Program Policies

Version 1.0

January 2024

REVISION HISTORY

Version	Date	Description
Draft	October 11, 2022	Initial program policies were created to support the application to the 2022 Continuum of Care Special Notice of Funding Opportunity.
1.0	January 2024	First edition of Back@Home-Balance of State Program Policies created for use at program launch.

QUESTIONS

For general questions about the Back@Home-Balance of State Program, send inquires to backathome@ncdps.gov.

ACKNOWLEDGEMENT/SOURCES

Rehousing work is an evolving field. Back@Home-BoS draws on many sources of knowledge and experience. In designing the program, the following guides were referred to often. In some cases, content from these guides was used without changes.

CoC and ESG Virtual Binders and related guidance, HUD Exchange, U.S. Department of Housing and Urban Development

Flexible Housing Subsidy Pool Guide, Change Well Project (2022)

Rapid Rehousing Toolkit, National Alliance to End Homelessness (2022)

Permanent Supportive Housing Evidence-Based Practices (EBP KIT), Substance Abuses and Mental Health Services Administration, U. S. Department of Health and Human Services (2010)

Contents

Program Overview

The Back@Home – Balance of State program serves individuals and families experiencing homelessness within seventy-nine North Carolina counties. The program offers supportive services and financial assistance to assist households to obtain and maintain housing. The program is administered by the North Carolina Office of Recovery and Resiliency with assistance from the North Carolina Department of Health and Human Services and the North Carolina Coalition to End Homelessness, in partnership with Housing Collaborative, Housing Stabilization Services Providers, and other local, state, and federal partners.

BACK@HOME NORTH CAROLINA

Back@Home North Carolina, or Back@Home, is a collaborative rehousing initiative. To stabilize in housing, households must have a combination of adequate income, affordable housing, and appropriate support and services. Back@Home addresses these needs through a combination of financial assistance and housing stabilization services, enabling households to obtain and maintain housing.

Built on successful permanent housing models, including rapid rehousing and permanent supportive housing, the Back@Home initiative further innovates these models by shifting from a traditional approach of centering on funding requirements to centering on the household's needs and experience. Typically, the delivery of assistance is designed around siloed funding sources with different eligibility requirements, target populations, and allowable uses of funds. This leads to a system that is difficult to navigate with gaps in service, barriers to resources, and duplication of effort.

By placing people experiencing housing instability or homelessness at the center of the design, the Back@Home initiative focuses on creating a more intuitive system, delivering assistance across funding streams, creating efficiencies and ease, and planning opportunities to scale quickly.

The Back@Home initiative provides an infrastructure utilized by multiple programs. Because Back@Home is designed for common activities that stabilize people in housing, the infrastructure can be utilized for programs with distinct purposes and related funding sources. Each program under the initiative has a defined target population and geographic area. As of 2023, three programs are under Back@Home:

- **Back@Home-Disaster: Operated September 2018 – June 2022**
  The inaugural program under the Back@Home North Carolina initiative was launched in twenty-two counties within three Continuums of Care (CoCs) in response to Hurricane Florence. The program began as a rapid rehousing intervention to assist households who were unable to exit disaster shelters and ineligible for other disaster housing assistance programs. After the disaster shelters closed, the program was expanded to support other disaster survivors who were at risk of or experiencing homelessness. The

program housed survivors from multiple other disasters while operating. The program was administered by the North Carolina Department of Health and Human Services (NCDHSS) with assistance from the NC Housing Finance Agency (NCHFA)and the North Carolina Coalition to End Homelessness (NCCEH). The program may be reopened to respond to future disasters.

- **Back@Home-CV: Operated August 2020 – September 2022**
  The second program under the Back@Home North Carolina initiative was launched to respond to the COVID-19 pandemic and accompanying economic crisis. Back@Home-Coronavirus (Back @Home-CV) was built on the infrastructure established by Back@Home-Disaster and provided similar services. The program operated in eighty-three counties across three CoCs. Elements of the Back@Home infrastructure were also utilized by three other CoCs in five additional counties. The program was administered by NCDDHS with assistance from NCHFA and NCCEH.

- **Back@Home-BoS: October 2023 - present**
  The Back@Home North Carolina - Balance of State Program (Back@Home-BoS) is the third program to build on the infrastructure developed through the Back@Home initiative. The seed funding for the program was obtained through the U.S. Department of Housing and Urban Development's 2022 Continuum of Care Special Notice of Funding Opportunity (SNOFO). Back@Home-BoS is focused on serving people experiencing homelessness with severe service needs in seventy-nine counties within the NC Balance of State Continuum of Care. Under this iteration, in addition to short-term assistance, Back@Home is adding the ability to provide long-term assistance to people with disabilities through permanent supportive housing. The program is administered by the North Carolina Office of Recovery and Resiliency (NCORR) with assistance from NCDHHS and NCCEH.

Back@Home is rooted in a foundation of research, enriched by lived experiences, and driven by a culture of learning and innovation and a relentless pursuit of housing stability for all North Carolinians.

Key Roles and Partners

Back@Home-BoS is a departure from the prevailing model of each agency implementing all program activities, often with overlap with other agencies and programs. Instead, Back@Home-BoS, employs an oversight agency with defined roles to distribute the work amongst many partners and create specialized roles. This model enables agencies and their staff to focus on a key piece of the program and deliver results.

Back@Home-BoS orchestrates collaboration between state and local partners to administer specific assistance to households. Defined roles are used to clarify responsibilities, utilize each partner's expertise, avoid duplication of effort, and promote coordination among partners.

OVERSIGHT AGENCY: NCORR

The North Carolina Office of Recovery and Resiliency (NCORR), the recipient or subrecipient of multiple funding sources, will be the Oversight Agency for Back@Home-BoS. NCORR will contract with two types of key partners to provide assistance to households and support the implementation of Back@Home-BoS. Additional partners may be added in the future as Back@Home-BoS continues to develop.

As the Oversight Agency, NCORR will:
- Administer all grants funded under the CoC and other funding sources
- Act as recipient for HUD CoC grants
- Design and oversee the program's System of Record
- Report to funders and other partners
- Create and oversee the program budget
- Design and implement funding processes to ensure they meet funding rules and regulations and to maximize leveraging of resources
- Ensure match requirements are met
- Contract with the Housing Collaborative to serve as the Housing Identification Hub
- Contract with Housing Stabilization Services Providers (HSS Providers), ensuring coverage for all counties in the NC BoS CoC
- Provide oversight and monitoring Subrecipients and contracted agencies to ensure compliance and adherence to best practices
- Provide ongoing technical assistance and training to Subrecipients to increase their abilities and improve performance over time

HOUSING INDENTIFICATION HUB: HOUSING COLLABORATIVE

Housing Collaborative is a subrecipient of NCORR. Housing Collaborative, a 501(c)3 nonprofit, is based in Charlotte, NC, and will serve as a core financial assistance administrator and housing identification partner, sometimes referred to as the Centralized Unit Recruitment and Financial Assistance Administrator.

Housing Collaborative has three roles:

1. Financial Assistance Administrator
   As a financial assistance administrator, Housing Collaborative will:
   - Quickly and regularly make unit-related payments including Unit Access, and Rent and Utility Financial Assistance
   - Ensure that all payments meet policy and grant requirements
   - Assist with managing multiple funding sources with varying eligible uses
   - Maintain a system of record to retain payment documentation

2. Property Provider Recruiter
   As a Property Provider recruiter, Housing Collaborative will:
   - Identify and engage Property Providers across all 79 counties and recruit units for households
   - Serve as the primary point of contact for Property Providers
   - Utilize Property Provider Incentives to assist in removing barriers to obtaining housing
   - Assess housing markets to understand which how to best recruit Property Providers

3. Housing Navigation Partner
   As a Housing Navigation partner, Housing Collaborative will:
   - Work closely with contracted Housing Stabilization Services Providers to ensure households connect with units and Property Providers
   - Assist households and case managers with housing applications
   - Match households with available units based on the household's needs and preferences
   - Facilitate unit inspections and/or lease and related documentation

HOUSING STABILIZATION SERVICES PROVIDERS

HSS Providers are Subrecipients of NCORR. All HSS Providers are 501(c)3 organizations or units of local governments, also known as local government agencies. HSS Providers serve assigned geographic areas within Back@Home-BoS's seventy-nine counties.

Back@Home-BoS HSS Providers will:

- Perform services in assigned counties or geographic area as a contracted subrecipient of the Oversight Agency, NCORR
- Serve as primary liaison with households served by the Back@Home-BoS program
- Provide four types of Housing Stabilization Services to Back@Home-BoS eligible and enrolled households
- Outreach to and assess people living in unsheltered locations and shelters not connected to the coordinated entry process to ensure access to permanent housing resources allocated by coordinated entry
- Work alongside the household to create and implement a Housing Stability Plan to obtain and maintain housing

- Connect households to emergency shelter, including non-congregate shelter, to ensure a safe location while a housing plan is created and executed
- Serve as the financial administrator for costs related to temporary stay financial assistance and move-in financial assistance
- Work closely with the Housing Identification Hub to assist households in securing and moving into units
- Provide housing stabilization case management once housed including regular meetings with households where households direct when, where, and how often they occur
- Make linkages to community-based resources for client-identified needs.

NC BALANCE OF STATE CONTINUUM OF CARE

The NC-503 North Carolina Balance of State Continuum of Care (NC BoS CoC) is one of twelve Continuums of Care in the state and represents 79 out of 100 counties in North Carolina. The NC BoS CoC was founded in 2006 to assist rural communities as they applied for and administered HUD funding through the Continuum of Care program. In 2009 the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act) increased the role and responsibilities of the CoC in overseeing the homeless service systems in their geographic areas including establishing and managing a coordinated entry system, overseeing and coordinating applications for HUD funding, creating partnerships with public housing authorities, and monitoring CoC performance using system performance measurements defined by HUD.

The NC BoS CoC Steering Committee serves as the primary decision-making body and board for the CoC and is responsible for all matters pertaining to the structure, purpose, performance, and activities of the NC BoS CoC. In addition, the NC BoS CoC is divided into 13 Regional Committees with each Regional Committee electing a representative for the Steering Committee. CoC responsibilities are divided between the Steering Committee and Regional Committee as defined in the NC BoS CoC Governance Charter.[1]

The North Carolina Coalition to End Homelessness (NCCEH) serves as both the Collaborative Applicant and Homeless Management Information System (HMIS) Lead Agency for NC BoS CoC. NCORR will work closely with NCCEH to ensure that Back@Home-BoS meets NC BoS CoC requirements as a grantee.

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES

The North Carolina Department of Health and Human Services (NCDHHS) partners with NCORR to ensure Back@Home-BoS has access to resources and is connected to the many programs and benefits NC DHHS oversees. This includes leveraging Medicaid services for Back@Home-BoS Households, partnering to align Back@Home-BoS Housing Stabilization Services Payment Structure with Medicaid-funded services, and contributing funding to the implementation of Back@Home-BoS. NCDHHS is currently contributing State Fiscal Recovery

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[1] https://www.ncceh.org/media/files/files/c8b984f3/coc-governance-charter.pdf

Funding to Back@Home-BoS. See State Fiscal Recovery Funding under Funding Sources section for more information.

NC INTERAGENCY COUNCIL FOR COORDINATING HOMELESS PROGRAMS

The North Carolina Interagency Council for Coordinating Homeless Programs (ICCHP) is a governor-appointed council charged with advising the Governor, their Cabinet, other state agencies and partners, on issues related to housing stabilization and services for persons that are homeless or at risk of homelessness and strategies to reduce and end homelessness. The ICCHP oversees the Back@Home Initiative's implementation. The ICCHP members help to facilitate partnerships and linkages.

NC PANDEMIC RECOVERY OFFICE

The North Carolina Pandemic Recovery Office (NCPRO) was established under Session Law 2020-4 of House Bill 1043 to oversee and coordinate the fiscal response to the COVID-19 pandemic. NCPRO is responsible for overseeing the distribution of COVID-19 related funding to provide support to state agencies, local governments, nonprofits, hospitals, educational institutions, and research organizations. This includes two funding sources in use in Back@Home-BoS the Emergency Rental Assistance Funding and State Fiscal Recovery Funding from the U.S. Treasury.

PARTNER PUBLIC HOUSING AUTHORITIES

Public Housing Authorities (PHAs) provide resources to house Back@Home-BoS households through rental assistance vouchers and PHA-owned units. There are nearly 100 PHAs within the NC BoS CoC seventy-nine county area. The rental assistance and units that PHAs oversee are essential resources for people experiencing homelessness and Back@Home-BoS enrolled households. In addition to assisting households in applying for these resources, Back@Home-BoS is initially partnering with five select PHAs that administer Stability Vouchers, Emergency Housing Vouchers, and Housing Choice Vouchers that have been committed as leverage for Back@Home-BoS.

PROPERTY PROVIDERS

Property Providers are people or businesses who own, develop, and/or manage housing in the community. The term includes property management companies, private landlords, and housing developers.

US DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

The US Department of Housing and Urban Development (HUD) administers and funds the CoC Program. The program is designed to promote communitywide commitment to the goal of ending homelessness by providing funding for efforts by nonprofit providers and State and local governments and promoting access to and effect utilization of mainstream programs by

homeless individuals and families. HUD awarded funding to NCORR through the Special Notice of Funding Opportunity (SNOFO) for the Back@Home-BoS Program.

US DEPARTMENT OF THE TREASURY

The US Department of Treasury (Treasury) established and administers the Emergency Rental Assistance (ERA) funds and the State and Local Fiscal Recovery Funds (SLFRF). The ERA Program provided over $46 billion for states, local governments, and recognized tribal communities to deliver rent and utility assistance and housing stability to households affected by the economic impacts of COVID-19. The SLFRF program authorized by the American Rescue Plan Act, also delivers $350 billion to state, territorial, local, and Tribal governments across the country to support their response to and recovery from the COVID-19 public health emergency.

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

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

Department of Housing and Urban Development Appropriations Act, 2020 (42 U.S.C. 11364a; Public Law 116-94, approved December 20, 2019).

NCORR applied to this funding opportunity under the NC-503 NC Balance of State Continuum of Care (NC BoS CoC) and in partnership with NCCEH as the Collaborative Applicant. The NC BoS CoC reviewed and approved the application and will provide ongoing support and oversight for Back@Home-BoS.

NCORR was awarded a total of five grants, three under the Unsheltered Set-Aside and two under the Rural Set-Aside.

UNSHELTERED SET-ASIDE

NCORR was awarded three grants under the Unsheltered Set-Aside:

1) Supportive Services Only – Other
2) Rapid Rehousing
3) Permanent Supportive Housing

The Unsheltered Set-Aside funding can serve households with severe service needs according to the CoC Plan and "meet the criteria of paragraph (1) of the definition of homeless at 578.3, except that persons coming from transitional housing must have originally come from places not meant for human habitation, emergency shelters, safe havens, or institutions where they resided for 90 days or less and originally came from places not meant for human habitation, safe havens, or emergency shelters; or 2. meet the criteria of paragraph (4) of the definition of homeless at 578.3"[4] in the 79 counties within the NC BoS CoC.

RURAL SET-ASIDE

NCORR was awarded two grants under the Rural Set-Aside:

1) Rapid Rehousing
2) Permanent Supportive Housing

The Rural Set-Aside funding can serve households with severe service needs according to the CoC Plan and "meeting the criteria of the definition of "homeless" in 24 CFR 578.3, except in order to serve individuals and families meeting the criteria of paragraph (3) of the definition of homelessness the CoC must receive approval to do so as described in Section VII.C of [the] NOFO"[5] in the 55 counties within the NC BoS CoC designated as rural.

The grants may operate in the following 55 counties:

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[4] https://www.hud.gov/sites/dfiles/SPM/documents/Continnum_of_Care_Supplemental_FR-6500-N-25S.pdf, page 8.
[5] https://www.hud.gov/sites/dfiles/SPM/documents/Continnum_of_Care_Supplemental_FR-6500-N-25S.pdf, page 9.

Anson, Beaufort, Bertie, Bladen, Camden, Carteret, Caswell, Cherokee, Chowan, Clay, Columbus, Currituck, Dare, Duplin, Franklin, Gates, Graham, Granville, Greene, Halifax, Harnett, Hertford, Hyde, Jackson, Jones, Lee, Lenoir, McDowell, Macon, Madison, Martin, Montgomery, Moore, Northampton, Pamlico, Pasquotank, Perquimans, person, Polk, Richmond, Robeson, Rutherford, Sampson, Scotland, Stanly, Stokes, Surry, Swain, Transylvania, Tyrrell, Vance, Warren, Washington, Wilson, Yadkin

EMERGENCY RENTAL ASSISTANCE FUNDS

NCORR was initially charged with the implementation and delivery of Emergency Rental Assistance (ERA) funds provided by the U.S. Department of the Treasury (Treasury) to the State of North Carolina Pandemic Recovery Office (NCPRO). Two allocations of Emergency Rental Assistance funds were provided to NCORR.

As established by guidance provided by the U.S. Treasury, while ERA funds were typically deployed to address the immediate financial distress faced by tenants and landlords during the COVID-19 pandemic, ERA funds may also serve as a catalyst to support solutions that address gaps in the housing ecosystem and provide longer term housing stability for targeted tenant households.

Under Back@Home-BoS, NCORR will specifically utilize funds from the second allocation of ERA funds (ERA 2) to leverage the funds' flexibility and long-term outlook to provide housing stability services and financial assistance for program eligible households and support the creation of a new flexible framework for housing stabilization across North Carolina.

USE OF ERA FUNDS

For the Back@Home-BoS, ERA 2 funds will support housing stability with two primary functions:

- Housing Stabilization Services
- Financial Assistance for Housing Stabilization

For purposes of using ERA 2 funds for Back@Home-BoS, Housing Stability Services include all activities that enable households to maintain or obtain housing as outlined in eligible expenses. U.S. Treasury guidance and the agreement with the North Carolina Pandemic Recovery Office allows up to 10 percent of the ERA 2 funds received by a grantee to be used for housing stability services.

The current agreement between NCPRO and NCORR for the use of ERA 2 funding allows for 10% of the total funding awarded to the agency to be used on administrative costs. Treasury guidance allows a maximum cap on administrative costs at 15% of the total award.

The aggregate amount of financial assistance an eligible household and associated household members may receive under ERA 2, when combined with financial assistance under ERA 1, must not exceed 18 months.

The NC Pandemic Recovery Office (NCPRO) is responsible for overseeing and monitoring the use of the ERA as well as reporting to the U.S. Treasury on behalf of state agencies.

STATE FISCAL RECOVERY FUNDING

The American Rescue Plan Act (ARPA) was enacted on March 11, 2021 to provide relief to address the continued impact of COVID-19 on the economy, public health, state and local governments, individuals, and businesses.[6] A component of ARPA is the State Fiscal Recovery Fund (SFRF) which provides $5.4 billion to North Carolina to help turn the tide on the pandemic, address its economic fallout, and lay the foundation for a strong and equitable recovery. Funds can be used to:

- Support urgent COVID-19 response efforts to continue to decrease spread of the virus and bring the pandemic under control.
- Replace lost revenue for eligible state, local, territorial, and Tribal governments to strengthen support for vital public services and help retain jobs.
- Support immediate economic stabilization for households and businesses.
- Address systemic public health and economic challenges that have contributed to the unequal impact of the pandemic.

The N.C. General Assembly appropriated SFRF for Rapid Rehousing for individuals and families at risk of homelessness in Session Law 2021-180 in section 9A.4.

"Of the funds appropriated in this act from the State Fiscal Recovery Fund to the Department of Health and Human Services, Division of Aging and Adult Services, the sum of fifteen million dollars ($15,000,000) in nonrecurring funds for the 2021-2022 fiscal year shall be allocated for rapid rehousing services to assist individuals and families at risk of homelessness due to the COVID-19 public health emergency with obtaining safe housing. The funds allocated under this section shall remain available until depleted or on the date federal law requires the funds to be fully expended, whichever is earlier. These funds shall be used to supplement and not supplant existing funds for homelessness prevention activities and may be used to provide financial assistance to eligible individuals and families to cover the cost of acute needs such as the following:

(1) Security deposits and rental assistance for a period not to exceed 12 months per individual or family.
(2) Utility deposits and utility assistance for a period not to exceed 12 months per individual or family.
(3) Temporary hotel stays while awaiting more permanent housing.
(4) Housing navigation services.
(5) Case management services related to the rapid attainment of safe housing.
(6) Activities to increase local capacity for housing services and other related services to prevent homelessness, such as the evidenced-based coordinated entry system.

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[6] Public Law 117 - 2 - American Rescue Plan Act of 2021 - Content Details - (govinfo.gov)

(7) Home improvements and home repairs to support vulnerable seniors age 60 and older to remain in in-home living arrangements rather than congregate care settings during the COVID-19 public health emergency." [7]

The NC Pandemic Recovery Office (NCPRO) is responsible for overseeing and monitoring the use of the SFRF as well as reporting to the U.S, Treasury on behalf of state agencies.

The North Carolina Department of Health and Human Services has developed a Memorandum of Agreement for the use of SFRF funds for Back@Home-BoS for allowed expenses 1-6. SFRF funds being used under Back@Home-BoS are categorized as "revenue replacement" expenditures per U.S. Treasury guidance.

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[7] https://www.ncleg.gov/EnactedLegislation/SessionLaws/PDF/2021-2022/SL2021-180.pdf, page 181.

Program Participation and Project Enrollment

IDENTIFICATION OF HOUSEHOLDS

HSS Providers will use street outreach, referrals from Coordinated Entry, and referrals from the community to identify households with high service needs, engage the households, and explore enrolling the household in Back@Home-BoS.

PROGRAM PARTICIPATION

To be considered participating in the Back@Home-BoS Program, a household must be actively enrolled in a Back@Home-BoS SSO, RRH, or PSH project. Households may move between these projects but must only be enrolled in one project at a time.

PROJECT TYPES

The use of HUD CoC funding and its division into component types necessitates the division of the Back@Home-BoS Program into three project types:

1. Supportive Services Only – Other (SSO)
2. Permanent Housing: Rapid Rehousing (RRH)
3. Permanent Housing: Permanent Supportive Housing (PSH)

Each project type has similar yet distinct eligibility and eligible costs.

SUMMARY OF ELIGIBLE COSTS BY PROJECT TYPE

The following table illustrates which eligible costs can be utilized while a household is enrolled in a SSO, RRH, or PSH project.

	SSO Project	RRH Projects	PSH Projects
Eligible Cost			
Housing Stabilization Services	✓	✓	✓
Temporary Stay Financial Assistance	✓	✓	✓
Unit Access Financial Assistance		✓	✓
Move-In Financial Assistance		✓	✓
Rent and Utility Financial Assistance		✓	✓
Additional Assistance Policies			
Duration of Assistance	Unlimited while unhoused; Limitations apply if housed during enrollment	Short + Medium Term 24 months or less	Long Term Any duration, no time limit
Household required to contribute a percent of income towards rent (see PSH Contribution Towards Rent)	N/A	No	Yes

SUPPORTIVE SERVICES ONLY – OTHER (SSO)

The Supportive Services Only – Other (SSO) project type allows Back@Home-BoS to provide supportive services—such as conducting outreach to sheltered and unsheltered homeless persons and families and providing referrals to other housing or other necessary services—to families and individuals experiencing homelessness.[8]

SSO PROJECT ENROLLMENT REQUIREMENTS

To be enrolled in a B@H Supportive Services Only Project, households must meet the following:

- **Eligibility Criteria:**
  - **Location:** Be located within the 79-county geographic area of the NC-503 North Carolina Balance of State CoC (NC BoS CoC)
  - **Living Situation:** The household must meet either Category 1 OR 4 of the HEARTH: Defining Homeless Final Rule[9]; AND
  - **Service Need:** The household is identified as unsheltered or having a severe service need by the Regional Coordinated Entry process;

DURATION AND TYPE OF ASSISTANCE DURING SSO ENROLLMENT

While a household is enrolled in a SSO project, Back@Home-BoS may provide Housing Stabilization Services and Temporary Stay Financial Assistance.

HSS Providers may continue to serve a household enrolled in SSO up to six months after they are housed as long as the household is:

- Not also receiving any ongoing housing assistance (e.g., rental assistance) through Back@Home-BoS[10]; and

- Not receiving the same type of housing stabilization services from another program or community partner.

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[8] https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/supportive-services-only/

[9] https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/coc-and-esg-homeless-eligibility-overview/

[10] https://www.hud.gov/sites/dfiles/CPD/documents/CoC/NEW-Unsheltered-DI-FINAL-7-14-22.pdf, page 89.

RAPID REHOUSING (RRH)

RRH is permanent housing that provides short-term (up to three months) and medium-term (4-24 months) tenant-based rental assistance and supportive services to households experiencing homelessness.[11]

RAPID REHOUSING PROJECT ENROLLMENT REQUIREMENTS

To be enrolled in a B@H Rapid Rehousing Project, households must meet the following:

- **Eligibility Criteria:**
  - o **Location:** Be located within the 79-county geographic area of the NC-503 North Carolina Balance of State CoC (NC BoS CoC)
  - o **Living Situation:** The household must meet either Category 1 OR 4 of the HEARTH: Defining Homeless Final Rule[12]; AND
  - o **Service Need:** The household is identified as unsheltered or having a severe service need by the Regional Coordinated Entry process;
  - o **Income Threshold:** The household must be a low-income household with an income below 80% AMI.

- **Coordinated Entry Prioritization for Permanent Housing**
- **Authorization to Enroll in Permanent Housing**

DURATION AND TYPE OF ASSISTANCE DURING RRH ENROLLMENT

While a household is enrolled in a RRH project, Back@Home-BoS may provide Housing Stabilization Services and Temporary Stay, Unit Access, Move-in, and Rent and Utility Financial Assistance.

Households may receive up to 24 months of assistance during an enrollment in RRH.

Rent and Utility Financial Assistance will end when one or both of the following are met:

- No Financial Need
  - o The household has the ability to pay the full rental amount on an ongoing basis OR
  - o Another program is providing rental and utility assistance
- Time Limit Reached
  - o The household has reached the 24-month limit of assistance

CONTRIBUTION TOWARDS RENT IN RRH

While a household is enrolled in RRH, Back@Home-BoS may cover the full amount of rent for up to 24 months. The NC BoS CoC written standards allow for households receiving RRH funds

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[11] https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/permanent-housing/rapid-re-housing/

[12] https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/coc-and-esg-homeless-eligibility-overview/

to not pay rent.[13] While households are not required to contribute to their rental payment, the goal is for households to reach the ability to take over the full rental payment.[14]

PERMANENT SUPPORTIVE HOUSING (PSH)

PSH is permanent housing in which long-term rental assistance and supportive services are provided to assist households with at least one member (adult or child) with a disability in achieving housing stability.[15]

PERMANENT SUPPORTIVE HOUSING PROJECT ENROLLMENT CRITERIA

To be enrolled in a Permanent Supportive Housing Project, households must meet the following:

- **Eligibility Criteria:**
  - **Location:** Be located within the 79-county geographic area of the NC-503 North Carolina Balance of State CoC (NC BoS CoC)
  - **Living Situation:** The household must meet either Category 1 OR 4 of the HEARTH: Defining Homeless Final Rule[16]; AND
  - **Service Need:** The household is identified as unsheltered or having a severe service need by the Regional Coordinated Entry process;
  - **Income Threshold:** The household must be a low-income household with an income below 80% AMI.
  - **Disability:** At least one household member (adult or child) must have a disability

- **Authorization to Enroll in Permanent Housing**
- **Coordinated Entry Prioritization for Permanent Housing**

DURATION AND TYPE OF ASSISTANCE DURING ENROLLMENT IN PSH

There is no time limit for how long a household may be served in PSH. While a household is enrolled in a PSH project, Back@Home-BoS may provide Housing Stabilization Services and Temporary Stay, Unit Access, Move-in, and Rent and Utility Financial Assistance.

CONTRIBUTION TOWARDS RENT IN PSH

Households enrolled in PSH will be required to contribute a percentage of of their income towards rental payments each month. Case managers will determine household income at enrollment in PSH and a redetermination will occur annually to determine rental contributions according to HUD policy. A redetermination may also be done at any time when a household's

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[13] https://www.ncceh.org/media/files/page/745ba062/hp-rrh-written-standards-final-11-02-21.pdf, p. 11

[14] https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-rent-calculation/charging-rent/

[15] https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-program-components/permanent-housing/permanent-supportive-housing/

[16] https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/coc-and-esg-homeless-eligibility-overview/

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 priorirtized for twenty-four non-rural counties to maximize the use of resources.

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[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/

Households located in the fifty-five counties listed below may be enrolled in RRH-Rural and PSH-Rural projects.	Households located in the 24 counties listed below may be enrolled in RRH-Unsheltered and PSH-Unsheltered projects
Anson, Beaufort, Bertie, Bladen, Camden, Carteret, Caswell, Cherokee, Chowan, Clay, Columbus, Currituck, Dare, Duplin, Franklin, Gates, Graham, Granville, Greene, Halifax, Harnett, Hertford, Hyde, Jackson, Jones, Lee, Lenoir, McDowell, Macon, Madison, Martin, Montgomery, Moore, Northampton, Pamlico, Pasquotank, Perquimans, person, Polk, Richmond, Robeson, Rutherford, Sampson, Scotland, Stanly, Stokes, Surry, Swain, Transylvania, Tyrrell, Vance, Warren, Washington, Wilson, Yadkin	Alamance, Alexander, Burke, Cabarrus, Caldwell, Catawba, Chatham, Craven, Davidson, Davie, Edgecombe, Haywood, Henderson, Hoke, Iredell, Johnston, Nash, Onslow, Pitt, Randolph, Rockingham, Rowan, Union, Wayne

SUMMARY OF ENROLLMENT REQUIREMENTS

The following table summarizes requirements for enrollment by each project type. Use the linked categories to move to more detail on each requirement.

Requirement	SSO	RRH	PSH
Eligibility Requirements			
Living Situation	HUD Category 1 or 4	HUD Category 1 or 4	HUD Category 1 or 4
Location	Within 79 counties	Within 79 counties	Within 79 counties
Service Need	Unsheltered or CE Priorization	CE Priorization	CE Prioritization
Income Threshold	For Temporary Stay Financial Assistance	Yes	Yes
Disability	No	No	Yes
Additional Enrollment Requirements			
CE Prioritzation for Permanent Housing	No	Yes	Yes
Authorization for Permanent Housing	No	Yes	Yes

NO OTHER PROGRAM REQUIREMENTS

There will be no further requirements for households such as sobriety or commitment to participation in services or treatment. Of note, households **may not** be screened out of Back@Home-BoS based on any of the following reasons:

1. Having too little or no income;
2. Active or history of substance use disorders;
3. Having a criminal record (with exceptions for state mandated restrictions); and
4. History of Domestic Violence (e.g., lack of protective order, or separation from the abuser, or law enforcement involvement).

ELIGIBILITY REQUIREMENTS

LOCATION

All households served by Back@Home-BoS must be located within the NC BoS CoC's 79-county geography at the time of enrollment in any project type.

The following counties are within the NC BoS CoC:
Alamance, Alexander, Anson, Beaufort, Bertie, Bladen, Burke, Cabarrus, Caldwell, Camden, Carteret, Caswell, Catawba, Chatham, Cherokee, Chowan, Clay, Columbus, Craven, Currituck, Dare, Davidson, Davie, Duplin, Edgecombe, Franklin, Gates, Graham, Granville, Greene, Halifax, Harnett, Haywood, Henderson, Hertford, Hoke, Hyde, Iredell, Jackson, Johnston, Jones, Lee, Lenoir, Macon, Madison, Martin, McDowell, Montgomery, Moore, Nash, Northampton, Onslow, Pamlico, Pasquotank, Perquimans, Person, Pitt, Polk, Randolph, Richmond, Robeson, Rockingham, Rowan, Rutherford, Sampson, Scotland, Stanly, Stokes, Surry, Swain, Transylvania, Tyrell, Union, Vance, Warren, Washington, Wayne, Wilson, Yadkin

LIVING SITUATION

All households served by Back@Home-BoS must meet either Category 1 OR 4 of HUD's homelessness definition as outlined below.

Category 1: Literally Homeless households are those who lack a fixed, regular, and adequate nighttime residence, meaning they meet at least one of the following: [19]

1. Has a primary nighttime residence that is a public or private place not meant for human habitation; or
2a. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or
2b. Is living in a publicly or privately operated transitional housing designated to provide temporary living arrangements AND who immediately before entering transitional housing resided in
    i. an emergency shelter or place not meant for human habitation immediately; or
    ii. resided in an institution where (s)he has resided for 90 days or less AND who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution[20]
3. Is exiting an institution where (s)he has resided for 90 days or less AND who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

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[19] https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/category-1/
[20] https://www.hud.gov/sites/dfiles/SPM/documents/Continnum_of_Care_Supplemental_FR-6500-N-25S.pdf, page 10.

Category 4: Fleeing/Attempting to Flee Domestic Violence households are those who are meet all the following criteria:

1. Is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;
2. Has no other safe residence; and
3. Lacks the resources to obtain other safe permanent housing.[21]

DOCUMENTATION OF LIVING SITUATION

HSS Providers will be required to provide documentation of homeless status at enrollment for all projects (SSO, RRH, PSH) according to the final rule.[22] The priority for obtaining evidence of homelessness status is:

Priority	Type of Verification	Description
1	Third-party documentation	Verification from a person or entity other than intake staff or the household seeking assistance. It includes the following types of documentation: • Third-party source documents • Third-party written verification • Third-party oral verification
2	Intake worker observations	A written verification form intake staff based on their observations and assessments.
3	Self-certification from the household seeking services	Verification from the household seeking assistance provided in writing or orally and recorded in writing by program staff.

In general, an HSS Provider must make conscientious and reasonable efforts to obtain third-party documentation whenever possible. Exceptions for documentation include:

- An HSS Provider must never contact someone for third-party documentation if the household believes that their health or safety will be jeopardized by contacting that person. In these instances, the HSS Provider should document the individual's or family's feelings and statements in the case file.

- A lack of third-party documentation must not prevent an unsheltered household from immediately receiving street outreach services from an HSS Provider. HSS Providers may use a self-certification (oral or written) from the individual or head of household

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[21] https://www.grants.gov/web/grants/view-opportunity.html?oppId=349091
[22] https://www.govinfo.gov/content/pkg/FR-2011-12-05/pdf/2011-30942.pdf, p. 76015

seeking assistance or documented staff observation by the case manager of the household's unsheltered circumstances for enrollment in the SSO project.

If third-party documentation is not available, an HSS Provider must document the due diligence efforts and the reasons that prevented them from obtaining third-party documentation in the case file. The due diligence documentation must be signed, dated, and certified by program staff to ensure that it is true and complete.

In general, all documentation types need to identify the HSS Provider providing assistance, the household needing assistance, and sufficient detail regarding the specific condition or criterion being documented.

SERVICE NEED

Households enrolled in Back@Home-BoS projects must have a severe service need. As outlined in the NC BoS CoC's plan submitted to HUD, severe service need households will be prioritized for referral to Back@Home-BoS.[23] NCORR and its Subrecipients will follow procedures as outlined in the CoC plan and will continue to partner with the CoC in case prioritization changes in the future.

This requirement can be met if the households is:

1) Prioritized for Permanent Housing after being assesssed throught the NC BoS CoC Coordinated Entry process; And/Or

2) Documented in an Unsheltered (Category 1a) Living Situation

INCOME THRESHOLD

To receive financial assistance, households enrolled in Back@Home-BoS must have an income below 80% of the area median income (AMI). Back@Home-BoS will use the following terms to determine income threshold eligibility for households:

- **Income:** Back@Home-BoS will use the Department of Housing and Urban Development's (HUD) definition of "annual income" in 24 CFR 5.6094 that includes:
  - The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;
  - The net income from the operation of a business or profession;
  - Interest, dividends, and other net income of any kind from real or personal property;
  - The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and

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[23] https://www.ncceh.org/media/files/files/a07ccb8e/plan-to-serve-severe-service-needs-draft-3.pdf

other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount;

- o Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay;
- o Some welfare payments;
- o Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling;
- o All regular pay, special pay, and allowances of a member of the Armed Forces; and
- o Financial assistance, more than amounts received for tuition and any other required fees and charges for individuals except for those over 23 years old with dependent children.[24]

- **Area Median Income:** Area median income for a household is the same as the income limits for families published by the Department of Housing and Urban Development (HUD) in accordance with 42 U.S.C. 1437a(b)(2), available under the heading for "Access Individual Income Limits Areas" at https://www.huduser.gov/portal/datasets/il.html. When determining area median income with respect to Tribal members, Tribal governments and TDHEs may rely on the methodology authorized by HUD for the Indian Housing Block Grant Program as it pertains to households residing in an Indian area comprising multiple counties (see HUD Office of Native American Programs, Program Guidance No. 2021-01, June 22, 2021).[25]

METHODS FOR INCOME DETERMINATION
Back@Home-BoS may determine income eligibility based on either (i) the household's total income for the previous calendar year, or (ii) sufficient confirmation of the household's monthly income at the time of application. For households that use a monthly income amount, HSS providers should extrapolate the monthly amount to determine what an annual (12 month) income would be. If a household qualifies based on a monthly income, the grantee must redetermine the household income eligibility every three months for the duration of assistance.[26] HSS Providers can use either method to calculate a household's income to determine program eligibility.

DOCUMENTATION OF INCOME DETERMINATION
HSS providers must verify the household income by obtaining one of the following documents:

- Third Party Verification of Income
- Self-Certification of Zero Income

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[24]https://www.law.cornell.edu/cfr/text/24/5.609#:~:text=(b)%20Annual%20income%20includes%2C,of%20a%20business%20or%20profession

[25] https://www.hud.gov/sites/dfiles/PIH/documents/2021-01_Income_Limits.pdf

[26]https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program/faqs#:~:text=If%20a%20grantee%20in%20ERA1,percent%20of%20area%20median%20income.

- Self-Certification of Income Document
- Certification from case manager or another professional with knowledge of the household's circumstances

Back@Home-BoS may support its income determination with either a written attestation from the applicant as to household income or documentation available from the household, such as paystubs, W-2s or other wage statements, tax filings, bank statements demonstrating regular income, or an attestation from an employer. In appropriate cases, Back@Home-BoS may rely on an attestation from a case manager or other professional with knowledge of a household's circumstances to certify that an applicant's household income qualifies for assistance.

HSS Providers must retain documentation on the certified self-attestation and record why they believe the household to be eligible. If the household self-attests and is certified by a case manager or housing professional, then this certified self-attestation is only valid for three months. After three months have elapsed, if the client is still being served or if the client re-enters Back@Home-BoS, then the HSS Provider must either acquire sufficient income documentation from the client or re-certify their self-attestation.

DISABILITY

Households enrolled in Back@Home-BoS PSH projects must have at least one household member with a documented disability. HSS Providers are required to document disability at PSH enrollment.

According to HUD's definition of disability, a person is considered to have a disability if the disability meets all the following criteria:

1. Is expected to be of long, continuing, or indefinite duration;
2. Substantially impedes the individual's ability to live independently;
3. Could be improved by the provision of more suitable housing conditions; and
4. Is one or more of the following:
    a. Physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury; and/or
    b. Developmental disability; and/or
    c. The disease of acquired immunodeficiency syndrome or any condition arising from the etiologic agency for acquired immunodeficiency syndrome.[27]

To document the household member's disability, HSS providers must collect one of the following:

- Written verification of the disability from professional licensed by the state to diagnose and treat the disability; OR
- Written verification from the Social Security Administration; OR
- The receipt of a disability check (e.g., SSDI check or Veteran Disability Compensation) OR

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[27] https://files.hudexchange.info/resources/documents/Virtual-Binders-Glossary-of-Terms.pdf

- Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, is confirmed and accompanied by evidence above.[28]

COORDINATED ENTRY

The purpose of a Coordinated Entry System is to ensure a standardized process for assessing needs and prioritizing households for housing and services based on vulnerability and acuity. The NC BoS CoC operates a decentralized Coordinated Entry System in each of its thirteen regions.

Back@Home-BoS will interact with the NC BoS Coordinated Entry in the following ways:

- Work with the region's Unsheltered Access Coordinator to identify households experiencing unsheltered homelessness who may be eligible for Back@Home-BoS
- Ensure households identified through outreach and other referral sources are assessed and added to the By Name List to be prioritized for permanent housing programs
- Participate in case conferencing to advocate for households and ensure they are prioritized for CoC housing resources
- Receive referrals of households from the By Name List who have been prioritized to receive permanent housing from Back@Home-BoS

HSS Providers interact with the Coordinated Entry System through Outreach and/or System Navigation Services.

COORDINATED ENTRY PRIORITIZATION FOR PERMANENT HOUSING

In addition to the eligibility criteria, before being enrolled in Back@Home-BoS for RRH or PSH, a household must receive a prioritization for permanent housing referral through the NC BoS CoC Regional Committee's Coordinated Entry (CE) process.

AUTHORIZATION TO ENROLL IN PERMANENT HOUSING PROJECT

Before enrolling a household in a permanent housing project, the HSS Provider must request an Authorization to Enroll in Permanent Housing from NCORR. The authorization request containing the household's eligibility information will be completed in NCORR's Back@Home-BoS System of Record. Upon receiving a request, NCORR staff will review the authorization request and determine whether it should be approved, rejected, or waitlisted. The determination will be based on the household's eligibility and Coordinated Entry Priorization for Permanenent Housing, as well as available project type budget.

In addition to considering whether the household can be enrolled in a permanent housing project, NCORR staff will review the household's previous enrollment in ERA programs to avoid spending funds beyond the limit of eighteen months of financial assistance per household. If the

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[28] https://www.hudexchange.info/faqs/programs/continuum-of-care-coc-program/program-requirements/definition-of-chronic-homelessness/how-must-an-individual-or-head-of-households-qualifying-disability/

household previously received assistance from an ERA program, the household may be enrolled in a Back@Home-BoS RRH or PSH project. However, ERA2 funds will not be used for any financial assistance for the household.

MOVEMENT ACROSS PROJECT TYPES

Households may be enrolled in any project type provided they meet the project type's enrollment criteria and there is Slot and project budget availability. All households may be enrolled in only one Back@Home-BoS SSO, RRH, or PSH project at a time.

All households referred to or outreached by Back@Home-BoS will be initially enrolled in the SSO project to receive assistance as they work towards a permanent housing option. As case managers and households create a Housing Stability Plan and determine a need for financial assistance to obtain and maintain housing, case managers will secure a CE Prioritization for Permanent Housing and facilitate an Authorization to Enroll in Permanent Housing.

The following are scenarios where a change of project type might be beneficial:

- If a household enrolled in SSO has a Housing Stability Plan that includes a need to receive financial assistance to obtain and maintain housing, the HSS Provider may request authorization to enroll the household in a Back@Home RRH or PSH project.

- If a household enrolled in a RRH project has not stabilized in the unit and needs both long-term rental assistance and continued supportive services to maintain a unit, the HSS Provider may explore whether ths household would qualify for PSH. The HSS Provider may request authorization to enroll in a Back@Home-BoS PSH project or other available PSH programs in the community. The HSS Provider may also attempt to link the household to other affordable housing resources including subsidized units or other rental assistance programs such as Housing Choice Vouchers.

MOVE-ON FROM PERMANENT SUPPORTIVE HOUSING

If a household is enrolled in PSH, they may remain in the PSH project as long as there is a continued service or financial need. As the household's needs change, the Housing Stability Plan should be updated. In cases where the household has stabilized and no longer needs services but still needs long-term rental assistance to afford housing, the HSS Provider may attempt to secure resources for the household that would enable a successful exit from the project, such as linking the household to other affordable housing resources to support rental payments.

CONTINUED ENROLLMENT AFTER CHANGE OF HOUSING STATUS

In the unfortunate event that a household is evicted from a unit, their enrollment can be continued and they do not need to change project types. Services will continue and the household can be rehoused in a new unit.

PROGRAM PARTICIPATION CLOSURE

Back@Home-BoS is a recovery-based program that believes that households can stabilize and maintain their housing over time. For those households that exit Back@Home-BoS to a permanent destination, as defined by HUD, these exits will be seen as "positive" exits from Back@Home-BoS.[29]

Back@Home-BoS households may voluntarily end their program participation and project enrollment and exit the project at any time for any reason. A household may also be exited if a case manager is unable to locate them for 90 days or if they are admitted to an institution, such as a jail or state hospital, for longer than 90 days.

All household exits from all Back@Home-BoS project types will be recorded in HMIS by HSS Providers who will also gather exit destination information to the best of their ability.

PROGRAM TERMINATION

Pursuant to 24 CFR 578.91, Back@Home-BoS may terminate assistance to a household who violates program requirements. Terminations, or involuntary exits, from Back@Home-BoS should be extremely rare and a last resort if a household is exhibiting serious violations of their responsibilities (i.e. threats to health or safety of staff or other households, misrepresentation of eligibility information including not providing information for income recertification, or extended inability to contact the household following repeated attempts through phone, email, home visits or other outreach). Termination from Back@Home-BoS does not bar the household from assistance from Back@Home-BoS in the future.

Households **may not** be terminated from Back@Home-BoS for any of 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; or
- Any other activity not covered in a lease agreement typical to the service area.

HSS Providers will exit the household from their current project enrollment and close the household's program participation.

Households will be given 10 days from the date of the written notification to file an appeal. Back@Home-BoS terminations are effective within 30 days of written notification to the household, pending outstanding appeal decisions. NCORR maintains the right to terminate earlier at their discretion.

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[29] https://files.hudexchange.info/resources/documents/System-Performance-Measure-7-Housing-Destination-Summary.pdf

All households will also be provided a copy of the Notice of Occupancy Rights under VAWA with any notice of termination of assistance.

PROGRAM TERMINATION GRIEVANCE PROCEDURE

All households served by Back@Home-BoS will have access to a grievance process for program terminations including:

- Households will be provided program rules and information about the termination process prior to receiving assistance;
- Written notice of the termination provided to the household including reasons for termination;
- An opportunity for the household to present written or oral objections to a person other than the person who made or approved the termination decision; and
- Prompt written notice of the final decision to the household.

Grievances will first be heard by the HSS Provider using the agency's grievance process. Grievances that cannot be resolved at the HSS Provider will be escalated to NCORR for a team of staff to review the appeal and make a final determination.

If a household needs to request a reasonable accommodation by Back@Home-BoS, HSS Providers may support them in the request.

For additional information on grievances, see the Grievance Policy.

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 STABILIZATION SERVICES

Housing Stabilization Services support households to get and keep housing. Back@Home-BoS is currently funding four core service types, listed below. While all service types should be available on an ongoing basis to each household, it is not necessary for each service type to be active each month. Though these services are designed to meet common household stability needs and can be tailored to individual needs, it should not be concluded that these four service types represent an exhaustive list and can cover all needs. Back@Home-BoS will connect households with other services available in the community. Additional types of Housing Stabilization Services could be funded as Back@Home-BoS expands.

HOUSING STABILIZATION SERVICE TYPES

Housing Stabilization Case Management
Housing Stabilization Case Management services create a partnership with the household to assess, plan, implement, coordinate, monitor, and evaluate the needs of the household to get and keep housing.

Outreach
Outreach services assist by locating, engaging, and supporting households with life-saving resources as they experience homelessness and are connected to housing resources.

System Navigation
System Navigation services assist households with accessing resources from the homeless system and partner systems to get and keep housing.

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

HSS PAYMENT STRUCTURE

HSS Providers will be offered a Housing Stabilization Services Payment (HSS Payment) at a set rate per household per month. NCORR will assign each HSS Provider a maximum number of households that may be billed for an HSS Payment each month. This number will be referred to as Slots and is included in the HSS Providers contract. The maximum number of Slots assigned to an HSS Provider by NCORR may be adjusted over time.

FINANCIAL ASSISTANCE FOR HOUSING STABILIZATION

Financial Assistance supports households to get and keep housing. Back@Home-BoS is currently funding five core categories of financial assistance:

- Temporary Stay Financial Assistance

- Unit Access Financial Assistance

- Move-In Financial Assistance

- Rent and Utility Financial Assistance

Though this financial assistance is designed to meet common household stability needs and can be tailored to individual needs, it should not be concluded they represent an exhaustive list and can cover all needs. Back@Home-BoS will connect households with other assistance available in the community. Additional types of financial assistance could be funded as Back@Home-BoS expands.

SEPARATION OF FINANCIAL ASSISTANCE AND SERVICES

There are no preconditions for households to receive financial assistance. Financial assistance for households will be individualized and flexible to meet the needs of the household. Households do not need to meet service goals or participate in housing support services to receive financial assistance.

TEMPORARY STAY FINANCIAL ASSISTANCE

Back@Home-BoS may assist enrolled households with limited, short-term hotel and motel stays to help households secure safe, temporary shelter while working on their Housing Stability Plan. Safety of the current living situation will be assessed by the HSS Provider with the household upon program enrollment and in ongoing meetings while in a homeless living situation. Local shelter resources should be exhausted as an option before utilizing temporary stay financial assistance.

UNIT ACCESS FINANCIAL ASSISTANCE

Unit access costs are expenses associated with helping secure a stable housing unit for an eligible household. Eligible expenses for Unit Access Financial Assistance are outlined below. Subcategories include Standard Unit Costs, Arrears, and Property Provider Incentives.

UNIT ACCESS: STANDARD UNIT COSTS

Type	Description
Application Fees	Charges imposed by Property Providers. These fees are typically non-refundable and usually cover the cost of processing the rental application and conducting various checks, such as background checks, credit checks, and reference checks. Application Fees are distinct from security

	deposits and rent payments, and they are typically paid upfront when an application for a rental property is submitted.
Administrative Fees	Charges imposed by Property Providers. These may also be called administrative charges or processing fees. These fees are typically non-refundable and usually cover various administrative expenses related to the rental process. These fees are distinct from security deposits and rent and are typically paid at lease signing after an application for a rental property has been approved. Property Providers may require the fee at a different time.
Background Check Fees	Charges imposed by Property Providers or at Housing Collaborative's discretion. These fees are used to cover the cost of conducting background checks on household members during the rental housing application process. Background checks are a common part of the resident screening process and typically involve investigating various aspects of an applicant's background, including their rental history, criminal history, and credit history.
Pet Fees and Deposits	Pet Fees and Deposits are charges imposed by Property Providers and designed to cover any potential damage caused by the resident's pet(s) during their residency. It is distinct from the standard security deposit and is specifically intended to address pet-related issues. Pet Fees or Deposits are usually a one-time charge. Typically, Pet Fees are non-refundable, and Pet Deposits are refundable.
Security Deposits	A sum of money paid to a Property Provider at the beginning of a rental agreement. The primary purpose of a security deposit is to provide financial protection for the Property Provider in case the resident fails to meet their obligations under the lease agreement or causes damage to the rented property. Security Deposits are typically refundable.
Utility Deposits and Connection Fees	Utility deposits, and all related fees to connection services as documented in an invoice, are collected by a utility company, typically an electricity, gas, water, or similar service provider, as a financial guarantee from a residential tenant. These deposits are separate from a housing security deposit and are specifically designed to cover any unpaid utility bills or potential charges for services provided to the rented property. Non-essential utilities that are not eligible for assistance include internet and cable. Utility deposits are typically refundable or applied to charges on the bill once good credit is established.
Inspection Fees	Charges associated with the assessment and evaluation of a property's condition, safety, and compliance with HUD standards.

UNIT ACCESS: ARREARS

Type	Description
Rental Arrears	Unpaid rent that is overdue to a Property Provider and has not been paid by the due date specified in the lease agreement. Rental arrears can occur when a resident fails to make their rent payment on time, and the amount owed accumulates over a period of time.
Utility Arrears	Unpaid bills from a utility service such as electricity, gas, water, sewage, or other essential public services. Non-essential utilities that are not eligible for assistance include internet and cable.
Utility Reconnection Fees	Charges imposed by utility service providers when they need to restore utility services that were temporarily disconnected or suspended due to non-payment, violation of terms, or other reasons. Non-essential utilities that are not eligible for assistance include internet and cable.

UNIT ACCESS: PROPERTY PROVIDER INCENTIVES

Property Provider Incentives are a strategy to encourage property-owner involvement with Back@Home-BoS. These incentives will be prioritized for access to units for hard to house households due to systemic housing barriers in challenging housing markets. If such assistance is necessary, and funding is available, it will be paid directly to the Property Provider.

To compete in the housing market, whether it is private or the affordable housing sector, Back@Home-BoS will leverage a variety of tools and payments to incentivize Property Providers and acquire available units for eligible households.

Back@Home-BoS will strive to ensure that these supplemental payments do not incentivize Property Providers to adopt more stringent leasing policies and are otherwise compliant with any rent or security deposit restrictions imposed by state or local law.

Type	Description
Cleaning and Maintenance	Costs associated with cleaning or removing items from a unit to restore the property to a livable condition. These costs may be incurred while a household is still residing in the unit or after they leave a unit. If used after move-out, it should supplement the use of security deposit, not replace it.
Extra Deposits	One additional month of security deposit offered to Property Providers that are separate from the standard security deposit and are offered voluntarily by the program.

Holding Fees	Payments made by the program to hold a rental property for future use by a household enrolled in the program before a lease agreement is finalized. These fees are typically paid to Property Providers to reserve the property for the program during the application and screening process. Holding Fees are typically paid on a monthly basis and do not exceed the amount equivalent to one month's rent per month that the unit is held.
Repair Funds	Funds used in circumstances where a quick response to minor damage by a household will keep the Property Provider relationship intact. Should supplement the use of security deposit to cover damages, not replace it.
Signing Bonus	Funds provided at lease signing to incentivize landlords to rent to Back@Home-BoS households. It may not exceed the equivalent of one month of rent.

MOVE-IN FINANCIAL ASSISTANCE

Move-in Financial Assistance refers to costs incurred to set up a new home for a household.

MOVING AND RELATED RELOCATION

Moving and related relocation expenses, which are also often referred to as move-in costs, are reasonable and necessary costs that a household may incur in the process of relocating into a new housing unit. Such costs may include reasonable moving expenses into the dwelling and storage unit fees for household items.

Type	Description
Furniture and Housing Supplies	Expenses associated with essential furnishings and basic household items for a residential unit, such as furniture, kitchen appliances, cookware, utensils, bedding and other essential items needed for daily living. May include acquisition, delivery, and assembly.
Moving Costs	Expenses associated with relocating households into a new residence, including truck rental or moving company fees.
Storage Unit Fees	Fees associated with rental of a storage unit.

RENT AND UTILITY FINANCIAL ASSISTANCE

Financial assistance provided to a household to support ongoing expenses with rent and utility costs.

RENT ASSISTANCE

Back@Home-BoS is a Tenant-Based Rental Assistance (TBRA) program under HUD CoC guidelines. All units must meet unit criteria outlined in the Unit Requirements section to receive

rental assistance. NCORR must provide prior authorization for any permanent housing assistance offered by a subrecipient.

UTILITY ASSISTANCE

For the purposes of Back@Home-BoS, utilities assistance is applicable to utility or home energy costs that are separately stated charges related to the occupancy of rental property. Accordingly, utilities and home energy costs include essential utilities such as electricity, gas, water, sewer, and trash. Non-essential utilities that are not eligible for assistance include internet and cable.

Based on data published by the North Carolina Utilities Commission in 2022 with a nominal increase to assume 2023 costs, the following thresholds represent the reasonable amount the Back@Home-BoS will obligate for prospective utility or energy costs based on the utility type and number of months of total assistance.

Utility Estimated Limits	Electricity	Natural Gas	Water	Wastewater	Trash	Total Utility Cap
1 month	$157	$88	$49	$60	$24	$378
2 months	$314	$176	$98	$120	$48	$756
3 months	$471	$264	$147	$180	$72	$1,134

Utilities and home energy costs that are covered by the Property Provider will be treated as part of the rent assistance.

NECESSARY AND REASONABLE COSTS

In determining reasonableness of a given cost for the usage of Back@Home-BoS funds, NCORR and program subrecipients will defer to the guidance and requirements established by 2 CFR 200.404.[30]

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[30] Code of Federal Regulations, 2 CFR 200.404, Reasonable costs, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E/subject-group-ECFRea20080eff2ea53/section-200.404#:~:text=A%20cost%20is%20reasonable%20if,made%20to%20incur%20the%20cost.

Housing Stabilization Services

Housing Stabilization Services support households to obtain and maintain housing. There are four types of housing stabilization services currently funded by Back@Home-BoS: Housing Stabilization Case Management, Outreach, System Navigation, and Housing Navigation. These services may be offered to households participating in the Back@Home-BoS program at any time while enrolled in any project type.

BASICS OF SERVICES PROVISION

SUMMARY OF SERVICE PROVISION BY SUBRECIPIENT

The table below summarizes Subrecipient responsibilities for providing each type of funded Housing Stabilization Service.

Service Type	HSS Providers	Housing Collaborative
Housing Stabilization Case Management	✓	
Outreach	✓	
System Navigation	✓	
Housing Navigation	✓	✓

HSS SLOTS

The payment and slot structure for Back@Home-BoS is designed to provide flexibility and scalability to HSS Providers and to promote best practices in service delivery. HSS Providers are assigned target numbers by NCORR for expected HSS Slots based on funding availability, need, and geographic area served. HSS Providers are contracted to serve a minimum of 50 households at a given time through these defined Slots. The HSS Slots and case manager-to-household ratio (approximately 1:25) helps to determine staffing needs. HSS Providers are expected to quickly enroll households through Coordinated Entry assignments or other outreach efforts to meet their target capacity and maintain these targets. In general, Back@Home-BoS Subrecipients have broad flexibility to prioritize their case load to address emergency needs, facilitate housing navigation and system navigation, and provide other relevant housing stabilization services to households.

CASE MANAGER RATIOS

To ensure quality of services, HSS Providers should aim to utilize a case management ratio of approximately 1 case manager per 25 households. This ratio may be determined on a team level. To calculate, the number of enrolled households will be divided by the number of FTE case managers.

ENGAGEMENT AND VOLUNTARY SERVICES

Supportive services will be available to enrolled households for the entire duration of their enrollment in Back@Home. Program households have the right to refuse the services, assistance, or incentives offered. Participation in the program is voluntary.

Following a Housing First model, a household cannot be terminated from the program for rejecting services. Case managers will focus on continually engaging households to develop a strong partnership to create and revise Housing Stability Plans.

Households will lead the case planning and goal setting based on what they want. Case managers will ensure that they provide information about the array of services available to the households through Back@Home and linkages with other programs to develop a comprehensive housing plan. Each household will receive different types of services based on their needs and preferences.

Through the duration of the household's enrollment, case managers will conduct an annual assessment of service needs for each household (§ 578.53(a)(2)) and will make annual adjustments.

HOUSING STABILITY PLANS

The Housing Stability Plan is the central tool for Back@Home-BoS to organize and deliver Housing Stabilization Services and Financial Assistance provided by Back@Home-BoS.

Case managers will create a Housing Stability Plan in partnership with every household which will be updated throughout their participation in the program. Plans will outline the household's housing goals including their desired housing situation, potential barriers to getting and keeping housing, and other resources the household needs to thrive.

The household and a case manager will work together to create strategies to achieve the household's goals including linkages to their natural supports and other community programs and services that support income, education, medical, mental health, and/or substance use needs. The Housing Stability Plan is expected to be updated by the case manager as the household meets their goals or as the needs of the household change.

OUTREACH

OUTREACH SERVICES

Outreach Services assist by locating, engaging, and supporting households with life-saving resources as they experience homelessness and are connected to housing resources.

The following activities are examples of Outreach Services:

- Locate households experiencing homelessness;

- Engage households experiencing homelessness who are not currently being assisted by the homeless service system to determine needs and explain the system and how to access resources;
- Collaborate with community partners, including Unsheltered Access Coordinator and other Coordinated Entry staff to identify households that may benefit from Back@Home-BoS assistance
- Provide education on Back@Home-BoS program benefits
- Assess household's eligibility for entry to Back@Home-BoS
- Provide life-saving resources such as food, water, clothing, blankets, and other necessities as acts of humanity and compassion and as a means of building rapport;
- Act as a street outreach resource for people experiencing unsheltered homelessness including:
  o Assertively and proactively engage people experiencing unsheltered homelessness
  o Respond to calls from the community identifying households who are unsheltered
  o Regularly check in with system partners (i.e., librarians, McKinney-Vento school liaisons, etc.) to identify new households experiencing homelessness; and
- Coordinate support for unsheltered households during extreme weather and other disasters

Outreach Services are vital in providing support and assistance to households who may not have easy access to essential resources and services. These services play a crucial role in connecting marginalized and vulnerable populations with the help they need, promoting inclusivity, and addressing social inequalities. A key component of outreach is that the group providing it is not stationary, but mobile; in other words, it involves meeting someone in need of an outreach service at the location where they are.

HOUSING STABILIZATION CASE MANAGEMENT

HOUSING STABILIZATION CASE MANAGEMENT SERVICES

Housing Stabilization Case Management Services create a partnership beteween the HSS Provider and the household to assess, plan, implement, coordinate, monitor, and evaluate the needs of the household to get and keep housing.

The following activities are examples of Housing Stabilization Case Management Services:

- Work alongside household to create and implement a Housing Stability Plan to obtain and maintain housing;
- Support the follow-through and achievement of the goals defined in the plan;
- Assist the household in revising the Housing Stability Plan;
- Assist with budgeting and providing financial counseling for housing/living expenses;
- Provide financial literacy and budget basics education and connect to other resources such as community-based consumer credit counseling bureaus;

- Support the household in the development of independent living skills;
- Assist the household in reducing the risk of eviction with conflict resolution skills; and
- Provide transportation to assist with obtaining and maintaining housing.

SERVICE DELIVERY

Housing Stabilization Case Management Services will be offered to enrolled households in all project types throughout their housing journey and while the household is in any living situation. These services are always focused on obtaining and maintaining housing, but are adapted to household needs over time.

Housing Stabilization Case Management Services will not differ based on the type of project enrollment. Instead, services will be offered to meet the needs of each specific household as outlined in their Housing Stability Plan.

Case managers will prioritize assisting households to establish a home, meet the obligations of tenancy, and positive relationships with neighbors and the Property Provider. Households will determine what supports they need to meet these housing goals. As needs change over time, households can receive more intensive or less intensive support services without losing their homes. Households will direct when, where, and how often case management meetings occur. Meetings will occur in a household's home and/or in a location of the household's choosing.

HSS Providers will provide information about an array of services that might fit a household's needs. In addition to formal systems, case managers will support households who indicate interest in restoring their natural support systems or helping to establish new community connections to support long-term goals and foster healing.

HSS Providers are expected to meet with enrolled households at least once per month. The location, duration, and content of such meetings will vary according to the household's need.

If a household refuses services, HSS Providers will continue to make monthly contact with the household to offer services. This refusal does not trigger program exit or termination of assistance as long as the HSS Provider meets monthly with the household. HSS Providers will also continue to support households with collecting documentation needed for the continuation of rental assistance.

SYSTEM NAVIGATION

SYSTEM NAVIGATION SERVICES

System Navigation Services assist households with accessing resources from the homeless system and partner systems to get and keep housing.

The following activities are examples of System Navigation Services:
- Assist households to obtain safe, interim housing, if desired, while working on longer-term housing plans;

- Obtain the necessary personal documentation required for housing applications or programs;
- Refer and provide warm handoffs to needed services available in the community including domestic violence services, Veteran specific services, behavioral health, healthcare, and first responders;
- Identify potential eligibility for benefits and resources, complete referrals and applications, and provide warm handoffs including:
  - Housing programs outside of the coordinated entry process including Public Housing Authorities, Target Key, HOPWA, and other local housing programs
  - Social services to help with finding housing necessary to support meeting medical care needs
  - Programs providing income benefits and programs such as SSI/SSDI, Veterans disability benefits, employment programs, Vocational Rehabilitation, and other local income supports;
- Complete Coordinated Entry Assessment Requirements, ensure the household is placed on the By Name List, and serve as an advocate during case conferencing meetings;
- Assist the household to complete annual or interim housing re-certifications; and
- Refer to legal support to address needs related to finding and maintaining stable housing.

Case managers will strive to develop a working familiarity with the systems and resources with which households often must interact and facilitate connections with those systems, including healthcare facilities, food and housing assistance programs, childcare, etc.

UTILIZING TEMPORARY STAY FINANCIAL ASSISTANCE

Upon enrollment, HSS Providers will prioritize ensuring households are in a safe location, as determined by the household, such as a congregate shelter facility or a non-congregate shelter in a hotel/motel room. Non-congregate shelter stays may be provided for a household, but only on a time-limited basis and only if there is no safe option to stay at a shelter. Reasons a shelter might not be an option may include safety concerns in a shelter may include high-risk for COVID transmission or other health and accessibility concerns, personal safety concerns, and/or no available shelter in the community. The cost of the hotel/motel room must be reasonable as compared to similar hotel rooms in the area. Each HSS Provider will have access to limited funds to provide non-congregate shelter options. Refer to Temporary Stay Financial Assistance in Eligible Costs for additional information.

CONNECTIONS TO OTHER SERVICES

HEALTHCARE, MENTAL HEALTH CARE, AND SUBSTANCE USE SERVICES

Case managers may assess households for ongoing health, mental health, and substance use needs. Obtaining services for these needs is not a requirement of program enrollment, but HSS Providers will maintain relationships with local providers to access services for households. HSS Providers have ongoing partnerships and collaborations with healthcare, mental health, and substance use agencies.

Where possible, NCORR will collaborate with other state agencies such as the NC Department of Health and Human Services to ensure that systemic barriers to accessing care are removed for Back@Home-BoS households and other households experiencing homelessness.

EMPLOYMENT AND BENEFITS

Access to adequate income and income supports can help households to obtain and maintain permanent housing. HSS Providers will connect households to variety of income support services. These services may include financial literacy education, credit repair assistance, employment assistance, and matched savings programs. HSS Providers selected via the RFA process demonstrated ongoing partnerships and collaborations with employment agencies, employers, and benefit advocates.

HSS Providers maintain and continually recruit local businesses in a variety of fields that are interested in employing households. Case managers will work with households to explore their unique skills, experiences, abilities, and interests to assist them in finding employment as they desire and are able.

It is helpful for case managers to have basic knowledge of Social Security Disability Income and Supplemental Security Income and enrollment procedures and offer enrollment support as an available service for households. In addition, HSS Providers may connect eligible households to benefits, including SNAPS, TANF, FAST, ePASS. HSS Providers may connect all households to a Medicaid Plan as eligible.

CONNECTING TO OTHER HOUSING ASSISTANCE RESOURCES

Back@Home-BoS continually seeks to leverage other housing assistance for households in the program. Other housing resources may include:

- Housing Choice Vouchers, Emergency Housing Vouchers, and Housing Stability Vouchers from Public Housing Authorities
- Public Housing Authority Units
- Other permanent housing programs governed by the Continuum of Care. This includes all programs that are listed on the CoC's Housing Inventory Count (HIC)[31] and/or require referrals to come through Coordinated Entry
- Transitions to Community Living Initiative
- Housing Opportunities for Persons With AIDS (HOPWA)

HSS Providers will assist households with completing applications for these programs and any other affordable housing programs the household identifies.

ENROLLMENT IN OTHER HOUSING PROGRAMS

Households can be enrolled in Back@Home-BoS and another program that offers similar assistance. In these cases, the household's assistance package from Back@Home-BoS will be

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[31] https://www.ncceh.org/bos/pithic/

tailored to ensure there is no duplication of services or financial assistance. If the other program duplicates all elements of Back@Home-BoS assistance, the HSS Provider should work to ensure the household is fully connected to the other program and exit the household from Back@Home-BoS.

ACCESSING LEVERAGED AND DEDICATED VOUCHERS

Back@Home-BoS will collaborate with Partner Public Housing Authorities to coordinate applications for three types of PHA-administered vouchers:

- Stability Vouchers[32] that were awarded to PHAs in jurisdictions that received CoC SNOFO funds to partner with the CoC;
- Emergency Housing Vouchers (EHVs)[33] that were allocated to PHAs to partner with the CoC; and
- Housing Choice Vouchers (HCVs)[34] from the PHA's HCV program that are committed as leverage to the project. These commitments to use HCVs for Back@Home-BoS participants were made by Partner Public Housing Authorities during the 2022 CoC SNOFO competition.

While HSS Providers should assist households in accessing all PHA vouchers and units, collaborative workflows will be used to access these three types of leveraged and dedicated vouchers. The use of these leveraged and dedicated vouchers is not intended to supplant federal funding for the same purpose.

The chart below shows the Partner PHAs and type of vouchers that will be coordinated for Back@Home-BoS households.

PHA	Stability Vouchers	EHVs	Committed HCVs
City of Greenville	✓		✓
City of Hickory	✓		
Foothills Regional Authority	✓		
North Carolina Commission on Indian Affairs	✓	✓	✓
Western Piedmont Council of Governments	✓		✓

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[32] https://www.hud.gov/program_offices/public_indian_housing/stability_voucher_program
[33] https://www.hud.gov/ehv
[34] https://www.hud.gov/topics/housing_choice_voucher_program_section_8

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) inspection[35]

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.

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[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]

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[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 federal[38] 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 Inspection[40], 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 CRF 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.

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[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 to be in place for each Back@Home-BoS household. If an agency is placing a client in shared housing, all unit requiements 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 Authrorization for Permenanent 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@NCCEH[42] 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.

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[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 Needs[43]
2) NC Balance of State Continuum of Care Standards- Outreach[44]
3) NC Balance of State Continuum of Care Standards - Permanent Supportive Housing[45]
4) NC Balance of State Continuum of Care Standards - Homelessness Prevention and Rapid Rehousing[46]
5) Homeless Management Information System (HMIS) Data Quality Plan[47]
6) NC Balance of State Continuum of Care Anti-Discrimination Policies and Procedures[48]
7) Coordinated Entry policies and procedures[49]
8) VAWA Emergency Transfer Plan Policy[50]

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[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 Procedures[51]
10) Client Bill of Rights[52]

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]

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[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, Subreceipients, 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 Balace 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.

Subrecipirents 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

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[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.

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[55] https://www.ncceh.org/files/12916/

Back@Home-BoS Program Policies

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

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[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 Subreciepients 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;

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[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;

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[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.