

Landscape Assessment: The Chelan/Douglas County Crisis Response System Through a Low-Barrier Lens

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Project Overview

The City of Wenatchee engaged Building Changes in a two-phase low-barrier shelter study. The first phase as reflected in this landscape assessment included analysis of and recommendation to existing homeless emergency services to identify if programs meet the Washington State Department of Commerce (Commerce) rule stating that each county must have at least one (1) low-barrier program serving adults and at least one low-barrier program serving households with children by July 2018. The identified low-barrier programs can be Emergency Shelter, Transitional Housing, Permanent Supportive Housing or Rapid Rehousing. This analysis took place between February and March 2018.

In addition to meeting the standards of the Commerce rule by July 2018, The City of Wenatchee has identified the need to develop low-barrier emergency shelter responses for adults and households with children. In the second phase, Building Changes will lead a low-barrier shelter design process and facilitate training centered around Housing First principles by June 2018.

Building Changes began working with the City of Wenatchee's Community Development Department on behalf of the Homelessness Steering Committee in January 2018, the entity that has strategic oversight for the homeless housing response in Chelan and Douglas Counties. Data collected between February-March 2018 through site visits, program inventory surveys, consumer interviews, HMIS, Coordinated Entry reviews, and a joint Homelessness Task Force and Steering Committee meeting informed this report. Of note, the joint Homelessness Task Force and Steering Committee meeting, held on February 27, 2018, was attended by over 45 community stakeholders representing law enforcement, non-profits, education, local government and community members. There, meeting participants shared feedback on the proposed project and sought clarification on the Commerce rule.

Methods

Thirteen community agencies participated in the data collection stage of this project. A review of existing Emergency Shelters, Transitional Housing, Rapid Rehousing and Permanent Supportive Housing programs was completed through meetings with program leadership and program eligibility surveys that were created and administered by Building Changes.

Data was collected through interviews with City of Wenatchee Code Enforcement, City of Wenatchee Community Development Department, the office of the Mayor and the Chief of Police. Street Outreach and Coordinated Entry teams provided insight into homeless services access for people with high service needs or high program-entry barriers (current/recent substance use, criminal histories, evictions or lack of income) from their observational experience. People with lived experience provided first-hand accounts of accessing the system and suggestions for lower-barrier services.

The program eligibility surveys were completed by six (6) agencies representing 13 programs. Surveys were sent to 12 community agencies and participation was voluntary. The program eligibility survey captured information regarding the population served by the program and entry rules including expectations around sobriety, criteria related to criminal histories, eviction histories and income. The program eligibility survey was completed by thirteen programs: four (4) Emergency Shelters, three (3) Transitional Housing Programs, five (5) Permanent Housing Programs and one (1) Rapid Rehousing program.

Descriptive analyses from de-identified HMIS, Coordinated Entry, and Prioritization List data for Chelan and Douglas Counties using Tableau software was also conducted. Specifically, de-identified data was analyzed for those enrolled in HMIS as of March 3, 2018, Coordinated Entry data for the year 2017, and Prioritization List entries as of February 21, 2018. In addition to descriptive analysis, we reviewed and coded data from "Date of Contact" fields from the Prioritization List dataset to identify specific barriers to shelter for clients. The data reviewed describes characteristics of households and system performance.

Commerce Rule Compliance

As of July 2018, each county must have at least one program with low entry and program requirements (also known as low-barrier) that serves adults without children and one program that serves households with children. As of December 2017, Commerce identifies low-barrier programs as having minimal entry criteria and designed to support people experiencing homelessness in connecting to permanent housing without pre-condition.

To meet the Commerce low-barrier standard programs must:

- have flexible intake schedules
- require minimal documentation
- not screen people experiencing homeless out of their programs for the following reasons:
 - Having too little or no income
 - Having poor credit or financial history
 - Having poor or lack of rental history
 - Involvement with the criminal justice system
 - Having active or a history of alcohol and/or substance use
 - Having a history of victimization
 - Lacking ID or proof of U.S. Residency Status
 - Other behaviors that are perceived as indicating a lack of “housing readiness” ¹

Additionally, projects identified as low-barrier by the Commerce standard have realistic and clear program rules and expectations that are centered around maintaining safe environments for all who utilize them. Low-barrier programs minimize exits to homelessness and do not exit people due to lack of participation in services, treatment or religious services, lack of progress on service plans or due solely to alcohol and/or substance use. Projects that require households to pay a portion of rent have reasonable and flexible payment expectations.

Importantly, all programs, regardless of low-barrier status are required to follow state and federal anti-discrimination laws. This includes:

- equal access for people experiencing homelessness regardless of race, national origin, gender identity, sexual orientation, marital status, age, veteran or military status, disability, or the use of an assistance animal.
- Programs serving households with children cannot restrict access based on the family composition, the age or sex of the children.
- Programs that serve sex/gender-segregated populations allow the use of facilities that align with the person's gender expression and identity.

Rationale of Low-Barrier Approaches

Housing Programs typically operate from a framework of Housing First or Housing Ready.

Housing First programs are designed to meet participants where they are starting from – there are no pre-conditions to housing, instead services and supports are offered to people once they are safely housed (even if that is in temporary housing). Housing First programs value safety as rules and consequences are centered around behaviors rather than simply compliance to a rule. For Housing First programs the primary focus is to connect people experiencing housing crises back to permanent housing as quickly as

¹ Washington State Department of Commerce (December 2017) CHG Low-barrier Project_ Draft_Dec 2017

possible and program staff work with individuals to help avoid being exited from the program back to homelessness solely because of behavior or rule violations. Housing First programs are by default low-barrier.

In low-barrier programs, unsafe behavior is addressed as it happens rather than creating rules to prevent unsafe situations that may never come to fruition. Reducing rules is a trauma informed approach to serving people from a wide background of experiences. A working hypothesis for reducing rules is that if households understand what's expected of them and how to proceed, the stress of maintaining their temporary housing will be reduced and the focus can be on securing permanent housing as quickly as possible.

Housing Ready programs require households to meet specific eligibility benchmarks meant to demonstrate that they are ready to be and remain housed. Benchmarks often include sobriety/abstinence from substances and/or alcohol and income thresholds. Housing Ready programs typically have more rules related to maintaining enrollment in the program. The ability to meet eligibility requirements and abide by rules is conflated with prediction for housing success. It is common for consequences in Housing Ready programs to include exiting households into homelessness for a period of time (a "time out" approach) or to be permanently exited from the program.

Housing First systems are endorsed and promoted by federal leadership including the US Department of Housing and Urban Development (HUD) and the United States Interagency Council on Homelessness (USICH). HUD's Federal Continuum of Care program expects funded projects to operate from a Housing First philosophy. Studies demonstrate that Housing First yields higher housing retention rates, reduces costs for expensive crisis response interventions, and helps people achieve better health and social outcomes.² A Housing First system, allows households to move on to appropriate interventions when they become available rather than when a household has demonstrated readiness. This promotes faster movement through the system and more direct connections between emergency housing and permanent housing. Vulnerable households can be prioritized for services that can best meet their needs when preconditions are removed as barriers to entry. In effective Housing First systems all programs operate from Housing First philosophy and serve people without precondition.

Findings Related to Commerce Compliance

Building Changes determined, through the review process discussed in the "methods" section above that the Rapid Rehousing Program administered by Chelan-Douglas Community Action Council meets the Commerce requirement for low-barrier programs.

The Rapid Re-housing program serves households with children and households without children, does not have pre-conditions for enrollment beyond experiencing literal homelessness as defined by Category One of the HUD/Hearth Definition of Homelessness and works with individuals to tailor service plans, rent subsidies and offers voluntary services for specific needs.

One (1) Emergency Shelter, a motel voucher program was identified to meet all the Commerce stated criteria for low-barrier programs. The Motel Voucher program serves households with and without children and does not screen out for criminal histories, income, previous rental experiences or current or historical use of alcohol and/or substances. While the program is low-barrier from the Commerce guidelines there are three important limitations of the program that should be considered before categorizing it as a low-barrier option within the system. The limitations include restricted access to residents of Leavenworth and

² Lipton, F.R. et. al. (2000). "Tenure in supportive housing for homeless persons with severe mental illness," *Psychiatric Services* 51(4): 479- 486. M. Larimer, D. Malone, M. Garner, et al. "Health Care and Public Service Use and Costs Before and After Provision of Housing for Chronically Homeless Persons with Severe Alcohol Problems." *Journal of the American Medical Association*, April 1, 2009, pp. 1349-1357. Massachusetts Housing and Shelter Alliance. (2007). "Home and Healthy for Good: A Statewide Pilot Housing First Program." Boston.

the upper valley, motel room availability is contingent on the season and rooms are unavailable in high-tourism seasons and the limited length of stay. Due to limited resources and the cost of motel stays, the project can typically offer households 1-3 nights of shelter if another, longer-term plan has been identified.

Five (5) Permanent Supportive Housing (PSH) Programs were reviewed in this analysis and are close to meeting the Commerce low-barrier program standard. With minor adjustments all five programs would meet the requirement. Two (2) of the Permanent Supportive Programs meet all commerce requirements regarding condition-less enrollment but require participation in case management services. Three (3) of the Permanent Supportive Housing programs screen households out based on criminal histories. The projects use different criteria, all screen out for sex offenses and two (2) screen out for violent felonies. In addition to criminal histories, at least one (1) of the PSH programs requires some income at time of enrollment to cover rent. Rent for this project is flexible and based on what the person can pay, but the expectation is for them to contribute financially to rent from program enrollment. Two (2) of the PSH programs describe that households can start with zero income and the program staff will work with the participant to connect them to resources they are eligible for after enrollment. This approach meets the flexibility and condition-less approach of low-barrier programs. It is recommended that the identified Permanent Supportive Housing Programs explore lowering the identified barriers to meet the commerce requirement.

Strengths, Challenges & Recommendations

Strengths

The review process provided the opportunity to listen to program and agency staff from across Chelan and Douglas Counties. It is clear that staff are committed to serving people experiencing crisis and movement toward a Housing First oriented system.

During the joint Homelessness Steering Committee and Task Force meeting on February 27, 2018 colleagues participated in a values activity. Participants were asked to respond to several statements posted around the room that related to low-barrier services and Housing First philosophies with an icon of a heart, a lightbulb or a brick wall depending on how they reacted to the statement. The heart symbolized a statement they liked, loved or agreed with, the lightbulb reflected a new idea or revelation and the brick wall represented feeling stopped or stuck by the statement. The statement "shelter is a human right" earned 33 heart icons, three (3) lightbulbs and zero (0) brick walls. The community's commitment to people experiencing homelessness was apparent during this activity and the subsequent discussion. Participants also responded to the statement "I can think of at least one rule I would get rid of right away if given the opportunity" with 11 hearts and seven (7) lightbulbs, demonstrating that there is a readiness to review rules and adjust.

The Coordinated Entry process is provider-led, allowing for ownership and buy in throughout the system. The open referral system provides accountability to referral processes and allows city staff and providers to identify referral acceptance trends among program type.

The Program Inventory review conducted through the program eligibility surveys highlighted that none of the responding programs consider debt to Housing Authorities or past evictions as access barriers. One (1) program had criteria related to landlord debt and allowed for a payment plan and the other 10 programs had no criteria related to landlord debt.

The majority of programs serve households who are undocumented, only one (1) has criteria related to funding that restricts access based on documentation status.

While most programs expect households to remain sober during their program stay only three (3) conduct drug tests. Two (2) have affirmative policies that allow households to abstain or build sobriety during their stay but don't require it at intake. This approach demonstrates flexibility and a more trauma informed approach.

Challenges & Recommendations

The Crisis Response System in Chelan & Douglas Counties has a number of programs available for people experiencing homelessness; most of these follow a Housing Ready model and therefore cater to households with few challenges. Coordinated Entry data from 2017 demonstrated that 47% of people seeking emergency services reported a physical disability, substance use/abuse history, violent felony conviction and/or sex offense registration. The circumstances reported above could limit access to emergency services. An additional access challenge is the limited hours of shelter intake.

During 1:1 interviews and the joint Homelessness Steering and Task Force meeting, Building Changes heard inconsistencies between participants knowing that low-barrier services were needed but not wanting to be the program or provider agency to meet this need. It is important to recognize the role all service providers play in the crisis response system including upholding barriers to access. The existence of a low-barrier shelter does not create a low-barrier crisis response system. All providers have responsibility to identify opportunities to lower barriers and connect households to permanent housing as quickly and often as possible.

Utilization & Performance:

Challenges: Generally, available resources are well utilized and most beds in the system are usually full. The low vacancy rate for market rate housing was identified as one significant challenge that impacts throughput through the system especially for Rapid Rehousing, scattered site permanent housing and for households that can self-resolve their experience of homelessness. Of note, some shelter beds in the system are unutilized due to eligibility and program rules that are too restrictive for people to meet and there are unsheltered people identified in annual Point in Time counts and by outreach teams throughout the year.

Perceptions play a large role in access and performance. Many of the interviews demonstrated that service providers do not know or understand the eligibility requirements and practices of their fellow providers. This misinformation impacts relationships between providers as well as access for people experiencing homelessness. This came up most often regarding religious service requirements for privately funded programs and how members of the LGBTQ community are served in programs. Misinformation contributes to program policies and practices that limit access as well. One interview participant shared that their program originally operated with few eligibility conditions but were required by the City Code Enforcement Office to restrict access to households with current substance use, violent felony charges, sex offense registration and/or charges for meth production to comply with their conditional use permit. The City provided clarification that Conditional Use Permits aren't specific enough to impact intake criteria for agencies.

System performance is an important consideration, increased system performance relies on movement of households through the crisis response system to permanent housing. In reviewing exits from shelter, it was identified that households who stay 0-90 days in shelter exit to permanent housing at a rate of 13%. Many factors could contribute to this rate of exit including households being exited due to rule non-compliance.

Recommendations: All beds available should be used to house people who would otherwise be unsheltered. Opportunities to compromise, reduce rules and utilize all available beds should be explored. Code Enforcement was identified as an important partner in the barrier reduction process. Clarification on the relationship between Code Enforcement and a program's autonomy to set rules and eligibility

standards should be provided to all agencies. Additional guidance from Code Enforcement should be provided to agencies who want to lower entry criteria and have questions about compliance to codes.

It is recommended that providers use task force meetings to dispel myths and share what their programs can offer and what their limitations are. As system barriers are addressed and reduced, it would be beneficial for providers to participate in a system mapping activity. This would allow for providers to identify what's changed and what gaps persist.

Substance Use/Abuse:

Challenges: The eligibility criteria across the system keeps people who are actively using alcohol and/or other substances from accessing emergency services. 2017 HMIS data demonstrates that 18% of households reported current substance abuse at the time they completed an intake. Rules related to drugs and alcohol vary across the system and appear to be applied inconsistently.

Recommendations: A system wide review and revised approach to eligibility related to substance and/or alcohol use would address this consistent barrier identified in the current system.

Emergency Shelter and Transitional Housing providers work together to identify which programs reduce rules related to drugs and alcohol and which programs uphold revised abstinence policies. Doing this acknowledges that some households prefer to be away from people who are currently or have recently used substances and/or alcohol for a multitude of reasons including their own sobriety, safety etc. This adjustment would increase accessibility to existing emergency shelters as well as impact throughput from shelter to Transitional Housing programs.

Programs that uphold abstinence policies should consider behavior driven policies and focus on unsafe behavior rather than solely on rule violations. All policies related to substance use should be vetted through the lens of The Federal Fair Housing Act which prohibits discrimination based on disability which includes recovery from substance abuse and alcoholism.

Discontinue the practice of drug testing. Drug testing in publicly funded programs raises the issue of resident's constitutional right to privacy.³ Providers that continue to drug test should be cautious that their practice is not discriminatory, however unintended. Households should be notified of what is being tested for before it is administered, and households should have an opportunity to disclose any medications they are taking that may impact the results of the test. Costs for drug tests should be incurred by the program. Administering drug tests can be costly. Budget for drug tests could be better utilized for connecting households to resources needed to obtain permanent housing or to offer additional housing focused case management services.

Train services providers in Harm Reduction techniques. These are a critical component of an effective Housing First, low-barrier system. Harm Reduction relies on the person to know what will work best for them in identifying how they can remain safe even when participating in behaviors that have risk.

The community should assess whether recovery housing is a necessary component of the crisis response system. If need is identified, a program should be created or re-tooled to meet the specific needs of people in recovery. The current models of clean and sober housing do not meet the standards of recovery housing as support for recovery is not offered through licensed Chemical Dependency Counselors.

³ Fair Housing Partners of Washington State (2016) A Guide to Fair Housing for Nonprofit Housing and Shelter Providers, Washington State Edition, Chapter 3 Section D. Clean and Sober Housing (24)

Criminal Histories:

Challenges: Households with criminal histories including violent felonies and sex offense registrations are not eligible for most resources within the system, except for Rapid Rehousing, emergency shelter motel vouchers in Leavenworth and two permanent supportive programs offered through Chelan/Douglas Community Action Council. 2017 Coordinated Entry Data suggests less than 4% of people seeking services disclosed violent felonies and/or sex offense registration.

Recommendations: In the instance of rulemaking for people who have registered sex offenses, the nature of their registration naturally disqualifies them from accessing programs near schools or that serve children therefore additional rules are not needed. It is recommended that criminal histories are reviewed on a case by case basis with the intent to screen in whenever possible. Program staff can ask questions about previous convictions and should consider the length of time since the person was convicted, if they have had subsequent offenses, and if they have met the requirements of parole. Having previous involvement with the criminal justice system should not preclude people from accessing emergency services and from regaining independence post incarceration. Motel vouchers and scattered site programming should be utilized for households who cannot be served in congregate environments due to safety concerns related to criminal histories. This includes making motel vouchers available for people with sex offense registrations if shelter is unable to serve them.

Accessibility:

Challenge: The current stock of Emergency Shelter or Transitional Housing programs do not meet Americans with Disabilities Act (ADA) standards, significantly limiting who can be served.

Recommendation: Until accessible shelter is available, motel vouchers should be offered to people who seek shelter and need ADA compliant spaces. With the addition of motel vouchers it is recommended that lengths of stay are extended to be comparable with other shelters in the Crisis Response System, as households requesting accessibility should have access to comparable services and accommodations as other households seeking shelter.

If accessibility in Transitional Housing is not addressed through retrofitting, households who need accommodations should be prioritized for Rapid Rehousing or scattered site programs that will allow the household to find their own housing that meets their accessibility needs.

Funders should be aware that fair housing complaints may be filed against them for funding services that are not accessible, especially when federal funds are utilized.⁴

Pets & Service Animals:

Challenges: Households with pets have very few options for shelter or longer-term housing if they plan to remain with their pet. According to Coordinated Entry data from 2017, 21% of people seeking emergency services have a pet. Of those who have pets, 32% have service animals. During interviews, several providers had confusion about the definitions of Service and/or Emotional Support Animals. This uncertainty may be creating unnecessary barriers for eligible households.

Service or assistance animals are a reasonable accommodation for people with disabilities if there is a disability related need for the animal. Companion or Emotional Support animals support people with mental health issues or cognitive disabilities and are a form of Service or assistance animals.

⁴ Fair Housing Partners of Washington State (2016) A Guide to Fair Housing for Nonprofit Housing and Shelter Providers, Washington State Edition, Chapter 4 Section B. Fair Housing Issues Related to People with Disabilities (29)

Recommendations: The system should identify solutions for households with pets. Solutions could be multifaceted including a partnership with a local animal rescue or foster program and/or making a pet-safe space within programs. A basement or storage space could be converted to accommodate cages and residents with pets could have access to that room to visit with their pet, take them on walks and have companionship. Providers should work with households to accommodate reasonable requests including helping the household secure documentation if it is required. There are examples of pet and people friendly shelters to learn from in Seattle, Washington, Portland, Oregon, Muncie, Indiana and other parts of the country.

Programs should make reasonable accommodations regarding service or assistance animals whenever feasible to do so. If the service animal request is not accommodated the provider should document the undue administrative or financial burden leading to it not being a reasonable accommodation.⁵

Family Unification

Challenge: Family composition and unification was identified in several interviews and through reviewing Coordinated Entry notes. Many families are displaced and not living together while housing is located. Several Coordinated Entry records demonstrate that families need to be housed to be reunited with their children who were currently out of their custody.

Recommendations: Families should have access to housing in publicly funded programs that serve households with children regardless of composition at enrollment, this includes age and gender of the child as well as children who are displaced from their families due to homelessness or Child Welfare involvement. Additionally, if households involved with Child Welfare are engaged in the reunification process and housing is a barrier to reunification, the household should be offered housing opportunities with the reasonable expectation that the family will be reunified within a set timeframe communicated by Children's Administration. If the resource can only be used to serve families and the household's reunification status changes, they should be transferred to another housing resource that meets their changed family composition. The Equal Access Rule, finalized by HUD in 2012 provides clarity on the definition of family including that children who are temporarily out of the home because of foster care placement are considered members of the family.⁶ The Equal Access Rule gives programs flexibility that should be exercised to house families when reunification is pending. The City of Wenatchee Community Development Department and other funders should work alongside Children's Administration to identify reasonable thresholds for appropriate housing when households are experiencing homelessness and reunification is contingent on housing access. Thresholds include minimum unit size, options for co-housing with family and/or friends that meet Children's Administration's background requirements and expected timelines for reunification. Thresholds should be communicated to service providers as opportunities for flexibility and the expectation to house families involved with Children's Administration should be set. Rapid Rehousing and Scattered Site Permanent Supportive Housing models are ideal as they can be tailored to meet the individual needs of the family. A tailored approach may include enrolling a family who is currently separated from their child(ren) and subsidizing a studio or one-bedroom unit until the family is reunified. If the household were still enrolled in Rapid Rehousing when the family is reunified the program could provide moving assistance and additional subsidy support for the larger unit size, as needed. Connecting families to available housing when it is available and tailoring services to meet specific needs is a housing first approach. Being housed while Children's Administration is involved could benefit the family's experience. For example, if Children's Administration determines that the parent's

⁵ Fair Housing Partners of Washington State (2016) A Guide to Fair Housing for Nonprofit Housing and Shelter Providers, Washington State Edition, Chapter 4 Section C. Fair Housing Issues Related to People with Disabilities (30)

⁶ Department of Housing and Urban Development, Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity, 24 CFR 5.403, 2a

housing is appropriate, home visits may begin. This allows the parent to demonstrate their parenting style and strengths in a natural environment and may contribute to an expedited reunification process.

Next Steps

Community stakeholders are committed to ending housing crises. Moving from a housing ready to a Housing First system, where there are low-barriers for enrollment and services are trauma informed and harm reduction focused will help Chelan & Douglas counties meet the needs of more households experiencing homelessness. The opportunities for refinement and streamlining are clear. Reviewing the system through access, throughput and the lens of Fair Housing will result in positive changes for people experiencing homelessness in Chelan and Douglas Counties. Provider and funder partnership is critical in making long-lasting adjustments to the system.

Next, Building Changes will lead a low-barrier shelter design process, gathering ideas and feedback from the community, including people with lived experiences of homelessness, incorporating promising practices and funding recommendations. The design will be centered around safety, access and exits to permanent housing. Service providers and community stakeholders will have opportunities to review the recommendations made in the Landscape Assessment and share feedback on the future state of the low-barrier crisis response system. Insight from people with lived experiences of homelessness will be formally incorporated into the design recommendations.

During the second phase, Building Changes will lead a day-long training on Housing First Principles and case management tools that support low-barrier programming including Harm Reduction, Trauma Informed Care and Motivational Interviewing.

Acknowledgements

This assessment exercise would not have been possible without the participation and commitment of community partners, system leadership and program participants who shared experiences, perspective and recommendations. The City of Wenatchee Community Development Department was instrumental in coordinating and planning interviews, providing context, data and guidance throughout the landscape process.

Appendix A- Recommendations

Utilization & Performance

- Create a Housing First Crisis Response System/Culture:
 - Engage all service partners in the rules-reduction process. Service providers should identify which rules they can reduce to serve more people throughout the system.
 - Lead a system mapping activity to review the current process for accessing services and envision a future-state map with reduced entry and program barriers. Use the system map to identify steps to reduce rules.
 - Use Task Force meetings to talk openly about access barriers and dispel myths.
- Reduce barriers for existing emergency shelter so that all available beds are consistently utilized
- Expand motel voucher access to provide comparable services and stays for households who cannot access shelter due to accessibility or other barriers
- Partner with Code Enforcement to clarify compliance standards for Conditional Use Permits

Substance Use

- Identify which programs reduce rules related to drugs and alcohol and which programs uphold revised abstinence policies.
- Policies related to substance and/or alcohol use should be vetted through the lens of Fair Housing
- Discontinue the practice of drug testing
- Train service providers in Trauma Informed Care and Harm Reduction approaches
- Identify if recovery housing is necessary in the crisis response system. Explore opportunities to re-tool or newly fund this model if needed.

Criminal Histories

- Remove blanket criminal history bans. Review histories on a case by case basis with the intent to screen in whenever possible.
- Utilize motel vouchers and scattered-site programs for households who cannot be served in congregate housing due to safety concerns related to criminal histories.

Accessibility

- Provide motel vouchers to households who need ADA accessible spaces until shelter is available. Lengths of stay and access to services should be comparable to households accessing emergency shelter facilities.
- Prioritize households who request accommodations for Rapid Rehousing or scattered-site programs if accessibility of Transitional Housing is not addressed.
- Funders should be aware that Fair Housing Complaints may be filed against them for funding services that are not accessible

Service Animals & Pets

- Provide clear guidance on rights and responsibilities related to service animals
 - Work with households to accommodate reasonable requests including helping the household secure documentation
 - Provide reasonable accommodations related to service animals whenever it is feasible to do so:
 - The provider should document undue administrative or financial burden leading to it not being a reasonable accommodation

- Partner with local animal rescue or foster programs to find safe placements for pets while households stay in emergency programs and locate permanent housing
- Create pet and people friendly shelter spaces- designate an area of the shelter where pets can safely stay

Family Unification:

- Follow the HUD Equal Access Rule guidance on family composition including standards on children out of the home due to foster care placement
- Partner with Children's Administration to set thresholds for appropriate housing
- Tailor approaches to individual family need including opportunity to move to a more suitable unit when the family is reunited
- Funder's provide guidance on allowable housing/moving costs for families involved in the reunification process