

**Wisconsin Balance of State Continuum
of Care
Emergency Shelter
Written Standards for Service Delivery**



The WIBOS Continuum of Care has developed these standards to provide specific guidelines for shelter operations. Under (24 CFR § 576.400 (e)(3)), the Wisconsin Balance of State Continuum of Care will follow the standards for providing COC assistance to Emergency Shelters receiving Emergency Solutions Grant (ESG) program funds. The WIBOS Continuum of Care developed the following Emergency Shelter program standards to ensure:

- Policies and procedures for evaluating individuals' and families' eligibility and determining the process of prioritizing eligible households in emergency shelter.
- Program standards that meet HUD's requirements for emergency shelters to define policies and procedures for admission, diversion, referral, and discharge standards as well as safeguards to meet needs for special populations such as victims of domestic violence, dating violence, sexual assault, and stalking.
- Requirements for participation in the COC's Homelessness Management Information System (HMIS) or a comparable database for those prohibited by VAWA.
- Program accountability to individuals and families experiencing homelessness.
- Program compliance with the Department of Housing and Urban Development policy and procedures.
- Service consistency within programs.
- Adequate program staff competence and training, specific to the target populations served.

DEFINITIONS:

Continuum of Care (COC)- means the group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals and healthcare systems; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

Family – *Family* includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, the following:

1. A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or,
2. A group of persons residing together, and such group includes, but is not limited to:
 - a. A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
 - b. An elderly family;
 - c. A near-elderly family;
 - d. A disabled family;
 - e. A displaced family; and,
 - f. The remaining member of a tenant family.

Homeless – For the purposes of Emergency Shelters, homeless means: An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (1) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; (2) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or (3) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. (24 CFR 576.2) (4) any individual or family who: (i) is fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, sex trafficking, stalking or other dangerous or life-threatening conditions that relate to violence against the individual or their family members, including a child, that has either taken place within the individuals or family’s primary nighttime residence; (ii) had no other residence; and (iii) lacks the resources or support networks (e.g. family, friends, and faith-based or other social networks) to obtain other permanent housing. 24 CFR 578.3).

Chronically Homeless – (1) A homeless individual or head of household with a disability that meets the HUD definition of a disability who (a) lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; AND (b) has been homeless and living in one of these places continuously for at least 12 months OR on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living in one of the aforementioned places.

Emergency Shelter - any appropriate facility that has the primary purpose of providing day shelters, temporary or transitional shelter for the homeless in general or for specific populations of the homeless and the use of which does not require occupants to sign leases or occupancy agreements, (24 CFR 91.5)

Coordinated Entry – The coordinated entry (CE) process is **an approach to coordination and management of a crisis response system’s resources** that allows users to make consistent decisions from available information to efficiently and effectively connect people to housing and service interventions that will rapidly end their homelessness.

CE is a powerful piece of a Housing Crisis Response Systems that ensures that people experiencing or at risk of homelessness can readily find and navigate crisis intervention assistance. It is designed to ensure that people experiencing a housing crisis are prioritized for and matched with the most appropriate housing intervention and services as quickly as possible. It aims to standardize the access, assessment, and referral process across all providers in communities.

Diversion - Diversion is a strategy to prevent homelessness for individuals seeking shelter or other homeless assistance by helping them identify immediate alternative housing arrangements and if necessary, connecting them with services and financial assistance to help them return to permanent housing. Diversion practices and programs help reduce the number of people becoming homeless and demand for shelter beds. Diversion program guidance is provided in Appendix A.

Rapid Rehousing – Rapid rehousing assistance aims to help homeless households move as quickly as possible into permanent housing and achieve stability in that housing through a combination of rental assistance and supportive services.

PERSONNEL

STANDARD: The program must appropriately staff services with trained personnel to ensure quality service delivery, effective program management, and the safety of program participants.

CRITERIA:

1. The organization must select program employees and/or volunteers with adequate and appropriate knowledge, experience, and stability for working with individuals and families experiencing homelessness and/or other issues that place individuals and families at risk of homelessness.
2. The organization must provide time for program employees and/or volunteers to attend webinars and/or trainings on program requirements, compliance, and best practices.
3. The organization must train program employees and/or volunteers on program policies and procedures, available local resources, and specific skill areas relevant to assisting clients in the program.
4. Organizations receiving ESG funds must participate in the coordinated entry system. Emergency Shelter programs must follow all WIBOSCOC Coordinated Entry Policies and Procedures. Participation in coordinated entry will be reviewed during annual monitoring.
5. All program staff have written job descriptions that address tasks staff must perform and the minimum qualification for the position.
6. All organization staff must receive adequate training. These trainings will be developed by each agency and will be offered for all new staff.

CLIENT INTAKE PROCESS

STANDARD: Emergency Shelter programs must have minimal entry requirements to ensure those served are the most vulnerable individuals and families needing assistance. Emergency Shelter programs must utilize Diversion intervention prior to shelter intake.

CRITERIA:

1. Emergency Shelter programs must be low barrier. Intake policies are required to reflect few barriers to entry as possible. (i.e., participants are not required to have income, be sober, provide identification, have a clean criminal history, participate in mental health treatment, including taking medication)

2. All adult program participants must meet two requirements in EHH-funded emergency shelters. They must be 18 years of age and literally homeless, imminently at-risk of homelessness, and/or fleeing or attempting to flee domestic violence.
3. EHH-funded emergency shelters may serve 17-year-olds who are homeless and unaccompanied by a parent or guardian under 2019 Wisconsin Act 22:

ACT to create 48.9875 of the statutes; **relating to:** a minor contracting for admission to a shelter facility or transitional living program. ***The people of the state of Wisconsin, represented in senate and assembly, do enact as follows:***

SECTION 1 . 48.9875 of the statutes is created to read:

48.9875 Minor consent for housing.

(1) In this section, “shelter facility” means a temporary place of lodging for individuals or families.

(2) A minor must be presumed to be qualified and competent to contract for admission to a shelter facility or transitional living program, if all of the following apply:

(a) The minor is 17 years of age.

(b) The minor is not under the supervision of a county department, a child welfare agency, the department, or the department of corrections under this chapter or ch. 938 or under the jurisdiction of the court.

(c) One of the following confirms that the minor is an unaccompanied youth as defined under 42 USC 11434a (6):

1. A local educational agency liaison designated under 42 USC 11432 (g) (1) (J) (ii) who has obtained the minor's consent to disclose the minor's status as an unaccompanied youth.

2. If a local educational agency liaison is not available, an employee of the shelter facility or transitional living program who conducts intake.

(3) The defense of infancy does not apply to any contract with a minor under sub.

4. Family Emergency Shelters cannot require that families separate to enter shelter and must not deny admission to families based upon composition of the family.
5. Emergency Shelter Programs cannot require proof of gender for an individual to enter shelter.
6. All EHH recipients must use the [WIBOS Verification of Homelessness](#) for documenting evidence to determine homeless status and chronically homeless status. Shelter Programs must document in the client file that the organization attempted to obtain the documentation in the preferred order. The order should be as follows:
 - Third-party documentation (including HMIS)
 - Intake worker observations through visual assessment
 - Self-certification of the person receiving assistance

7. Programs must only deny entry or services for program specific violations relating to safety and security of program staff and participants.
8. EHH funded shelter programs must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for EHH assistance and the amount and types of assistance the individual or family needs to regain stability into permanent housing. Evaluations need to be conducted in accordance with Coordinated Assessment Requirements set forth under § 576.400(d).
9. Participants have the right to refuse to answer questions on an intake/discharge form or refuse to have their data shared in HMIS or other comparable databases.
10. Shelters must provide the client with a written copy of the program rules and the termination process before he/she begins receiving assistance.
11. All shelters receiving EHH funds are required to utilize Diversion interventions prior to shelter entry. Assessment for Diversion eligibility, in addition to the provision of some crisis stabilization services, should take place at the "front door," the initial access point (or points) to the homeless assistance system. Shelter programs must formulate a screening process that can quickly determine whether individuals and families are eligible to be diverted. Diversion Program guidance is provided in Appendix A of these standards.

ASSESSING, PRIORITIZING, AND REASSESSING HOUSEHOLDS

STANDARD: Shelters must assess, prioritize, and reassess client needs for all clients entered into EHH funded shelters.

CRITERIA:

1. Shelters must provide an initial assessment to all clients to determine client needs (ie: housing, medical, transportation, etc.).
2. Shelters must provide all clients with a client driven case plan or goal setting to prioritize client goals.
3. Shelters must develop an internal process for how often they will reassess the client initial needs assessment and case plan.
4. Shelters must document their process for assessing, prioritizing, and reassessing client needs in their agency-initiated policies for their shelter program.

CLIENT AND PROGRAM FILES

STANDARD: Organizations must keep all client files up-to-date and confidential to ensure effective delivery and tracking of services.

CRITERIA:

1. Client and program files must, at a minimum, contain all information and forms required by the state EHH office, service plans, case notes, referral lists, and service activity logs including services provided directly by the shelter program and indirectly by other community service providers including the WI BOSCO. EHH requires:
 - a. **Client Files**
 - o Documentation of homeless status

- Determination of ineligibility, if applicable, which shows the reason for this determination
 - Intake form & Assessment of client needs
 - Documentation of referral to services
 - Documentation of provision of termination procedure
 - Annual income evaluation
 - Program participants' records
 - Documentation of using the Community's Coordinated Entry System
 - Compliance with shelter and housing standards
 - Services and assistance provided
 - b. Program Files**
 - Expenditures and match
 - Conflict of interest/code of conduct policies
 - Homeless participation requirement
 - Confidentiality procedures
2. Client data must be entered into Homeless Management Information System (HMIS) or a comparable database in accordance with HUD HMIS data standards.
 3. Organizations must maintain the security and privacy of written client files and must not disclose any client information without written permission of the client.
 4. All records pertaining to EHH funds must be retained for a minimum of 5 years after the final expenditure of their EHH contract.
 5. Paper files should be maintained in a room with a locked file cabinet, etc. with access strictly reserved for the organization's staff members who need the information. Access to electronic files must be password protected with access strictly reserved for the organization's staff members who need the information.

CASE MANAGEMENT

STANDARD: Shelters must provide access to case management services by trained staff to each individual and/or family in the program.

CRITERIA:

1. Shelter staff must offer regular and consistent case management to shelter residents based on the individual's or family's specific needs. Case management includes:
 - Assessing, planning, coordinating, implementing, and evaluating the services delivered to the clients.
 - Helping clients to create strong support network and participate in the community as desired.
 - Assisting clients with securing permanent housing through programs such as Rapid Rehousing, Tenant Based Rental Assistance (TBRA), Transitional

Housing or Permanent Supportive Housing or a connection to other community programs that provide these services.

2. Shelter staff must assist clients in accessing cash and non-cash income through employment, mainstream benefits, childcare assistance, health insurance, and other benefits clients may be eligible for.
3. Shelter staff must ensure participants are offered Coordinated Entry in accordance with WIBOSCOC Coordinated Entry Policies and Procedures.
4. Shelter programs cannot deny services to individuals and families unwilling to participate in supportive services.

CLIENT TERMINATION AND DISCHARGE

STANDARD: Programs must establish and follow an agency-initiated termination and discharge policy. Emergency Shelter programs will only terminate assistance in the most severe cases.

CRITERIA:

1. If a program participant violates program requirements, the recipient or subrecipient may terminate the assistance in accordance with a formal process established by the recipient or subrecipient that recognizes the rights of individuals affected. The recipient or subrecipient must exercise judgement and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
2. To terminate shelter assistance to a program participant, the required formal process at a minimum, must consist of: (1) Provide notice to the program participant containing a clear statement of the reasons for termination. (2) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision. (3) Prompt notice of the final decision to the program participant.
 - a. *Ability to provide further assistance.* Termination under the section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual.
3. All shelters must document in their shelter program policies and procedures their shelter discharge process. This process must be documented for both planned and unplanned exits from shelter.

EMERGENCY SHELTER

STANDARD: Shelter facilities must provide safe, temporary housing options that meet participants' needs.

CRITERIA:

1. The shelter must meet state or local government safety, sanitation, and privacy standards and habitability requirements. Shelters should be structurally sound to protect residents from the elements and not pose any threats to health and safety of the residents.
2. The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act, the Fair Housing Act, and Title II of the Americans with Disabilities Act, where applicable.
3. Shelters must comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4946), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4821-4956) and implementing regulations.
4. DV shelters must provide measures for securing the facility and its occupants.
5. Shelters must not charge money for any housing or supportive services provided.
6. Must participate in the planning of the local homeless coalitions After Hours Plan and the Point in Time Count.

Additions for Domestic Violence Shelters

Standard: DV Shelters must provide temporary emergency housing for victims of domestic violence and their children. Domestic violence shelters who are unable to provide shelter space are required to make direct contact to safe housing providers or locate other appropriate temporary housing options.

Criteria:

1. DV shelters must provide a 24-hour staffed facility when residents are present.
2. DV shelters must provide a 24-hour hotline or have a process established in the After Hours Plan, that enables victims of domestic violence to speak directly to an advocate, make arrangements for emergency housing and transportation to safety. These accommodations must be documented in the local homeless coalitions After Hours Plan.

EVALUATION AND PLANNING

STANDARD: Shelters must conduct ongoing planning and evaluation to ensure programs continue to meet community needs for individuals and families experiencing homelessness.

CRITERIA:

1. Agencies must maintain written goals and objectives for their services to meet outcomes required by ESG.
2. Programs must review case files of clients to determine if existing services meet their needs. Programs must revise client-driven goals, objectives and activities based on their evaluation and client needs.

3. Programs must conduct, at a minimum, an annual evaluation of their goals, objectives, and activities, making adjustments to the programs as needed to meet the needs of the community.
4. Programs should review project performance at a minimum quarterly to ensure compliance.

Approved as part of the Coordinated Entry update by Board, 11/7/23

Appendix A

Diversion Guidance

Diversion occurs at a “front door” of the homeless service system (e.g., coordinated entry point, service center, emergency shelter) but before the persons spends a night in a shelter, in a motel with a voucher, places not meant for human habitation, or unsheltered. In diversion, there is a focused conversation aimed at helping the person identify an immediate housing arrangement that is a safe alternative to shelter or sleeping unsheltered. This housing arrangement may be temporary, allowing time to identify a permanent housing option while avoiding the immediate trauma of homelessness, or it may allow those involved to explore the possibility of extending temporary arrangement into permanent one.

Approaching Diversion from a client-centered service perspective is critical. Diversion is not a process of turning people away or declining to provide needed services. Rather, Diversion offers a valuable service that helps people avoid experience of being in shelter or unsheltered. Integrating Diversion practices into the system helps to ensure that scarce resources are better utilized.

Screening Tool and Process: Communities should formulate a screening process that can quickly determine whether individuals and families are eligible to be diverted.

System Entry Point(s): Assessment for Diversion eligibility, in addition to the provision of some crisis stabilization services, should take place at the “front door,” the initial access point (or points) to the homeless assistance system.