce pathways, etc.
- Connection to prevention/diversion/aftercare outside the homeless services system, so services received to prevent homelessness or prevent a return to homelessness
- Put practices/steps in place so that staff conduct follow-up to ensure that individuals get the services needed. (Closed loop referral system)
- Staff are trained in culturally appropriate, TIC practices.

Recommended/ Must Consider

- Ensure that CES system is minor-friendly and is able to appropriately direct them to affirming services.
- Hire peer navigators as CES staff and pay living wages

Racial Equity & Justice Core Principles:

Youth homelessness exists today largely due to America's long history of structural racism and systemic inequities. In order to end youth homelessness, we will work to ensure our systems work for all youth. Partner organizations serving on the YHDP Steering Committee are committed to centering the importance of racial equity and justice in all of our work to end youth homelessness. We see equity as providing opportunities and resources based on need, realizing not everyone starts in the same place. Justice takes this concept a step further by removing the barriers that impede equal rights and self-determination; it seeks to overturn oppression at its roots. The YHDP Steering Committee, Youth Action Board, and Unaccompanied Youth Committee will strengthen our knowledge, skills, attitudes and personal competency to address inequity

and injustice, internally and in our external efforts through continual practice of these core practices.

Recognize and Center Intersectionality:

Intersectionality looks at the interaction of multiple social identities and how those identities separately and together are subjected to oppression and discrimination.

- We challenge all of our partner organizations to be consistently intersectional in all of the work we do
- We unapologetically center the voices and experiences of LGBTQ youth and youth of color, while upholding that all of us have many identities.

Name and Challenge White Supremacy:

- We name white supremacy as any condition where whites overwhelmingly control power and material resources
- We will name and challenge conscious and unconscious ideas of white superiority, entitlement, and white dominance.

Engage in Principled Struggle:

Learning and growing are the results of struggle. Struggle causes change and liberation. As an initiative we strive to engage in Principled Struggle (attributed to NTanya Lee) and work to foster and cultivate spaces for members, coalitions, and communities to move through conflict in a way that makes us better.

To do this, we each commit to:

- 1. Being honest and direct while maintaining compassion.
- 2. Taking responsibility for our own feelings and actions.
- 3. Seeking deeper understanding. (We ask and read first).
- 4. Considering social positions and how they inform response to conflict.

Practice Targeted Universalism:

From john a. Powell "A targeted universal strategy is one that is inclusive of the needs of both the dominant and marginal groups but pays particular attention to the situation of the marginal group. Targeted universalism rejects a blanket universal which is likely to be indifferent to the reality that different groups are situated differently relative to the institutions and resources of society. It also rejects the claim of formal equality that would treat all people the same as a way of denying difference."

• We commit to using targeted strategies to reach universal goals, mindful that blanket goals may be indifferent to the reality that groups are situated differently relative to the institutions and resources of society.

• We commit to evaluating the outcomes of our efforts for all populations and not just the output.

Generate Transformative Visions Toward Liberation:

- As a transformative initiative, we seek out those campaigns and activities that have the greatest potential to improve the lives of young people experiencing homelessness.
- We will reimagine opportunities to engage and win future fights that move us towards our long-term vision.
- We commit to transforming power dynamics and systems. We want youth at the front lines of marginalization to have full decision-making power when reshaping systems to work better for them.

Create a Culture of Accountability:

Accountability refers to creating processes and systems that are designed to help individuals and groups be held responsible for their decisions and actions and whether the work being done reflects and embodies racial equity and justice principles.

- The Youth Action Board, YHDP Steering Committee, and Unaccompanied Youth Committee members understand that accountability is a cornerstone of racial equity work and are committed to the practice of white accountability in particular.
- We pledge to continually evaluate and analyze our work against the following questions:
 - o How is the issue being defined? Who is defining it?
 - Who is this work going to benefit if it succeeds? Who will benefit if the work does not succeed?
 - O How are assignments distributed among the stakeholders? How will a group know if its plan has accounted for risks and unintended consequences for different racial and ethnic groups?
 - What happens if people pull out before the goals are met?
 - Who anointed the people and groups being relied on for the answers to these questions?
 - o Are there opportunities to diversify respondents to these questions?

Priority	Prioritization Factor
1	Youth in violent or potentially
	violent situations – includes
	potentially life-threatening
	situations, violence includes
	physical, sexual, and

	psychological abuse; racism,
	homophobia, xenophobia, and
	other forms/systems of
	oppression and violence
	• LGBTQ+, BIPOC,
	Immigrant/Refugee, minor
	(under age 18);
	Intersectional/multiple
	prioritized identities
	 Youth living outside
	 Youth with behavioral and/or
	mental health challenges or
	conditions (includes YYA
	actively using substances who
	request harm reduction, are
	overdose risk, etc.)
2	Youth with disabilities
	 Youth with other chronic health
	conditions
	 Pregnant or parenting youth
3	Youth with foster care
	experience
	Youth new to being houseless
4	Youth who have experienced
	incarceration and/or have
	interacted with any element of
	the criminal/carceral system
	(courts, etc.)
	Young adults just entering adult
	system (ages 18-19)
5	• Veterans
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Guidelines for Transitional Housing (TH)

Transitional housing programs are generally expected to place individuals and families into permanent housing within 12 months. Transitional Housing is intended as a best practice to be used as bridge housing (i.e., temporary housing when shelter is not available, or the participant is preparing to enroll in RRH or another PH program) that should not exceed 3 months.

A tenant in transitional housing will have a signed lease, sublease, or occupancy agreement with the CoC/YHDP provider agency of at least 1 month that is renewable for up to 24 months. Program participants should receive only the assistance they need to exit homelessness safely and stably; therefore, not all program participants should automatically receive 24 months of assistance. No minimum time limit may be required by the program for enrollment in the TH portion of the project; a client may choose the RRH program at any time. There will be no

occupancy fee for the transitional housing component of the joint projects, i.e., program participants will not need to pay rent.

As we build Transitional Housing back into the RICoC's portfolio, it's important to revisit how CoC regulations affect eligibility for CoC resources as it relates to Transitional Housing. Generally, persons who reside in transitional housing for homeless persons are considered homeless under Paragraph 1 of the definition of homelessness in 24 CFR 578.3 of the CoC Program Interim Rule. However, under most circumstances, persons residing in transitional housing (TH) are not considered chronically homeless and therefore, do not maintain their chronic status for purposes of eligibility into other CoC-funded projects, even if they were determined chronically homeless prior to entry into TH. This is because to be considered chronically homeless, a household must meet the criteria outlined in the Final Rule on Defining "Chronically Homeless," which does not include transitional housing as an eligible location. Further, in calculating the length of time homeless for the purposes of determining if a household is chronically homeless, time spent in transitional housing that is for seven nights or more would count as a break in homelessness as only time spent residing in a place not meant for human habitation, emergency shelter, or safe haven can be counted.

Guidelines for Rapid Rehousing (RRH)

All participants receiving RRH assistance will be expected to contribute to rental payments if they have income with which to make payments. Participants with zero income will be served regardless of their inability to pay rent. Rent charges will be calculated consistent with 24 CFR 578.77. Rent will not exceed the maximum changes indicated in the regulations. Please see the RRH written standards below for specific rent payment requirements in the RRH program.

CoC RRH households receiving rental assistance subsidies must contribute a minimum of 30% of their monthly adjusted income towards rent. This tenant rent contributed may be adjusted at any time based on changes to household income. There is no minimum rent requirement and tenant rent contributed may be zero for households with no income. Income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a).

CoC/YHDP Recipients should not have a policy in place to provide all program participants with 12 months of rental assistance in the RRH portion of the project, but instead should determine the least amount necessary to help the program participant safely and stably exit homelessness, which will vary by person. The RICoC calls this "Progressive Engagement" and encourages each CoC/YHDP project to develop its own progressive engagement policy and procedure based on the subpopulation the program serves.

For CoC RRH, participants may receive rental assistance of no more than the following percentages of the rent amount for each of the indicated time frames (security deposits are excluded from these limits):

- Months 1-12: rental assistance provided may be up to 100% of the total rent amount
- Months 13-16: rental assistance provided may be up to 80% of the total rent amount
- Months 16-20: rental assistance provided may be up to 60% of the total rent amount
- Months 20-24: rental assistance provided may be up to 40% of the total rent amount

The progressive engagement model acknowledges the time-limited nature of the RRH assistance being provided to households and has been put in place by the CoC in these written standards so that households do not simply obtain permanent housing but maintain permanent housing after the subsidy ends. The CoC also recognized that it is important for RRH assistance to be flexible and that not all households will be able to progress through the program according to the above-stated rental assistance limits. These rental assistance limits represent the ideal movement through the program when a household is able to smoothly transition off of the time-limited subsidy into stable housing that they can maintain on their own.

Each TH/RRH or RRH program covered in these written standards may extend the assistance limits in cases where the household will not be able to maintain stable housing without deviation from these limits. Additionally, in cases where a household has income and is being charged rent, and that household cannot pay their portion of the rent due to extenuating circumstances, an exemption can be made. All exemptions, either to rental assistance limits, or a household's monthly portion, must be clearly indicated in the household's file and the program's reasoning must be documented. Additionally, the option of providing exemptions does not change the minimum number of households a provider is contracted to serve based on their funding contract. Providers should carefully consider the budget effects of extending assistance limits to each household. Rental assistance payments cannot extend beyond 24 months during a household's enrollment in an RRH program unless the project is a YHDP project with a HUD-approved waiver to extend RRH for up to 36 months.

Rental assistance can be provided for up to 36 months to a household for the RRH portion of the TH-RRH projects if the recipient demonstrates: (1) the method it will use to determine which youth need rental assistance beyond 24 months and (2) the services and resources that will be offered to ensure youth can sustain their housing at the end of the 36 months of assistance. The total amount of time a participant can receive rental assistance in the approved project cannot exceed 36 months.

Guidelines for Termination and Grievance Procedures

TH/RRH and RRH programs covered by these written standards will utilize the Grievance Policy outlined in the CoC's Policies and Procedures.

Guidelines for Service Provision and Case Management

The CoC/YHDP are re-investing in a transitional housing model with TH-RRH Joint Component projects. That is, in part, because the CoC believes that for some populations experiencing

homelessness, the availability of strong and robust services in a location convenient to the participant may be a benefit some clients choose. Therefore, in the transitional housing component of a TH-RRH project, supportive services must be made available to residents throughout the duration of their residence in the project. All TH-RRH programs are required to be operated in accordance with the CoC's Housing First Principles; therefore, while robust services are required to be available in the TH project, it is the client's choice how they wish to engage with those services, and no services may be required for ongoing program eligibility. TH-RRH providers will conduct an annual assessment of service needs for all program participants and adjust services as necessary. Whenever possible the annual assessment should be conducted in the HMIS or comparable database for survivors of violence.