

Attachment E

Requirements for Adopting a Housing First Approach to Operations

1. Housing First Defined

- a. For purposes of this Agreement, “Housing First” means, pursuant to section III.A.3.e. of the HUD FY 2015 Continuum of Care Program Notice of Fund Availability (hereinafter “HUD FY 2015 NOFA”), a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions.

- b. Instructions for the Project application that were incorporated into the HUD FY 2015 NOFA and that served as the basis for Sub-recipient’s application to HUD further specify that:
 - i. Few to no programmatic prerequisites to permanent housing entry – People experiencing homelessness are offered permanent housing with no programmatic preconditions such as demonstration of sobriety, completion of alcohol or drug treatment, or agreeing to comply with a treatment plans upon entry into the program.

 - ii. Supportive services are voluntary, but can and should be used to persistently engage participants to ensure housing stability. Supportive services are proactively offered to help tenants achieve and maintain housing stability, but tenants are not required to participate in services as a condition of tenancy. Techniques such as harm reduction, motivational interviewing, and Recovery Oriented care are implemented to engage with participants.

- c. Sub-recipient has certified in its request for FY 2015 HUD Continuum of Care program funding that it will operate Project using a Housing First approach.

2. Denial of Eligibility for Services under a Housing First Approach

Sub-recipient shall not make eligibility or access to the Project contingent on any condition or restriction that is not essential for eligibility, including but not limited to:

- a. Failure to meet minimum income requirements;
- b. Perceived lack of housing readiness;
- c. Current or past history of substance use;
- d. Criminal record, with the exception of state- or federally-mandated restrictions;
- e. Failure or refusal to participate in supportive services;
- f. Failure to complete treatment, be compliant with medications, or make progress on a service plan;
- g. Disability or type of disability;
- h. Current or past history of domestic violence (e.g., lack of protective order, period of separation from abuser, law enforcement involvement);
- i. Poor credit or problematic financial history;
- j. Poor rental history or no rental history;
- k. Family composition, as defined by HUD for Equal Access purposes;

- l. Sexual orientation;
- m. Gender identity;
- n. Lack of transportation;
- o. Project hours of intake or operation;
- p. Accompaniment by pets; or
- q. Any other activity not covered in a typical lease agreement executed in accordance with Florida landlord-tenant laws.

3. Termination of Service under a Housing First Approach

Sub-recipient shall not make continued eligibility for the Project contingent on any condition or restriction that is not essential for eligibility, including those listed at Paragraph 2 above and the following:

- a. Loss of income or failure to increase income;
- b. Decision on the part of a domestic violence survivor to reunite with abuser; or
- c. Eviction, displacement, or relocation from a housing unit.

4. Additional Housing First Requirements

Sub-recipient shall:

- a. Adjust or modify service intensity and duration as appropriate based on changes in Program Participants' needs or circumstances;
- b. Provide prospective and current Program Participants with disabilities clear opportunities to request reasonable accommodations as part of the service delivery process;
- c. In the event of an eviction, displacement, or relocation of a Program Participant from a housing unit, Case Manager continues providing services unless/until Program Participant is transferred to a different PSH provider or terminated from service via COC Case Conference Committee approval;
- d. Notify the CES-designated Point of Contact and assigned Case Manager within two (2) business days of becoming aware that a Program Participant is being considered for an exit from the program due to any of the exceptions noted below in paragraph 5.
- e. Notify the CES-designated Point of Contract of any Case Management openings prior to registry management meetings.

5. Exceptions to Housing First

Notwithstanding Paragraphs 2, 3, and 4, the following actions shall not be considered a violation of a Housing First approach:

- a. Requirements imposed by local, state or federal laws;
- b. Documented, imminent threats to health and safety of program staff; or
- c. The mutually agreed upon Sub-recipient- or Project-specific circumstances or conditions: