

**ST. CLAIR COUNTY
CONTINUUM OF CARE
(CoC II-508)**

WRITTEN PROGRAM STANDARDS



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TERMINOLOGY AND DEFINITIONS

Applicant	An eligible applicant designated by the Continuum of Care to apply for assistance on behalf of that Continuum.
At Risk of Homelessness	An individual or family with income below 30% of the median, lacking support to prevent homelessness, and meeting specific conditions like recent displacement, living in overcrowded housing, imminent eviction, or exiting an institution. Also includes children and youth qualifying as homeless under federal statutes.
Centralized or Coordinated Entry System	A process designed to coordinate intake, assessment, and referrals for housing and services across a geographic area.
Chronically Homeless	A homeless individual with a disability who has been homeless continuously for 12 months or on at least 4 occasions in the last 3 years, or a family where the head of household meets these criteria. Institutional stays of under 90 days do not break the homelessness period.
Collaborative Applicant	The entity designated by the Continuum of Care to apply for a grant on behalf of the Continuum for planning funds.
Continuum of Care (CoC)	A group of stakeholders working to address homelessness, including nonprofits, governments, social services, and housing agencies.
Developmental Disability	A severe, chronic disability that manifests before age 22, leading to significant limitations in major life activities, requiring long-term individualized support.
Eligible Applicant	A private nonprofit, state, or local government entity eligible to apply for Continuum of Care funds.
Emergency Shelter	Defined under 24 CFR part 576 as a facility that provides temporary housing for homeless individuals and families.
Fair Market Rent (FMR)	The rent values published annually by HUD to determine subsidy levels.
Homeless	Individuals or families lacking a stable nighttime residence, imminently losing housing, youth meeting federal homeless definitions, or those fleeing domestic violence without resources for permanent housing.
Homeless Management Information System (HMIS)	The information system designated by the CoC to track homelessness data per HUD requirements.

Homeless Prevention	Programs designed to prevent individuals and families from becoming homeless by providing short-term financial assistance and supportive services.
Permanent Housing	Housing without a set length of stay, including permanent supportive housing and rapid rehousing. Requires a lease of at least one year, renewable monthly, and terminable only for cause.
Permanent Supportive Housing	Permanent housing with supportive services for individuals with disabilities to live independently.
Program Participant	An individual or family receiving assistance through the Continuum of Care program.
Project	A group of eligible activities funded by the CoC, including rental assistance, supportive services, or capital investments in housing.
Rapid Rehousing (RRH)	A housing intervention that provides short-term rental assistance and supportive services to help people quickly exit homelessness and stabilize in permanent housing.
Recipient	An applicant that signs a grant agreement with HUD.
Subrecipient	A nonprofit, state, or local government entity that receives a subgrant from a recipient to carry out a project.
Transitional Housing	Temporary housing designed to facilitate movement into permanent housing, with leases or occupancy agreements of up to 24 months.
Victim Service Provider	A nonprofit focused on services for victims of domestic violence, dating violence, sexual assault, or stalking, including shelters and crisis centers.
U.S. Department of Housing and Urban Development (HUD)	A federal agency responsible for national policies and programs related to housing and urban development, including funding and regulations for homelessness assistance, public housing, and initiatives.
The McKinney-Vento Homeless Assistance Act	A federal law providing funding for homeless programs, including emergency shelters, transitional housing, and supportive services. It defines homelessness and requires schools to ensure education access for homeless children and youth.
Lobbying	Activities aimed at influencing government decisions or legislation. HUD prohibits the use of federal funds for lobbying efforts related to grant applications or funding decisions.
Monitoring	HUD's process of reviewing grant recipients and subrecipients to ensure compliance with funding regulations, program requirements, and performance benchmarks.

Violence Against Women Act (VAWA)	A federal law that provides protections for survivors of domestic violence, dating violence, sexual assault, and stalking, including housing protections for victims in HUD-assisted programs.
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MANUAL STRUCTURE

This manual is organized into three parts to clearly distinguish requirements that apply across all U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) and Illinois Department of Human Services (IDHS) funded activities from those that are program-specific within the St. Clair County Illinois 508 Continuum of Care (SCC CoC).

Part I: General Requirements for Programs

This section establishes system-wide standards, policies, and procedures that apply to all programs funded through the U.S. Department of Housing and Urban Development (HUD) Continuum of Care and programs funded through the Illinois Department of Human Services (IDHS), unless otherwise noted. It includes system-wide standards related to coordinated entry, participant rights and responsibilities, fair housing, nondiscrimination, confidentiality, grievance and appeal procedures, and other overarching compliance standards applicable to both programs. It also reflects the SCC CoC's commitment to housing-focused, low-barrier service delivery approaches.

Part II: Continuum of Care (CoC) Program-Specific Requirements

This section outlines policies and procedures unique to the U.S. Department of Housing and Urban Development (HUD) Continuum of Care Program, in accordance with 24 CFR Part 578. It includes but is not limited to eligibility criteria, prioritization standards, housing and leasing requirements, rental and supportive service assistance, utility allowances, habitability standards, initial certifications and recertifications, and termination of assistance specific to CoC-funded program components.

Part III: Illinois Department of Human Services (IDHS) Program-Specific Requirements

This section establishes standards and guidance for programs funded through the Illinois Department of Human Services (IDHS), including Emergency Solutions Grant (ESG), Homelessness Prevention, and Shelter Diversion activities. These programs are administered by the State of Illinois in accordance with IDHS program guidance, grant agreements, and applicable federal requirements as incorporated through State-administered programs. This section outlines requirements related to eligible activities, participant eligibility, financial assistance, and service delivery, and establishes expectations for coordination with the Continuum of Care (CoC) system, including alignment with Coordinated Entry where applicable.

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PART I

GENERAL WRITTEN STANDARDS

SECTION 1: INTRODUCTION

1.1 Purpose and Authority

The U.S. Department of Housing and Urban Development (HUD) through the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) and Continuum of Care (CoC) Program Interim Rule, requires each Continuum of Care to establish and consistently follow written standards for providing CoC Program assistance.

The McKinney-Vento Homeless Assistance Act, As Amended by Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 and codified at 24 CFR Part 578), establishes the federal regulatory framework for homeless assistance programs.

Within the State of Illinois, ESG and other homelessness assistance programs are administered by the Illinois Department of Human Services (IDHS) in accordance with applicable State program guidance and federal requirements as incorporated through State-administered programs.

In accordance with these requirements, the St. Clair County, Illinois Continuum of Care (SCC CoC) has developed these Written Standards to establish system-wide expectations for programs funded through the CoC Program and programs administered through IDHS, and to support the community's efforts to prevent and end homelessness, promote housing stability, and support individuals and families in achieving long-term self-sufficiency.

1.2 Scope And Limitations

These Written Standards establish minimum requirements and expectations applicable to all programs operating within the SCC CoC, including CoC-funded projects and programs administered through IDHS, unless otherwise specified. These standards are intended to promote consistency, transparency, and compliance with applicable federal, state, and local requirements across the homelessness response system.

These Written Standards are not intended to replace program-specific regulations, grant agreements, Coordinated Entry policies and procedures, HMIS policies and procedures, or individual agency policies, and do not address the following:

- *Eligible costs and activities within federal and state funding sources*
- *Grant Close-Out procedures*
- *Performance Evaluation and system performance measures*
- *Homeless Management Information System (HMIS) participation requirements*
- *Homeless Action Council (HAC) guidelines*
- *Coordinated Entry policies and procedures*

For detailed information on these topics, please refer to the applicable funding source documentation, grant close-out instructions, or additional resources identified in the appendix corresponding to each topic, as applicable.

SECTION 2: STANDARDS APPLICABLE TO ALL PROJECTS

2.1 Applicability

These standards apply to all programs funded through and operating within the St. Clair County Continuum of Care (SCC CoC), including CoC-funded projects and programs administered through the Illinois Department of Human Services (IDHS), unless otherwise specified.

Covered projects types may include but are not limited to Emergency Shelter (ES), Transitional Housing (TH), Rapid Re-housing (RRH), and Permanent Housing (PSH), as applicable to the funding source.

All projects should adhere to the standards outlined in this document. Where there are some variations in applicability by project type, those variations will be noted in the project type-specific sections.

2.2 Relationship to Other Requirements

Although the following standards apply to all SCC COC homeless projects, these standards are not exhaustive in terms of outlining all federal or state homeless program funding requirements. Organizations operating HUD funded homeless projects must ensure they read, understand, and comply with all applicable statutes, regulations, funding agreements, and guidance, including those issued by HUD and other applicable authorities.

2.3 Compliance and Implementation Timeline

All SCC CoC and IDHS funded homeless programs are required to comply with these standards and must update all relevant organizational policies, procedures and program documents as necessary to reflect compliance within six (6) months of the release of the standards.

Failure to comply with the requirements set forth in these Written Standards may result in corrective action, as described in later sections of this document.

2.4 Use of Funds Within the CoC Geographic Area

All projects are expected to utilize their resources to serve eligible households within St. Clair County, consistent with the geographic boundaries of SCC COC. Use of program funds outside of the SCC CoC geographic area may be permitted when necessary to ensure participant safety or housing stability, including but not limited to situations involving domestic violence or other extenuating circumstances. Requests to utilize funds outside of the geographic area must be reviewed and approved in accordance with local governance processes, including consultation with the Collaborative Applicant and, where applicable, the Homeless Action Council (HAC) Board of Directors. Any material changes to project service area or program design must be submitted for review and approval in accordance with SCC CoC governance policies. For additional information, refer to the Homeless Action Council of St. Clair County Bylaws ([Appendix G](#))

2.5 Regulatory and Funding Source Compliance

Homeless projects funded through HUD's Continuum of Care Program (CoC) must ensure they are operating in compliance with the 24 CFR Part 578, and all applicable HUD notices, guidance, and funding agreements. Projects funded through Illinois Department of Human Services (IDHS) must ensure they are in compliance with all relevant state regulations, policies, and contractual

requirements associated with those funding sources. At the same time, all projects operating within the SCC CoC, regardless of funding source, are expected to align with the system-wide standards established in this document to promote consistency, coordination, and equitable service delivery across the local homelessness response system. Recipients and subrecipients are responsible for identifying, accessing, and adhering to all applicable federal and state requirements governing their funded activities while implementing these Written Standards to the greatest extent practicable. Guidance and regulatory information related to IDHS-funded programs is available through official IDHS resources and publications located at [IDHS: Search](#).

2.6 Public Safety and Community Coordination

The St. Clair County Continuum of Care (SCC CoC) recognizes that promoting public safety and minimizing trauma for individuals experiencing homelessness and the broader community are essential components of an effective homelessness response system. The SCC CoC will collaborate, as appropriate, with local government, public health entities, and law enforcement partners to support a coordinated community-wide approach to addressing homelessness. These efforts are intended to promote safe and accessible public spaces, reduce unsheltered homelessness, and ensure that individuals experiencing homelessness are connected to appropriate housing and supportive services.

SECTION 3: NON-DISCRIMINATION REQUIREMENTS

3.1 Anti-Discrimination Policy

All recipients and subrecipients of HUD and Illinois Department of Human Services (IDHS) funded programs, in St Clair County shall comply with all applicable non-discrimination laws and regulations, including those enforced by the U.S. Department of Housing and Urban Development (HUD) or any other applicable funding source, and shall ensure that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity funded in whole or in part by HUD and/or any other applicable funding source.

3.2 Definition of ‘Family’

The federal definition of ‘family’ set forth by [24 CFR 5.403](#) for purposes of receiving assistance from certain programs is as follows:

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

There may be exceptions for programs funded through special initiatives under the annual CoC Competition. Some of these initiatives may have specific eligibility requirements or definitions that slightly differ from the standard CoC family definition.

3.3 Protections for Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

The Violence Against Women Act (VAWA) Final Rule ([24 CFR Part 5 Subpart L](#)) establishes essential protections across HUD’s covered programs. It ensures that survivors are not denied

assistance as applicants, nor evicted or have their assistance terminated as tenants, due to their status as victims of domestic violence, dating violence, sexual assault, or stalking.

Efforts must be made to safeguard the rights, privacy, and safety of survivors of domestic violence, dating violence, sexual assault, or stalking (hereafter referred to as “domestic violence survivors”). To protect survivors in such situations, the final rule prohibits any denial, termination, or eviction that is directly related to the applicant or tenant being a victim of domestic violence, dating violence, sexual assault, or stalking, provided the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy.

All St. Clair County Continuum of Care (SCC CoC) HUD-funded and IDHS-funded programs, where applicable projects must maintain written policies and procedures that comply with the Violence Against Women Act (VAWA), including provisions for emergency transfers in accordance with 24 CFR Part 5 Subpart L. The SCC CoC maintains an Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking located in [Appendix I](#); all applicable agencies shall comply with the requirements of the Emergency Transfer Plan and implement procedures for responding to emergency transfer requests from eligible participants.

Leases, subleases, or occupancy agreements for tenants receiving assistance under the CoC or other applicable IDHS-administered housing programs must include VAWA addendums that clearly outline the applicable statutory protections outlined in 24 CFR Part 5 Subpart L.

SECTION 4: PROGRAM OPERATIONS AND COMPONENTS

4.1 Staffing and Program Capacity

HUD COC and IDHS funded programs must be adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants. Staffing levels and qualifications must be sufficient to meet the intensity of services required by the project design and participant needs. Each agency of CoC and/or IDHS- funded programs must have a policy outlining staff roles, responsibilities, and expectations. These policies must:

- Clearly define staff roles and responsibilities to prevent duplication of services and ensure accountability.
- Establish minimum qualifications and competencies for each role to promote effective service delivery.
- Provide training and professional development opportunities to enhance staff skills and knowledge.
- Ensure adequate supervision and support for program staff to maintain service quality and compliance with CoC standards.

4.2 Continuum of Care Planning Activities

The SCC CoC conducts ongoing planning activities to support a coordinated, effective, and data-informed homeless response system. Continuum of Care planning activities are intended to improve system performance, identify housing and service gaps, increase coordination among providers, and support the community's efforts to prevent and end homelessness.

Planning activities may include, but are not limited to:

- Developing and maintaining a community-wide planning process involving the coordination of housing providers, service providers, local governments, and other stakeholders to identify strategies and resources necessary to prevent and end homelessness;
- Determining and evaluating the geographic area served by the Continuum of Care;
- Developing, implementing, and improving the Continuum of Care system;
- Evaluating the performance and outcomes of CoC-funded and ESG-funded projects operating within the Continuum of Care;
- Conducting community planning and data collection activities, including the Point-in-Time (PIT) Count, Housing Inventory Count (HIC), system performance measurement, and other data collection activities required by HUD;
- Preparing and submitting Continuum of Care funding applications and related documentation to HUD;
- Monitoring recipients and subrecipients and promoting compliance with applicable federal, state, local, and Continuum of Care requirements;
- Identifying service gaps, housing needs, and system-level priorities;
- Supporting HMIS administration, data quality improvement, reporting, and analysis activities;
- Supporting Coordinated Entry planning, evaluation, and continuous improvement activities; and
- Developing and periodically updating policies, procedures, and Written Standards necessary to support implementation of the Continuum of Care Program and operation of the local homeless response system.

Planning activities may be carried out through the Collaborative Applicant, Homeless Action Council (HAC) Board of Directors, CoC Committees, HMIS Lead Agency, Coordinated Entry partners, and other entities designated through the SCC CoC Written Standards and HAC Bylaws.

CoC Planning Grant Administration

In accordance with HUD requirements, Continuum of Care Planning Grant funds may only be awarded to the Continuum of Care's designated Collaborative Applicant or Unified Funding Agency (UFA). The St. Clair County Intergovernmental Grants Department (IGD) serves as the Collaborative Applicant for the SCC CoC and is therefore eligible to apply for, receive, and administer Continuum of Care Planning Grant funds on behalf of the Continuum of Care. Planning activities funded through the CoC Planning Grant shall be carried out in accordance with HUD requirements, applicable grant agreements, and local CoC governance documents.

4.3 Participation In Coordinated Entry

All HUD funded projects operating within the SCC COC must participate in the SCC COC Coordinated Entry process and follow the Coordinated Entry Policies and Procedures related to creating and maintaining a prioritization list. Programs administered through the Illinois Department of Human Services (IDHS) must coordinate with the SCC CoC Coordinated Entry

system in accordance with applicable program requirements and local Coordinated Entry policies, where applicable. Projects may not establish or operate separate waitlists or prioritization processes outside of the SCC COC Coordinated Entry system. Coordinated entry is a centralized and streamlined system for accessing housing and support services to end homelessness in a community and is required by HUD for all CoCs as stated in [24 CFR 578.7](#) of the CoC Program Interim Rule. SCC CoC has a single designated point of access to coordinated entry at the St. Clair County Housing Resource Center (HRC), 19 Public Square, Suite 200, Belleville, IL 62220.

Coordinated Entry / HRC staff use the CoC's Coordinated Entry Assessment Tool, specifically the Matching for Appropriate Placement (MAP) to determine the severity of service needs for homeless individuals. Assessment results are used to inform system-wide prioritization in accordance with the SCC COC Coordinated Entry Policies and Procedures. The goal of this process is to ensure that individuals and families receive the level of support necessary to achieve housing stability while promoting independence and efficient use of system resources.

If available, information about a homeless person's use of local crisis services can supplement the assessment, providing a more comprehensive understanding of their severity of need. Individuals in need of assistance can call 618-825-3330, 24 hours a day, to access emergency services. The only exceptions are for persons fleeing domestic violence, who may contact the Violence Prevention Center's 24-hour crisis hotline at 618-235-0892. In addition, the Violence Prevention Center of Southwestern Il will follow the same prioritization framework, with survivor-centered approach focused solely on survivors of domestic violence.

SCC COC HUD funded projects must abide by all approved SCC COC Coordinated Entry policies and procedures. Please visit the St. Clair County webpage to locate the IL-508 Coordinated Entry System Policy and Procedures for the Saint Clair County Continuum of Care. [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#)

4.4 Participant Engagement Requirements (CoC Programs Only)

For Continuum of Care (CoC)-funded programs, service providers must ensure that program participants are engaged in at least 20 hours per week of combined employment, services, or program-related activities. Engagement may include, but is not limited to, case management, counseling, treatment services, volunteer activities, work therapy, education, job training, and community-building activities. Employment may count toward the required 20 hours. This requirement does not apply to Permanent Supportive Housing (PSH) programs, program participants age 62 or older, or to individuals with disabilities as defined under [24 CFR 8.3](#) or developmental disabilities as defined under [24 CFR 578.3](#). or programs in which participation in supportive services may not be required, recipients and subrecipients must make reasonable efforts to engage program participants in services and other program-related activities that support housing stability and participant goals. This requirement establishes a program standard for engagement and does not, on its own, constitute a separate reporting or documentation requirement beyond existing program requirements.

SECTION 5: DISPLACEMENT AND RELOCATION

As outlined in 24 CFR 578.83:

5.1 Minimizing Displacement

The organization shall take all reasonable steps to minimize the displacement of individuals, families, businesses, nonprofit organizations, and farms as a result of projects undertaken. Efforts to minimize displacement may include, but are not limited to:

- Assessing project alternatives to reduce displacement impact.
- Implementing strategies to preserve existing affordable housing.
- Engaging affected communities early in the planning process.
- Coordinating with local agencies to explore mitigation efforts such as in-place rehabilitation and phased development to allow continued occupancy.

5.2 Temporary Relocation

When temporary relocation is necessary, the organization shall ensure that displaced individuals and families:

- Receive adequate notice and counseling regarding their rights and available assistance.
- Are provided suitable temporary housing that meets safety and livability standards and is located in reasonable proximity to their original residence.
- Do not incur significant out-of-pocket expenses related to the relocation.
- Have the opportunity to return to their original housing, when feasible, after project completion

5.3 Relocation Assistance for Displaced Person

Individuals, families, businesses, nonprofit organizations, and farms that are permanently displaced shall be provided relocation assistance in accordance with applicable federal, state, and local laws. Relocation assistance shall include:

- Advisory services: Counseling on available housing options, financial assistance programs, and other relevant resources.
- Financial assistance: Reimbursement for moving expenses, security deposits, and, where applicable, replacement housing payments.
- Housing placement assistance: Efforts to locate comparable replacement housing within a reasonable timeframe.
- Support services: Additional aid, as necessary, to ensure successful transition into new housing or business locations.

PART II

CONTINUUM OF CARE (COC)

PROGRAM SPECIFIC STANDARDS

SECTION 1: OVERVIEW

This section sets forth requirements applicable only to programs funded under the HUD Continuum of Care (CoC) Program, in accordance with 24 CFR Part 578. These standards supplement the General Written Standards in Part I and apply to CoC-funded projects as specified. Where CoC-specific requirements differ from general standards, the requirements in this section govern.

SECTION 2: MATCH REQUIREMENTS

All CoC funded program projects are required to provide matching funds set forth by 24 CFR 578.73. The minimum match requirement is 25% of the total award, excluding any amounts designated for leasing. Leasing funds do not require a match; however, all other funds awarded for a leasing project are subject to the 25% match requirement. Match provided must be verifiable, properly valued, and necessary to the operation of the CoC-funded project.

- Match can be provided in the form of cash and/or in-kind services.
- All matching funds, whether cash or in-kind, must be used for eligible and allowable CoC Program costs as outlined in 24 CFR Part 578 Subpart D -- Program Components and Eligible Costs for the specific project type.
- A match commitment must be documented on the official letterhead of the agency providing the match.
- In-kind services require a Memorandum of Understanding (MOU) on agency letterhead, to be completed before the start of the operating year. The MOU must clearly state that the services will be provided during the operating year.
- Only services explicitly listed in the MOU will be considered eligible match.

Recipients and/ or subrecipients are required to submit match documentation, including amounts, with their monthly invoice to their designated fiscal personnel. The submitted match must align with the match commitment letter, and if in-kind services are used, they must correspond to the services defined in the Memorandum of Understanding (MOU). Each monthly invoice must specify both the match for the month and the cumulative match-to-date.

If a recipient wishes to modify a committed match source or amount, the recipient must ensure that the revised match remains compliant with 24 CFR 578.73 and all applicable HUD requirements. Where HUD approval is required, the recipient must submit the appropriate request to HUD prior to implementing the change. The Collaborative Applicant must be notified in writing of any approved or proposed changes to committed match. Subrecipients seeking to modify a committed match source or amount must submit the request to their recipient agency for review and

coordination with HUD, as applicable. Any modification is subject to approval prior to implementation and must remain compliant with 24 CFR 578.73.

This request must include:

- The reason for the change
- Details of the new match source
- The funding amount

2.1 Cash Match

Cash match occurs when a recipient and/or subrecipient uses non-CoC Program grant funds to cover eligible costs, including staff time for eligible activities.

Required Documentation

A written commitment on the committing agency's letterhead, signed and dated by an authorized representative, must include:

- Amount of cash committed to the project
- Date the cash will be available
- Grant and fiscal year to which the cash match will be applied
- Allowable activities the cash match will fund
- Tracking records following general accounting principles (e.g., general ledger entries)
- Source documentation proving that the cash match was spent on eligible activities

2.2 In-Kind Match

In-kind match occurs when non-cash contributions of goods, services, or property that support eligible program activities and meet the CoC match requirement.

Required Documentation

For in-kind contributions of property, equipment, or goods, the following documentation is required:

- *A commitment letter from the donating entity*
- *Tracking records demonstrating that the donated items were received and utilized for the project or its participants during the grant term*

Please refer to CoC Match - Overview - HUD Exchange for more guidance.

SECTION 3: HOUSING SEARCH AND LANDLORD ENGAGEMENT

To support rapid and successful placement into permanent housing, all programs must provide or coordinate housing search and landlord engagement services. These services are encouraged to reflect low-barrier and client-centered principles, emphasizing participant choice, reducing barriers, and supporting housing stability. Participation in housing search activities is not contingent upon engagement in services beyond those necessary for housing placement.

3.1 Housing Search

Upon project enrollment, participant housing preferences must be obtained and housing search services initiated without delay. Participants are encouraged to take an active role in their search, and programs must support empowerment and choice throughout the process.

Programs must:

- Provide housing referrals or allow participants to search independently if they choose.
- Remain involved in landlord communications even if the participant initiates contact.
- Provide participants with education and scripts to aid in approaching landlords.
- Aim to complete a minimum of three housing viewings within the first 30 days of enrollment, to the extent practicable given market conditions and participant preferences.

3.2 Landlord Recruitment

Programs must maintain professional and clear communication with landlords. At lease-up, staff must:

- Provide the landlord with staff contact information and communication protocols;
- Clarify that agency staff are not on-call 24 hours and that landlords should first contact the tenant directly for non-emergency issues;
- Direct landlords to call 911 in the case of police or medical emergencies.
- Non-emergency contacts from landlords should be acknowledged by program staff within 1–3 business days.

SECTION 4: OCCUPANCY, RENT AND UTILITY COMPLIANCE

This section applies to CoC-funded projects that include leasing and/or long-term rental assistance, including Permanent Supportive Housing Rapid, Re-Housing (RRH), Transitional Housing (TH), and other applicable project types, unless otherwise specified.

4.1 Occupancy Agreements and Leases

Recipients and/or subrecipients must ensure that all program participants residing in housing have signed occupancy agreements, leases, and/ or subleases in place as applicable to the project type and housing model. Agreements must comply with applicable state and local landlord-tenant laws and must not include provisions inconsistent with CoC or HUD requirements.

Program Type	Required Agreement	Minimum Initial Term	Renewal Requirement
Permanent Supportive Housing (PSH)	Rental Assistance: Lease between the participant and property owner. Leasing: Sublease between the participant and recipient/subrecipient.	1 year	Automatically renewable upon expiration (month to month)

Program Type	Required Agreement	Minimum Initial Term	Renewal Requirement
Rapid Re-Housing (RRH)	Required Agreement: Lease between the participant and property owner.	1 year	Automatically renewable upon expiration.
Transitional Housing (TH)	Rental Assistance: Lease between the participant and property owner. Leasing: Sublease or occupancy agreement between the participant and recipient/subrecipient.	1 month	Automatically renewable upon expiration (maximum term of 24 months).

For additional information regarding lease structure requirements under the Continuum of Care Program, including distinctions between leasing and rental assistance projects, recipients and subrecipients should refer to the [CoC Leasing and Rental Assistance Requirements - Lease Structure - HUD Exchange](#).

4.2 Calculation of Occupancy Charges

Occupancy charges are not required for program participants. Participants may not be denied program entry or terminated solely for inability to pay occupancy charges. However, if they are imposed, they must not exceed the highest of the following:

- 30% of the family's monthly adjusted income, considering factors such as:
 - Family size
 - Age of family members
 - Medical expenses
 - Child-care expenses
- 10% of the family's monthly income
- The portion of welfare assistance designated by a public agency for housing costs, adjusted in accordance with actual housing expenses.

4.3 Income Determination

Income must be calculated in accordance [4 CFR 5.609](#) (Annual Income) and [24 CFR 5.611](#) (Adjusted Income), as applicable, and consistent with HUD guidance regarding Continuum of Care Program rent calculations. Initial income examinations must be completed at program enrollment and reviewed during annual recertification. Additional reviews must occur when a participant reports a change in household income, household composition, or other circumstances affecting rent calculations, utility allowances, rental assistance amounts, or program eligibility.

To determine and verify household income and eligibility, recipients and subrecipients shall collect and maintain appropriate supporting documentation in the participant file. Documentation may include, but is not limited to:

- Government-issued identification or other proof of identity for adult household members;
- Social Security cards or verification of Social Security numbers, when applicable;

- Two (2) months / Four (4) to eight (8) consecutive pay stubs, when employment income is reported;
- Benefit verification or award letters, including Social Security, SSI, SSDI, TANF, unemployment compensation, pensions, veterans benefits, or other public benefits;
- Federal income tax returns or tax transcripts, when applicable;
- IRS Form 4506-T or successor form, when required by the recipient or subrecipient;
- Child support verification, alimony documentation, or other court-ordered payment records;
- Bank statements or other documentation necessary to verify income and assets;
- Zero Income Certifications or Affidavits for adult household members reporting no income;
- Documentation supporting how basic living expenses are being met when a household reports zero income;
- School enrollment or student status documentation, when applicable;
- Signed releases of information and consent forms necessary to verify household information; and
- Any additional documentation necessary to verify household income, composition, eligibility, or program compliance.

Third-party verification shall be obtained whenever possible. When third-party verification cannot be obtained, the recipient or subrecipient must document efforts made to obtain such verification and may utilize participant-provided documentation or self-certification when permitted by applicable program requirements. All income determinations and supporting documentation must be maintained in the participant file.

4.4 Rent Calculations, Fair Market Rent, and Rent Reasonableness

Recipients and subrecipients must calculate and document participant rent contributions, contract rent, and gross rent prior to lease execution, provision of rental assistance, annual recertification, interim review, lease renewal involving a rent increase, unit transfer, or any other change affecting housing costs. Rent calculations shall be completed in accordance with applicable HUD regulations and Continuum of Care Program requirements.

Recipients and subrecipients must calculate participant rent contributions in accordance with section 3(a)(1) of the U.S. Housing Act of 1937 ([42 U.S.C. 1437a\(a\)\(1\)](#)). Income calculations must be completed in accordance with [24 CFR 5.609 -- Annual income](#) and [24 CFR 5.611 -- Adjusted income](#).

- For Permanent Supportive Housing (PSH) and Transitional Housing (TH) projects operating under a rental assistance component, participant rent contributions shall be calculated in accordance with [24 CFR 578.77](#).

- For projects operating under a leasing component, occupancy charges are not required; however, if assessed, occupancy charges may not exceed the limits established by [24 CFR 578.49](#)
- Rapid Re-Housing (RRH) projects shall establish participant rent contributions in accordance with [HUD Notice CPD-17-11](#), other applicable HUD guidance, and these Written Standards.

Recipients and subrecipients must establish and document rent reasonableness prior to initial lease execution, prior to approving rental assistance, prior to approving a rent increase, and whenever a participant moves to a new unit. Rent reasonableness determinations shall compare the assisted unit to similar unassisted units in the same or comparable market area and consider factors including:

- Location
- Unit size and number of bedrooms
- Unit type
- Age of the property
- Quality and condition of the unit
- Accessibility features
- Amenities provided
- Utilities included in the rent
- Maintenance responsibilities
- Other factors affecting market rent

Where applicable, recipients and subrecipients must also verify compliance with [HUD Fair Market Rent \(FMR\)](#) requirements. Documentation demonstrating compliance with rent reasonableness and FMR requirements must be maintained in the participant file before assistance is provided or continued.

Documentation supporting rent calculations shall include, at a minimum:

- Supporting income documentation used to calculate rent contributions;
- Documentation supporting any deductions or allowances used in the calculation;
- Completed rent calculation worksheets;
- Documentation supporting rent reasonableness determinations;
- Documentation supporting Fair Market Rent compliance,
- Documentation of any special circumstances, adjustments, or calculation revisions

For additional information regarding rent calculations, rent contributions, [Fair Market Rent](#) requirements, and rent reasonableness determinations, recipients and subrecipients should refer to [CoC Rent Calculation - Overview - HUD Exchange](#)

4.5 Recertification

All CoC program participants must undergo a recertification process at least annually, in accordance with 24 CFR 578.37 . Participants must be recertified at least once every 12 months from the date of initial enrollment or last recertification. Recertification must be documented and maintained in the participant file.

During recertification, the following criteria must be reviewed and documented:

- **Income Eligibility:**
Verification and documentation of current household income in accordance with section [4.3 Income Determination](#), including collection of supporting documentation necessary to verify all sources of household income.
- **Household Composition**
Verification and documentation of all household members and any changes in household composition since the previous certification.
- **Housing Stability:**
Assessment of the participant's ongoing need for assistance, housing stability, and supportive service needs.
- **Compliance with Program Requirements:**
Review of participant engagement in required services (if applicable), lease compliance, occupancy requirements and other program expectations.
- **Rent and Utility Calculations**
Recalculation of participant rent contributions, utility allowances, utility reimbursements, gross rent, and rental assistance amounts.
- **Rent Reasonableness and Fair Market Rent Compliance**
Verification that the assisted unit continues to meet applicable rent reasonableness and Fair Market Rent requirements.
- **Property Taxes and Insurance**
Verification and documentation that property taxes and required property insurance associated with the assisted unit remain current and in compliance with applicable program requirements. Documentation supporting verification shall be maintained in the participant file, property file, property file, landlord file, or other program file maintained by the recipient or subrecipient.

To determine continued eligibility and calculate participant rent obligations, recipients and subrecipients shall collect and maintain supporting documentation, which may include, but is not limited to:

- Two (2) months/ Four (4) to eight (8) consecutive pay stubs;
- Benefit statements and award letters;
- Federal tax returns or tax transcripts, when applicable;
- IRS Form 4506-T
- Bank statements;
- Child support, pension, unemployment, or other income verification;
- Zero Income Certifications or Affidavits;

- Student status or school enrollment documentation, when applicable;
- Other documentation necessary to verify household income, composition, eligibility, or compliance with program requirements.

Any resulting changes to participant rent contributions, utility allowances, utility reimbursements, gross rent calculations, or rental assistance amounts identified through the recertification process shall be implemented immediately upon completion of the recertification and verification of all required documentation. All recertification documentation, calculations, determinations, and effective dates must be maintained in the participant file.

4.6 Interim Recertifications and Adjustments

In addition to the annual recertification process, recipients and subrecipients shall conduct an interim review whenever a participant reports a change, or when a change is otherwise identified, that may affect household income, household composition, participant rent contribution, utility allowance, utility reimbursement, rental assistance amount, or program eligibility. Interim reviews may also be required at the request of the Collaborative Applicant, IGD Recipient, or funding entity.

Examples of circumstances requiring an interim review include, but are not limited to:

- Loss of employment or reduction in household income;
- New employment or an increase in household income;
- Addition of a household member;
- Removal of a household member;
- Transfer to a unit with a different bedroom size;
- Changes in utility responsibility;
- Changes in contract rent;
- A change in landlord or property ownership;
- Execution of a new lease or lease amendment; or
- Other changes that may affect housing costs, rental assistance calculations, or program compliance.

Recipients and subrecipients shall obtain and maintain documentation necessary to verify the reported change, including updated income documentation, household composition records, lease documents, utility information, or other supporting documentation, as applicable.

Any resulting changes to participant rent contributions, utility allowances, rent calculations, or rental assistance amounts shall be implemented upon completion of the interim review and verification of the reported change. Participants shall be provided with a minimum of thirty (30) days' written notice prior to the effective date of any change to their rent contribution, utility allowance, or other participant-paid housing costs. All notices and implementation of such changes shall be conducted in accordance with applicable federal requirements, Illinois law, tenant rights, lease provisions, and program requirements. Delays in implementing revised calculations are not permitted unless specifically authorized by the Collaborative Applicant, IGD, or required by HUD regulations.

All interim review documentation, calculations, determinations, and effective dates must be maintained in the participant file.

SECTION 5: ESTABLISHING REASONABLE MONTHLY UTILITY CONSUMPTION

Under HUD CPD Notice 17-11, guidance is provided on the utility allowance and reimbursement for projects funded under the Continuum of Care (CoC) Program and Emergency Solutions Grants (ESG) Program. Recipients and/or subrecipients must ensure that reasonable monthly utility consumption amounts are determined for program participants. The calculation of these amounts must adhere to the local Public Housing Authority (PHA) schedule of utility allowances.

5.1 Utility Allowance

- Recipients and subrecipients must use the local Public Housing Authority (PHA) utility allowance schedule, located in [Appendix G](#), to determine reasonable monthly utility consumption for program participants.
- The utility allowance is based on unit size and the utilities the participant is responsible for paying.
- If a program participant receives rental assistance and is required to pay utilities separately, the recipient or subrecipient must deduct the appropriate utility allowance from the participant's total rent responsibility.

5.2 Utility Reimbursement

- If a program participant's rent contribution (based on 30% of adjusted monthly income) is less than the utility allowance, the difference must be reimbursed to the participant to cover utility costs.
- The recipient or subrecipient may reimburse the client directly or provide the utility reimbursement directly to the utility provider on their behalf.

SECTION 6: HOUSING INSPECTIONS

6.1 Inspection Standards

Housing leased with Continuum of Care program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the applicable standards under 24 CFR 5.703 (Housing Quality Standards), or any successor inspection standards adopted by HUD, including the National Standards for the Physical Inspection of Real Estate (NSPIRE), when applicable.

For tenant-based rental assistance, individual unit leases, and sponsor-based rental assistance when not all units in a building are or will be assisted, the standards apply only to the unit itself, the pathways for entering and exiting the unit to the public way, and the building's shared areas.

Inspection standards shall be applied in accordance with HUD requirements in effect at the time of inspection.

6.2 Inspection Requirements

- Initial Inspection:
Before any assistance is provided on behalf of a program participant, the recipient or subrecipient must physically inspect each unit to ensure compliance with applicable inspection standards as described in Section 5.1. Assistance will not be provided for units that fail to meet these standards unless the owner corrects all deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected.
- Annual Inspections:
Recipients or subrecipients must inspect all units at least annually during the grant period to ensure continued compliance with HUD-required inspection standards in effect at the time of inspection.
- Exemptions:
The requirements in 24 CFR 5.705 through 24 CFR 5.713 do not apply, except otherwise required by HUD.

6.3 Suitable Dwelling

- The dwelling unit must have at least one bedroom or living/sleeping room for every two persons and must be adequate in size and configuration to ensure the health, safety, and privacy of all household members.
- Children of opposite sex, except for very young children, may not be required to occupy the same bedroom or living/sleeping room.
- If household composition changes during the term of assistance, recipients and subrecipients may relocate the household to a more appropriately sized unit, provided the relocation is conducted in a manner that minimizes disruption to housing stability and ensuring continued access to necessary supportive services.

Each agency of CoC-funded programs must have a policy outlining their adherence to above regulations.

SECTION 7: LEAD BASED PAINT POLICY

All CoC funded programs must comply with federal regulations regarding lead-based paint hazards. All recipients and subrecipients must adhere to the following regulations to protect program participants, particularly households with children under the age of six and pregnant individuals, from exposure to lead-based paint hazards.

CoC-funded programs must comply with the following federal regulations, as applicable based on the type of assistance provided and the age of the housing:

- The Lead Disclosure Rule (24 CFR Part 35 Subpart A)
- The Lead-Safe Housing Rule (CFR Part 35 Subpart B)
- The Lead Renovation, Repair, and Painting (RRP) Rule (40 CFR Part 745 Subpart E)

7.1 Applicability of Lead-Based Paint Requirements

Lead-based paint requirements under 24 CFR Part 35 apply differently depending on the type of assistance provided, as outlined below.

Type of Assistance	Applicable 24 CFR Part 35 Subparts
Tenant-Based Rental Assistance	Subparts A, B, M, and R
Project-Based or Sponsor-Based Rental Assistance	Subparts A, B, H, and R
Acquisition, Leasing, Services, or Operating Costs	May vary based on activity and level of funding

Each agency of CoC-funded programs must have a policy outlining their adherence to above regulations.

SECTION 8: ENVIRONMENTAL REVIEW

The SCC CoC recognizes that many CoC-funded activities involve little to no physical intervention and may qualify as exempt or categorically excluded activities under HUD environmental review requirements. Nevertheless, recipients and subrecipients must ensure the appropriate environmental review determination is made and documented prior to committing or expending HUD funds. Recipients and subrecipients must correctly identify the level of environmental review required for each CoC-funded activity and ensure that all applicable environmental clearance requirements have been satisfied.

If required, recipients and subrecipients of HUD funding must conduct environmental reviews to ensure compliance with federal environmental laws, thereby protecting both the environment and community health. CoC projects must adhere to HUD's procedures and standards, assessing environmental impacts and complying with NEPA and other relevant laws as outlined in 24 CFR Part 58. This regulation provides guidelines for entities assuming HUD's environmental responsibilities, detailing how to conduct environmental reviews for HUD-assisted projects, including requirements related to project classification, compliance documentation, and approval thresholds. More information and resources can be found at: CoC Program Environmental Review Resources - HUD Exchange.

The St. Clair County Intergovernmental Grants Department, as the Continuum of Care lead, maintains a stand-alone Environmental Review Policy that establishes detailed procedures, roles, responsibilities, and timelines for completing environmental reviews. This policy can be located at St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development.

SECTION 9: HOMELESS PROGRAM ELIGIBILITY

Persons served by SCC COC homeless projects must be defined as homeless according to HUD's Homeless definition set forth 24 CFR 578.3.

The Homeless definition is comprised of four categories:

- Category 1:** Literal homelessness is further defined as homeless individuals/families who lack a fixed, regular, and adequate nighttime residence, meaning:
- i Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation, such a place not meant for human habitation
 - ii Living in emergency shelter or transitional housing designated to provide temporary living arrangements (including hotel/motel stays paid for by charitable or government programs)
 - iii Exiting an institution where the individual resided for less than 90 days and where the individual entered the institution immediately from emergency shelter (including hotel/motel stays paid for by charitable or government programs) or an unsheltered location
- Category 2:** Individuals/families who will imminently (within 14 days) lose their primary night-time residence with no subsequent residence AND no resources or support networks
- Category 3:** Unaccompanied youth or families with children/youth who meet the homeless definition under another federal statute and 3 additional criteria (HUD has not granted any SCC COC homeless projects permission to serve households defined as homeless under category 3)
- Category 4:** Individuals/families fleeing or attempting to flee domestic violence with no subsequent residence AND no resources or support networks

Not all SCC COC homeless projects are permitted to serve people defined as homeless under all four categories of the Homeless definition.

9.1 Program Eligibility Reference Chart

The Program Eligibility Chart is intended as a quick reference. For further explanations on the program eligibility description, population, specializations, time frame, etc., see the program standards in this document.

Program Type	Category 1: Literally Homeless	Category 2: Imminent Risk of Literal Homelessness	Category 3: Unaccompanied Youth or Families with Children/Youth	Category 4: Fleeing/Attempting to Flee Domestic Violence (DV)
Transitional Housing	✓	✓	Not HUD-Approved	✓
Rapid Re-housing	✓	Not HUD-Approved	Not HUD-Approved	✓

Program Type	Category 1: Literally Homeless	Category 2: Imminent Risk of Literal Homelessness	Category 3: Unaccompanied Youth or Families with Children/Youth	Category 4: Fleeing/Attempting to Flee Domestic Violence (DV)
Permanent Supportive Housing	✓	Not HUD- Approved	Not HUD- Approved	✓

PSH participants must also meet applicable disability requirements and any project-specific eligibility requirements.

More detailed information and official HUD guidance on the homeless definition and program eligibility can be found at [CoC Program Toolkit - Introduction to the CoC Program - HUD Exchange](#). Eligibility by homeless category is subject to HUD regulations, NOFO requirements, and individual project funding agreements. Category 2 eligibility is generally limited to Homeless Prevention projects and is not permitted in all CoC-funded project types.

SECTION 10: DOCUMENTATION AND RECORDKEEPING REQUIREMENTS

To ensure compliance with all applicable requirements, SCC COC homeless projects must establish and maintain policies and procedures. Internal policies and procedures should outline program design and shall be available to SCC COC Collaborative Applicant upon request. These policies and procedures are essential for making sure that Continuum of Care (CoC) program funds are used appropriately. Additionally, maintaining sufficient records is crucial for enabling HUD to verify that all requirements are being met. Set forth by the Interim Rule ([24 CFR 578.103.](#)), documentation and record keeping include the following:

10.1 Organizational and Program Policies and Procedures

Agencies operating programs within the SCC CoC shall maintain written policies and procedures sufficient to demonstrate compliance with applicable federal, state, local, funding source, and SCC CoC requirements. At a minimum, agencies should maintain policies and procedures addressing the following topics:

- Anti-Discrimination
- Appeals and Grievances
- Conflict of Interest / Code of Conduct
- Coordinated Entry Participation
- Displacement and Relocation
- Drug-Free Workplace
- Education Policy
- Eligibility Determination
- Emergency Transfer Procedures
- Immigration Enforcement
- Income Determination and Verification
- Lead-Based Paint Compliance
- Occupancy, Rent, and Utility Compliance
- Privacy and Confidentiality
- Program Termination
- Record Retention and Recordkeeping
- Staffing and Program Capacity
- Standard Operating Procedures

- Financial Management
- Housing Inspections
- Housing Search and Landlord Engagement
- Transfer Procedures
- Violence Against Women Act (VAWA)

10.2 Participant File Documentation

Recipients and subrecipients must maintain complete and accurate participant files sufficient to document program eligibility, housing assistance, supportive services, compliance with applicable funding requirements, and all determinations made on behalf of the participant. While additional documentation may be required based on program type, funding source, or participant circumstances, participant files should contain the following, as applicable:

- Annual and Interim Recertifications
- Appeals and Grievance Documentation
- Case Management and Supportive Service Documentation
- Disability Verification (if applicable)
- Fair Market Rent (FMR) Documentation
- Financial Assistance Documentation
- Homeless Status Documentation
- Housing Inspection Documentation
- Household Composition Documentation
- Identification Documentation
- Income Verification
- Lead-Based Paint Documentation (if applicable)
- Lease, Sublease, or Occupancy Agreement
- Notices and Correspondence
- Program Eligibility Documentation
- Program Rules and/or Participant Agreement
- Reasonable Accommodation Documentation (if applicable)
- Releases of Information and Consent Forms
- Rent Calculation Documentation
- Rent Reasonableness Documentation
- Service Assessments and Service Plans
- Termination Documentation
- Utility Allowance Documentation
- VAWA Documentation (if applicable)

Please refer to the [Internal Wellness Checklist for the Continuum of Care \(CoC\) Program](#) for more guidance. All agencies must have required documentation in files.

SECTION 11: PRIVACY AND CONFIDENTIALITY

CoC- funded programs must abide by and have a policy outlining the federal confidentiality regulations set forth by [24 CFR 578.103](#).

SECTION 12: TRANSITIONAL HOUSING PROJECTS STANDARDS

The purpose of Transitional Housing (TH) projects is to facilitate the movement of homeless individuals and families to permanent housing as quickly as possible. TH projects should be targeted to persons who have been assessed as not being able to quickly resolve their homelessness

on their own, but who do not have needs great enough to necessitate placement into Permanent Supportive Housing.

12.1 Transitional Housing Eligibility

All TH projects must serve persons who meet category 1 or 4 of HUD's homeless definition set forth by 24 CFR 578.3.

TH projects serving category 2 homeless should remember that to be defined as homeless under category 2 of HUD's homeless definition individuals/families must be imminently losing their housing AND have no subsequent residence identified AND lack resources or supports to obtain other permanent housing.

All of this must be documented as outlined in the Documentation and Recordkeeping Requirements section and must comply with the regulations set forth in the Interim Rule (24 CFR 578.103).

12.2 Transitional Housing Prioritization

TH projects should be targeted to persons who have been assessed as not being able to quickly resolve their homelessness on their own, but who do not have needs great enough to necessitate placement into Permanent Supportive Housing. Coordinated Entry should further screen homeless applicants to identify people with greater vulnerabilities and prioritize those applicants for assistance.

12.3 Low-Barrier and Client-Centered Approach in Transitional Housing

All SCC COC homeless assistance projects must follow a low-barrier and client-centered approach. For TH projects, the following practices and policies must be adopted and implemented at minimum:

- Program Entry
 - Reducing barriers to entry
 - TH projects must minimize any barriers to applicant's entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility and prioritization requirements.
 - TH projects should prioritize for assistance those persons with greater vulnerabilities.
- Program Design
 - Voluntary Supportive Services
 - TH projects must offer supportive services to program participants on a voluntary basis. However, TH projects may require program participants to

meet with case managers on a regular basis for purposes of evaluating the extent to which participants have ongoing need for the TH project assistance.

- Housing Focused Assistance
 - When screening applicants for admission into the TH project, Coordinated Entry must assure that applicants are linked with TH assistance when:
 - TH is desired by the applicant
 - TH is most appropriate to meet health and safety needs of the applicant
 - No permanent housing solutions (with or without services) are available that similarly or better meet the desires and needs of the applicant
 - TH projects' primary goal is to safely place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns.

SECTION 13: RAPID RE-HOUSING PROJECTS STANDARDS

The purpose of Rapid Re-Housing (RRH) projects is to move homeless individuals and families out of emergency shelter (and, in some cases, out of TH) to permanent housing as quickly as possible. Each COC-partnered agency should adapt at minimum the following standards. Each agency can include more details in their own policies and procedures.

13.1 Rapid Re-Housing Eligibility

Per the HEARTH Act and the Continuum of Care Program Interim Rule, eligibility for Rapid Rehousing is satisfied by membership in Categories 1 and 4.

Participants must enter from:

- A place not meant for human habitation- cars, parks, sidewalks, and abandoned buildings;
- An emergency shelter or government/charity-funded motel (emergency voucher);
- A Safe Haven (as defined by HUD);
- One of the above places but temporarily – for no more than 90 days– in an institution;
- Transitional Housing for homeless people and originally came from the streets or emergency shelter;
- Persons being evicted within fourteen days and no subsequent residence has been identified and lacks resources and support network to access housing
- Youth/families who are homeless under other Federal Statutes (Category 3); eligibility depends on the specific program or funding stream

Eligibility for Rapid Re-Housing (RRH) and other homelessness assistance programs may be restricted or subject to exceptions based on the specific criteria outlined in the Notice of Funding Opportunities (NOFOs).

All of this must be documented as outlined in the Documentation and Recordkeeping Requirements section and must comply with the regulations set forth in the Interim Rule (24 CFR 578.103).

13.2 Rapid Re-Housing Prioritization

Where possible, RRH projects should be targeted to individuals and households who are unable to resolve their homelessness on their own but do not have service needs so great as to necessitate movement into TH or PSH. Within this targeted population, RRH providers should prioritize for assistance those people with greater vulnerabilities and less likelihood of exiting homelessness “but for” rapid re-housing assistance, RRH projects should strive to serve as many appropriate participants as possible, adjusting the duration and amount of assistance in order to meet the individualized needs.

Additionally, in cases where an eligible homeless Veteran has been identified, and that Veteran is not eligible for VA programs; RRH providers should prioritize the homeless Veteran for assistance.

13.3 Low-Barrier and Client-Centered Approach in Rapid Re-Housing

All SCC COC homeless assistance projects must follow a low-barrier and client-centered approach. For RRH projects, the following practices and policies must be adopted and implemented at minimum:

- Program Entry
 - Reducing barriers to entry
 - RRH projects must minimize any barriers to homeless persons/households’ entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility (and any population prioritization) requirements. RRH projects should prioritize for assistance those persons with greater vulnerabilities. This may be determined, in part, through completion of the CoC’s coordinated entry assessment tool
- Program Design
 - Supportive Services
 - RRH projects must offer supportive services to program participants. RRH projects will require program participants to meet with case managers.
 - Participants will be required to meet a minimum of once a month 24 CFR 578.37(a)(1)(ii)(F). Clients should execute a client service agreement prior to admittance in the program acknowledging and understanding the requirements, i.e. detailing the participant’s role and expectations such as income documentation, case management, rent calculations. Meetings are for but not limited to ensuring the household is making progress on their housing plan and/or is stable in housing.
 - Housing Focused Assistance
 - RRH projects’ primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns.

To that end supportive services should be tailored to the client's needs as they pertain to obtaining and retaining permanent housing.

- RRH financial assistance, i.e., rental assistance may be individualized and flexible. Please see the following section for details about SCC COC standards related to the provision of RRH financial assistance.

Determining Rental Assistance Provided

All SCC COC RRH projects must adhere to the following standards to determine the amount and duration of RRH assistance that can be provided to program participants.

1. Amount and Duration of Rental Assistance

- SCC CoC RRH projects provide time-limited, individualized financial assistance to help participants obtain and retain permanent housing.
- Financial assistance is provided at the minimum necessary amount and duration to avoid an immediate or near-term loss of housing.
- The length of rental assistance is determined by client need and may be short-term (≤ 3 months) or medium-term (4–24 months). Assistance may not exceed 24 months per 24 CFR 578.37(ii).
- The CoC's goal is for most households to reach full rental responsibility within 18 months, supported by income growth, connections to mainstream benefits, and targeted supportive services. Participants may continue receiving supportive services through months 18–24, and may receive additional financial assistance within the 24-month maximum when extenuating circumstances are documented. Examples include, but are not limited to:
 - loss of income
 - unexpected essential expenses
 - delays in benefit approval
 - health and safety emergencies

Any extension of assistance or deviation from the standard step-down timeline (listed below) must be approved by the Program Director and documented, with notification provided to the Collaborative Applicant/CoC Lead. When rental assistance is extended or the step-down schedule is adjusted, the household's service plan must be updated to include clear actions that support progress toward increased income and long-term housing stability (e.g., applying for employment, maintaining progress in school or training, securing benefits, or other individualized goals).

2. Rental Subsidies & Utility Allowances

- RRH projects are **not** subject to the occupancy charge and rent contribution requirements at 24 CFR 578.77. Instead, RRH projects must follow the CoC's Written Standards, which establish how the amount or percentage of rent each participant must pay, as required under 24 CFR 578.37.
- Rental subsidies are based on client income.

- Initial assistance can cover up to 100% of rent, depending on client income, as permitted by CoC Written Standards.
- Participant contribution increases over time until the household pays 100% of contract rent (declining assistance model), unless a reassessment shows a need to pause or adjust increases. Supportive services intensity should **not** decrease as rent support declines; services should remain steady or increase based on need.
- Utility Allowance & Financial Preparedness
 - When participants are responsible for utilities, providers must account for a reasonable utility allowance in rent/contribution calculations and provide a utility reimbursement if applicable, per HUD Notice CPD 17-11. Programs must use the applicable Public Housing Authority (PHA) Utility Allowance Schedule to determine the reasonable utility allowance, consistent with HUD requirements for RRH. Because utility assistance, including utility reimbursements, is subject to the same 24-month maximum as other RRH financial assistance under 24 CFR 578.37(a)(1)(ii), programs must proactively prepare households for the point when they assume full responsibility for utility costs.
 - As part of monthly case management and progressive engagement, programs should:
 - Provide financial capability and budgeting support, including planning for utility costs;
 - Begin utility-budgeting preparation once a household reaches the stage of paying 100% of rent;
 - Adjust the service plan to help participants anticipate and sustain ongoing household expenses after RRH assistance ends
- Declining Assistance Framework:
 - SCC CoC RRH projects may use a declining rental assistance model as the standard approach for supporting households toward full rental independence. The following timeline serves as the CoC's baseline expectation:

Standard Step-Down Timeline

Months In Program	Participant Rent Contribution
0–6 months	0%–30%
7–9 months	30% of rent
10–12 months	50% of rent
13–15 months	75% of rent
16–18 months	100% of rent

- Programs may propose a different step-down schedule or contribution percentages when specific household circumstances warrant an adjustment. Any proposed modification must:

- Be submitted in writing,
- Include documentation supporting the household-specific need, and demonstrating that the circumstances qualify as extenuating;
- service plan identifying concrete steps the household will take toward achieving income growth and long-term housing stability,
- Be approved by the Program Director prior to implementation; and
- Be reported to the Collaborative Applicant/CoC Lead for monitoring and compliance.
- Progressive Engagement Requirement
 - Assistance levels are individualized and adjusted based on the household's current needs 24 CFR 578.37(a)(1)(ii)(A).
 - Assistance begins at the level necessary to obtain or stabilize housing.
 - Assistance may increase, decrease, pause, or resume based on changes in income, expenses, or housing stability, up to the 24-month maximum allowed under 24 CFR 578.37(a)(1)(ii)(C).
 - The step-down timeline is a goal and program structure, but adjustments must be made when household needs warrant it. Assistance does not automatically decline.
 - Reevaluations must occur at least annually and whenever income or circumstances change, per 24 CFR 578.37(a)(1)(ii)(E).
 - Participants must meet with a case manager at least monthly to support long-term stability, consistent with 24 CFR 578.37(b)(4).

3. Maximum Duration of Assistance

- Assistance must end by 24 months, per 24 CFR 578.37(a)(1)(ii)(C). (RRH permits short-term up to 3 months and medium-term 4–24 months).

4. Move-in Assistance

- Move-in assistance supports initial placement and stabilization for households likely to achieve housing stability with time-limited aid; it is paired with services and rent support as needed.
- Eligible costs (subject to project budget & availability of funds):
 - Security deposits up to two months' rent
 - Advance payment of last month's rent (in addition to first month and security deposit)
 - Utility deposits (supportive services eligible cost)
 - One-time moving costs (e.g., truck rental, moving company)
- The program determines the type and amount of move-in assistance within CoC standards, the grant budget, and funding availability.

5. Supportive Services Post-Assistance

- Participants may receive eligible supportive services for up to 6 months after rental assistance ends 24 CFR 578.37 (a)(10)(ii)(D).
- If housing stability remains uncertain, case managers are encouraged to keep the client file open and continue providing supportive services (24 CFR 578.37 (a)(1)(ii)(E)).

6. Annual & Ongoing Assessments

- Annual assessments are required to confirm the household lacks sufficient resources/support networks to retain housing without CoC assistance and to set the type and amount of assistance. Providers must also reassess upon notice of income or household changes (24 CFR 578.37(a)(1)(ii)(E)).
- Participants must be reassessed at least quarterly, and more frequently as needed, to support ongoing progressive engagement, determine continued need for assistance, and evaluate any adjustments to rental assistance or participant rent contribution.
 - Status changes must be documented with appropriate records, including:
 - Pay stubs
 - Bank statements
 - SSDI/SSI letters
 - Cash app transactions
 - Written receipts
 - Uber/DoorDash earnings printouts, etc.
- Documentation must show:
 - Reason for continued assistance (e.g., lack of funds/resources).
 - Updated rent contribution calculation consistent with CoC standards (and with CPD-17-11 utility allowance where applicable).

All RRH providers must provide the Collaborative Applicant/CoC Lead with copies of their current program policies and procedures, upon request or during monitoring, to demonstrate alignment with and implementation of the CoC's Written Standards.

All of this must be documented as outlined in the Documentation and Recordkeeping Requirements section and must comply with the regulations set forth in the Interim Rule (24 CFR 578.103).

SECTION 14: PERMANENT SUPPORTIVE HOUSING PROJECTS STANDARDS

14.1 Permanent Supportive Housing Eligibility

All SCC COC PSH projects must serve persons who meet category 1 of HUD's homeless definition AND are diagnosed with a disability. Additional project-specific requirements and considerations for Permanent Supportive Housing placements are outlined in the following sections.

PSH Eligibility When Fleeing DV (category 4 of the homeless definition)

SCC CoC PSH projects can serve disabled individuals/households fleeing DV (category 4 of the homeless definition), but the people fleeing DV must reside in a shelter or TH immediately prior to entering the PSH project. Persons fleeing DV cannot enter PSH directly from a housed situation.

PSH projects are NOT permitted to serve individuals or families who are imminently at risk of losing their housing (category 2 of the homeless definition).

PSH Projects Serving or Prioritizing Chronically Homeless Households

Certain Permanent Supportive Housing (PSH) projects may be designated to serve or prioritize chronically homeless individuals and families in accordance with HUD program requirements and project-specific eligibility criteria.

Pursuant to [CPD Notice 2025-06](#), which withdrew CPD Notices 2016-11 and 2014-01, the CoC no longer incorporates a separate chronic homelessness prioritization framework within these Written Standards. Agencies operating projects with chronic homelessness eligibility requirements remain responsible for complying with all applicable HUD regulations, documentation standards, and recordkeeping requirements.

All of this must be documented as outlined in the Documentation and Recordkeeping Requirements section and must comply with the regulations set forth in the Interim Rule (24 CFR 578.103).

14.2 Disability evidence protocol:

Pursuant to [24 CFR 578.103\(4\)\(i\)\(b\)1-5](#), acceptable evidence of disability includes:

- (1) Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently.
- (2) Written verification from the Social Security Administration.
- (3) The receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation)
- (4) Other documentation approved by HUD; or
- (5) Intake staff recorded observation of disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence in paragraph (1), (2), (3), or (4) of this section.

14.3 Priority Policy for Permanent Housing Placements

All Permanent Supportive Housing (PSH) referrals and placements shall occur through the SCC CoC Coordinated Entry System in accordance with applicable HUD requirements, project eligibility requirements, grant agreements, and the SCC CoC Coordinated Entry Policies and Procedures.

The following priorities are intended to provide general guidance regarding households that may demonstrate the greatest need for Permanent Supportive Housing. However, Coordinated Entry referrals are made based on multiple factors, including but not limited to vulnerability, disability status, housing barriers, participant choice, project eligibility requirements, safety considerations, and housing availability. As such, the priorities below should not be interpreted as a strict referral hierarchy.

- (1) **First Priority: Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs.** An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.
- (2) **Second Priority: Homeless Individuals and Families with a Disability with Severe Service Needs.** An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.
- (3) **Third Priority: Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter without Severe Service Needs.** An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.
- (4) **Fourth Priority: Homeless Individuals and Families with a Disability Coming from Transitional Housing.** An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

14.4 Low-Barrier and Client-Centered Approach in Permanent Supportive Housing

All SCC COC homeless assistance projects are encouraged to follow a low-barrier and client-centered approach. For PSH projects, the following practices and policies must be adopted and implemented at minimum:

- Program Entry

- Reducing barriers to entry
 - PSH projects must minimize any barriers to homeless persons/households entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility (and any prioritization) requirements.
 - PSH projects must assess people referred through Coordinated Entry to identify vulnerabilities, housing barriers, and supportive service needs while adhering to Coordinated Entry referral processes and project eligibility requirements.
- Program Design
 - Supportive Services
 - PSH projects must offer supportive services to program participants on a voluntary basis. However, PSH projects may require program participants to meet with case managers on a regular basis for purposes of ensuring the household is stable in housing and has ongoing need for services.
 - PSH projects should work with program participants on a regular basis to identify a plan for assessing for reduced supportive service needs and possible movement onto a non-PSH affordable housing option when/if the program participant desires.
 - Standard Lease Agreement
 - PSH projects must ensure that there is a standard lease agreement in place between the landlord/property manager and the program participant.
 - Housing Focused Assistance
 - PSH projects' primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, but they are also tailored to the client's needs as they pertain to obtaining and retaining permanent housing

14.5 Permanent Supportive Housing Program Occupancy and Rent Requirements

1. Lease Agreements
 - All CoC-funded PSH programs must ensure that participants have a lease agreement that:
 - Is at least one year in duration.
 - Is renewable per program regulations.
2. Participant Rent Contribution
 - Participants in PSH rental assistance programs are required to pay the higher of:
 - 30% of their monthly adjusted income, or
 - 10% of their gross monthly income (including utilities).
 - Zero-Income Participants:
 - If a participant has zero income, they are not required to pay rent.

- Their supportive services partner must work with them to secure income (earned or unearned) as soon as possible.
- HUD Rent Calculation Compliance:
 - Under no circumstances can a tenant be charged more than the HUD-established rent calculation standard.
- 3. Occupancy Charges for Leasing Programs
 - Participants in leasing programs may be charged an occupancy charge based on:
 - 30% of the monthly adjusted income, or
 - 10% of the family's gross income, or
 - The portion of the family's welfare assistance designated for housing.
- 4. Participant Re-Evaluation Requirements
 - Participants must be re-evaluated at least once per year.
 - Early re-evaluation may occur if there is a change in participant status.

All of this must be documented as outlined in the Documentation and Recordkeeping Requirements section and must comply with the regulations set forth in the Interim Rule (24 CFR 578.103).

SECTION 15: TRANSFER POLICY

The SCC CoC believes that transfers between projects should be rare but acknowledges that there are safety, access, and legitimate programmatic reasons to transfer a household. After exhausting all other options, transfers should be utilized to avoid a project exit that would result in a return to homelessness. The SCC CoC Coordinated Entry System has developed and implemented clear policies and procedures regarding transfers. These policies and procedures can be reviewed in the CoC's Coordinated Entry Policies and Procedure [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#). All transfers must follow the outlined Coordinated Entry Transfer Policy and Process.

For other circumstances requiring grant transfers, please refer to the Steps for Grant Transfer policy, located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#)

SECTION 16: HOMELESS PROGRAM TERMINATION POLICIES AND PROCEDURES

Per HUD's Interim Rule ([24 CFR 578.91](#)) COC funded programs must have termination policies and procedures that ensure that participant termination is limited to only the most severe cases. Programs must utilize a low-barrier and client-centered approach and make reasonable efforts to preserve housing stability and program participation prior to pursuing termination.

16.1 General Requirements

CoC-funded programs may terminate assistance to a program participant who violates program requirements or conditions of occupancy. Prior to pursuing termination, programs should make reasonable efforts to maintain housing stability and resolve concerns whenever possible. Termination from a program does not prohibit a participant from receiving assistance again at a later date.

16.2 Due Process Requirements

In terminating assistance to a program participant, programs must provide a formal process that recognizes the rights of individuals receiving assistance and satisfies due process requirements.

In accordance with [24 CFR 578.91\(b\)](#), programs shall:

- Provide participants with written program rules and termination procedures prior to program enrollment;
- Provide written notice containing a clear statement of the reasons for the proposed termination;
- Provide participants an opportunity to respond to, correct, or appeal the proposed action, when applicable;
- Provide a review of the decision by an individual who did not make the original determination;
- Permit participants to submit written and/or verbal information during the review process; and
- Provide prompt written notice of the final decision.

16.3 Hard-to-House Populations

In accordance with [24 CFR 578.91\(c\)](#), programs serving hard-to-house populations, including Permanent Supportive Housing (PSH) participants, shall exercise judgment and examine all extenuating circumstances when determining whether violations are serious enough to warrant termination. Programs should make reasonable efforts to preserve housing stability and avoid termination whenever possible.

16.4 Agency Policies and Procedures

Each agency shall maintain written termination policies and procedures that comply with applicable HUD regulations, funding requirements, and agency policies. Agency procedures may include additional requirements regarding corrective actions, notices of program violations, opportunities to resolve violations, appeal timelines, documentation requirements, and grievance procedures, provided such requirements remain consistent with applicable regulations. For additional information regarding termination of assistance to program participants, agencies should refer to [24 CFR 578.91](#) and any subsequent [HUD guidance](#).

SECTION 17: EDUCATION POLICY

Consistent with the CoC Program Interim Rule 24 CFR 578.23, all CoC funded programs assisting families with children or unaccompanied youth must:

- Take the educational needs of children into account when placing families in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education.
- Inform families with children, high school students and unaccompanied youth of their educational rights, including providing written materials, help with enrollment, and linkage to McKinney Vento Liaisons (both K-12 and college) as part of intake procedures. In the case of projects that provide housing or services to families, designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and facilitate the enrollment, attendance, and success in school of homeless children, high school students and unaccompanied youth. This includes addressing problems due to transportation needs, immunization and residency requirements, lack of birth certificates and school records, and guardianship issues.
- Not require children and unaccompanied youth to enroll in a new school as a condition of receiving services.
- Allow parents or the youth (if unaccompanied) to make decisions about school placement.
- Not require children and unaccompanied youth to attend after-school or educational programs that would replace/interfere with regular day school or prohibit them from staying enrolled in their original school.
- Post notices of student's rights at each program site that serves homeless children and families in appropriate languages.

Each agency of CoC-funded programs must have a policy outlining their adherence to above regulations.

SECTION 18: GRIEVANCES AND APPEALS

18.1 Definitions

- **Grievance:** A complaint regarding the delivery of services, staff conduct, accessibility of services, program operations, or other concerns that do not involve a formal program eligibility or assistance decision.
- **Appeal:** A request for review of an agency decision affecting a participant's eligibility, benefits, housing assistance, program participation, sanctions, or termination of assistance.

18.2 Agency Grievances and Appeals Policy and Procedures

All agencies operating programs within the SCC CoC shall maintain written grievance and appeal policies and procedures that comply with applicable federal, state, local, and funding source requirements.

At a minimum, agency policies and procedures should:

- Inform participants of their grievance and appeal rights;
- Establish a process for submitting grievances and appeals;
- Provide participants with an opportunity to submit documentation or information supporting their grievance or appeal;
- Provide for the review of appeals by an individual who did not make or approve the original decision;
- Maintain confidentiality throughout the grievance and appeal process;
- Document grievances, appeals, investigations, findings, and final determinations; and
- Provide participants with written notice of the outcome of a grievance or appeal.

Programs subject to specific grievance, appeal, or due process requirements imposed by HUD, other funders, or applicable regulations shall comply with those requirements in addition to these Written Standards.

18.3 SCC CoC Grievance and Appeals Process

Participants are encouraged to first utilize the grievance and appeal procedures established by the agency administering the program in which they are enrolled. If a participant believes that their concern has not been adequately addressed through the agency's grievance or appeal process, they may submit a written grievance to the SCC CoC for review.

The SCC CoC's review is intended to evaluate whether the agency followed its established policies and procedures and complied with applicable Continuum of Care requirements. The SCC CoC does not replace an agency's grievance or appeal process and is not responsible for making program eligibility, housing placement, disciplinary, or termination decisions on behalf of individual agencies.

If a participant believes that their concern has not been adequately addressed through the agency's grievance or appeal process, they may submit a written grievance or appeal to the SCC CoC for review.

1. Filing the Appeal:

- Submit all grievances/appeals in writing within ten (10) business days of the incident, concern or decision, to the St. Clair County CoC/HAC Board of Directors Chairman (St. Clair County Intergovernmental Grants Department 19 Public Square, Suite 200 Belleville, IL 62220)

2. Documenting the Appeal:

- The Chairman will document the information received at the time the appeal is filed.

3. Investigating the Complaint:

- The investigation of the complaint will be completed within 10 working days of the appeal being filed with the Chairman.

4. Communicating the Results:

- The results of the investigation and the recommendations made by the Board of Directors will be sent in writing to the client.
- A copy of the report will be filed at the Housing Resource Center.

SECTION 19: PROTOCOL FOR IMMIGRATION ENFORCEMENT REQUESTS

Each agency of CoC-funded programs should have a policy outlining the guidance for responding to federal immigration authorities' requests. The policy should follow State and Federal laws and not prohibit or restrict compliance with 8 U.S.C. § 1373 in any way. For additional information: 8 U.S.C. 1373 - Communication between government agencies and the Immigration and Naturalization Service - Content Details - USCODE-2023-title8-chap12-subchapII-partIX-sec1373

SECTION 20: GRANT MANAGEMENT AND COMPLIANCE

20.1 Grant Applications/ Agreements

Application Process

The CoC Program grant application process occurs annually within a framework established by HUD and is administered by the CoC through the collaborative applicant. HUD issues a Notice of Funding Opportunity (NOFO), detailing available funding and application procedures for the CoC. Upon release of the HUD NOFO, as the collaborative applicant, the St. Clair County Illinois Intergovernmental Grants Department (SCC IGD) issues a request for new and renewal programs to apply for funding. Applicants must follow the process established by the CoC for seeking new or renewal funding. Successful applicants are included in the CoC's collaborative application submitted to HUD. HUD provides public notice and notification to approved CoC Program application. SCC IGD directly notifies subrecipients of funded programs. SCC IGD serves as the collaborative applicant for the CoC and has grant agreements with subrecipients to administer each project at the local level for individuals, youth, and families experiencing homelessness. SCC IGD will contract directly with each funded subrecipient agency once all grant requirements and conditions are met to provide housing and services. For more information and guidance, please refer to 24 CFR 578.19 -- Application process and 24 CFR 578.23 -- Executing grant agreements.

Agreement Modifications

Any modifications to the application or grant agreement must be submitted to the Collaborative Applicant and the Board of Directors for review and approval. All changes should be communicated and thoroughly reviewed to ensure alignment with funding requirements and organizational policies.

Faith-Based Providers

Religious or faith-based organizations may be eligible to receive funding through the Continuum of Care (CoC). Faith-based organizations that receive CoC funding may do so without compromising their independence, autonomy, or the expression of their religious beliefs and character. These organizations are free to continue their religious mission, including the definition, development, practice, and expression of their beliefs, provided that program funds are not used for explicitly religious activities such as worship, religious instruction, or proselytization.

Any religious organization receiving CoC funds, is entitled to the following:

- Retain independence from federal, state, and local governments.
- Continue carrying out its mission.
- Use space within its facility to provide CoC Program-funded services without the requirement to remove religious symbols or art.
- Retain authority over its internal governance.
- Retain religious terms in its organization's name, select board members on a religious basis, and include religious references in its mission statement and governing documents.

These provisions ensure the equal participation of faith-based organizations in HUD programs in line with the implementation of Federal Register :: Equal Participation of Faith-Based Organizations in HUD Programs: Implementation of E.O. 13559.

20.2 Financial Management

Under the CoC Program Interim Rule 24 CFR Part 578, CoC-funded programs must maintain financial management policies and procedures. Recipients and subrecipients are encouraged to refer to Chapter 34 of the CPD Monitoring Handbook and the regulations in 2 CFR Part 200, which outline uniform administrative requirements, cost principles, and audit requirements for federal awards.

20.3 Code of Conduct/ Conflict of Interest

Procurement

For the procurement of property (goods, supplies, or equipment) and services, CoC- funded programs must abide by and have a policy outlining the standards of conduct and conflict-of-interest requirements under 2 CFR 200.317 and 200.318.

Organizational and Other Conflict

CoC- funded programs must abide by and have a policy outlining the federal conflict of interest regulations set forth by 24 CFR 578.95.

For more information on the Code of Conduct/ Conflict of Interest Policy for the HAC, please refer to St. Clair County Illinois Homeless Action Council Of St. Clair County Bylaws which is located at St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development (RC Version: 9.13.3.0).

20.4 Anti-Lobbying

CoC funded programs are strictly prohibited from using federal funds to engage in lobbying activities. In compliance with the Anti-Lobbying Act (31 USC 1352) , CoC funded programs may not use federal funds to engage in lobbying efforts aimed at influencing the outcome of federal or state legislation, or to influence any government official or employee regarding the awarding or extension of federal contracts, grants, or loans. For additional guidance, please refer to 24 CFR 91.225 – Certifications and 24 CFR Part 87 -- New Restrictions on Lobbying.

SECTION 21: DRUG-FREE WORKPLACE

The award and administration of HUD grants and cooperative agreements must comply with the Office of Management and Budget (OMB) guidance implementing the portion of the Drug-Free Workplace Act of 1988 (41 U.S.C. 701-707) (referred to as the Act in this part) that applies to grants set forth in 2 CFR Part 2429. Each agency of CoC-funded programs must have a policy outlining the elements of a Drug-Free Workplace. For more information regarding which sections of the Federal Regulations applies, refer to 2 CFR 182.115.

SECTION 22: ECONOMIC OPPORTUNITIES FOR LOW- AND VERY LOW-INCOME PERSONS

Under Section 3 of the Housing and Urban Development Act of 1968 (12 USC 1701u), as implemented by 24 CFR Part 75, Continuum of Care (CoC) programs that meet Section 3 applicability thresholds must ensure that economic opportunities generated by HUD financial assistance are directed to low- and very low-income persons, particularly those receiving government housing assistance or residing in the project's community. Section 3 requirements apply to CoC-funded projects when they involve:

- Housing construction or substantial rehabilitation.
- Public construction activities exceeding HUD's monetary threshold for Section 3 applicability.
- Other CoC-funded activities that independently meet the definition of 'housing and community development assistance' under Section 3 regulations, as applicable

For more guidance, please visit Section 3 - HUD Exchange.

SECTION 23: MONITORING

Compliance monitoring will be conducted by the Collaborative Applicant and Consultant(s) to evaluate general administration and program operations. This process allows for assessing how projects implement these guidelines and identifying areas that may require additional resources or training to meet regulations, Policies & Procedures, Written Standards, and best practices. The primary goal of monitoring is to ensure compliance, identify and prevent deficiencies, and design corrective actions to improve or strengthen the performance of CoC funded programs. Monitoring activities will also support the CoC's commitment to improving system performance and achieving measurable outcomes.

The Collaborative Applicant, Consultant(s), and Rank & Review Committee will regularly share information and discuss program performance to ensure that the monitoring process is comprehensive, transparent, and aligned with the program's goal.

Details of compliance monitoring by the Collaborative Applicant are outlined in the Policy and Procedure Manual for Compliance Monitoring, available on St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development (RC Version: 9.13.3.0).

PART III

ILLINOIS DEPARTMENT OF HUMAN SERVICES (IDHS)- PROGRAM SPECIFIC STANDARDS

SECTION 1: OVERVIEW

This section establishes standards and expectations for homelessness response activities supported through State-administered funding provided by the Illinois Department of Human Services (IDHS), including Emergency Solutions Grant (ESG), Homelessness Prevention, and Shelter Diversion programs. These programs operate collectively to provide a coordinated, system-wide response to homelessness and housing instability within the SCC CoC geographic area.

The Emergency Solutions Grant (ESG) Program is authorized under Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act, as amended by the HEARTH Act. ESG funding within the State of Illinois is administered by IDHS, Division of Family and Community Services, and is implemented in alignment with applicable federal ESG requirements (24 CFR Part 576), as incorporated through State program guidance.

State-administered Homelessness Prevention and Shelter Diversion programs complement ESG-funded activities by providing targeted financial assistance, housing stabilization services, and problem-solving interventions designed to prevent households from entering homelessness or to divert them from the homeless services system when safe alternatives exist. These programs emphasize early intervention, flexibility, and the use of limited financial resources to resolve housing crises as quickly as possible.

In alignment with IDHS program guidance and the State of Illinois' Home Illinois: Plan to Prevent and End Homelessness, programs must operate using a housing-focused, low-barrier approach that prioritizes participant choice, voluntary services, and rapid access to safe and stable housing. These efforts support statewide goals to prevent homelessness whenever possible, reduce the length of time households experience homelessness, and promote equitable access to housing resources, with a focus on addressing racial disparities in homelessness

Collectively, these programs support a continuum of services including, but not limited to, street outreach, emergency shelter, rapid re-housing, homelessness prevention, and diversion services. Activities must be delivered in a coordinated manner to ensure that households receive the most appropriate intervention based on their needs and that system resources are used efficiently.

All activities described in this section are implemented in alignment with IDHS program requirements and guidance, applicable federal requirements incorporated through State programs, and 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements). Recipients and subrecipients must also comply with local written standards adopted by the SCC CoC.

Programs covered under this section must participate with the Continuum of Care (CoC) system, including Coordinated Entry processes, to ensure consistent, equitable, and efficient service delivery across the homelessness response system. Coordination across programs—including ESG, Homelessness Prevention, and Shelter Diversion—is required to support seamless transitions between interventions and to minimize duplication of services.

Although these standards are informed by ESG program requirements, they also establish broader system expectations applicable to State-funded homelessness assistance programs. Individual programs remain subject to their specific eligibility criteria, funding limitations, and administrative requirements as established by IDHS.

SECTION 2: MATCH REQUIREMENTS

This section outlines match requirements applicable to programs funded through the Illinois Department of Human Services (IDHS) and addressed in this manual, including Emergency Solutions Grant (ESG), Homelessness Prevention, and Shelter Diversion programs.

Match requirements vary by funding source and program type:

- Emergency Solutions Grant (ESG): Match is required.
- Homelessness Prevention (State-administered): Match is not required.
- Shelter Diversion: Match is not required unless specifically required by IDHS.

ESG Match Requirements

All ESG-funded projects are required to meet match requirements in accordance with State ESG guidance issued by IDHS, which incorporates applicable federal ESG match standards. The minimum match requirement for ESG-funded activities is 100 percent of the total ESG funds expended.

State of Illinois Match Requirements

In accordance with IDHS ESG funding requirements, projects must meet the 100 percent match requirement, with at least 25 percent of the total match provided as cash. The remaining match may be provided as eligible in-kind contributions. All match must be documented and verifiable in accordance with State ESG guidance and applicable federal requirements.

Match contributions must be:

- Allowable ESG costs;
- Necessary and reasonable for the operation of the ESG-funded project;
- Verifiable from the records of the organization providing the match; and
- Directly attributable to eligible ESG activities and program components.

Match must be incurred during the applicable grant period and must correspond to the ESG component under which funds are expended.

Eligible Match Sources

ESG match may be provided in the form of:

- Cash contributions; and/or
- In-kind contributions, including donated goods, services, or property.

All match, whether cash or in-kind, must be:

- Non-federal in origin (unless specifically permitted by HUD);
- Used only for eligible activities; and
- Documented in a manner that allows for independent verification.

2.1. Cash match

When an ESG recipient or subrecipient uses non-ESG funds to pay for allowable ESG program costs.

Required Documentation

Cash match must be supported by:

- A written match commitment on the committing entity's official letterhead, signed and dated by an authorized representative, identifying:
 - The amount of cash committed;
 - The time period during which the funds will be available;
 - The ESG component(s) to which the cash match will be applied; and
 - The eligible ESG activities the cash match will support.
- Accounting records demonstrating that the cash match was expended on eligible ESG costs, including:
 - General ledger entries;
 - Payroll records, where applicable; and
 - Source documentation (e.g., invoices, receipts, cancelled checks).

Cash match expenditures must be traceable and auditable.

2.2 In-kind match

Consists of non-cash contributions of goods, services, or property provided by a third party to support eligible ESG activities.

Required Documentation

In-kind match must be supported by:

- A written commitment or Memorandum of Understanding (MOU) on the contributing entity's letterhead, executed prior to the provision of the service or contribution, which identifies:
 - The specific in-kind contribution to be provided;
 - The estimated value of the contribution;
 - The ESG component and activity supported; and
 - The period during which the contribution will be made.
- Documentation demonstrating that the in-kind contribution was actually provided during the grant period, such as:
 - Time sheets or activity logs for donated services;
 - Receipts or delivery records for donated goods; and
 - Valuation methodology consistent with 2 CFR Part 200.

Only in-kind contributions explicitly described in the written commitment or MOU will be eligible to count as match.

2.3 Match Reporting and Invoicing

Recipients and/or subrecipients must report match with each monthly or regular ESG reimbursement request. Match documentation must:

- Reflect both current-period match and cumulative match-to-date;
- Align with the approved match commitments; and
- Be sufficient to demonstrate compliance with the 100 percent match requirement.

Failure to document match appropriately may result in delayed reimbursement or disallowed costs.

2.4 Match Modifications

If an ESG-funded agency needs to modify a previously committed match source, the agency must submit a written request to the ESG recipient prior to implementing the change. Requests must include:

- The reason for the modification;
- Identification of the proposed replacement match source; and
- The amount of match to be replaced.

All match modifications are subject to approval and must remain compliant with State ESG requirements and applicable federal regulations. Supporting documentation must be maintained to demonstrate that revised match contributions meet all eligibility and documentation requirements.

SECTION 3: PROGRAM COMPONENTS

Programs addressed in this manual are funded through the Illinois Department of Human Services (IDHS) and include Emergency Solutions Grant (ESG), Homelessness Prevention, and Shelter Diversion activities. These programs are designed to operate together as part of a coordinated homelessness response system, providing a range of interventions to address both homelessness and the risk of homelessness.

Consistent with IDHS program design, these activities collectively support outreach and engagement, emergency shelter, rapid re-housing, homelessness prevention, and diversion strategies to stabilize households in the most appropriate and least intensive intervention necessary.

3.1 Program and Component Structure

Within the IDHS-administered ESG program, providers may operate one or more of the following components, subject to funding availability and approved program design:

- Street Outreach
- Emergency Shelter (including essential services)
- Rapid Re-Housing

These components are designed to assist individuals and families experiencing homelessness to quickly regain stability in permanent housing.

In addition to ESG-funded components, IDHS administers complementary programs that address housing instability earlier in the crisis:

- **Homelessness Prevention**
Provides rental, utility, and supportive service assistance to households at imminent risk of losing housing, with the goal of stabilizing households and preventing entry into homelessness.
- **Shelter Diversion**
Assists households at the front door of the homelessness response system in identifying immediate alternative housing arrangements and avoiding entry into shelter whenever possible.

Together, these programs form a continuum of interventions that align with State priorities to prevent homelessness, reduce time spent in homelessness, and support long-term housing stability.

3.2 Component-Specific Requirements

Each program component or intervention is subject to its own eligibility criteria, allowable activities, documentation standards, and service delivery expectations, as established by IDHS program guidance and applicable requirements incorporated through State-administered programs.

Where requirements differ by program or component, those differences are addressed in the applicable sections of these Written Standards.

All programs covered in this section must also comply with the General Written Standards set forth in Part I of this manual, including requirements related to nondiscrimination, low-barrier and client-centered service delivery, coordinated entry processes where applicable, recordkeeping, and monitoring.

3.3 System Coordination Across Programs

Recipients and subrecipients must coordinate across program types and funding sources—including ESG, Homelessness Prevention, and Shelter Diversion—to ensure consistent service delivery and efficient use of resources across the homelessness response system.

Coordination efforts must support:

- Consistent application of eligibility and documentation requirements;
- Alignment with housing-focused, low-barrier service delivery approaches; and
- Seamless transitions for participants between interventions based on need.

Providers must communicate and collaborate to minimize duplication of services and to ensure that households receive appropriate assistance regardless of the point of entry into the system.

3.4 Geographic Service Areas

The ESG recipient or other designated administering entity may establish geographic service areas or coverage boundaries for funded providers to promote equitable access, improve coordination, and maximize efficient use of resources.

Designated service areas may be based on factors such as geographic need, provider capacity, or program design.

When geographic boundaries are established, providers must:

- Deliver services within their designated service area, unless otherwise approved; and
- Coordinate with other providers to ensure households can access appropriate services regardless of location.

The establishment of service areas must not create barriers to accessing assistance and must support equitable and consistent service delivery across the CoC.

SECTION 4: ELIGIBILITY & RE-EVALUATION REQUIREMENTS

Eligibility for assistance must be determined in accordance with applicable Illinois Department of Human Services (IDHS) program requirements, based on the specific program type (Emergency Solutions Grant (ESG), Homelessness Prevention, or Shelter Diversion), household circumstances, and documented need.

Recipients and subrecipients must ensure that eligibility determinations and re-evaluations are conducted consistently, equitably, and in alignment with these Written Standards.

4.1 Homeless Definition

The Homeless definition is comprised of four categories:

- Category 1:** Literal homelessness is further defined as homeless individuals/families who lack a fixed, regular, and adequate nighttime residence, meaning:
- i. Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation, such a place not meant for human habitation
 - ii. Living in emergency shelter or transitional housing designated to provide temporary living arrangements (including hotel/motel stays paid for by charitable or government programs)
 - iii. Exiting an institution where the individual resided for less than 90 days and where the individual entered the institution immediately from emergency shelter (including hotel/motel stays paid for by charitable or government programs) or an unsheltered location
- Category 2:** Individuals/families who will imminently (within 14 days) lose their primary night-time residence with no subsequent residence AND no resources or support networks
- Category 3:** Unaccompanied youth or families with children/youth who meet the homeless definition under another federal statute and additional criteria. Households qualifying under Category 3 not eligible for ESG-funded assistance and may not be eligible under certain State-administered programs depending on program design.
- Category 4:** Individuals/families fleeing or attempting to flee domestic violence with no subsequent residence AND no resources or support networks

4.2 Program Eligibility Reference Chart

The Program Eligibility Chart is intended as a quick reference. For further explanations on the program eligibility description, population, specializations, time frame, etc., see the program standards in this document.

Program Type	Category 1: Literally Homeless	Category 2: Imminent Risk of Literal Homelessness	Category 3: Unaccompanied Youth or Families with Children/Youth	Category 4: Fleeing/Attempting to Flee Domestic Violence (DV)
Street Outreach	✓	Not HUD-Approved	Not HUD-Approved	✓
Emergency Shelters	✓	✓	Not HUD-Approved	✓
Homeless Prevention	Not HUD-Approved	✓	Not HUD-Approved	✓
Rapid Re-housing	✓	Not HUD-Approved	Not HUD-Approved	✓
Shelter Diversion	Not HUD-Approved	✓	Not HUD-Approved	✓

4.3 Homelessness Prevention Income Eligibility

Households receiving assistance under the IDHS Homelessness Prevention Program must meet State-established eligibility requirements. At a minimum, households must:

- Be at imminent risk of homelessness (Category 2) or fleeing/attempting to flee domestic violence (Category 4);
- Demonstrate a temporary financial crisis beyond their control; and
- Demonstrate an ability to maintain housing after assistance, based on current or anticipated income.

Income eligibility and financial assistance limits are determined in accordance with IDHS program requirements and applicable funding guidance.

4.4 Re-Evaluation Requirements

Re-evaluations must be conducted in accordance with the requirements of the applicable funding source and program type.

- ESG-funded programs must conduct periodic re-evaluations of household eligibility and need for continued assistance, in accordance with State ESG guidance;

- Homelessness Prevention programs must assess ongoing need and stability in accordance with IDHS program requirements, including follow-up and outcome tracking expectations;
- Shelter Diversion programs focus on immediate crisis resolution and typically do not require ongoing re-evaluation beyond the diversion assistance period.

Re-evaluations must also occur when there is a significant change in household income, composition, or other circumstances that may affect eligibility or assistance levels.

Continued assistance must be supported by documentation and aligned with program-specific requirements.

4.5 Documentation Standards

Documentation standards vary by program but must comply with IDHS guidance and these Written Standards.

Self-certification may only be used when third-party documentation cannot be obtained and must be supported by documentation of due diligence efforts.

Recipients and subrecipients must maintain sufficient records to demonstrate:

- Participant eligibility;
- Determination of need;
- Assistance provided; and
- Ongoing compliance with applicable program requirements.

Detailed documentation and recordkeeping standards applicable to all programs are addressed in [Part I](#) of this manual.

SECTION 5: STREET OUTREACH

Street Outreach activities are intended to engage individuals and families experiencing unsheltered homelessness in order to:

- Identify and assess immediate needs,
- Provide crisis intervention and connection to emergency services, and
- Facilitate access to shelter, housing, and supportive services.

Street Outreach activities funded through the Emergency Solutions Grant (ESG) Program must be conducted in accordance with State-administered ESG requirements and applicable federal standards as incorporated through IDHS program guidance. Activities may include engagement, case management, emergency health services, and connection to the Coordinated Entry system, as applicable.

Outreach efforts must be targeted to individuals and families residing in places not meant for human habitation and must prioritize safety, voluntary participation, and trauma-informed engagement.

5.1 Street Outreach Eligibility

Street Outreach activities are limited to individuals and families who are unsheltered and meet:

- Category 1 – Literally Homeless, and/or

- Category 4 – Fleeing or Attempting to Flee Domestic Violence, and who are residing in unsheltered locations.

Street Outreach may not serve households who are at imminent risk of homelessness but are not yet homeless and must not be used to provide Homelessness Prevention assistance.

All eligibility determinations and service interactions must be documented in accordance with applicable ESG documentation requirements and these Written Standards.

5.2 Low-Barrier and Client-Centered and Engagement Principles in Street Outreach

Street Outreach activities must operate in accordance with low-barrier and client-centered principles engagement practices, consistent with IDHS program guidance.

Minimum engagement and service delivery standards include

Engagement Design

- Participation in outreach services must be voluntary;
- Programs must use person-centered, trauma-informed approaches that respect participant autonomy, safety, and self-determination; and
- Outreach must focus on reducing barriers to shelter and housing access and facilitating rapid connections to appropriate housing interventions.

Street Outreach providers must coordinate with the SCC CoC Coordinated Entry system in accordance with local policies and procedures, except where prohibited for victim service providers.

5.3 ESG Street Outreach Limitations

Street Outreach activities are limited to essential, non-facility-based services and may not include:

- Provision of emergency shelter or long-term housing services;
- Requiring individuals to accept housing or services as a condition of engagement; or
- Activities not directly related to engagement, crisis response, or connection to housing and services, as defined under ESG program requirements.

SECTION 6: EMERGENCY SHELTER

Emergency Shelter activities provide temporary shelter and essential services to individuals and families experiencing homelessness. Emergency shelters funded through ESG as administered by IDHS must:

- Serve households that meet the applicable HUD definition of homeless under Category 1 (Literally Homeless) or Category 4 (Fleeing or Attempting to Flee Domestic Violence);
- Operate in compliance with ESG habitability, safety, and inspection requirements; and
- Support rapid exits to permanent housing through housing-focused service delivery.

Emergency Shelter activities must be conducted in accordance with State ESG requirements and applicable federal regulations and may include shelter operations, essential services, and renovation or rehabilitation of shelter facilities, where permitted.

6.1 Program Eligibility

Emergency Shelter assistance is limited to households who meet the homeless definition at project entry under:

- Category 1 – Literally Homeless; or
- Category 4 – Fleeing or Attempting to Flee Domestic Violence.

Emergency Shelter projects may not serve households defined under Category 2 (Imminent Risk of Homelessness) or Category 3 (Other Federal Statute).

Emergency Shelter projects that serve families must comply with HUD’s definition of family and must make reasonable efforts to keep families intact, consistent with participant safety and program capacity.

All eligibility determinations must be documented in accordance with the Documentation and Recordkeeping Requirements set forth in these Written Standards.

6.2 Low-Barrier and Client-Centered Approach and Shelter Standards

Emergency Shelter programs must operate in accordance with low-barrier and client-centered principles and low-barrier service delivery practices, consistent with IDHS program guidance.

Minimum standards include:

at Program Entry

- Providers must utilize diversion strategies, where appropriate, to connect households to safe alternative housing options and prevent unnecessary shelter entry;
- Programs must minimize barriers to shelter entry, ensuring that admission is not conditioned on requirements beyond basic eligibility

in Program Design

- Supportive services must be offered on a voluntary basis, except where limited engagement is necessary to address immediate safety or housing barriers; and
- Programs must prioritize rapid exit to permanent housing regardless of other service needs or personal challenges.

Emergency Shelter projects may not require participation in services as a condition of shelter entry or continued stay, except as specifically permitted under applicable program requirements.

Emergency Shelter providers must coordinate with the SCC CoC Coordinated Entry system in accordance with local policies and procedures, except where prohibited for victim service providers.

6.3 Role of Diversion in Shelter Operations

Emergency Shelter providers must incorporate shelter diversion practices at the point of entry, consistent with IDHS program expectations and local Coordinated Entry processes.

Diversion efforts must:

- Occur prior to or at the point of shelter entry;
- Focus on identifying safe alternative housing arrangements; and
- Ensure that shelter remains available for households with no safe alternative options.

Diversion must not create barriers to shelter access and must be implemented in a manner that prioritizes participant safety and choice.

SECTION 7: HOMELESSNESS PREVENTION

Homelessness Prevention activities are designed to stabilize housing for individuals and families who are at imminent risk of homelessness and lack the financial resources or support networks necessary to remain housed. Prevention assistance is intended to prevent households from becoming literally homeless and entering the homelessness response system.

Homelessness Prevention programs addressed in this section are administered through the Illinois Department of Human Services (IDHS) and are distinct from ESG-funded activities. These programs operate in alignment with State-established requirements and program guidance.

Prevention assistance may include:

- Rental or mortgage assistance;
- Payment of rental or mortgage arrears;
- Utility assistance and arrearages;
- Security deposits; and
- Housing-related supportive services necessary to stabilize housing.

All payments for financial assistance must be made directly to landlords, utility providers, or other third-party vendors, and must not be made directly to program participants

7.1 Homeless Prevention Eligibility

Households receiving IDHS Homelessness Prevention assistance must meet State-established eligibility criteria. At a minimum, households must:

- Be at imminent risk of homelessness (Category 2) or fleeing/attempting to flee domestic violence (Category 4);
- Be experiencing a temporary financial crisis beyond the household's control; and
- Demonstrate an ability to maintain housing following assistance, based on current or anticipated income.

Examples of qualifying temporary crises may include, but are not limited to:

- Loss or reduction of employment income;
- Medical emergency or disability;
- Loss or delay of public benefits;
- Changes in household composition;
- Victimization by criminal activity; or
- Other comparable financial hardships

All eligibility determinations must be documented in accordance with the Documentation and Recordkeeping Requirements set forth in these Written Standards.

7.2 Financial Assistance and Program Requirements

Prevention assistance must be targeted, time-limited, and based on documented need. Financial assistance must be provided at the minimum level necessary to stabilize housing and prevent homelessness.

Assistance must:

- Be reasonable and directly tied to resolving the immediate housing crisis;
- Not exceed program funding limitations established by IDHS; and
- Be supported by documentation demonstrating eligibility and need.

Prevention programs must ensure that assistance is not provided in a manner that duplicates other available resources and must coordinate with other assistance programs where applicable.

7.3 Supportive Services and Case Management

Supportive services provided under Homelessness Prevention must be directly related to housing stabilization and prevention of homelessness.

Required services may include:

- Case management and housing stabilization planning;
- Financial counseling and budgeting assistance;
- Coordination with public benefit programs (e.g., SNAP, LIHEAP); and
- Follow-up to assess housing outcomes.

Additional supportive services may be provided through referrals or other funding sources, as appropriate.

7.4 Housing Stability and Follow-Up

Providers must conduct follow-up activities to assess whether households maintain housing stability after receiving assistance, in accordance with IDHS program requirements.

At a minimum:

- Households must be contacted following assistance to assess ongoing housing status; and
- Outcomes must be documented and reported as required by IDHS.

The goal of follow-up is to evaluate program effectiveness and support long-term housing stability, not to impose additional eligibility barriers.

7.5 Low-Barrier and Client-Centered and Service Delivery Approach

Homelessness Prevention programs must operate using a housing-focused, low-barrier approach consistent with IDHS program guidance and the Home Illinois Plan.

Programs must:

- Minimize barriers to assistance and prioritize households at greatest risk of housing loss;
- Provide services in a voluntary, participant-centered manner; and
- Focus on resolving the immediate housing crisis quickly and efficiently.

Screening and assessment practices must support timely access to assistance and must not create unnecessary delays or barriers to receiving support.

7.6 Documentation Requirements

Recipients and subrecipients must maintain documentation sufficient to demonstrate:

- Program eligibility;
- Nature of the financial crisis;
- Assistance provided; and
- Compliance with IDHS program requirements.

Documentation must be maintained in accordance with IDHS recordkeeping requirements and these Written Standards. Requirements for documentation, file maintenance, and record retention are addressed in [Part I](#) of this manual.

SECTION 8: RAPID RE-HOUSING

Rapid Re-Housing (RRH) activities are designed to assist individuals and families experiencing homelessness to quickly obtain and retain permanent housing. RRH combines short- to medium-term financial assistance with housing-focused supportive services to promote housing stability.

Rapid Re-Housing activities funded through the Emergency Solutions Grant (ESG) Program must be implemented in accordance with State-administered ESG requirements and applicable federal standards, as incorporated through Illinois Department of Human Services (IDHS) program guidance.

RRH assistance may include:

- Rental assistance;
- Utility assistance;
- Security deposits and other eligible move-in costs;
- Housing search and placement services; and
- Case management and housing stabilization services.

RRH assistance must be individualized, progressive, and responsive to household need, with the goal of promoting housing stability while minimizing the duration and intensity of financial assistance.

8.1 Rapid Re-Housing Eligibility

Rapid Re-Housing assistance is limited to households who meet:

- Category 1 – Literally Homeless; or
- Category 4 – Fleeing or Attempting to Flee Domestic Violence

Households must meet the applicable eligibility criteria at the time of program entry.

RRH assistance may not be provided to households who are at imminent risk of homelessness but are not yet homeless (Category 2), nor to households qualifying under Category 3 (Other Federal Statute).

All eligibility determinations must be documented in accordance with the Documentation and Recordkeeping Requirements set forth in these Written Standards.

8.2 Low-Barrier and Client-Centered and Service Delivery Standards

Rapid Re-Housing programs must operate in accordance with low-barrier and client-centered principles service delivery practices, consistent with IDHS program guidance and CoC standards.

at Program Entry

- Programs must minimize barriers to entry by limiting eligibility requirements to those required by applicable program rules and Coordinated Entry prioritization standards;
- Households must not be required to demonstrate sobriety, income, employment, service participation, or compliance with treatment plans as a condition of receiving assistance; and
- Screening and assessment practices must support rapid placement into housing and must not delay assistance based on perceived readiness.

in Program Design

- Supportive services must be provided on a voluntary basis, except where limited engagement is necessary to address immediate safety or housing needs;
- Participants must be supported in making informed choices regarding housing and services; and
- Financial assistance must be progressive and flexible, adjusted based on changing household needs.

RRH assistance must prioritize rapid placement into permanent housing and support long-term housing stability through appropriate, time-limited financial assistance and services.

8.3 Coordination with Coordinated Entry

Rapid Re-Housing providers must participate with the SCC CoC Coordinated Entry system in accordance with local policies and procedures, except where prohibited for victim service providers.

Participation in Coordinated Entry must support consistent prioritization, equitable access to housing resources, and efficient system-wide coordination.

8.4 Financial Assistance Approach

RRH financial assistance must be:

- Based on documented household need;
- Provided at the minimum level necessary to stabilize housing; and
- Adjusted over time through a progressive assistance approach.

Providers may increase, decrease, or discontinue assistance based on changes in household income, stability, or housing outcomes, consistent with program requirements.

Assistance must not be provided at fixed levels or durations without consideration of individual household circumstances and must align with applicable ESG and IDHS program requirements.

Participants receiving ESG Rapid Re-Housing assistance must be re-evaluated at least annually to determine continued eligibility and the type and amount of assistance needed. At a minimum, the re-evaluation must document that the household's annual income does not exceed 30 percent

of Area Median Income (AMI) and that the household lacks sufficient resources and support networks necessary to retain housing without ESG assistance

SECTION 9: HABITABILITY & INSPECTIONS

All housing and facilities assisted through programs covered in this section, including Emergency Solutions Grant (ESG), Rapid Re-Housing (RRH), and Homelessness Prevention activities, must meet applicable habitability and safety standards in accordance with Illinois Department of Human Services (IDHS) program guidance and applicable federal requirements, as incorporated through State-administered programs.

Habitability requirements and inspection expectations vary by program component and are intended to ensure that participants reside in housing and facilities that are safe, sanitary, and suitable for human habitation

9.1 Emergency Shelter Habitability

Emergency shelters funded under the ESG Program must meet applicable habitability standards designed to protect the health and safety of shelter participants, including requirements related to:

- Structure and materials,
- Heating and water supply,
- Sanitary facilities,
- Food preparation and storage areas,
- Space and security, and
- Fire safety and emergency exits.

Shelters must also comply with applicable State and local fire safety and health inspection requirements, including maintaining current inspection approvals where required. For ESG-funded activities administered by the State of Illinois, compliance with State inspection and certification requirements is required.

Emergency shelters must be maintained in a condition that meets habitability standards throughout the period of assistance. Deficiencies that pose a threat to health or safety must be addressed promptly.

9.2 RRH and Homelessness Prevention Unit Habitability

Housing units assisted under Rapid Re-Housing (RRH) and Homelessness Prevention must meet ESG habitability standards before assistance is provided and continue to meet those standards for the duration of assistance.

Habitability determinations must confirm that assisted units are:

- Safe and sanitary,
- Structurally sound, and
- Suitable for occupancy by the assisted household.

Units that fail to meet applicable habitability standards must not receive financial assistance until deficiencies are corrected and documented.

9.3 Inspection Timing and Frequency

Inspections must be conducted at intervals appropriate to the ESG program component and type of assistance provided.

- Initial inspections are required prior to the provision of ESG housing assistance to confirm compliance with habitability requirements.
- Ongoing or periodic inspections may be required to ensure continued compliance, particularly when assistance is provided over time or when conditions change.
- Additional inspections may be conducted when there is reason to believe habitability standards are no longer being met.

Inspection protocols should be reasonable, risk-based, and sufficient to demonstrate compliance with ESG requirements without creating unnecessary barriers to housing stability.

9.4 Lead-Based Paint Requirements

Lead-based paint requirements applicable to assisted housing are addressed in [Part I](#) of this manual. Programs must comply with applicable lead-based paint requirements under federal law, as incorporated through State-administered programs, based on:

- The age of the housing,
- The type of ESG assistance provided, and
- The presence of children under six (6) years of age or pregnant persons.

Lead-based paint evaluations, hazard reduction, clearance, occupant notifications, and documentation must be conducted in accordance with [Part I](#) and applicable federal guidance.

9.5 Summary of Habitability and Inspection Requirements by Program Component

Component	Applicable Standard	Inspection Timing	Lead Requirements
Street Outreach	Not applicable to housing	N/A	Not applicable
Emergency Shelter	Applicable habitability standards	Initial and ongoing, as required	Refer to Part I, if applicable
Homelessness Prevention	Applicable habitability standards	Initial and as needed during assistance	Refer to Part I
Rapid Re-Housing	Applicable habitability standards	Initial and periodic, as required	Refer to Part I

SECTION 10: FINANCIAL ASSISTANCE

Financial assistance provided under programs addressed in this section must be administered in accordance with Illinois Department of Human Services (IDHS) program requirements and

applicable federal standards as incorporated through State-administered programs. Financial assistance must be tailored to the needs and circumstances of each household and must be targeted, time-limited, and focused on housing stability, while minimizing barriers to assistance and supporting rapid resolution of housing crises.

10.1 Eligible Financial Assistance by Program Component

Recipients and subrecipients may provide the following types of financial assistance, as applicable to each program component

- **Street Outreach**
Financial assistance is generally not provided. Assistance is limited to engagement, case management, and eligible supportive services designed to connect unsheltered individuals to housing and services.
- **Emergency Shelter**
Funds may support the operational costs of emergency shelters and essential services, but do not provide direct rental assistance to participants.
- **Homelessness Prevention**
Eligible financial assistance may include short- or medium-term rental or mortgage assistance, utility assistance, and other housing stabilization costs necessary to prevent the loss of housing.
- **Rapid Re-Housing (RRH)**
Eligible financial assistance may include short- or medium-term rental assistance, utility assistance, security deposits, utility deposits, and other eligible move-in costs needed to support initial housing placement and stabilization.

All financial assistance must be reasonable, necessary, and directly related to the goal of preventing or ending homelessness.

10.2 Duration of Financial Assistance

The duration of financial assistance must be based on household need and must comply with applicable program limits as established through IDHS program guidance

- **Homelessness Prevention** assistance may be provided for up to 12 months, unless otherwise permitted under applicable IDHS program guidance.
- **Rapid Re-Housing** assistance may be provided for up to 24 months, unless otherwise permitted under applicable IDHS program guidance.

Actual assistance provided may be more limited based on program design, funding availability, and household need. Assistance must be adjusted as household circumstances change and must not exceed applicable program limits.

10.3 Utility Assistance

Utility assistance may be provided as part of Homelessness Prevention or Rapid Re-Housing when utilities are necessary to obtain or retain housing.

Utility assistance may include:

- Utility payments,
- Utility deposits, and

- Utility arrearages, where permitted.

Utility assistance must be reasonable, documented, and coordinated with rental assistance to support overall housing stability. Assistance for utilities is subject to the same cumulative duration limits as other ESG financial assistance.

10.4 Flexibility and Progressive Assistance

Financial assistance must be administered using a housing-focused, progressive approach, consistent with IDHS program guidance and low-barrier and client-centered principles. Assistance must be provided at the minimum level and duration necessary to stabilize housing and should not be based on fixed or predetermined amounts.

Recipients and subrecipients may:

- Increase, decrease, pause, or discontinue assistance based on documented changes in household income, resources, or stability;
- Adjust the form or amount of assistance during re-evaluation periods; and
- Continue or resume assistance when extenuating circumstances arise, within regulatory limits.

All decisions regarding assistance levels and duration must be supported by documentation and must align with applicable program requirements and these Written Standards.

10.5 Summary of Financial Assistance by Program Component

Component	Eligible Financial Assistance	Maximum Duration	Utility Assistance
Street Outreach	Not applicable	N/A	Not applicable
Emergency Shelter	Operating costs and essential services	N/A	Not applicable
Homelessness Prevention	Rent, utilities, housing stabilization costs	Up to 12 months	Yes
Rapid Re-Housing	Rent, utilities, deposits, move-in costs	Up to 24 months	Yes

SECTION 11: TERMINATION POLICIES

Termination of assistance must be rare, limited to the most serious circumstances, and conducted in a manner that respects the rights, safety, and dignity of program participants. Recipients and subrecipients must maintain written termination policies and procedures consistent with Illinois Department of Human Services (IDHS) program requirements, applicable federal standards as incorporated through State-administered programs, and these Written Standards.

Termination must be based on a formal, documented process and may not occur without adherence to required due process protections.

11.1 Grounds for Termination

Assistance may be terminated only for serious violations of program requirements, including but not limited to:

- Material noncompliance with program rules after reasonable attempts to resolve the issue;
- Serious or repeated violations of lease or occupancy requirements that pose a health or safety risk; or
- Other circumstances permitted under applicable program requirements

Termination decisions must consider all relevant facts and extenuating circumstances and must not be based solely on inability to pay rent, utilities, or other program-related costs.

11.2 Due Process Requirements

Prior to terminating ESG assistance, recipients and subrecipients must ensure the following due process protections are provided:

- **Written Notice:**
Participants must receive timely written notice of the proposed termination, including a clear explanation of the reason(s) for termination and the effective date.
- **Opportunity to Appeal:**
Participants must be provided an opportunity to appeal the termination decision through a fair and impartial review process. Appeals must be reviewed by staff not directly involved in the original determination.
- **Final Determination:**
Participants must receive written notice of the final decision following the appeal process.

All notices, appeal documentation, and final determinations must be retained in accordance with applicable recordkeeping requirements.

11.3 Effect of Termination

Termination of assistance does not bar future eligibility for assistance under the same or other programs. Former participants may be considered for future assistance if they meet applicable eligibility criteria and funding is available.

Termination of assistance does not replace or override any legal eviction processes where applicable. Programs must comply with all applicable landlord-tenant laws and due process requirements when terminating tenancy in addition to program assistance.

SECTION 12: RECORDKEEPING & REPORTING

Recipients and subrecipients must maintain accurate, complete, and timely records sufficient to demonstrate compliance with Illinois Department of Human Services (IDHS) program requirements, applicable federal standards as incorporated through State-administered programs, and these Written Standards. Recordkeeping and reporting practices must support transparency, accountability, and effective program monitoring.

12.1 Homeless Management Information System (HMIS)

Unless exempt as a victim service provider, all programs covered under this section must participate in the SCC CoC's designated Homeless Management Information System (HMIS) and comply with all HMIS policies and procedures.

- Projects must enter and maintain complete and accurate participant-level data in HMIS in accordance with applicable data standards;
- Victim service providers must maintain comparable confidential databases consistent with federal requirements; and
- HMIS participation requirements, data quality standards, and confidentiality protections are addressed in Part I and the SCC CoC HMIS Policies and Procedures.

12.2 Program Participant Files

Recipients and subrecipients must establish and maintain individual program participant files that document eligibility, assistance provided, and compliance with applicable program requirements.

Program participant files must include, as applicable:

- Documentation of homeless or at-risk status;
- Income verification for Homelessness Prevention or other income-restricted assistance;
- Records supporting financial assistance provided;
- Re-evaluation or follow-up documentation, as applicable;
- Habitability inspections, where required; and
- Notices, appeals, or other correspondence related to termination or changes in assistance.

Documentation must be sufficient to support eligibility determinations, assistance provided, and the level and duration of assistance.

12.3 Record Retention

Recipients and subrecipients must retain all records related to assisted activities for the period required by applicable program requirements, typically a minimum of five (5) years following the end of the grant term or final expenditure of funds, unless a longer retention period is required due to audit, monitoring, or litigation.

Records must be accessible for review by IDHS, the SCC CoC, or other authorized entities during monitoring or audit activities.

12.4 General Recordkeeping and Reporting Requirements

General requirements related to recordkeeping systems, documentation standards, confidentiality, reporting, monitoring, and audit readiness are addressed in [Part I](#) of this manual.

Recipients and subrecipients are responsible for ensuring that program-specific records align with and supplement the general requirements established in [Part I](#).

APPENDIX A

PERMANENT SUPPORTIVE HOUSING GUIDANCE

This appendix contains information and reference material to support the implementation of Permanent Supportive Housing (PSH) projects funded under the Continuum of Care (CoC) Program, in accordance with 24 CFR Part 578.

The resources included herein are intended to assist CoC recipients and subrecipients in understanding the purpose, regulatory framework, and best practices associated with CoC-funded PSH. This appendix is provided for informational purposes only and does not supersede the binding requirements set forth in Part II: Continuum of Care (CoC) Program Specific Standards of this manual.

- [Introductory Guide to the CoC Program - HUD Exchange](#)
- [CoC Program Toolkit - HUD Exchange](#)
- [Continuum of Care \(CoC\) Program Eligibility Requirements - HUD Exchange](#)
- [CoC Program Components - Permanent Supportive Housing \(PSH\) - HUD Exchange](#)
- [eCFR :: 24 CFR 578.37 -- Program components and uses of assistance.](#)
- [CoC Additional Requirements - PSH Retention - HUD Exchange](#)
- [CoC Virtual Binders: At A Glance - HUD Exchange](#)
- [CPD 17-11](#)
- [St Clair County Public Housing Authority Utility Allowance Schedule IL-HUD 52667-2025.pdf](#)
- [Notices CPD-2016-11 and CPD-2014-12](#)

APPENDIX B

TRANSITIONAL HOUSING GUIDANCE

This appendix provides information and reference materials to support the implementation of Transitional Housing (TH) projects funded under the Continuum of Care (CoC) Program, in accordance with 24 CFR Part 578.

The guidance and resources included herein are intended to help recipients and subrecipients understand the purpose, regulatory framework, and best-practice considerations associated with CoC-funded Transitional Housing projects. This appendix is provided for informational and technical assistance purposes only and does not supersede or replace the binding requirements set forth in Part II: Continuum of Care (CoC) Program Specific Standards of this manual.

- CoC Program Components - Transitional Housing (TH) - HUD Exchange
- Introductory Guide to the CoC Program - HUD Exchange
- CoC Program Toolkit - HUD Exchange
- CPD 17-11
- CoC Virtual Binders: At A Glance - HUD Exchange

APPENDIX C

RAPID REHOUSING GUIDANCE

This appendix contains information and reference material related to Rapid Re-Housing (RRH) under both Continuum of Care (CoC) Program and the Emergency Solutions Grant (ESG) Program.

These resources are provided for informational and technical assistance purposes only. Program requirements, eligibility, and standards applicable to funded projects are governed by the corresponding Written Standards set forth in Part II (CoC) and Part III (ESG) of this manual.

C.1 Continuum of Care (CoC) Program – Rapid Re-Housing

Regulatory Authority: 24 CFR Part 578

- [Introductory Guide to the CoC Program - HUD Exchange](#)
- [CoC Program Toolkit - HUD Exchange](#)
- [Continuum of Care \(CoC\) Program Eligibility Requirements - HUD Exchange](#)
- [NAEH_RapidRehousingToolkit.pdf](#)
- [CoC Program Components - Rapid Re-housing \(RRH\) - HUD Exchange](#)
- [eCFR :: 24 CFR 578.37 -- Program components and uses of assistance.](#)
- [CoC and ESG Virtual Binders: At A Glance - HUD Exchange](#)
- [CPD 17-11](#)
- [St Clair County Public Housing Authority Utility Allowance Schedule IL-HUD 52667-2025.pdf](#)

C.2 Emergency Solutions Grant (ESG) Program – Rapid Re-Housing

Regulatory Authority: IDHS Program Guidance and Grant Requirements, incorporating applicable federal standards under 24 CFR Part 576

- [IDHS: Rapid Re-Housing Program \(RRH\)](#)
- [IDHS: VII. Rapid Re-Housing](#)
- [IDHS: Emergency Solutions Grant \(ESG\) Program - FY25](#)
- [ESG HOUSING PROVIDER and RRH Eligibility Determination Flow Chart.pdf](#)
- [Microsoft Word - ESG External Manual 4-9-2018 Final.docx](#)

APPENDIX D

EMERGENCY SHELTER GUIDANCE

This appendix provides supplemental information and reference materials to support the implementation of Emergency Shelter activities funded through programs administered by the Illinois Department of Human Services (IDHS), including Emergency Solutions Grant (ESG)–funded shelter operations.

These resources are intended to support recipients and subrecipients in understanding program design, eligible activities, and best practice considerations for Emergency Shelter activities, in accordance with IDHS program guidance and applicable federal standards as incorporated through State-administered programs.

This appendix is provided for informational and technical assistance purposes only and does not supersede or replace the binding requirements set forth in Part III: IDHS Program-Specific Standards of this manual.

- [IDHS: Emergency Solutions Grant \(ESG\) Program - FY25](#)
- [IDHS: SECTION 5: Eligible Activities](#)
- [Microsoft Word - ESG External Manual 4-9-2018 Final.docx](#)

APPENDIX E

STREET OUTREACH GUIDANCE

This appendix provides supplemental information and reference materials to support the implementation of Street Outreach activities funded through programs administered by the Illinois Department of Human Services (IDHS), including Emergency Solutions Grant (ESG)–funded outreach.

These resources are intended to support recipients and subrecipients in understanding program design, eligible activities, and best practice considerations for outreach to individuals and families experiencing unsheltered homelessness, in accordance with IDHS program guidance and applicable federal standards as incorporated through State-administered programs.

This appendix is provided for informational and technical assistance purposes only and does not supersede or replace the binding requirements set forth in Part III: IDHS Program-Specific Standards of this manual.

- [IDHS: SECTION 1: General Information](#)
- [IDHS: Emergency Solutions Grant \(ESG\) Program - FY25](#)
- [Microsoft Word - ESG External Manual 4-9-2018 Final.docx](#)

APPENDIX F

HOMELESSNESS PREVENTION GUIDELINES

This appendix provides supplemental information and reference materials to support the implementation of Homelessness Prevention activities funded through programs administered by the Illinois Department of Human Services (IDHS).

These resources are intended to support recipients and subrecipients in understanding program design, eligible activities, and best practice considerations associated with preventing households at imminent risk of homelessness from losing housing, in accordance with IDHS program guidance.

This appendix is provided for informational and technical assistance purposes only and does not supersede or replace the binding requirements set forth in Part III: IDHS Program-Specific Standards of this manual.

- [IDHS: Homeless Prevention](#)
- [IDHS: IV. Homeless Prevention Program \(Statute: 310 ILCS 70/1\)](#)
- [IDHS: SECTION 7: Program Requirements for RR/HOUSING PROVIDER \(Rapid Rehousing/Homelessness Prevention\)](#)
- [Microsoft Word - ESG External Manual 4-9-2018 Final.docx](#)

APPENDIX G

ADDITIONAL RESOURCES

To access the following policies and procedures, along with other helpful information, please visit the Saint Clair County website:

[St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#)

- St. Clair County Illinois Homeless Action Council Of St. Clair County Bylaws
- East Saint Louis/ Belleville/ Saint Clair County Continuum of Care II 508 Homeless Management Information Systems (HMIS) Policies and Procedures Manual
- Saint Clair County Continuum of Care II 508 Coordinated Entry System Policy and Procedures
- St. Clair County Intergovernmental Grants Department/Community Development LEAD POLICIES AND PROCEDURES
- The Policy and Procedure Manual for Compliance Monitoring
- St. Clair County Continuum of Care- HUD Match Requirements

To access additional information and resources, please visit the HUD exchange website:

[CoC: Continuum of Care Program - HUD Exchange](#)

[FY 2013 CoC Start Up Training: Program Components](#)

[HUD-Wellness-Checklist-for-CoC-Programs.pdf](#)

[Lead-Based Paint - HUD Exchange](#)

[Utility Allowance Final CLEARED VERSION](#)

[CPD Monitoring Handbook \(6509.2\) | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

[IDHS State Funding for Homelessness Prevention, Services, and Supportive Housing: Grants](#)

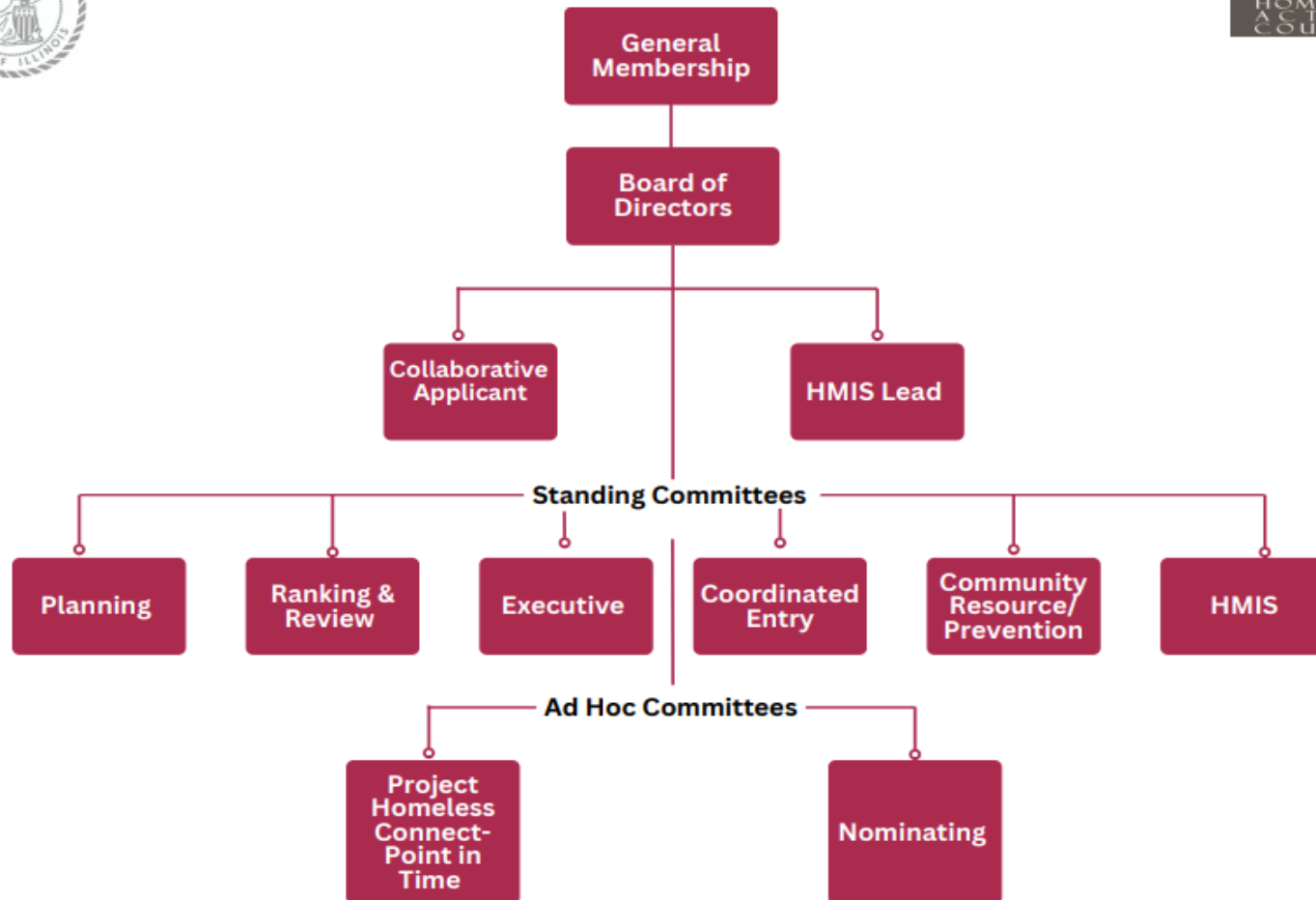
[eCFR :: 24 CFR Part 578 -- Continuum of Care Program](#)

[eCFR :: 24 CFR Part 576 -- Emergency Solutions Grants Program](#)

[Institutional Stays and CoC and ESG Eligibility](#)

APPENDIX H
HAC REFERENCE CHART

ST CLAIR COUNTY HOMELESS
ACTION COUNCIL



APPENDIX I

Il 508 Coc- St. Clair County/Belleville/East St. Louis Emergency Transfer Plan For Victims Of Domestic Violence, Dating Violence, Sexual Assault, Or Stalking

Emergency Transfers

IL508 COC-St. Clair County/Belleville/East St. Louis is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with [The Violence Against Women Act \(VAWA\)](#) all HUD-funded Housing Providers in IL-508 allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. All COC funded programs are required to provide the VAWA Notice of Occupancy Rights ([HUD 5380](#)) to their tenant at start of the project. The ability to request a transfer is available regardless of sex. The ability of the Housing Provider to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the Housing Provider has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development ([HUD-5381](#)), the Federal agency that oversees that IL 508 COC programs is in compliance with VAWA.

Eligibility for Emergency Transfers

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

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall notify their housing provider and submit a written request for an emergency transfer. The housing provider shall promptly notify the SCC CoC Collaborative Applicant and coordinate the emergency transfer request in accordance with this Plan. Housing providers shall provide reasonable accommodations to individuals with disabilities when requesting an emergency transfer. The tenant's written request for an emergency transfer should include either:

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

Confidentiality

The Housing Providers will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives the Housing Provider written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants ([HUD 5380](#)) for more information about the Housing Provider's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

The Housing Provider cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. The Housing Provider will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. The Housing Provider may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If the Housing Provider has no safe and available units for which a tenant who needs an emergency is eligible, the Housing Provider will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, the Housing Provider will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Safety and Security of Tenants

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

Resource	Purpose	Contact Information
National Domestic Violence Hotline	Support, safety planning, crisis intervention, and referrals for survivors of domestic violence and stalking	Call: 1-800-799-SAFE (7233) Text: START to 88788 Online Chat Available Website: https://www.thehotline.org/
National Deaf Domestic Violence Hotline (NDDVH)	Support for individuals who are Deaf, DeafBlind, or hard of hearing experiencing domestic violence.	Video Phone: 855-812-1001 Instant Messenger: DeafHotline Email: nationaldeafhotline@adwas.org
RAINN National Sexual Assault Hotline	Confidential support and crisis services for survivors of sexual assault.	Call: 800-656-HOPE (4673) Text: HOPE to 64673 Chat: RAINN.org/hotline Website: https://rainn.org/
Crisis Connection	Information, safety planning, and resources for victims of stalking, domestic violence, and sexual abuse/ assault.	Call: 1-800-245-4580 Email: info@crisisconnectioninc.org Website: https://www.crisisconnectioninc.org/getinformedstalking.html
VictimConnect Resource Center	Information, referrals, and emotional support for victims of crime, including domestic violence, sexual assault, stalking, and human trafficking.	Call/Text: 1-855-4-VICTIM (855-484-2846) Online Chat: victimconnect.org Website: https://victimconnect.org/
Violence Prevention Center of Southwestern Illinois	Local advocacy, emergency shelter, safety planning, counseling, and support services.	24-Hour Hotline: 618-235-0892

Internet Safety Note: Internet usage can be monitored and may not be fully erasable. If you believe your internet activity may be monitored, consider calling a hotline directly from a safe location or device.

Regulatory Authority

This Emergency Transfer Plan is governed by the Violence Against Women Act (VAWA), which provides protections to victims of domestic violence, dating violence, sexual assault, and stalking in HUD-assisted housing programs. In compliance with VAWA, all HUD-funded housing providers are required to allow tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer to a safe unit when needed.

In addition, the following HUD forms reflect the current regulatory requirements and must be utilized, as applicable, by all housing providers in the administration of this Plan. Housing providers are responsible for ensuring they use the most current versions published by HUD. Hyperlinks to the official HUD forms are provided below and should be referenced directly rather than relying on reproduced copies maintained within agency policies or procedures.

- [**HUD-5380**](#): Notice of Occupancy Rights Under the Violence Against Women Act (VAWA)
- [**HUD-5381**](#): Model Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking
- [**HUD-5382**](#): Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation
- [**HUD-5383**](#): Emergency Transfer Request for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking
- [**HUD-5384**](#)– Emergency Transfer Data Collection

These forms supersede previous versions and must be utilized in accordance with the HUD VAWA Final Rule ([24 CFR Part 5 Subpart L](#)), which outlines the process for emergency transfers, tenant protections, and confidentiality requirements

REVISION HISTORY

Board Approved Revision Date	Description
8/26/21	Adopted
6/28/22	Revision
1/24/23	Revision
6/28/23	Revision
7/25/23	Recertifications (Page 21)
9/26/23	Rapid Rehousing Section
6/24/2025	Comprehensive update to all sections
3/24/2026	RRH Project Standards-revision
09/22/2026	Comprehensive revision of the manual, including division into three parts to improve organization and clarify CoC-specific and state-funded program requirements.

