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Funding Sources

USING MULTIPLE FUNDING SOURCES

Back@Home-BoS utilizes multiple funding sources to offer a more comprehensive solution for household stability. See the [Eligible Costs section](#) for information on what is currently included in the Back@Home-BoS service package. Applicability and prioritization of the funding sources will be determined by NCORR based on eligibility and availability of each funding source.

Combining various funding sources enables Back@Home-BoS to use a holistic approach to address various needs by increasing the overall range of support available. Instead of relying on a single funding stream that may have limited scope, households can benefit from a more comprehensive solution. This can be especially beneficial for low-income families facing multiple financial challenges as it allows households to access a wider range of assistance in one program, reducing the number of programs a household must interact with in order to create a stable housing option.

CONTINUUM OF CARE FUNDING

Back@Home-BoS utilizes five grants awarded to NCORR as Continuum of Care funding through the U.S. Department of Housing and Urban Development (HUD) Special Notice of Funding Opportunity (Special NOFO) to Address Unsheltered and Rural Homelessness (FR 6500-N-25S)². The Special NOFO was designed to target individuals with severe service needs, especially in communities with homelessness occurring in rural areas, and with high proportions of unsheltered homelessness. The FY 2022 Special NOFO was also designed to encourage practices that are based on Housing First and public health principles to “reduce the prevalence of unsheltered homelessness, improve services engagement, health outcomes, and housing stability for vulnerable unsheltered individuals and families.”³

The HUD funds received by NCORR include grants both for rural and unsheltered geographic areas, and for both Rapid Rehousing and Permanent Supportive Housing, as well as one Supportive Services Only (SSO) grant. As the Oversight Agency, NCORR will ensure that the use of these funds follows the NOFO rules and guidelines as follows, and in alignment with Continuum of Care policies under 24 CFR part 578 as well as other applicable federal regulations including 2 CFR 200, in addition to state and local regulations.

The funding is authorized by Subtitle C of Title IV of the McKinney-Vento Homeless Assistance Act (42 USC 11381-11389) as well as CoC guidance under 24 CFR Part 578. The authority to include activities eligible under the Rural Housing Stability Assistance program under section 491 of such Act (42 U.S.C. 11408) in grants awarded under this NOFO is section 231 of the

² https://www.hud.gov/sites/dfiles/SPM/documents/Continuum_of_Care_Supplemental_FR-6500-N-25S.pdf

³ https://www.hud.gov/sites/dfiles/SPM/documents/Continuum_of_Care_Supplemental_FR-6500-N-25S.pdf, page 2.

income decreases. HSS Providers will receive training and program guidance on determining the household's rental payment. The household's rental payment will be paid directly to the Property Provider.¹⁷

The amount of rent owed by a household is calculated using the family's annual income less allowable deductions. There is no requirement for a minimum contribution. Households with no income will not be required to contribute towards rent. The household's rent contribution total must be the highest of these three totals:

- 30% of the household's Monthly Adjusted Income
- 10% of the household's Monthly Gross Income
- The portion of the household's welfare assistance, if any, is designated for housing costs.

All pieces of supporting evidence used to calculate rent must be kept in the household's client file. A Household's portion of rent payments are determined initially, and at least annually thereafter, for PSH households. In addition, adjustments to the rent contribution must be made as changes to the household's income are identified.¹⁸

UNSHELTERED AND RURAL PROJECTS

Households located in any of the NC BoS CoC's seventy-nine counties may be entered in the SSO project. If households are enrolled in RRH or PSH housing assistance projects, it will be one of two types, rural or unsheltered, depending on where they are located.

Two Continuum of Care grants (one RRH and one PSH) are restricted to utilizing funding in counties defined as rural. Additional details can be found in the [HUD Continuum of Care Funding section](#). RRH and PSH projects will each have two types - rural and unsheltered.

1. Rapid Rehousing (RRH)
 - a. Rapid Rehousing-Rural
 - b. Rapid Rehousing-Unsheltered
2. Permanent Supportive Housing (PSH)
 - a. Permanent Supportive Housing-Rural (PSH-Rural)
 - b. Permanent Supportive Housing-Unsheltered (PSH-Unsheltered)

Households in all seventy-nine counties in the NC BoS CoC are covered by either rural or unsheltered RRH and PSH projects. Unsheltered funds will be prioritized for twenty-four non-rural counties to maximize the use of resources.

¹⁷ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-rent-calculation/charging-rent/>

¹⁸ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-rent-calculation/documentation-and-review/>

Eligible Costs

Back@Home-BoS uses multiple funding sources to fund the eligible costs outlined in this section. Information about the design can be found in the [Using Multiple Funding Sources section](#). Eligible costs for the program inclusive of all sources are listed below. Information about how the varied funding sources are used for each line item may be found in the Back@Home-BoS Funding Source Management and Cost Allocation Guide.

SUMMARY OF ELIGIBLE COSTS

The table below details which partner may be reimbursed for each eligible cost.

Cost Category	HSS Providers	Housing Collaborative
Housing Stabilization Services		
Housing Stabilization Case Management	✓	
Outreach	✓	
System Navigation	✓	
Housing Navigation	✓	✓
Financial Assistance		
Temporary Stay	✓	
Unit Access		✓
Move-In	✓	
Rent and Utility		✓

HOUSING NAVIGATION

Housing Navigation services will be provided by a collaboration between HSS Providers and the Housing Collaborative. Housing Navigation is an element of Housing Identification. More information may be found in the [Housing Navigation](#) subsection under the [Housing Identification](#) section.

Housing Identification

Housing Identification includes both Property Provider Recruitment and Housing Navigation.

Property Provider recruitment acquires units for the Back@Home-BoS program.

Housing Navigation ensures households find the right fit for their housing needs.

As the Housing Identification Hub, Housing Collaborative will be the primary point of contact for Property Providers who are partnering with Back@Home-BoS

HSS Provider case managers also support housing navigation efforts by being the primary point of contact for households in the process.

Back@Home-BoS is a Tenant Based Rental Assistance Program. While households may receive Housing Stabilization Services to assist in obtaining any type of living situation as chosen by the household, Unit Access and Rent and Utility Financial Assistance may only be used in units that meet the requirements outlined in this section.

UNIT REQUIREMENTS

A vital part of housing identification is locating available, affordable units in the community for eligible households. All units that will be used for the Back@Home-BoS must meet the following criteria:

1. Standard Lease
2. Housing Assistance Payment (HAP) contract
3. Rent Reasonableness
4. Debarment Verification
5. Passed HUD Housing Quality Standards (HQS) inspection³⁵

STANDARD LEASING

All households receiving unit access and rent and utility financial assistance will have standard NC leases or rental agreements. These leases will not have any provisions that would not be found in leases held by someone who does not have a disability. Back@Home-BoS will not require additional house rules to receive financial assistance. Initial leases must be for at least 12 months.³⁶ All leases are renewable at tenants' and owners' option.

³⁵ On September 18, 2023, the compliance date was extended to October 1, 2024, for the transition of HUD's National Standards for the Physical Inspection of Real Estate (NSPIRE) final rule as a replacement to HQS. Until then, the continued use of HQS inspections is expected.

<https://www.federalregister.gov/documents/2023/09/18/2023-20130/economic-growth-regulatory-relief-and-consumer-protection-act-implementation-of-national-standards>

³⁶ https://files.hudexchange.info/resources/documents/Rapid_Re-Housing_ESG_vs_CoC.pdf

Leases for households must be written, legally binding documents. Leases are not allowed to have:

- Additional requirements beyond what is covered in a lease agreement typical to the area; and
- Any provisions that are contradictory to program policies and procedures, such as requiring drug testing or program participation.

Upon lease signing, HSS Providers will explain basic tenant-landlord rights and requirements of specific leases to households including:

- Tenant rights as defined by federal, North Carolina, and local laws and ordinances;
- Tenant responsibilities regarding property damage, keeping properties they occupy clean and safe and notifying Property Providers of all property management needs; and
- Property Provider responsibilities, including maintaining the property in good, safe, working condition and making all repairs as necessary within a reasonable time.

HSS Providers will assist households in creating a plan to adhere to the lease requirements.

HOUSING ASSISTANCE PAYMENT (HAP) AGREEMENT

The Housing Assistance Payment (HAP) contract is the contractual agreement between Back@Home-BoS and the Property Provider that is required by HUD to administer rental assistance. The HAP contract outlines:

- The terms of the rental assistance provided to the Property Provider on the household's behalf by Back@Home-BoS
- The anticipated portion of the rent to be paid by the household
- An overview of utilities and appliances connected to the unit.

Housing Collaborative will ensure that a HAP contract is signed for every unit that is receiving Back@Home-BoS financial assistance.

RENT REASONABLENESS

All units that receive rental assistance will need to meet rent reasonableness standards. Housing Collaborative will conduct a rent reasonableness check to ensure that program rents being paid are reasonable in relation to rents being charged for comparable unassisted units in the area. To determine whether a unit meets this standard, a rent reasonableness review will be conducted comparing no less than 3 comparable units.³⁷

³⁷ <https://files.hudexchange.info/resources/documents/CoC-Rent-Reasonableness-and-FMR.pdf>

DEBARMENT VERIFICATION

Housing Collaborative will verify the property's ownership and check the names of the ownership and property management entities against the federal³⁸ and state debarment databases.³⁹

HOUSING INSPECTIONS

Back@Home-BoS will use HUD's Housing Quality Standards (HQS) for all units.

Before any financial assistance is provided, each unit is physically inspected to ensure it meets HQS guidelines. All unit inspections will be scheduled by Housing Collaborative at least annually during the grant period to ensure that the units continue to meet HQS. Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days of the date of the initial inspection and Housing Collaborative verifies that all deficiencies have been corrected. Inspections will be completed by a certified HQS inspector.

LEAD BASED PAINT

Lead is used in the manufacturing of various products and in manufacturing, including paint, until a federal government ban for residential use in 1978. Lead-based paint is not dangerous in itself but becomes hazardous once it starts to deteriorate. At certain levels, lead can cause major health issues affecting the central nervous system, skeletal system, and other major organs like the kidneys. Children and pregnant individuals are at a higher risk of elevated exposure.

In order to ensure the safety and well-being of tenants, as part of the current HQS Inspection⁴⁰, an inspector will conduct a Visual Assessment initially and then annually of all painted surfaces under the following conditions:

- The unit was built before 1978; and
- There is a child under 6 years old or a pregnant individual expected to reside in the unit.

If a Visual Assessment is necessary, but the de minimis Levels are not exceeded, no further action is warranted. However, if the de minimis levels are exceeded, testing by a Certified Risk Assessor/Certified Lead Professional will be completed. If treatment is needed, the Paint Stabilization will be done by a qualified contractor, following safe work practices, and clearance will be performed in accordance with all federal regulations (24 CFR Part 35) which may also include an Environmental Investigation and monitoring the property owner's compliance with Lead Safe Housing Rule (LSHR). All exceptions will be appropriately documented.

³⁸ <https://sam.gov/content/home>

³⁹ <https://www.doa.nc.gov/nc-debarred-vendors>

⁴⁰ A notice by HUD September 18, 2023, states that NSPIRE final rule will go into effect no later than October 1, 2024.

Additionally, to meet the Elevated Blood Lead Level (EBLL) requirement, quarterly data will be shared with the local Health Department. Proper notification will also be sent to the HUD Field Office after a verification of EBLL.

SHARED HOUSING

Shared housing is a situation in which multiple households have private bedrooms but share common areas, sanitary facilities, and cooking facilities. Shared Housing can be a viable option for families seeking economical housing under various market conditions. Families in markets with tight rental conditions or with a prevalence of single-family housing, for example, may determine a shared housing living arrangement to be a useful way to secure affordable housing.

A separate HAP contract and lease must be in place for each Back@Home-BoS household. If an agency is placing a client in shared housing, all unit requirements still apply.

PROPERTY PROVIDER AND UNIT RECRUITMENT

Property Providers are an essential partner in Back@Home-BoS. Back@Home-BoS will actively recruit Property Providers to accrue units to help place households in permanent housing.

Back@Home-BoS uses a systemic approach to move households quickly into housing. Rather than looking for units household-by-household, systems need to assess the total unit needs of the people experiencing homelessness in their communities and develop a plan to meet target unit numbers before all households are identified by case managers. Conversations with Property Providers need to center on the business opportunity rental assistance provides and how many units they want to dedicate to the housing program now and in the future as units turnover.

PROPERTY PROVIDER SUPPORTS

Housing Collaborative may distribute electronic materials to Property Providers detailing all Property Provider support policies and procedures, as well as basic information about Back@Home-BoS and responses to frequently asked questions.

Housing Collaborative will be the primary contact for Property Providers and will ensure that Property Providers have a streamlined process for contacting them in case of developing issues with household's housing and respond in a timely manner (within 1 business day) to all Property Provider contacts. In addition, Housing Collaborative will proactively call participating Property Providers to see if there are any issues threatening tenancy that need to be addressed. Housing Collaborative will coordinate with the HSS Provider to assist the household in addressing any issues that arise. Open and clear communication between Housing Collaborative and Property Providers, including setting realistic standards and expectations for services provided, are essential to effective Property Provider support.

Housing Collaborative and HSS Providers will be available to mediate disputes between Property Providers and households, with household permission, as concerns arise. Housing

Collaborative will work collaboratively with Property Providers while HSS Providers will work with households to develop mutually agreeable plans to sustain tenancy.

UTILIZING PROPERTY PROVIDER INCENTIVES

Housing Collaborative can utilize additional supports on a case-by case basis as needed, including as financial incentives as described in [Eligible Costs](#).

Property Provider Incentives may be used to increase access to units for households facing numerous system barriers to leasing a unit (i.e., no rental history, history of eviction, poor credit, criminal records, etc.).

Property Provider Incentives may also be deployed in areas within the NC BoS CoC with more competitive rental markets with lower vacancy rates.

UTILIZING SUBSIDIZED UNITS

Housing Collaborative is encouraged to utilize subsidized units for households where possible. Subsidized units are those units where the government or other funder provides financial assistance to make housing more affordable for eligible individuals or families. This assistance can come in various forms, such as direct rental subsidies, reduced rent, or other financial incentives for landlords. These types of units include subsidized units created by:

- HOME-ARP investments
- Multi-Family Units
- NC Targeting Program
- Section 811
- Supportive Housing Development Program
- Tax Credits

Housing Collaborative will identify where subsidized units are located in the community and maintain partnerships with Property Providers managing these units to increase access for Back@Home-BoS households.

PROPERTY PROVIDER SCREENING

Housing Collaborative will collaborate with HSS Providers and other partners to identify and screen out potential Property Providers who have a history of poor compliance with their legal responsibilities and fair housing practices. Housing Collaborative will document household complaints against Property Providers to screen out potential Property Providers for lack of compliance with legal responsibilities and fair housing practices.

In addition, Housing Collaborative will ensure that Property Providers have not:

- Failed to deliver on previously agreed housing units and/or
- Been investigated and confirmed to have engaged in fraudulent activity in NCORR's ERA-funded programs.

HOUSING NAVIGATION

HOUSING NAVIGATION SERVICES

Housing Navigation Services assist households to gain access to and address issues with maintaining a physical unit.

The following activities are examples of Housing Navigation Services:

- Assist the household to address any barriers to obtaining housing including eviction history, poor credit, criminal history;
- Assist the household to identify housing preferences and needs;
- Assist the household to select adequate housing and complete housing applications, including supporting with background checks and other required paperwork associated with a housing application;
- Complete reasonable accommodation requests;
- Coordinate the household's move into stable housing including by assisting with the following:
 - Logistics of the move (e.g., arranging for a moving company or truck rental)
 - Utility Set-Up and reinstatement
 - Obtaining furniture/commodities to support stable housing;
- Connect to or provide the household with education/training on residents' and Property Owners' roles, rights, and responsibilities.

HSS Providers and Housing Collaborative will partner to offer Housing Navigation services to Back@Home-BoS households.

HOUSING CHOICE

The goal of Back@Home-BoS is to find housing options that are appropriate and meet the needs of households. Housing Collaborative housing navigators and HSS Provider case managers will assist households in identifying their housing preferences and offer the same range of choices in units as are available to others at their income level in the same housing market. Housing navigators, case managers, and households will consider the size of the unit, location, accessibility features, and cost of rent when deciding on a unit.

Housing Collaborative will work in partnership with HSS Providers to find the best housing option for a household. If a household or HSS Provider identifies an available unit, the case manager will coordinate with Housing Collaborative to ensure the unit meets program requirements and the Property Provider is a viable option for financial assistance.

Back@Home-BoS will honor client choice for unit selection if the housing meets program requirements and the Property Provider is willing to accept financial assistance. When needed, Housing Collaborative will utilize available Property Provider incentives to assist a household in gaining access to a unit.

HOUSING SEARCH

HSS Provider case managers and Housing Collaborative housing navigators will work in partnership to place households into units.

HSS Provider case managers will assist households in obtaining the necessary identification and documentation to apply for units. Upon receiving Authorization for Permanent Housing, the HSS Provider case manager will refer households to Housing Collaborative to assist with connecting the household with available units in the community.

Housing Collaborative housing navigators will assist the household in viewing the unit, completing a rental application, and coordinating the lease signing.

MOVE-IN

Housing Collaborative and the HSS Provider will assist the household with scheduling move-in.

Housing Collaborative will ensure all unit-related payments are made.

HSS Providers will assist households by identifying furniture and household items needed to make the new house a home for the household. HSS Providers will ensure these needs are met through providing Move-in Financial Assistance and/or connecting households to donations and other resources.

MAINTAINING THE UNIT

Housing Collaborative and HSS Providers will continue to collaborate to ensure the household maintains the housing unit.

HSS Providers will provide support to the household, including ensuring services are tailored to meet changing needs. HSS Providers will support accurate payments by continuing to partner with Housing Collaborative, ensuring needed information is shared between all parties, including income recertification and changes, documentation of utility bills, and any changes to household composition or living situation. In addition, HSS Providers will also notify Housing Collaborative if a potential issue is identified through home visits with the household.

Housing Collaborative will make all unit-related Rent and Utility Financial Assistance payments and any Property Provider Incentives payments that may become necessary for the households to stay in the unit. Housing Collaborative will regularly check in with Property Providers to identify and resolve issues threatening tenancy.

If a tenancy issue cannot be resolved, the Housing Collaborative will work with the HSS Provider to locate a new unit and rehouse the household to avoid eviction to the best of their abilities.

As a unit's lease is up for renewal, Housing Collaborative will assist with renewing the lease and getting a new HAP signed with the Property Provider. The HSS Provider will support communication with the household.

HOUSING IDENTIFICATION RESPONSIBILITY SUMMARY

Housing Identification Activities	Agency Responsible	
	HSS Provider	Housing Collaborative
Recruit units for Back@Home-BoS		✓
Obtain documentation such as state id or social security card for housing applications	✓	
Determine household needs for units	✓	✓
Identify available units that meet household needs		✓
Arrange for viewing of units	✓	✓
Complete rental applications	✓	✓
Complete HAP contract and facilitate execution of lease and required addenda		✓
Deploy Property Provider Incentives		✓
Assist with setting up utilities for unit	✓	
Arrange for moving services if needed	✓	
Identify resources for furnishing and home goods	✓	
Income initial certification and recertifications	✓	
Regularly check in with Property Provider to help resolve issues threatening tenancy		✓
Assist with HAP contract and lease renewals		✓
Locate a new unit and rehouse the household if needed	✓	✓

Data Collection and Data Entry Requirements

Data collection for Back@Home-BoS will be accomplished through direct interaction with households, largely recorded on various programmatic forms or directly entered into the systems of record. Back@Home-BoS subrecipient staff will be responsible for the completion of the various programmatic forms and entering any data collected to the appropriate system of record (including uploading programmatic forms to the appropriate system of record). Back@Home-BoS NCORR staff will be responsible for verifying the accuracy and completeness of data collected for households.

Back@Home-BoS will utilize three systems of record for data entry of collected data. To minimize data entry, data from HMIS and Housing Accelerator will be imported to the Back@Home-BoS System of Record.

BACK@HOME-BOS SYSTEM OF RECORD

The Back@Home-BoS System of Record is a customized information technology system in the Salesforce platform to import client-level data and payment data from HMIS and the Housing Accelerator, allowing NCORR to provide oversight and payments to Subrecipients providing financial assistance and services to households enrolled in Back@Home-BoS projects.

The Back@Home-BoS System of Record is managed by NCORR's Business Systems team. NCORR's staff will be primarily responsible for data collection, entry, and maintenance in the system.

HSS Provider staff will be responsible for:

- Submitting a request for NCORR to authorize enrollment of a household in a Back@Home-BoS permanent housing project in HMIS. Adequate data entry and eligibility documentation must be completed and maintained by HSS Providers to substantiate NCORR approval of an authorization for permanent housing project enrollment in HMIS.
- Submitting monthly invoices for financial assistance and services provided to enrolled households. Data entry and documentation must be completed and maintained by HSS Providers to substantiate NCORR approval to pay invoiced financial assistance and service.

Housing Collaborative staff will be responsible for:

- Submitting monthly invoices for financial assistance and services provided to eligible households. Data entry and documentation must be completed and maintained by Housing Collaborative to substantiate NCORR approval to pay invoiced financial assistance and service.

NCORR, Housing Collaborative, and HSS Provider staff will adhere to Back@Home-BoS Standard Operating Procedures to ensure timeliness and accuracy of data collection, entry, and maintenance in the system.

HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

As directed by Congress, HUD must provide an annual estimate of all individuals and families experiencing homelessness nationwide and within the territories. Therefore, the NC BoS CoC is required to have an HMIS that has the capacity to collect unduplicated counts of individuals and families experiencing homelessness and provide information to project Subrecipients and applicants for needs analysis and funding priorities. Projects that include CoC funding under the NC BoS CoC must participate in the NC BoS CoC HMIS system.

HMIS is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families. The North Carolina Coalition to End Homelessness (NCCEH) serves as the HMIS Lead Agency for the NC BoS CoC. Back@Home-BoS uses the the NC BoS CoC's system, HMIS@NCCEH.

HSS Provider staff will be responsible for data collection, entry, and maintenance in the system. HSS Provider staff will adhere to the most recent HMIS Data Standards published on the HUD Exchange to ensure timeliness and accuracy of data collection, entry, and maintenance in the system.⁴¹ HSS Provider staff will also adhere to the administrative and operation policies and procedures of HMIS@NCCEH⁴² including appropriate use of Back@Home-BoS SSO, RRH-Rural, RRH-Unsheltered, PSH-Rural and PSH-Unsheltered projects.

HOUSING ACCELERATOR SYSTEM

Housing Accelerator is a customized information technology system in the Salesforce platform to collect client-level data and payment data related to housing navigation and financial assistance to homeless individuals and families enrolled in Back@Home-BoS projects.

The Housing Accelerator system is managed by Housing Collaborative. Housing Collaborative staff will be primarily responsible for data collection, entry, and maintenance in the system.

HSS Provider staff will be responsible for submitting a referral record in the Housing Accelerator system when an eligible and enrolled Back@Home-BoS household needs housing navigation or financial assistance for rent, utilities, or unit access costs.

Housing Collaborative and HSS Provider staff will adhere to Back@Home-BoS Standard Operating Procedures to ensure timeliness and accuracy of data collection, entry, and maintenance in the system.

⁴¹ <https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>

⁴² <https://www.ncceh.org/hmis/administrative/>

Program Performance Measurement

With a commitment to continuous improvement, Back@Home-BoS partners actively seek feedback, adjust strategies, and ensure the program remains both impactful and sustainable.

NCORR will routinely conduct performance measurement activities by establishing Key Performance Indicators (KPIs) to measure efficiency, effectiveness, and ability to produce quality outputs that meet program goals and objectives. In the event performance standards are not consistently achieved by Subrecipients, NCORR will identify and communicate areas of improvement, and when appropriate may provide additional training or technical assistance. NCORR may also issue a Performance Improvement Plan; these plans may include: (1) information on acceptable performance levels; (2) specific, measurable, and achievable objectives; (3) relevant and time-bound guidance on what NCORR will do to assist with performance improvement; (4) details on progress meetings; and (5) consequences for not meeting the objectives of the plan.

Examples of Key Performance Indicators may include but are not limited to:

- Number of households receiving financial assistance and amount of financial assistance provided;
- Number of households receiving housing stabilization services;
- Number of available case management slots unassigned by provider/county;
- Number of positive exits to permanent housing;
- Length of time to become housed;
- Case manager to client ratios; and
- Client satisfaction.

Unsatisfactory performance by any subrecipient, as defined by the NCORR, may result in a reduction of funds or termination of contract.

Additional Key Performance Indicators may be added at the discretion of NCORR at any point to evaluate and measure performance and achievement of program goals and objectives.

Cross-Cutting and Other Policies and Regulations

INVOLVEMENT OF HOUSEHOLDS WITH LIVED EXPERIENCE OF HOMELESSNESS

Back@Home-BoS values the insights and expertise that people with lived experience of homelessness bring to program design, policy decisions, and program implementation. To that end, NCORR and all Subrecipients adhere to 24 CFR 578.75(g). This includes:

- Providing for the participation of people who are or have experienced homelessness on the board of directors or other equivalent policymaking entity. This requirement is waived if NCORR or other Subrecipients are unable to meet such a requirement if they obtain HUD approval and have a plan to otherwise consult with people experiencing or have experienced homelessness when considering making policies and decisions.
- Involving people who are or have experienced homelessness through employment, volunteer services, project operation, or providing services.

NCORR regularly consults with the NC BoS CoC Lived Experience Advisory on Back@Home-BoS to solicit their guidance. The group advised on the RFA for HSS Providers before its release and program workflows before program launch.

CONTINUUM OF CARE POLICIES AND PROCEDURES

Back@Home-BoS, including the North Carolina Office of Recovery and Resiliency (NCORR) and its Subrecipients will follow all applicable NC BoS Continuum of Care (CoC) policies and procedures, including, but not limited to:

- 1) NC Balance of State Continuum of Care Plan to Serve Individuals and Families Experiencing Homelessness with Severe Service Needs⁴³
- 2) NC Balance of State Continuum of Care Standards- Outreach⁴⁴
- 3) NC Balance of State Continuum of Care Standards - Permanent Supportive Housing⁴⁵
- 4) NC Balance of State Continuum of Care Standards - Homelessness Prevention and Rapid Rehousing⁴⁶
- 5) Homeless Management Information System (HMIS) Data Quality Plan⁴⁷
- 6) NC Balance of State Continuum of Care Anti-Discrimination Policies and Procedures⁴⁸
- 7) Coordinated Entry policies and procedures⁴⁹
- 8) VAWA Emergency Transfer Plan Policy⁵⁰

⁴³ [plan-to-serve-severe-service-needs-draft-3.pdf \(ncceh.org\)](#)

⁴⁴ <https://www.ncceh.org/media/files/page/a64ba896/street-outreach-written-standards-final-11-02-21.pdf>

⁴⁵ [psh-written-standards-final-11-02-21.pdf \(ncceh.org\)](#)

⁴⁶ [ncceh.org/files/10270/](#)

⁴⁷ [hmis-ncceh-data-quality-plan-draft-clean-1-30-23-.docx \(live.com\)](#)

⁴⁸ [2023-anti-discrimination-policy-final-draft.docx \(live.com\)](#)

⁴⁹ <https://www.ncceh.org/bos/coordinatedentry/>

⁵⁰ <https://www.ncceh.org/media/files/pages-page/242b6afd/2023-nc-bos-coc-vawa-emergency-transfer-plan-final.pdf>

- 9) Anti-Discrimination Policies and Procedures⁵¹
10) Client Bill of Rights⁵²

ONBOARDING AND TRAINING

Recognizing that Back@Home-BoS is a new model, onboarding support and training will be available and encouraged, and in some cases required. Back@Home-BoS plans to partner with agencies to provide a full range of training on best practices.

As required by the NC BoS CoC, Back@Home-BoS will provide access to training. This may include, but is not limited to, the following topics:

- Requirements of all funding streams and the Back@Home-BoS program model
- The principles of Housing First and the basic program philosophy of Housing Stabilization Services
- Landlord and tenancy rights and responsibilities
- The ethical use and application of Back@Home-BoS's financial assistance policies, including, but not limited to, initial and ongoing eligibility criteria, program requirements, assistance maximums
- Medicaid enrollment procedures
- Social Security Disability Income and Supplemental Security Income and enrollment procedures

Subrecipients will maintain documentation to show that each program staff have completed required trainings. NCORR is responsible for keeping Subrecipients regularly updated on changing regulations, training requirements, and/or program policies through regular oversight and technical guidance processes.

DOMESTIC VIOLENCE POLICY

Back@Home-BoS prioritizes the safety of all households in the program including those experiencing domestic violence, dating violence, sexual assault, human trafficking, or stalking.

Per 24 CFR 578.23(c)(4)(i)(ii), all Subrecipients will maintain the confidentiality of records pertaining to a household that was provided family violence prevention and will not publicly disclose the address or location of any family violence project without the written authorization of the person responsible for the operation of the project.

In addition, NCORR and all Subrecipients adhere to the NC Balance of State CoC's VAWA Emergency Transfer Plan Policy which mandates that all HUD grantees help people experiencing domestic violence move to another unit for their safety upon the household's request.⁵³

⁵¹ <https://www.ncceh.org/files/13261/>

⁵² <https://www.ncceh.org/media/files/pages-page/92511894/nc-bos-coc-client-bill-of-rights-final.pdf>

⁵³ <https://www.ncceh.org/files/12971/>

As outlined in 24 CFR 578.103(6), HSS Providers will retain the following documentation for households who move to a different Continuum of Care due to imminent threat of further domestic violence, dating violence, sexual assault, or stalking:

- Documentation of the original incidence of domestic violence, dating violence, sexual assault, or stalking, only if the original violence is not already documented in Back@Home-BoS household's case file. This may be written observation of the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; medical or dental records; court records or law enforcement records; or written certification by the household to whom the violence occurred or by the head of household.
- Documentation of the reasonable belief of imminent threat of further domestic violence, dating violence, or sexual assault or stalking, which would include threats from a third-party, such as a friend or family member of the perpetrator of the violence. This may be written observation by the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; current restraining order; recent court order or other court records; law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts; or a written certification by Back@Home-BoS household to whom the violence occurred or the head of household.
- Data on emergency transfers requested including data on the outcomes of such requests.

GRIEVANCE POLICY

NCORR is committed to addressing any grievances from program participants, Subrecipients, or other stakeholders in a fair and timely manner.

Grievances may be filed regarding NCORR programs, policies, services, or staff. Grievances should first be addressed to the relevant HSS Provider or Housing Collaborative. If a satisfactory response is not reached, households may request to escalate the issue to NCORR.

To file a grievance with NCORR, submit a written grievance to the NCORR Grievance Coordinator within 30 days of the issue using one of these methods:

Email: backathome@ncdps.gov

Mail: Attn: Back at Home Program
North Carolina Office of Recovery and Resiliency (NCORR)
PO Box 110465
Durham, NC 27709

Phone: (984) 833-5350, TDD 1-800-735-2962

The grievance should include a description of the issue, steps already taken to resolve it, and the desired resolution.

NCORR will review the grievance and issue a written decision within 15 business days. Reasonable accommodations for persons with disabilities will be considered in the grievance process.

If the initial resolution is not satisfactory, grievances may be further appealed to any of the following:

North Carolina Balance of State Continuum of Care
Via Email: bos@ncceh.org
Via Phone: 919-755-4393

HUD Office of the Inspector General
Via Phone: 1-800-347-3735
Via Internet Form: [Hotline Form | Office of Inspector General](#)

US Treasury Office of the Inspector General
Via Internet form: [US Treasury OIG Fraud Form](#)

NCORR is committed to resolving all grievances fairly and according to applicable state and federal regulations.

PRIVACY AND CONFIDENTIALITY POLICY

PERSONALLY IDENTIFIABLE INFORMATION (“PII”)

Personally Identifiable Information (“PII”) is defined by NCORR as follows: “Information that can be used to distinguish or trace an individual’s identity, such as name, and social security number, alone, or when combined with other personal and identifying information which is linked or linkable to a specific individual, such as date, place of birth, mother’s maiden name, etc.” Back@Home-BoS is committed to protecting the privacy of all individual stakeholders, including applicants, the public and those individuals working on Back@Home-BoS. NCORR does not collect certain sensitive PII, including social security numbers, in the implementation of Back@Home-BoS. The purpose of this section is to establish when and under what conditions certain information relating to individuals may be disclosed.

The data collected from applicants for Back@Home-BoS may contain personal information on individuals that is covered by the Federal Privacy Act of 1974, as well as applicable state laws.

These laws provide for confidentiality and restrict the disclosure of confidential and personal information. However, NCORR may disclose PII when required to do so by federal or state laws and regulations, such as PII integral to a legislative inquiry. Unauthorized disclosure of such

personal information may result in personal liability with civil and criminal penalties. The information collected may only be used for limited official purposes:

Program staff may use personal information throughout the award determination and closeout process to ensure compliance with Back@Home-BoS requirements, reduce errors, and mitigate fraud and abuse.

Independent auditors, when hired by the Back@Home-BoS to perform a financial or programmatic audit of the program may use personal information in determining program compliance with all applicable federal regulations, including State and local law.

NCORR may disclose personal information of an applicant to those with duly authorized power of attorney or for whom the applicant has provided written consent to do so.

Organizations assisting Back@Home-BoS in executing the program must comply with all federal and state law enforcement and auditing requests. This includes, but is not limited to, HUD, FBI, NC Office of the Comptroller, and the HUD Office of the Inspector General.

Subrecipients and staff that are collecting or accessing sensitive PII in other systems, including HMIS and Housing Accelerator, should follow that system's security and privacy protocols.

COMPLIANCE AND MONITORING

NCORR utilizes Compliance Specialists to ensure adherence to program policy, ensuring data is reviewed and meets the program standard for consistency, completion, and eligibility. Additional monitoring guidance is found in the NCORR Compliance and Monitoring Manual regarding how implementing partners are monitored for compliance.

ANTI-FRAUD, WASTE, AND ABUSE (AFWA)

Anti-Fraud, Waste, and Abuse (AFWA) principles apply to the use of all Back@Home-BoS funds. NCORR's Anti-Fraud, Waste and Abuse policy has been adopted to limit the potential exposure of fraud, waste, and abuse. Implementing partners must agree to limit fraud, waste, and abuse as a condition of their participation in the implementation of the program. For additional information reference NCORR's AFWA Policy.

GRANT RECOVERY

While implementing and monitoring Back@Home-BoS, expenditures may be identified for potential grant recovery during reviews by program staff or auditors. The Compliance Department is responsible for oversight of the recovery process.

DOCUMENT RETENTION AND RECORD-KEEPING REQUIREMENTS

In accordance with State and Federal requirements, NCORR follows the records retention rules as stated in 2 CFR § 200.333–200.337 and 24 CFR § 570.490 (HUD funding specifically). Financial records, supporting documents, statistical records, funding decisions related to the method of distribution, fair housing, applicant demographic data, and all other pertinent records

are to be maintained for five years after closeout of the last spent grant. NCORR establishes requirements in written agreements for compliance with all cross-cutting requirements outlined in 2 CFR Part 200 Appendix II, including record keeping requirements.

ACCESS TO RECORDS

2 CFR § 200.337 states the Federal awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, must have the right of access to any documents, papers, or other records of the non-Federal entity which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the non-Federal entity's personnel for the purpose of interview and discussion related to such documents.

The State shall provide citizens with reasonable access to records regarding the use of funds and ensure that units of general local government provide citizens with reasonable access to records regarding the use of funds consistent with State or local requirements concerning the privacy of personal records.

The availability of records is subject to the exemptions to public disclosure set forth in the Public Records Act, found at Chapter 132 of the North Carolina General Statutes. All public records requests must be made pursuant to that law.

AFFIRMATIVELY FURTHERING FAIR HOUSING

Fair housing means all persons have equal opportunity to be considered for rental units, purchase of property, housing loans, and property insurance.

The North Carolina Fair Housing Act makes it illegal to discriminate in housing because of race, color, religion, sex, national origin, physical or mental handicaps, or family status (families with children).

Anyone who has control over residential property and real estate financing must obey the law. This includes rental managers, property owners, real estate agents, landlords, banks, developers, builders, and individual homeowners who are selling or renting their property.

The Continuum of Care (CoC) Program interim rule at 24 CFR 578.93(c) requires recipients of CoC Program funds to affirmatively further fair housing and market their housing and supportive services to eligible persons regardless of race, national origin, color, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities according to 24 § 578.103 (a) (14).

NCORR and all its programs, including Back@Home-BoS, complies with all applicable state and federal fair housing laws. Please see NCORR's Fair Housing Policy Statement to see how NCORR will provide and promote equal opportunities in all housing and programs and will take affirmative steps to reach out to all eligible program beneficiaries.

ANTI-DISCRIMINATION POLICY AND EQUAL ACCESS

The Back@Home-BoS and its Subrecipients do not discriminate in housing services or employment on the basis of race, color, national origin, religion, age, disability, or sex.

Back@Home-BoS complies with all applicable fair housing and civil rights requirements, including the NC Balance of State CoC Anti-Discrimination Policies and Procedures.⁵⁴ NCORR and all Subrecipients must manage a responsible and sound operation in accordance with federal and local nondiscrimination and equal opportunity provisions, as codified in the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, Titles II & III of the Americans with Disabilities Act, HUD's Equal Access to Housing Rule and Gender Identity Final Rule, 24 CFR 5.100, 5.105(a)(2) and 5.106(b). This includes establishing an Agency Anti-Discrimination Policy and grievance procedures and training all clients, staff, volunteers, and contractors on the policy.

Back@Home-BoS is a Housing First program, and Back@Home-BoS NCORR and its Subrecipients use a Housing First approach. This means that Back@Home-BoS believes all clients are ready for housing and puts no conditions on the receipt of housing assistance. If clients have barriers to obtaining housing (such as bad credit), Back@Home-BoS uses its extensive Property Provider network to find a Property Provider that will rent to the client even with systemic housing barriers. If clients face barriers to maintaining housing (such as substance use disorders), Back@Home-BoS links clients to intensive, voluntary services to help address those barriers while they are in housing.

CONFLICT OF INTEREST POLICY

NCORR and all Subrecipients, including HSS Providers and Housing Collaborative, will adhere to NCORR's Conflict of Interest Policy including the use of the COI disclosure form.

DRUG-FREE WORKFORCE POLICY

NCORR and all Subrecipients, including HSS Providers and Housing Collaborative, must comply with drug-free workplace requirements in Subpart B of 2 C.F.R., Part 2429, which adopts the government-wide implementation (2 C.F.R., Part 182) of sections 5152-5158 of the Drug-Free Workplace Act of 1988 (Pub. L. 100-690, Title V, Subtitle D; 41 U.S.C. §§ 701 – 707).

NCORR staff adheres to the NC DPS Drug and Alcohol Free Workplace and Testing policy. Subrecipients may either adopt the NC DPS policy or maintain their own Drug-Free Workforce policy that meets federal requirements. NCORR will monitor Subrecipients to ensure this policy is in place.

ENVIRONMENTAL REVIEW

Activities under this program are subject to environmental review by HUD under 24 CFR part 50 and 58. NCORR has completed the 24 CFR part 58 environmental review for the exempt

⁵⁴ <https://www.ncceh.org/media/files/pages-page/53807515/2023-anti-discrimination-policy-final.pdf>

activities being carried out within this program. The subrecipient is not responsible for carrying out an environmental review for this program.

If required by NCORR, at any time during the program, the subrecipient shall supply all available, relevant information necessary for performance of a subsequent environmental review.

The subrecipient, its project partners, and their contractors may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project under this program, or commit or expend HUD or local funds for eligible activities under this project, until NCORR and HUD have performed an environmental review and received an authority to use grant funds.

PROGRAM INCOME

Program income is the income received by the recipient or subrecipient directly generated by a grant-supported activity. Program income earned during the grant term shall be returned to NCORR and retained by NCORR. The program income will be added to funds committed to the project by HUD and NCORR. Program income will only be used for eligible activities in accordance with the requirements of this policy.

DUPLICATION OF BENEFITS

NCORR will practice due diligence and utilize the system of record to determine if multiple individuals from the same household have received funding under other federal programs. In the event a duplication of benefits is found, NCORR may take efforts to de-duplicate the assistance first. If the assistance is a true duplication of benefits, NCORR will refer the beneficiary to the grant recovery process, outlined further in this manual.

PROCUREMENT PROCEDURES

2 CFR 200 Subpart D is applicable to Back@Home-BoS. NCORR as the non-Federal entity has documented procurement procedures, consistent with State, local, and tribal laws and regulations and the standards of Subpart D, for the acquisition of property or services required under a Federal award or subaward. The non-Federal entity's documented procurement procedures must conform to the procurement standards identified in §§ 200.317 through 200.327. NCORR requires all implementing partners to have a procurement policy confirming to the standards identified in 2 CFR 200 §§ 200.317 - 200.327

Background/Foundation

This section serves as a guide to some of the approaches that are foundational for Back@Home-BoS design and implementation. By sharing proven strategies and fundamental principles, NCORR aims to establish a coherent understanding of the core concepts pivotal to Back@Home-BoS design and implementation.

CULTURALLY RESPONSIVE

Homelessness is a symptom of many contributing factors, including unaffordable housing, income disparities, societal inequalities, untreated addiction and mental illness, decades of disinvestment, and other systemic challenges faced by individuals. Within North Carolina, this has led to minority populations being overrepresented in the NC Balance of State CoC homelessness population in comparison to the overall population.⁵⁵ Back@Home-BoS will address this by:

- Reviewing policies and practices to check that they do not contribute to racial disparities;
- Supporting culturally competent engagements with clients to minimize further discrimination; and
- Including analysis of demographics in program reports and shift program policies and procedures if disparities are noted.

DYNAMIC ASSISTANCE

Back@Home-BoS uses a Dynamic Assistance or Progressive Engagement Approach to strive to provide the right amount of assistance to households to meet their needs, such that the program will be more able to offer appropriate support to households that may need longer and deeper subsidies. The length and depth of financial assistance will aim to be flexible enough to adjust to a household's changing needs and circumstances.

Back@Home-BoS will use tools, including the Housing Stability Plan form, to assist HSS Providers and Housing Collaborative in their evaluation of service and financial assistance needs. If a household's income increases or decreases, the financial assistance will be appropriately adjusted such that households do not lose housing. HSS Providers will periodically reassess the level of need to determine whether assistance should be adjusted. Households may request that their level of assistance be reassessed at any time. When a household no longer needs Rent and Utility Financial Assistance, HSS Providers will update Housing Collaborative.

⁵⁵ <https://www.ncceh.org/files/12916/>

HARM REDUCTION

Back@Home-BoS adheres to Harm Reduction approach.

Harm Reduction is an evidence-based approach that emphasizes engaging directly with people who use drugs to prevent overdose and infectious disease transmission, improve the physical, mental, and social well-being of those served, and offer low-threshold options for accessing substance use disorder treatment and other healthcare services.

Harm Reduction is a comprehensive approach to addressing substance use disorders through prevention, treatment, and recovery where individuals who use substances set their own goals. Harm Reduction organizations incorporate a spectrum of strategies that meet people “where they are” on their own terms, and may serve as a pathway to additional prevention, treatment, and recovery services. Harm Reduction works by addressing broader health and social issues through improved policies, programs, and practices. Specifically, Harm Reduction services can:

- Connect individuals to overdose education, counseling, and referral to treatment for infectious diseases and substance use disorders;
- Distribute opioid overdose reversal medications (e.g., naloxone) to individuals at risk of overdose, or to those who might respond to an overdose;
- Lessen harms associated with drug use and related behaviors that increase the risk of infectious diseases, including HIV, viral hepatitis, and bacterial and fungal infections;
- Reduce infectious disease transmission among people who use drugs, including those who inject drugs by equipping them with accurate information and facilitating referral to resources;
- Reduce overdose deaths, promote linkages to care, and facilitate co-location of services as part of a comprehensive, integrated approach;
- Reduce stigma associated with substance use and co-occurring disorders; and
- Promote a philosophy of hope and healing by utilizing those with lived experience of recovery in the management of Harm Reduction services, and connecting those who have expressed interest to treatment, peer support workers, and other recovery support services.⁵⁶

Harm Reduction assists in engaging vulnerable populations often reticent to seek or accept assistance. Back@Home-BoS will:

- Take a non-judgmental approach;
- Provide opportunities for services and housing without requirements;
- Honor people’s choices;
- Foster the development of trusting relationships; and

⁵⁶ <https://www.samhsa.gov/find-help/harm-reduction>

- Offer consistent encouragement and actionable alternatives to harmful behaviors.

HOUSING FIRST

Back@Home-BoS is a program that implements the best practice of a Housing First approach. Housing First is a nationally recognized homeless assistance approach that prioritizes providing permanent housing to people experiencing homelessness, thus ending their homelessness, and serving as a platform from which they can pursue personal goals and improve their quality of life. This approach is guided by the belief that people need necessities and a place to live before attending to other needs that rely on stable housing to be successful, such as getting a job, budgeting properly, or attending to substance use issues. Additionally, Housing First is based on the understanding that personal choice is valuable in housing selection and supportive service participation and that exercising that choice is likely to make a person more successful in remaining housed and improving their life.

Housing First does not require people experiencing homelessness to address all their problems, including behavioral health problems, or to graduate through a series of service programs before they can access housing. Housing First does not mandate participation in services either before obtaining housing or to retain housing. The Housing First approach views housing as the foundation for life improvement and enables access to permanent housing without prerequisites or conditions beyond those of a typical renter. Housing stabilization services are offered to support people with housing stability and individual well-being, but participation is not required as services have been found to be more effective when a person chooses to engage.⁵⁷ Services are offered to households repeatedly and the responsibility to engage households in services rests with the service provider.

Wherever possible, NCORR and its Subrecipients will strive to remove any arbitrary programmatic requirements to ensure meaningful engagement with households that leads to permanent housing. Back@Home-BoS will:

- Honor people's choices
- Eliminate requirements for entry (sobriety, mental health treatment, income)
- Eliminate participation requirements once housed (sobriety, med compliance, services)
- Move people into housing first and then ensure access to the services and links to community resources they want/need
- Provide ongoing encouragement and repeated engagement with households to offer and provide supports that help meet the client's housing and services goals

HSS Service Providers will seek out households with severe service needs and accept referrals from the Regional Coordinated Entry process for permanent housing assistance.

Back@Home-BoS does not screen out for:

- Having too little or no income;

⁵⁷ <https://endhomelessness.org/resource/housing-first/>

- Active or history of substance abuse;
- Having a criminal record; or
- History of domestic violence (e.g., lack of protective order, or separation from abuser, or law enforcement involvement).

Back@Home-BoS will also ensure that households are not terminated from the program for the following reasons:

- Failure to participate in supportive services;
- Failure to make progress on a service plan;
- Loss of income or failure to improve income;
- Being actively involved in a domestic violence situation;
- Any other activity not covered in a lease agreement typically found in North Carolina; or
- Failure to maintain recovery.

In certain circumstances a household enrolled in Back@Home-BoS may need a different program to support their housing goals. Back@Home-BoS will ensure that the household is fully enrolled and supported before exiting them from the program.

TRAUMA-INFORMED CARE

Back@Home-BoS adheres to a Trauma-Informed approach.

Most people experiencing homelessness have at least one but often multiple traumatic events prior to their first homeless event and during homelessness. A program that is trauma-informed realizes the widespread impact of trauma and understands potential paths for recovery; recognizes the signs and symptoms of trauma in clients, families, staff, and others involved with the system; and responds by fully integrating knowledge about trauma into policies, procedures, and practices, and seeks to actively resist re-traumatization.

The key assumptions in Trauma-Informed Care include:

- All people at all levels of the organization or system have a basic realization about trauma and understand how trauma can affect families, groups, organizations, and communities as well as individuals. People's experiences and behavior are understood in the context of coping strategies designed to survive adversity and overwhelming circumstances, whether these occurred in the past (i.e., a client dealing with prior child abuse), whether they are currently manifesting (i.e., a staff member living with domestic violence in the home), or whether they are related to the emotional distress that results in hearing about the firsthand experiences of another (i.e., secondary traumatic stress experienced by a direct care professional).
- People in the organization or system are also able to recognize the signs of trauma. These signs may be gender, age, or setting-specific and may be manifest by individuals seeking or providing services in these settings. Trauma screening and assessment assist in the recognition of trauma, as do workforce development, employee assistance, and supervision practices.

- The program, organization, or system responds by applying the principles of a trauma-informed approach to all areas of functioning. The program, organization, or system integrates an understanding that the experience of traumatic events impacts all people involved, whether directly or indirectly.
- A trauma-informed approach seeks to resist the re-traumatization of clients as well as staff. Staff who work within a trauma-informed environment are taught to recognize how organizational practices may trigger painful memories and re-traumatize clients with trauma histories.

The key principles of Trauma-Informed Care include:

- **Safety:** Throughout the organization, staff, and the people they serve, whether children or adults, feel physically and psychologically safe; the physical setting is safe and interpersonal interactions promote a sense of safety. Understanding safety as defined by those served is a high priority.
- **Trustworthiness and Transparency:** Organizational operations and decisions are conducted with transparency with the goal of building and maintaining trust with clients and family members, among staff, and others involved in the organization.
- **Peer Support:** Peer support and mutual self-help are key vehicles for establishing safety and hope, building trust, enhancing collaboration, and utilizing their stories and lived experience to promote recovery and healing.
- **Collaboration and Mutuality:** Importance is placed on partnering and the leveling of power differences between staff and clients and among organizational staff, demonstrating that healing happens in relationships and in the meaningful sharing of power and decision-making.
- **Empowerment, Voice, and Choice:** Throughout the organization and among the clients served, individuals' strengths and experiences are recognized and built upon. The organization fosters a belief in the primacy of the people served, in resilience, and in the ability of individuals, organizations, and communities to heal and promote recovery from trauma.
- **Cultural, Historical, and Gender Issues:** The organization actively moves past cultural stereotypes and biases (e.g. based on race, ethnicity, sexual orientation, age, religion, gender identity, geography, etc.); offers access to gender-responsive services; leverages the healing value of traditional cultural connections; incorporates policies, protocols, and processes that are responsive to the racial, ethnic and cultural needs of individuals served; and recognizes and addresses historical trauma.⁵⁸

Trauma-informed services ensures that a person:

- Feels safe;
- Has control over their choices;

⁵⁸ <https://store.samhsa.gov/sites/default/files/d7/priv/sma14-4884.pdf>

- Plays a significant role in planning their services;
- Trusts, as much as possible, the process and the person with which they work; and
- Identifies their strengths to feel empowered.