

These Program Standards (PS) as referenced in Exhibit ____ apply to all City funded contracts for all agencies receiving homeless service funds. The System Components Scope of Required Services (SRS) documents will contain contractual requirements specific to the activity for which the agency is contracted to provide. The Program Standards and Scope of Required Services, and the documents that are linked hereto together comprise the entire Statement of Work for the activity being contracted.

PROGRAM STANDARDS

These program standards are contractual requirements which all programs providing services must adhere to. This document is not a standalone document and is meant to work in conjunction with the Scope of Required Services, which may add to, clarify, or supersede any contractual requirements set forth in this document.

SYSTEM COMPONENT OVERVIEW

All contracted activities are considered to be important components of the Continuum of Care. The following is a list (although not exhaustive) of system components utilized through the CoC: homeless prevention, access centers, outreach, housing navigation, day centers, drop in shelters, emergency shelter, housing location, transitional housing, rapid re-housing, and permanent supportive housing. (24 CFR 576.400)

DEFINITIONS

- 1. Housing First:** Housing First programs focus on quickly moving people experiencing homelessness into permanent housing and then providing the additional supports and services each person needs and wants to stabilize in that housing. Services are never mandatory and cannot be a condition of obtaining the housing intervention. The basic underlying principle is that persons are better able to move forward with their lives once the crisis of homelessness is over and they have control of their housing. Supportive services focus on the income, resources, skills, and tools needed to: pay rent, comply with a lease, take reasonable care of a housing unit, and avoid serious conflict with other tenants, the landlord, and/or the police.

- 2. Low Barrier:** Housing First programs do not require persons to prove “housing readiness.” There are no preconditions. Persons experiencing homelessness do not have to: demonstrate sobriety, engage in treatment, have employment, or have income to obtain program entry or for continued assistance. Rules should not be imposed on participants for them to access services. Stable housing is of critical importance for participants’ health, education, employment, and other related quality of life determinants. The basic underlying principle of Coordinated Intake System Components is that access to housing is the primary need for its program participants, and as such, there should be minimal barriers to assist persons to end their homelessness. Enrollment requirements for all System Components reflect a low-barrier philosophy. Criteria for continued assistance does not include requirements for service participation.

- 3. Harm Reduction:** As part of the low-barrier design of CoC's System Components, all contracted programs must emphasize a Harm Reduction approach. In accordance with Harm Reduction principles, contracted programs must not require treatment or sobriety. Agency must seek to work with program participants to reduce the negative consequences of the person's continued use of alcohol and/or drugs, or non-compliance with medications. Programs utilizing a Harm Reduction approach do not terminate assistance based solely on a person's inability to achieve sobriety or because of medication non-compliance. Efforts should include all possible approaches to assist the person to reduce or minimize their risky behaviors, while at the same time assisting them to move into, and stabilize in, permanent housing. Harm reduction is not intended to prevent the termination of a participant whose actions or behavior constitute a threat to the safety of other participants and staff.
- 4. Trauma Informed Care:** All programs must incorporate Trauma Informed Care policies and procedures into their program design and delivery of services. Trauma Informed Care is defined as an organizational structure and treatment framework that involves understanding, recognizing, and responding to the effects of all types of trauma. Trauma Informed Care also emphasizes physical, psychological, and emotional safety for both participant and providers, and helps participants rebuild a sense of control and empowerment. Trauma Informed services take into account an understanding of trauma in all aspects of service delivery and place priority on the trauma survivor's safety, choice, and control. Trauma Informed Services create a culture of nonviolence, learning, and collaboration. Agency must also develop sets of policies and procedures for educating and training staff on Trauma Informed Care practices and how trauma may adversely affect aspects of a person's development.

UTILIZATION OF THE COORDINATED INTAKE SYSTEM- (24 CFR 576.400)

- 5.** The United Way of Forsyth County facilitates the coordination and management of a crisis response system's resources that allows users to make data-informed decisions from available information to efficiently and effectively connect people to interventions that will rapidly end their homelessness. CIC ensures that the highest need, most vulnerable households in the community are prioritized for services and that the housing and supportive services in the system are used as efficiently and effectively as possible. Funded System Components are connected and coordinated through the CIC in the response to end homelessness.

 - 5.1. Agency must comply with all applicable procedures in the approved CoC Operations Manual.
 - 5.2. Agency must participate in the CIC coordination and collaboration with the CoC lead, and other provider agencies is funded to provide services.
 - 5.3. Agency must integrate their program with the Coordinated Intake Center (CIC) by working with agencies and other providers to coordinate referrals and services for participants identified through the CIC.
 - 5.4. Agency must accept referrals and/or matches from the Regional Coordinator and/or CIC Matchers, in accordance with any guidance or policies set forth by the CoC Operations Manual.

COMMUNITY BASED COLLABORATIVE REQUIREMENTS

6. Agency must ensure that the Program Director or Senior Program Manager in charge of operations attends and participates in regular mandatory system and service coordination meetings.
7. Agency must ensure collaboration and leveraging of resources with Community Partners to provide any additional services that their participants may require. Agency must be able to demonstrate direct and coordinated links to community partners.
8. Agency must work collaboratively with Veterans Service providers, such as Supportive Services for Veteran Families (SSVF), Housing and Urban Development- Veterans Administration Supportive Housing (HUD-VASH) to assist with the community's goal of ending Veteran homelessness.

AGENCY OBLIGATIONS

9. Participants who identify as actively fleeing a domestic violence situation must be offered an immediate connection to a domestic violence shelter at a confidential location, when requested by the participant, to ensure the safety and well-being of the participant.
10. Connection to domestic violence shelter must be completed via linkages. Linkage should never be done merely in the form of a "referral," but rather should be done as a "warm hand off." Agency must continue to work with and provide support and services to participant until participant is successfully transitioned to the domestic violence shelter.
11. Agency are required to abide by participant confidentiality requirements as set forth by CoC Operations Manual and the Violence Against Women Act (VAWA) Confidentiality Provision (34 U.S.C. 12291(b)(2)). (24 CFR 5.2005 (b)(1))
12. Agency must develop clear and consistent program policies and procedures.
13. Agency program policies and procedures will be subject to review, approval, amendment/ revision by the City of Winston-Salem Community Development Department staff.

HEALTH, SAFETY, AND INCIDENT REPORTS

14. Agency shall have written policies and procedures to guide staff actions and program services regarding injury and disease prevention within their programs.
15. Agency must utilize a centralized and organized system of documenting Incident Reports and an Incident Report log to track, monitor, and resolve crises, conflicts, accidents, injuries, illnesses, trauma, etc. that occur within any and all of Agency's facilities and/or programs.
16. Incident reports must be made available to the City of Winston-Salem upon request.
17. Incidents related to the suspicion of abuse, neglect, trauma, and/or death of children must be immediately reported to the Child Abuse Hotline at 1-800-4-A- CHILD.
18. Incidents related to the suspicion of abuse and/or neglect of senior/elder participant must be immediately reported to the Elder Abuse Hotline at: 336-703-3503.

19. Agency is to provide the name and title of the individual designated by Agency to handle all Incidents. Agency must clearly indicate how this individual can be contacted. (Incident Report Coordinator)

20. Agency must maintain a written set of Incident Reporting Policies and Procedures.

21. Agency must have a procedure of how incident reports will be documented, and the maintenance of any police reports or other documents associated with the incident. Copies of the incident reporting forms, and policies and procedures must always be made readily available to program staff.

PARTICIPANT GRIEVANCE AND TERMINATION POLICIES AND PROCEDURES- 24 CFR 576.402

22. Agency must maintain a written set of grievance and termination policies and procedures. Policies and procedures must include a training component for staff and sub Agency. Training agendas and sign in sheets must be made available upon request for review.

23. Grievance and termination policies and procedures must be reviewed with participant during intake, as well as given a copy of the policy and procedures. Copies of these policies and procedures must be made freely available for all program participants upon request.

24. Intake paperwork must contain a participant's signature acknowledging that they have been made aware of the Agency Grievance and Termination Policies and procedures or documentation that the client was unable/unwilling to sign the acknowledgement. Agency can create their own forms.

25. Grievance and Termination Policies and Procedures must be prominently displayed in the common area(s) of Agency's facility.

26. Agency must designate both a primary and alternate person as a point of contact for grievance and termination situations. This must also include a procedure to support circumstances where if Agency's designated or alternative individual are not available or if not in the office, how a participant can still be supported.

GRIEVANCE POLICIES AND PROCEDURES

27. Agency' must contact participants within three (3) business days of receiving and confirming receipt of the grievance.

28. To the extent possible and when appropriate, grievance procedures must include a face-to-face meeting with the participant. The grievance investigation must include the gathering of facts, statement(s) from the grievant and/or other participants and staff (if applicable). At the conclusion of the Agency finding, an issuance of a written decision that includes factors and vetted facts that led to the final determination of the grievance, must be given to the client and copy placed in their file

29. The confidentiality of the participant and their grievance must be ensured. This includes client interaction, settings and documentation.

30. A centralized and organized system of documenting grievances including a copy or description of the grievance, date the Agency met with the participant, the staff that addressed the grievance, the date the Agency met with the participant, the staff that addressed the grievance and the date the participant received the written determination.

31. Documentation must be made available to the City of Winston-Salem, along with the participant chart/case file, upon request. Agency's failure to provide such documentation within five (5) business days of the request may result in a material breach of this agreement.

32. Agency must include within their grievance policy and procedures, information on how a participant can appeal a decision pertaining to their grievance.

33. Agency must have procedures for a first and second level grievance appeal and must give the participant the opportunity to present written and/or oral objections before a staff member other than the staff-person (or a subordinate of the person) who made or approved the initial grievance.

34. Contractor, for both first and second level appeals, must provide a letter of determination to the participant that consist of facts that led to the decision not to exceed 10 business days of receipt of the appeal. The final decision should contain a clear statement of the outcomes that led to the decision of the appeal.

TERMINATION POLICIES AND PROCEDURES

35. Agency may terminate a participant pursuant to its termination policies and procedures. Agency termination policies and procedures must not conflict with any parameters set forth in the Program Standards or Scope of Required Services.

36. Reasons for terminations:

- Possession of weapons
- Sexual misconduct/assault
- Behaviors that are a danger to others
- Verbally/physically threatening behaviors
- Physical violence to staff and/or other participants
- Direct observation of participant engaging in illegal activity on Agency' site
- Issues of safety and health to themselves and other

37. Agency are not required to initiate terminations for behavioral concerns if behavior mitigation plans can be identified and endorsed by both participant and contractor. All mitigation plans must be documented and tracked.

38. Agency must have a procedure of how a program participant will be provided a written termination notice, when termination from a program occurs. The termination notice is a requirement and must contain a clear statement of the reason(s) for the termination based on investigated facts.

39. Termination of a program participant does not bar the Agency from providing further assistance at a later date, to the same individual or family previously terminated form the program.

40. Agency must have a policy for reinstating previously terminated participants and must be presented with a written reinstatement notice upon participant reinstatement.

41. Upon termination of a participant, Agency must refer the participant to another shelter service. Unanticipated events may cause limitations to this requirement such as situations that necessitate first responders, police, or fire department in which it would not be possible to provide a termination letter at that time or coordinate a post exit plan. Agency must still create a termination letter that satisfies

requirements for documentation purposes, place documentation in HMIS and make available to participants upon their request. Unanticipated events may cause limitations to this requirement such as situations that necessitate first responders, police, or fire department in which it would not be possible to provide a termination letter at that time or coordinate a post exit plan. Agency must still create a termination letter that satisfies requirements for documentation purposes, place documentation in HMIS and make available to participants upon their request.

FAIR HOUSING REQUIREMENTS

42. Quid Pro Quo Agency must ensure program and its Policies and Procedures are aligned with HUD's Final Rules: Quid Pro Quo and Hostile Environment Harassment and Liability for Discriminatory Housing Practices under the Fair Housing Act –

<https://www.federalregister.gov/documents/2016/09/14/2016-21868/quid-pro-quo-and-hostile-environment-harassment-and-liability-for-discriminatory-housing-practices>

43. VAWA Violence Against Women Reauthorization Act of 2013: Implementation in HUD Housing Programs-

<https://www.federalregister.gov/documents/2016/11/16/2016-25888/violence-against-women-reauthorization-act-of-2013-implementation-in-hud-housing-programs>

44. Equal Access and Gender Identity- Agency must ensure their program and its Policies and Procedures are aligned with the Winston-Salem Continuum of Care policy on equal access and gender identity, in relation to the following six service areas: Access to sex-segregated services and facilities; Access to family programs and facilities; Access to bathrooms; Ensuring safety and privacy; Use of names and personal gender pronouns; HMIS data collection and intake forms.

45. Agency must ensure all families who are eligible to receive services have the right to receive services regardless of the gender identities within the family. In legally permitted gender segregated facilities, providers are required to serve all family members in accordance with their gender identity.

46. Agency must ensure all persons receiving services have access to bathrooms consistent with their gender identity, regardless of appearance, biological or physical characteristics, or legally documented sex. Service providers may not ask for documented proof of gender as a requisite for bathroom access, nor may they institute different bathroom rules for cisgender and transgender participants.

47. Agency must ensure all persons receiving services have the right to safety and privacy. When privacy or safety concerns are raised by participants, service providers must take nondiscriminatory steps to address them and make reasonable accommodation when appropriate. It is not the responsibility of a transgender or gender nonconforming participant to accommodate facilities, programs, and/or the concerns of other residents or participants with respect to the participant's gender identity and/or gender expression. Moreover, another participant's discomfort is not a reason to deny equal access or equal treatment to a transgender or gender nonconforming participant.

48. Agency must ensure all persons receiving services through contracted programs have the right to be known, referred to, and addressed by their name and/or gender pronouns with which they identify, regardless of their name and gender marker on their identity documents. An individual need not provide proof of a legal name change to create or change their records to reflect their name.

49. Agency must ensure all persons receiving services may be documented in HMIS, on intake forms, and all other data collection tools and repositories according to the gender with which they identify and the name by which they are known. The full name field in HMIS does not require use of a legal name.

50. Agency must comply with guidance in regard to Americans with Disabilities Act (ADA) and the ADA Amendments Act of 2008 (ADAA) standards.

SERVICE ANIMALS

Agency are responsible for operating their programs in accordance with the CoC's Service Animal Accommodation Policy.

51. If necessary, Agencies must make "reasonable accommodations" or reasonable modifications to their program to allow individuals with service animals to participate. If the participant requests a specific accommodation due to their service animal, Agency may inquire about the reason the participant needs that accommodation.

52. The service animal must be permitted to accompany their handler to all areas of the Residential Housing programs including the dining room and restroom. A service animal may not be segregated from his/her handler.

53. The supervision of the service animal is the responsibility of the participant. The animal must always be under the participant's control. Injuries to or caused by the service animal must be reported to the Agency's Executive Director immediately. If the participant is unable to control the service animal, other accommodations must be made for the service animal.

54. Service animals may be removed from a shelter location for reasons of health, safety or disruption of program. For example, the service animal is out of control and the animal's handler does not take effective action to control it; or the animal poses a direct threat to the health or safety of others that cannot be eliminated by reasonable modifications. Infractions should be handled on a case by case basis.

55. All decisions to refuse the accommodation of a service animal require consultation with the Agency's Executive Director, or if he/she is unavailable, the senior manager on duty. The Agency shall document the rationale for the failure to provide accommodation and maintain a copy of such documentation in its ADA compliance files.

Agency must not discriminate against participants, in regard to the provision of ongoing services or enrollment in any services provided by the CIC based upon the race, ethnicity, religion, national origin, disability, gender, gender identity, age, sexual orientation or familial status of the applicant.

FINANCIAL MANAGEMENT

56. City funded programs must be provided free of charge to all participants

57. Agency must meet with the City of Winston-Salem to discuss programmatic issues, fiscal/budgetary issues, data integrity/data quality issues, general procedural issues, and/or other general concerns as needed. Either the City or the Agency may request such a meeting.

58. The City of Winston-Salem allocates funding and other resources to each Agency based upon identified need in the community. Funds and resources are not for the proprietary use of the Agency nor collaborative community partners contracted to coordinate these resources in the region. The City of Winston-Salem will, at its discretion, reallocate funds and resources based on several factors which include but are not limited to a change in a region's need and agency performance.

59. Agency must track all benefits and services provided to participants by funding source in the agency's general ledger. On a monthly basis, all expenditures must be reconciled with HMIS, and supporting documentation to ensure accuracy.

60. Agency must submit accurate and timely monthly invoices along with any requested supporting documentation.

61. If the City of Winston-Salem determines that costs are not adequately supported, Agency are responsible for reimbursing the City of Winston- Salem for all associated costs.

62. Agency must have Manager or Supervisorial staff approval for all financial payments on behalf of program participants (e.g. financial assistance, rent assistance). At no point should a financial payment be decided on the sole discretion of one person, there must be at least two Agency personnel approving the financial payment (e.g. housing navigator and/or Manager or Supervisorial staff).

63. Agency administering financial assistance on participants' behalf must ensure that no financial assistance is issued directly to participants. Agency must track, coordinate, and issue direct financial assistance available through the CIC.

ACTIVE CONTRACT MANAGEMENT

64. The Agency shall comply with data collection, analysis, and reporting activities. The City of Winston-Salem's Local System Administrator will outline a data reporting schedule which will establish the necessary data fields and timelines for input into HMIS. If data is needed on an ad hoc basis, the agency must provide the data within the designated timeframe that is established, which will typically be a five (5) business day turnaround, unless explicitly indicated by upper management. If an agency is consistently (more than 3 times) delinquent in their data collection and reporting requirements, this can move an agency to remedial action.

65. The Agency agrees to attend and actively participate in regular meetings to review performance and collaborate on improving program quality and outcomes. These meetings may occur individually or as a group of Agency by component

66. Agency participation at performance management meetings is mandatory for program, quality assurance, contract, and fiscal management staff. The City of Winston-Salem intends to utilize contract performance data, collaborative meetings, and proactive troubleshooting with providers to guide program development, evaluate effectiveness, revise policies and procedures, and inform active contract and renewal decisions.

SUBAGENCY

67. Agency must receive written approval from the City of Winston-Salem to enter into a subcontract agreement with another provider.

68. Agency must provide training and guidance to sub Agency in order to facilitate capacity building and ensure program compliance. The approval of a proposed sub Agency does not relieve Agency of any requirements under this agreement.

69. Agency must ensure that all applicable terms and conditions of this Agreement are provided to any approved sub Agency in the form of a written Sub Agency Agreement, which will be made available to the City of Winston-Salem as requested.

70. Agency must have a sub Agency monitoring policy in place. Sub Agency monitoring policy and procedures must detail risk assessment methodology, monitoring strategy, frequency and scope of monitoring, monitoring reports, deficiency follow-up, and technical assistance. Sub Agency monitoring policy and procedures must be made available to the City of Winston-Salem upon request.

71. Agency must provide a copy of an MOU and program budget for all sub Agency, if requested by the City of Winston-Salem staff.

PERSONNEL

72. Agency must assign a sufficient number of staff with background experience and expertise to provide the services required in the relevant Scope of Required Services.

72.1 If requested, Agency must provide the City of Winston-Salem with staff rosters, job descriptions, and/or resumes of budgeted staff to ensure appropriate staffing levels are met and that budgeted staff possess the requisite skills needed to successfully operate the program.

73. Agency must provide access to at least one Bilingual, Spanish speaking staff to meet the needs of participants receiving services when requested by participant. Agency must have an established plan and procedure to provide Spanish translation services in the event Spanish speaking staff is unavailable.

74. Agency must provide or coordinate access to training programs for all new employees and continuing in-service training for all employees who interact with participants in the context of their daily work, and any specific funder required trainings.

75. All staff should receive training in: (1.) Motivational-Interviewing, (2.) Progressive Participant Engagement, (3.) Problem- Solving, and (4.) Trauma-Informed Care (5.) Operations of the CIC.

76. Agency' staff are considered Mandated Reporters of suspected child and senior abuse and must report suspicions of child or senior abuse as required by North Carolina law.

77. Agency must ensure that key management staff are present. When there is a vacancy, interim replacement is made within ten (10) calendar days of the creation of the vacancy to ensure all staff levels needed for the delivery of services is present. Agency must notify the City of Winston-Salem in writing of any change in key management staff within ten (10) calendar days of the vacancy.

78. Agency must ensure that service delivery is not interrupted during periods of personnel change.

79. Agency must have a person with lived experience designated on the Board of Directors. A copy of the Board of Directors with the Person with Lived Experience notified, must be presented upon request from the City of Winston-Salem. (24 CFR 576.405)

HMIS DATA COLLECTION AND PARTICIPATION REQUIREMENTS(24 CFR 575.500(n))

80. In order to provide well-coordinated support for households and manage the limited resources available in the County, Agency must utilize the Homeless Management Information System (HMIS) to track participants served and the benefits provided, unless otherwise exempted, through written permission, for reasons of participant safety and confidentiality.

81. If the program is exempted from participation in HMIS Agency shall use an equivalent system to record, track and maintain all required data under the U.S. Department of Housing and Urban Development (HUD) Universal Data Standards including, but not limited to; demographic information, dates of participation in the program, benefits and services provided, outcomes achieved and placement destinations upon exit from the program.

82. Agency shall ensure that all participants served sign the Consent to Share Protected Personal Information form granting other providers access to their information.

83. Agency shall encourage utilization of HMIS as well as best practices for data entry, as follows:

1. Create the participant's record in HMIS within three (3) business days of the participant's initial screening for benefits and program enrollment.
2. Utilize the bed assignment function in HMIS to assign the participant to a numbered bed in a housing program / facility on the same day that the participant actually enters the facility.
3. Update the participant's standardized assessment in HMIS within three (3) business days of the assessment being conducted.
4. Update the participant's housing status within three (3) business days.
5. Update information on services provided to the participant within a three (3) day period following the provision of services.
6. If applicable, update information on financial assistance benefits provided to the participant no later than the 2 business days after the benefits are requested.

84. Agency must comply with all reporting required by system funders, which may include a report of households served, the benefits and services provided to households, complaints, or other data.

85. Agency must regularly monitor data integrity and make data quality corrections as needed. Agency are responsible for maintaining a data integrity of 95%.

PROGRAM REPORTS

86. Agency is required to submit timely quarterly reports. Failure to submit a quarterly report in a timely fashion multiple times could result in termination of the contract.

CUSTOMER SERVICE

87. Agency must implement an active Customer Service Program in order to secure feedback from participants regarding their experiences with the program. Customer Services Program is applicable to any and all the Agency's programs either operated directly or by subcontracting

88. Agency must have policies and procedures to ensure feedback from participants in the Customer Services Program are anonymous, confidential, and optional. Policies and procedures must include a component identifying the anonymous collection of these surveys and must utilize a centralized and confidential system of storing all participant satisfaction surveys. Surveys must be made readily available to the City of Winston-Salem for review upon request.

89. The City of Winston-Salem reserves the right to monitor for the quality of the Agency' Customer Service. Monitoring may include randomly selecting participants for telephone and/or site surveys. The City, at its sole discretion, may change the means of measuring this standard.

MATERIALS, EQUIPMENT AND INVENTORY

90. Agency must provide all equipment necessary to perform all services required by this contract.

91. Agency must provide sufficient telephone lines at its site(s).

92. Agency must provide necessary computer equipment and supplies (e.g., terminals, controller, paper, printer ribbons, etc.) to provide services.