



# Michigan Balance of State Continuum of Care Program Standards for Permanent Supportive Housing **Draft**

Permanent Supportive Housing is an eligible activity within the Michigan Balance of State Continuum of Care (MIBOSCOC) for the Continuum of Care Program. To provide continuity of service to all being served with Permanent Supportive Housing (PSH) throughout the MIBOSCOC, the MIBOSCOC is providing basic expectations for all Permanent Supportive Housing projects' services in this Program Standards for Permanent Supportive Housing document.

These standards and expectations are what the MIBOSCOC has agreed to for service continuity, but all projects must first adhere to all regulations established for Permanent Supportive Housing as described in [24 CFR Part 578 by the HERATH Act of 2009](#). Additional guidance on these regulations can be found in the [HUD CoC Binders](#) detailing all project components and financial management requirements. Nothing in this document is intended to supersede the regulations or guidance provided by the US Department of Housing and Urban Development (HUD).

## Overview:

Permanent Supportive Housing is an intervention designed to help individuals and families with at least one member with a disability exit homelessness to permanent housing and achieve stability in that housing. Permanent Supportive Housing assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety) and the resources and services provided are tailored to the unique needs of the household. Core components of a Permanent Supportive Housing project are:

- Housing identification,
- Long-term rental assistance and move-in (financial) assistance, and
- Housing focused case management and stabilization services.

While a household that is served in Permanent Supportive Housing is not required to utilize all core components, in order to meet the project standards in this document, a Permanent Supportive Housing project must offer project participants all core components: housing identification, move-in and rent assistance, and housing focused case management and stabilization services. Project standards are detailed below for each of the core components. These standards are accompanied by principles on which the standards are based as well as examples of how a program may meet those standards.

In addition to these core component activities, all Permanent Supportive Housing projects should adhere to a Housing First philosophy. It is the expectation of the MIBOSCOC that all funded projects adopt this model of care. Housing First is the philosophy that people need basic necessities like food and a place to live before attending to anything else less critical like getting a job, building credit, or attending to substance use issues. Housing choice is highly valued in a Housing First model and is a voluntary model of care for persons experiencing homelessness. Housing First does not mandate participation in services before obtaining housing or in order to maintain housing.

## Eligibility:

MIBOSCOC developed the following Permanent Supportive Housing standards for CoC Program funded Permanent Supportive Housing projects to ensure:

- Project accountability to all population groups (individuals, families, veterans, youth, survivors of violence) experiencing homelessness;
- Project compliance with HUD, project uniformity, and common participant expectations;
- Adequate project staff competence and training; and
- That agencies have a set of standards to guide their programming.

All programs throughout the MIBOSCOC must comply with the Non-Discrimination and Family Separation Policy of MIBOSCOC, and the nondiscrimination provisions of Federal civil rights laws, including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II or III of the Americans with Disabilities Act, as applicable.

## HUD COC PERMANENT SUPPORTIVE HOUSING

HUD Continuum of Care Permanent Supportive Housing assistance can be provided to individuals and families defined as homeless under any of the following category included in the HUD federal definition of homeless:

- Literally homeless (Category 1): An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - (i) an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
  - (ii) an individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); or
  - (iii) an individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

**The CoC Program Notice of Funding Opportunity (NOFO) imposes additional eligibility requirements not reflected in the regulation.** Projects funded to carry out Permanent Supportive Housing assistance under the CoC program must follow both CoC Program NOFO and regulatory requirements.

## Standards for Documenting Eligibility

The following documentation requirements are listed in order of preference. The service provider and/or referring agency are required to provide the following documentation to prove eligibility for homeless programming:

- Literally Homeless (Category 1):
  1. Written observation by the outreach worker; or
  2. Written referral by another housing or service provider; or
  3. Certification by the individual or head of household seeking assistance stating that they are living on the streets or in shelter;
  4. For individuals exiting an institution, one of the form of evidence above and:

- Discharge paperwork or written/oral referral, or
- Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited the institution.

Most Permanent Supportive Housing projects will also require documentation of a disability for eligibility. More details on this and documenting homelessness status for Permanent Supportive Housing can be found on the MIBOSCOC training site in the Chronic Homelessness Documentation training.

*Citation: [https://www.hudexchange.info/resources/documents/HomelessDefinition\\_RecordkeepingRequirementsandCriteria.pdf](https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf)*

## Prioritization:

The full prioritization policy for the MIBOSCOC can be found in the MIBOSCOC Coordinated Entry Policy. Prioritization uses a standardized assessment tool and evaluates for eligibility criteria for all project types throughout the CoC, taking into account client choice.

All Permanent Supportive Housing projects in MIBOSCOC follow HUD's [CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#) notice.

## Housing Identification- Scattered Site Models:

Housing Identification is a core component of Permanent Supportive Housing, the goal of which is to find housing for project participants quickly in scattered-site Permanent Supportive Housing projects. Activities under this core component include recruiting landlords with units in the communities and neighborhoods where project participants want to live and negotiating with landlords to help project participants access housing.

### Principles

- Within the limits of rent reasonableness, a Permanent Supportive Housing project should have the ability to help households access units that are desirable and sustainable—those that are in neighborhoods where they want to live in, that have access to transportation, are close to employment, and that are safe.
- Housing identification efforts should be designed and implemented to actively recruit and retain landlords and housing managers willing to forego or adjust their typical tenant screening criteria in order to rent to project participants who may have otherwise been screened out.
- Critical to the formation of landlord-project relationship is the recognition of the landlord as a vital partner. The Permanent Supportive Housing provider must be responsive to landlords to preserve and develop those partnerships for future housing placements.

### Project Staffing

- Projects should designate staff whose responsibility is to identify and recruit landlords and encourage them to rent to homeless households served by the project. Staff have the knowledge, skills, and agency resources to understand landlords' perspectives, understand landlord and tenant rights and responsibilities, and negotiate landlord supports. The project's staff must be trained in this specialized skill set to perform the recruitment function effectively.
- The project should have standard procedures to onboard new staff and to keep staff regularly updated on new strategies, policies, and housing assistance options in the community.

## Project Policies

- The project should have written policies and procedures for landlord recruitment activities, including screening out potential landlord partners who have a history of poor compliance with their legal responsibilities and fair housing practices.
- The project should outline standard, basic level of support to all landlords who lease to project participants. This support is detailed in a written policy and distributed to landlords. The project can negotiate additional supports, as needed, on a case-by-case basis.
- The project should have a detailed policy for the type of assistance provided to help participants find and secure housing. Staff explain and distribute this policy to participants at entry to the project. Some participants may decline assistance in finding housing, but the project should check on their progress and offer advice and/or direct assistance if they encounter obstacles they cannot resolve independently.

## Project Activities

- The project should continually engage in the recruitment and retention of landlord partners and has methods of tracking landlord partners and unit vacancies, unit locations, characteristics, and costs.
- The project should provide participants with multiple housing choices within practical constraints. The onus is on the project to provide these housing choices, but this does not preclude project participants from conducting their own search and choosing housing they identify independently.
- The project should assist participants in making an informed housing choice with the goal that the participant will be able to maintain.

## Housing Identification- Project Based Models:

In Project Based Permanent Supportive Housing, housing identification is accomplished when a participant chooses to accept a referral to that Project Based Permanent Supportive Housing project. Activities under this core component include informing the participant about the available housing in order for them to make an informed choice.

### Principles

- Project Based Permanent Supportive Housing models must balance the needs of the property management and the participant.
- Efforts should be made to work with housing projects that were created before the focus on low barrier housing to update their tenant screening criteria to rent to project participants who may have otherwise been screened out.

## Rent, Move-In Assistance, and Ongoing Rental Subsidy:

The goal of which is to provide rental assistance for as long as a participant requires. Activities under this core component include paying for security deposits, move-in expenses, rent, and utilities.

### Principles

- Rent and move-in assistance should be flexible and tailored needs of a participant household while providing the assistance necessary for households to move immediately out of homelessness and to stabilize in permanent housing.
- A Permanent Supportive Housing project should make efforts to maximize the number of households it is able to serve by providing households with assistance in securing income that can

increase the amount of rent paid by the participant and decrease the amount paid by the project for each participant.

### Project Staffing

- Project staff should be trained on the regulatory requirements of all Permanent Supportive Housing funding streams and on the ethical use and application of a project's financial assistance policies, including, but not limited to, initial and ongoing eligibility criteria and project requirements. The project should have a routine way to onboard new staff and to keep staff regularly updated on changing regulations and/or project policies.

### Project Policies

- Rental assistance shall be paid to landlords on time each month.
- Participant households will contribute 30% of their income to the rental payment each month. If the participant's income is \$0, they will pay \$0.
- Project staff shall work with participants to increase income, especially by pursuing mainstream benefits for which the household is eligible (SSI, SSDI, food assistance, Medicaid, Medicare, WIC, Veteran Benefits, etc).

### Project Activities

- The project should provide financial assistance for housing costs, including rental deposits, first month's rent, and ongoing rental assistance.
- The project should issue checks quickly and on time and have the capacity to track payments to landlords and other vendors.
- The project should help participants meet basic needs at move-in, either through agency donation or resource referrals.

## Permanent Supportive Housing Case Management and Services

Permanent Supportive Housing case management and services are the third core component of Permanent Supportive Housing. The goals of Permanent Supportive Housing case management are to help participants obtain and move into permanent housing, support participants to stabilize in housing, and connect them to community and mainstream services and supports as needed.

### Principles

- Permanent Supportive Housing case management should be participant driven. Case managers should actively engage participants in voluntary case management and service participation by creating an environment in which the participant is driving the case planning and goal-setting based on what they want from the project and services, rather than on what the case manager decides they need to do to be successful.
- Permanent Supportive Housing case management should be flexible in intensity—offering only essential assistance until or unless the participant demonstrates the need for or requests additional help. The intensity and duration of case management is based on the needs of individual households and may lessen or increase over time.
- Permanent Supportive Housing case management uses a strengths-based approach to recognize the strengths and skills participants bring to the situation and prevent a power imbalance between participant and case manager. Case managers identify the inherent strengths of a person

or family instead of diagnoses or deficits, then build on those strengths to support the participant's success.

- Permanent Supportive Housing program case management focuses on housing retention and helping a participant build a support network outside of the project. It connects the participant with community resources and service options, such as legal services, health care, vocational assistance, transportation, childcare, and other forms of assistance.
- Caseloads should not exceed an amount that allows staff to engage with all participants as required and be available to respond quickly to participant emergencies. Caseloads should be flexible enough to account for participants requiring additional assistance and where the participants are in the housing process. It is recommended that Permanent Supportive Housing caseloads do not exceed 20 participants. There is no minimum required caseload as long as the provider is able to fulfill funder expectations for the number of participants served.

### Project Staff

- The case manager's job descriptions should direct case managers to focus on housing and to use strengths-based practices focused on participant engagement and meeting the unique needs of each household.
- Case managers should be trained on Permanent Supportive Housing case management strategies and related evidence-based practices as well as program policies and community resources. Additionally, a project has a regular process for onboarding new staff and regularly updating the training of current staff.
- At minimum, required staff training should include MIBOSCOC supported training in: Housing First Practices, Implicit Bias, Trauma-Informed Service Provision, and Motivational Interviewing.

### Project Policies

- Except where dictated by the funder, program participants should direct when, where, and how often case management meetings occur. Meetings occur in a participant's home and/or in a location of the participant's choosing whenever possible.
- Case managers respect a program participant's home as their own, scheduling appointments ahead of time, only entering when invited in, and respecting the program participant's personal property and wishes while in their home.
- When case management and service compliance is not mandated by federal or state regulation, services offered by a project have voluntary participation.
- The project should have clear safety procedures for home visits that staff are trained on and that are posted clearly visible in office space and shared with program participants at intake, and shared with participants and staff whenever changes are made.
- The project should clearly defined relationships with benefit and income programs that it can connect program participants to as appropriate.
- The project should have clearly defined policies and objective standards for when case management should continue and end. These guidelines are flexible enough to respond to the varied and changing needs of program participants. In instances where cases are continued outside of these defined policies and objective standards, there is a review and approval process.

### Project Activities

Project activities for Permanent Supportive Housing case management are grouped into categories that will contribute to the specific goals of Permanent Supportive Housing case management. The project

activities listed here are not exclusively provided in a linear progression and can be administered in whatever order and intensity is most appropriate for a participant.

### Obtain and Move into Permanent Housing

- Assessments completed prior to housing should be limited and focus on those things necessary to support health and safety and resolve the housing crisis as quickly as possible.
- The project should have resources and/or be able to connect participants to community resources that help participants: resolve or navigate tenant problems (like rental and utility arrears or multiple evictions) that landlords/property management may screen for on rental applications; obtain necessary documentation such as identification; prepare participants for successful tenancy by reviewing lease provisions; and support other move-in activities.
- The project should offer learning opportunities which can include instruction or guidance on basic landlord-tenant rights and responsibilities, understanding the requirements and prohibitions of a lease, and meeting minimum expectations for care of the housing unit.

### Support Stabilization in Housing

- The project staff should work directly with the participant and landlord/property management to resolve tenancy issues without threatening the participant's tenancy. The issue might be failure to pay rent, not properly maintaining the unit, or disturbing the quiet enjoyment of others. It also may include the landlord/property management not meeting their obligations. The project should work quickly to identify a corrective course of action, and, without breaking a participant's confidentiality, keep the landlord/property management and participant informed about the project's action to mitigate the situation.
- Case managers should encourage participants to build their relationship with their landlord/property management directly. This might relate to repairs; an extension on a rent payment; or complaints, either against the participant or of the participant.
- Case managers help participants avoid evictions before they happen and maintain a positive relationship with the landlord/property management. This can be done by moving a participant into a different unit prior to eviction and possibly identifying a new tenant household for the landlord's unit.
- The project should have a written policy on how they will actively work to prevent eviction and state that, should an eviction occur, the participant is able to remain in the project and find a new rental unit to quickly secure housing again.
- Housing plans, sometimes known as case plans or goal plans, should focus on how project participants can maintain a lease and address barriers to housing retention, including maximizing their ability to pay rent; improving understanding of landlord/tenant rights and responsibilities; and addressing other issues that have, in the past, resulted in housing crisis or housing loss. Plans account for participant preferences/choices and include only goals created with and agreed to by the participant. These plans should identify strengths from previous instances of housing success and strive to replicate or build upon these strengths.
- The project should, at a minimum, maintain a list of community resources (and their eligibility requirements) to which participants can be referred. Preferably, project has relationships with these agencies. The list should be regularly updated, and case managers should stay informed on availability and eligibility of these resources.
- Case managers should make referrals to appropriate community and mainstream resources, including, but not limited to income supplements/benefits (TANF, Food Stamps/SNAP, etc.), non-cash supports (healthcare, food supports, etc.), legal assistance, credit counseling, and subsidized

childcare. When making these referrals, it is the case manager's responsibility to follow-up on receipt of assistance. However, a participant may choose not to follow up on or participate in any referred services or programs.

- Case managers should pay particular attention to participants' incomes. Though income is not a requirement, case managers help participants review their budgets, including income and spending, to make decisions about managing expenses and increasing income. Options are most often focused on benefit enrollment. All income and budgeting conversations should be had using motivational interviewing techniques and with awareness of implicit biases.
- If appropriate, participants should be assisted in identifying existing familial and personal connections that can help them maintain housing by providing supports such as child care, transportation, etc. Participants may choose not to engage in this process.

**Examples of Meeting Project Standards: Case Management and Services that meet the above standards include those that:**

- Have job descriptions for case managers that include requirements that they focus activities on obtaining housing and housing stabilization and conduct case management in participants' homes and other locations outside the office and that they have the ability to get to and from those meetings.
- Have case/housing plan templates that limit the number of goals and action steps to be included in a single plan and focus attention on housing and income related goals.
- Have a case review process to help staff problem-solve around case/housing plans.
- Make use of a "permanent supports map" that helps participants identify people already in their lives who can help with specific things, such as transportation or child care.
- Offer budgeting assistance and referral when desired by participants.
- Train staff to coach participants in conflict avoidance or de-escalation, adequate care of the housing unit, lease compliance, etc.
- Collect, maintain, and update records of available mainstream and community resources for project participants. This includes community resources that can reduce burdens on income including food banks, clothing consignments store, low-income utility programs, and others.

### Ending Assistance

- Permanent Supportive Housing assistance may not end during a participant's lifetime and this is an appropriate outcome.
- Because Permanent Supportive Housing is limited, however, if a participant shows reduced need for ongoing case management, has adequate natural supports to meet their current and expected future needs, and has demonstrated stability in housing, the case manager should discuss the option of exiting the Permanent Supportive Housing project and maintaining rental assistance with a Housing Choice Voucher available through the process of "Moving On". Moving On should only be pursued if the participant is comfortable doing so and will qualify for the voucher.
- When closing a case, case managers should provide information to participants about how they can access assistance from the project again if needed and what kind of follow-up assistance may be available. In instances when a participant is at imminent risk of returning to homelessness, the project has the capacity to either directly intervene or provide referral to another prevention resource.



## Core Outcomes in Permanent Supportive Housing

MIBOSCOC embraces the [CSH Dimensions of Quality Supportive Housing](#) within the standards of operating Permanent Supportive Housing projects. The core outcomes for tenants as listed by CSH are as follows:

- Tenants Stay Housed: Supportive housing is designed to break a cycle of housing instability for tenants and ensure they remain in permanent housing.
- Tenants Improve Their Physical and Mental Health: Supportive housing and associated services help tenants to access needed physical and mental health care and improve their health status.
- Tenants Increase Their Income and Employment: Tenants increase their income in supportive housing by obtaining benefits and/or employment. In cases in which tenants are already employed or receiving all benefits for which they are eligible, they maintain their income.
- Tenants are Satisfied with the Services and Housing: Tenant satisfaction is an important outcome that ultimately affects the quality of life for tenants and the ability of supportive housing projects to help tenants achieve housing stability.
- Tenants Have Social and Community Connections: Supportive housing helps tenants to develop connections to their community and build social support networks.

*Taken from CSH Dimensions of Quality Supportive Housing, pg 5: [https://www.csh.org/wp-content/uploads/2013/07/CSH\\_Dimensions\\_of\\_Quality\\_Supportive\\_Housing\\_guidebook.pdf](https://www.csh.org/wp-content/uploads/2013/07/CSH_Dimensions_of_Quality_Supportive_Housing_guidebook.pdf)*

## Quality Standards in Permanent Supportive Housing

All Permanent Supportive Housing projects should strive to the highest level of quality for participants. Projects should adhere to the Dimensions of Quality as outlined in the CSH materials found at [csh.org/quality](http://csh.org/quality).