

**Response to Comments Received on Detroit Continuum of Care Written Standards**  
June 2016

Comments	Response
Comments in response to the section "Overview"	
Specific comments sought: Are there additional Overall Essential Elements that should be considered?	
No/none at this time/no, essential elements are comprehensive/none [10 respondents provided comments in one of these formats]	Thank you for your response.
Yes – under Federal Regulations, Transgender individuals and HoH should be added to the language about equal access and Family Separation.	The Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity regulations are now mentioned within this section.
Guidelines discussing the support of homeless families with school aged children who may not be unsheltered but are homeless due to staying with others (doubled-up) and moving from house to house daily/weekly.	Thank you for your response. At this time, the existing elements will remain as is in order for them to apply to all populations served within the program models.
The element of time. This is being noticed in the Cam system, it has been over two years since any assistance was obtained through this system.	Language is now included in this section indicating that adherence to CAM's policies and procedures is required.
Specific comments sought: Should more information be included regarding any of the Overall Essential Elements listed?	
None at this time/no [9 respondents provided comments in one of these formats]	Thank you for your response.
HAND & the CoC should not dictate forms and documents. My answer is too long for this space, so call or write, but CARF and JHACO accredited agencies (which neither HAND nor the CoC are), as well as different funders require certain issues in policies and forms that the CoC and HAND will be unconcerned with. If our forms give the information required, we should be able to retain our own forms, documents and policies. The last forms sent out by HAND increased pages from 1 to 6 and 2 to 9 in certain forms where we did not need any of the additional information collected for our clients.	The number of CoC-standardized forms and other types of documentation will remain as minimal as possible. This language is now added within this section.
Would you consider some language that speaks to the CoC's awareness and sensitivity to homeless youth and young adults (those vulnerable individuals\head of households who are under 24 years old)	Thank you for your response. At this time, the existing elements will remain as is in order for them to apply to all populations served within the program models. However, sub-population differences can be taken into account when outcome measure targets are decided on at a later date.
CAM programs should have more information of	Thank you for your response. At this time, the

being linked to other systems for homeless people, if they have to turn anyone away.	existing essential element regarding program participation in CAM will remain as is.
Specific comments sought: Are there additional definitions that should be added?	
None at this time/no/terms are well defined [9 respondents provided comments in one of these formats]	Thank you for your response.
No definition of TAY-SPDAT or any reference to the CoC's awareness or sensitivity to youth\young adult homelessness.	Thank you for your response. At this time, the section will remain as is until the CoC further explores assessment options for youth and or young adults who are homeless.
Doubled-Up. If not able to reside in the same place more than 2 weeks they should be eligible under HUD definition as well.	The HEARTH definition of "homeless" with a description of Category 2 homelessness is now included in this section.
Define why CAM although established does not fulfill its lperhaps the name needs to be changed.	Thank you for your response. At this time, the CAM definition will retain its existing meaning.
Maybe the Chronic definitions	The definition of chronically homeless is now included within this section.
Specific comments sought: Do you have specific comments/changes to any of the definitions already listed?	
None at this time/no [8 respondents provided comments in one of these formats]	Thank you for your response.
Yes	Thank you for your response.
Re General Program Policies: Does "Avoiding family separation (for family shelter)" also mean to address Families that are teen-parent head of households and homeless families with teens (13 to 17 years old)?	Yes, this definition of family applies regardless of age. This is now clarified within the section.
In the Introduction it states "This document is an outline of the programs that comprise Detroit's Homeless System." However, we have other programs that operate in the city of Detroit that do not participate in the CoC. They have their own performance measurements as required by their funders. How would these program factor into this policy?	If a project has as its primary mission, to serve people who are homeless, and that project operates in Detroit/Hamtramck/Highland Park, then that project <i>is</i> "participating in the CoC". It is the goal that all projects meeting this definition will abide by these Written Standards. It is recognized that this change in operations may happen slowly for some projects.
The language should be added regarding the HUD definition that recognizes if you are housed/doubled up and cannot stay more than 14 days that you are eligible under HUD guidelines should be stated and included.	The HEARTH definition of "homeless" is now included in this section.
Make information more accessible for working with CAM.	Thank you for your response. At this time, the CAM definition will retain its existing meaning.
Comments in response to the section "Outreach"	
Currently, PATH only requires a VI-SPDAT completed on all outreach participants, then a full SPDAT is completed for anyone scoring on the VI-SPDAT for Permanent Housing. Specific comments sought: Should all outreach projects move to this model?	

Not sure	Thank you for your responses. Since the majority of comments indicated that all outreach projects should move to this model, language is now included in the essential program elements within this section to reflect this.
No	
Maybe	
Yes [5 respondents provided this comment]	
For the sake of uniformity perhaps it should be considered.	
I would agree that city funded programs move to this model but full SPDAT training would need to happen, at a minimum, on a quarterly basis.	
Specific comments sought: What time frame should housing retention be tracked by all outreach projects?	
6 months	The HUD System Performance Measure for housing retention looks at people who exit a Street Outreach project to permanent housing who return to homelessness at the 6 month, 12 month, and 24 month intervals. Therefore, at this time the standards will reflect this requirement. It is noted that street outreach projects may not be able to track housing retention for clients past 6 months. However, it is the intent that the homeless system as a whole will be able to track this data over time.
Perhaps month, 3 months, 6 months, then annually.	
At least two year housing as outlined	
quarterly	
Every 6 months	
6 months to a year	
one month, six months, annually for three years.	
Two year intervals are too long. Outreach is not meant to be intensive case management, like PSH. I believe we should aim for one month and six month intervals only.	
One month, 6 months and 1 year	
the current version is ok	
1 year	
once a month and once a year	
Specific comments sought: Do you have any comments about how the Outreach program model is described?	
None at this time/no [10 respondents provided comments in one of these formats]	Thank you for your response.
90 days to 6 months for engagement in outreach settings. "Service preference should be given to the unsheltered." This gives no thought to those youth and young adults who are unstably housed (incl. exchanging services for shelter, etc.) and these people would typically only go unsheltered after being raped, beaten, etc.	Thank you for your comment. At this time, the language "service preference should be given to the unsheltered" will stay as it is currently written. It is noted, however, that this is stated as a preference only, and does not necessarily exclude people at risk from being served. Additionally, as the CoC develops a comprehensive system response to the needs of youth who are homeless, this section may be modified.
Hours of operation include non-business hours- Does this mean they can only operate during non-business hours or that at least x amount of days should include evening hours? Needs	Hours of operation include business and non-business hours. Exact hours will not be specified at this time. This is now clarified within this section. The HUD System Performance Measure

clarification. The Measurement of the extent to which persons who exited to PH return to homelessness within 6 months and 24 months. I think 24 months should be removed and stay with the 6 month time frame.	for housing retention looks at people who exit a Street Outreach project to permanent housing who return to homelessness at the 6 month, 12 month, and 24 month intervals. Therefore, at this time the standards will reflect this requirement. It is noted that street outreach projects may not be able to track housing retention for clients past 6 months. However, it is the intent that the homeless system as a whole will be able to track this data over time.
Appears to be a great model. Would like to include in the talking points that they ask or actively listen to the participants at the CAM level and Outreach level to see if they are actually residing in their cars or unsheltered. It needs to be language stated to these participants that we are trying to determine eligibility and provide essential services to assist if qualified.	It is now indicated within this section that staff members should engage in efforts to determine participants' eligibility.
Yes, have there been additional training for agencies who do primarily deal with housing.	The CoC will address training needs for agencies as these needs are identified.
Specific comments sought: Do you have additional comments about the Outreach program model?	
No/none at this time [11 respondents provided comments in one of these formats]	Thank you for your response.
Please do not add anything to the PATH workload. It is already overtaxed.	Thank you for your response.
Have dedicated staff to complete APPLICABLE SPDATs with participants. I've added the word applicable with the hope that the TAY will be looped into the processes to be used with youth\young adults.	Thank you for your response. At this time, the section will remain as is until the CoC further explores assessment options for youth and or young adults who are homeless.
I agree that services should be given to the unsheltered. I also believe outreach teams should not be penalized if they outreach people in non-traditional shelters that are not funded by local or state dollars.	Thank you for your response.
Comments in response to the section "Prevention"	
Specific comments sought: In what timeframe should utility and relocation assistance be provided? For example, once every 12 months.	
Once every 12 months	Thank you for your response. Since the majority of respondents indicated this assistance should be provided once every 12 months, this timeframe is now included within the Written Standards.
Up to three times in one year	
As needed	
As needed. Depending on circumstances something could occur within those 12 months that alters the whole situation	
Yes	
Consider utility & relocation assistance during	

first six months, and every 12 months thereafter	
Once every 24 months.	
Annually	
up to 3x in 12 months	
As a standard yes. But possibly look at it case by case. May be situations where this may not be applicable.	
Every 12 months, clients should be encouraged once every twelve months	
Specific comments sought: Should legal and mediation services be provided for up to 18 months? If not, what time frame is best for these services?	
Yes/I agree/up to 18 months/18 months is good [10 respondents provided comments in one of these formats]	Thank you for your response. Since the majority of respondents indicated these services should be provided up to 18 months, the up to 18 months timeframe will remain as is within the Written Standards.
No, but at least 12 months	
no, up to 24 months of legal and mediation services	
Specific comments sought: Under the timeframe for Financial Assistance and Services – how do you think the need for these services should be determined and who should determine them?	
Assess against the ability to receive State Aid or provide financial assistance to those in need with income/resources up to 200% above poverty levels. If we develop a standard measurement tool, then this tool can be used by any of the CoC providers	Thank you for your response. Case managers will make determinations on participants' need for these services utilizing a risk matrix. This is now clarified within this section of the Written Standards.
Determined by dedicated staff through case management and appropriate documentation to verify need.	
the person should be evaluated based on need and their current situation financial assistance needs to be monitored carefully to reduce the chance of abuse I think the caseworkers should be the one that makes the determination	
HAND	
With regards to the definitions, it appears housing case management (case manager) should determine the need for financial assistance and services.	
The need should be determined by 3rd party verification- such as a shut-off notice or eviction notice. The Prevention staff should determine the need based on the 3rd party verification.	
Determined by CM and most immediate need i.e. eviction notice date/summons date, etc.	
Specific comments sought: Do you have any comments about how the Prevention program model is described?	

I like the fact that you've named DHHS "Coordinates with DHHS" as they are a key piece in helping to figure out if CPS intervention is warranted as well as if youth\young adults have been in foster care and whether youth is eligible for FC-related resources.	Thank you for your response.
Not at this time/no [9 respondents provided comments in one of these formats]	Thank you for your response.
Should be as needed	Thank you for your response.
Under measurements, 2 years is too long of a time frame. I believe it should be one year.	Thank you for your response. The measurements will continue to include “% of households that receive assistance will not become literally homeless” within 1 year and within 2 years.
Specific comments sought: Do you have any additional comments about the Prevention program model?	
"Those at imminent risk of being homeless (must have court ordered eviction notice, or complaint and summons, judgment or writ.)": This leaves me wondering if the CoC has awareness or sensitivity to the fact that youth who are "at imminent risk..." will not have such documentation...	It is now clarified within this section that the exact documentation needed to determine eligibility is based on programs' funding sources.
None at this time/no [7 respondents provided comments in one of these formats]	Thank you for your response.
Is needed	Thank you for your response.
Mental health is a big concern in dealing with the situation involving the homeless and of course drug abuse is also a big concern. This is a costly treatment but I think the time limit that you said on it is little bit too short we have to find a way to give him ongoing care for the mental illness and their drug abuse	Thank you for your response. At this time, this section will remain as is since another program model type may be more appropriate for individuals in need of longer-term services.
Make sure it covers all prevention programs.	Thank you for your response. The Written Standards will establish the standards for all Prevention programs.
Comments in response to the section “Temporary Shelter”	
Specific comments sought: Should hotel/motel vouchers be included as a program model?	
No, don't recommend at this time [4 respondents provided comments in one of these formats]	Thank you for your response. Since the majority of respondents think hotel/motel vouchers should be included as a program model, it is now included within the Written Standards.
Yes [3 respondents provided this comment]	
yes it should and it should be closely monitored to avoid abuse	
I believe in the cases where there is no shelter space and these families have nowhere to go that this should be an option as an extreme emergency.	

Yes, but only temporary, no more than three days.	
Specific comments sought: If so, what should the description be?	
N/A [2 respondents provided this comment]	Thank you for your response. Since the majority of respondents think hotel/motel vouchers should be included as a program model, it is now included within the Written Standards.
Two and a half stars or higher	
?	
needs often service after CAM hours and DV victims need immediate relocation	
Emergency Housing Assistance	
Providing services on an outreach level, with expectations that are written and can be given to the client. Like a card that has info on the back and front.	
For clients timing out of shelters	
Specific comments sought: What are the essential program elements?	
N/A [2 respondents provided this comment]	Thank you for your response. Since the majority of respondents think hotel/motel vouchers should be included as a program model, it is now included within the Written Standards.
Counseling	
Are the children involved the ability to secure some type of housing or employment. Age. Mental condition	
Families who are homeless or about to become homeless who cannot obtain shelter beds, warming centers or temporary housing with relatives, friends etc. can be eligible for this assistance. Priority be given to families with children.	
If client was housed in a shelter for 90 and is awaiting housing in the next 30 days due to unexpected situations like: inspections, house being repaired etc....	
Specific comments sought: What is the timeframe for assistance?	
N/A [2 respondents provided this comment]	Thank you for your response. Since the majority of respondents think hotel/motel vouchers should be included as a program model, it is now included within the Written Standards.
Two years on-going	
Min 30 days	
12 months	
Families who can show the potential for being displaced and shelter space or residing with family, friends is not available they should be screened and provided this assistance. Time frame – at time of being unsheltered through being placed in a shelter or other options.	
1 year	
After 90 days	
Specific comments sought: What population should be targeted?	
N/A [2 respondents provided this comment]	Thank you for your response. Since the majority

Depend on the program, but veterans should be given preference	of respondents think hotel/motel vouchers should be included as a program model, it is now included within the Written Standards.
Whoever has the need and meets the criteria	
DV; families	
Families with youth, unaccompanied minors, others.	
Women with children under the age of 18, homeless men	
Shelter clients or clients timing out of ES,TH	
Specific comments sought: What are the outcome measurements that should be considered?	
N/A [2 respondents provided this comment]	Thank you for your response. Since the majority of respondents think hotel/motel vouchers should be included as a program model, it is now included within the Written Standards.
At least 70 percent placement	
the ability to move on in a positive direction and possibly secure their own residence	
relocation success; placement within 24 hrs of voucher	
5 of families who are unsheltered with children, % of these families that have income and can become permanently housed with assistance (financial literacy, housing referrals, and utility assistance).	
Follow up measures	
PH or PSH	
Specific comments sought: When should warming centers operate? 24/7? Same business hours as CAM?	
Warming Centers cannot operate 24 hours a day, except when the temperatures drop to well below freezing. The funding isn't there. There is barely enough money in the programs to house for 16 hours and feed 2 meals. They must operate 7 days a week including Holidays. How could Warming Centers stay open the same hours as CAM? This would leave people out in the streets all night! CAM, on the other hand, needs to be open 24/7 if this model of Coordinated Assessment is expected to work. HAND received a written proposal for this with the HUD NOFA 2015, but didn't fund it, instead adding additional funds to the current CAM operations.	Thank you for your response. Since there is currently a lack of capacity to operate warming centers 24/7, the centers' hours will be determined based on funding. As funding allows, they should operate from evening to morning. Ideally, they would remain open during the day when there is inclement weather. This is now reflected within the Essential Program Elements of this program model type.
Whenever high\low temperatures put the vulnerable populations at risk of heat stroke\frostbite concerns	
Operate 24/7 [7 respondents provided this comment]	
Same as CAM	
Warming centers should operate during the	



afternoon and midnight hours, when it is the coldest. CAM should be able to adjust their schedule, not the other way around. The Warming Centers should operate from 4pm-8am.	
24/7 in inclement weather (extreme cold conditions). Otherwise evenings to AM (overnight)	
No	
Specific comments sought: Should they have the same Essential Elements as Emergency Shelters?	
Warming Centers change 50 to 70 % of their clients from night to night. They cannot have the same case management linkages that even the Shelters struggle financially to provide.	Thank you for your response. At this time, this program model type will not consist of the same Essential Elements as Emergency Shelters. Access to sleeping space, bathing opportunities, and food items are now added to this section.
If funding will cover the costs of that.	
No/not at this time/not necessarily [6 respondents provided comments in one of these formats]	
Yes [3 respondents provided comments in one of these formats]	
Unless the funders want to increase the level of funding for warming centers, the expectations for warming centers will need to be adjusted. Warming Center participants are very transient. This program should be very low barrier, safe, and provide at least two meals.	
Sleeping space, access to restrooms, food pantry?	
Specific comments sought: Should warming centers be required to provide case management, complete a housing stabilization plan and connect people with housing and mainstream resources?	
No/NO. Please come and spend a night with us in the Warming Center and you will answer your own questions. [3 respondents provided comments in one of these formats]	Thank-you for your response. Since there is currently a lack of capacity within the warming centers to provide case management, the Essential Program Elements now reference that case management should be provided to the extent that the warming center staffing capacity allows. Referrals should be made to CAM and or Outreach for clients utilizing services for 14 consecutive days. This is now clarified within this section of the Written Standards.
Yes, to the extent that this can be funded and that it allows for transfer of users to shelter and other housing within 90 days of first use.	
When requested by client/consumer [2 respondents provided comments in one of these formats]	
Yes [2 respondents provided this comment]	
I think that option should be available but not everyone is looking for housing or trying to get into the mainstream they may just be looking for heat	
Warming Centers have been place to keep people safe from the elements. While case management would help, we need to make sure these centers	

are fully funded in order to employ the needed staff to provide those services.	
Not necessarily case management but some way of connecting these families to CAM or other agencies for assistance.	
Only on a limited basis.	
<b>Specific comments sought: What measurements for warming centers should be tracked?</b>	
Based on most of the clientele, keeping these folks alive and well is a good measurement outcome. CCSS tried until the last week possible to NOT do the Women's Warming Center in spite of being called daily by the City. It is all any agency can do to keep the peace, stop the fights and deliver the babies in Warming Center!	Thank you for your response. At this time, the measures for the Warming Centers will be limited only to the % of persons entered into HMIS.
# of users; % transferred to emergency shelters and other housing	
Number of clients; services (all types)	
The number of intakes and at least 70 percent served	
the number of people who utilize the system and how many come back	
No	
% exiting to PH; % exiting to emergency shelter/transitional housing; % VISPDAT	
100% Should receive a VI-SPDAT	
basic intakes; lunches; referrals	
# of persons served	
Number of participants, frequency of the same participants in a particular time frame, if applicable what types of resources did it appear these participants needed.	
Return to the warming centers on a regular basis.	
Meals, transportation, and basic needs	
<b>Specific comments sought: Do you have any additional comments about the Temporary Shelter program models?</b>	
These temporary shelters are a life-line. CCSS had many clients last year who were told repeatedly by CAM that there was no place for them to go. Warming Center is a refuge.	Thank you for your response.
No consideration to the circumstances that youth\young adults find themselves in that often cannot be verified by the usual means such as an eviction notice, Court order, etc.	Thank you for your response. Low barriers to entry will apply to adults, youth, and young adults; these include those described in the Essential Program Elements section of this program model.
No/none at this time [10 respondents provided comments in one of these formats]	Thank you for your response.

Historically these programs have been designed and funded around the need to keep people safe and out of the elements. As the system changes, so should the programs but there are added challenges to operating a seasonal program. Staff retention can be particularly difficult. Case management should be offered but to start the outcomes should be few which more being added on each year. This will give the agencies time to adjust and we can learn what works and what doesn't and the why behind it.	Thank you for your response.
Well written and thought out document.	Thank you for your response.
Comments in response to the section "Transitional Housing"	
Specific comments sought: Should the Written Standards specifically state that Transitional Housing programs will be limited to serving only specific populations?	
Yes, but not the three chosen!	Thank you for your response. Since the majority of respondents indicated that the Written Standards should state that Transitional Housing programs will be limited to serving only specific populations, the Written Standards will continue to reflect this.
Yes [6 respondents provided this comment]	
No. This excludes vulnerable populations that don't qualify for other Federally Funded housing programs.	
No [2 respondents provided this comment]	
At this point, it is too late for the standards to say anything else. All TH programs that do not serve those populations have been reallocated.	
Specific comments sought: If so, are the three populations identified the most appropriate populations to which Transitional Housing programs should be limited?	
NO. The populations chosen were NEVER the outcomes required for funding. While some TH should have been eliminated or sunsetted, the manner in which this was done was wrong. No notice was given prior to May of 2015 that the outcome measurements being tracked were NOT what would be used to eliminate TH for any agency.	Thank you for your response. Based on national research and HUD recommendations, the Written Standards will continue to be limited to the three populations currently included.
Yes [4 respondents provided this comment]	
Not only these three	
No [2 respondents provided this comment]	
Most appropriate but there will always be other circumstances not identified. So look at it under these guidelines	
TH should also be used for those who are chronically homeless and are waiting for PSH beds to come online.	Thank you for your response. The Transitional – Bridge Housing model identified in the Written Standards allows for this movement as long as a documented offer of permanent housing has been made.
Specific comments sought: If Transitional Housing programs should not be limited to only the specific	

populations given, what other types of populations are appropriate to be served by transitional housing?	
Homeless mentally ill and homeless substance use – not just those walking out of a treatment facility. CCSS was housing people who had relapsed and now could not stay in the dry TH facilities. Running a damp TH program with excellent outcomes was tossed aside by HAND. Now, you have nowhere for people to live while PSH is ramped up. Bad decision and poor implementation.	Thank you for your response. Based on national research and HUD recommendations, the Written Standards will continue to be limited to the three populations currently included.
Asylum Seekers and Refugees; International Victims of Human Trafficking	
Veterans	
Veterans mentally challenged	
Yes	
Families	
Extreme emergencies such as human or labor trafficking parents	
Transitional Housing should be limited to only those listed.	
clients released from jail, substance abuse, DV, and clients with families that have a household member with a disability and singles	
Specific comments sought: Should the Transitional Housing Written Standards require clients to pay a portion of their income towards rent? If so, what should this standard be?	
30% of adjusted gross income should be charged as rent, as HUD recommends.	Thank you for your response. Since the majority of respondents indicated that the Transitional Housing Written Standards should require clients to pay a portion of their income towards rent, this is now reflected within this section of the Written Standards. Additionally, since the most common response was that clients should pay 30% of their rent, this standard is now included in the Written Standards.
No [2 respondents provided this comment]	
Yes, once income is obtained. It's critical for clients to learn financial management in order to exit into and maintain self-sufficiency in permanent housing.	
30 percent up to market rate	
I think they should be apportioned towards the rent just to demonstrate responsibility and that in a real situation you have to pay your way you not talking about taking all the fun but something to make them feel like they have ownership in the whole process	
Yes	
Yes, 30% of gross.	
Yes, 30% if they have an income, should be helped with employment	
If they have income it should be prorated towards the payment so that by the time they are	

transitioning out to permanent housing they have become used to paying rent. If they do not pay it towards rent then some of the income should be kept in an account for them to use when they find housing (for utilities, essential house items such as beds, cook ware etc.).	
Yes. 10%	
Yes they should and it should be at least 20 to 30 percent to show client some responsibility.	
Specific comments sought: Do you have any comments about how the Transitional Housing program model is described?	
No mention of TAY-SPDAT... no sense of the CoC's awareness\sensitivity to this tool as a more appropriate measure of youth\young adult crises\needs.	Thank you for your response. At this time, the section will remain as is until the CoC further explores assessment options for youth and or young adults who are homeless.
Recommend programming be required. The essential program elements statement, "...e.g. willingness/desire to participate in services", is subjective. Outcomes on program participation is objective and leaves no room for misinterpretation.	Thank you for your response. As is noted earlier in the "Overall Essential Elements" section of the Written Standards, all projects will be expected to utilize a Housing First approach.
No [3 respondents provided this comment]	Thank you for your response.
Yes, the model describes "youth age 24 and under". What is the minimum age?	The minimum age is 13. This is now clarified within the Written Standards.
Clients should be aware that they are responsible for obtaining their own furniture while they in transitional and that transitional housing is different from a shelter.	Thank you for your response.
I think TH should not just be designed for three requirements. The system will miss a lot of people like clients released from jail.	Thank you for your response. Based on national research and HUD recommendations, the Written Standards will continue to be limited to the three populations currently included.
Specific comments sought: Do you have any additional comments about the Transitional Housing program model?	
I have lots - so does Rev. Fowler.	Thank you for your response.
The Asset-building component is good, this would be where a youth\young adult serving program could support participants to open a bank account to start saving what might be "rent".	Thank you for your response. The language in the Essential Program Elements has been expanded to note that services may include financial counseling to help the client improve money management skills.
In Detroit, a border-city, the CoC should recognize and continue supporting the special need for housing of asylum seekers, refugees, and international victims of human trafficking. Freedom House is an example of specialized population that through HMIS documentation,	Thank you for your response. Based on national research and HUD recommendations, the Written Standards will continue to be limited to the three populations currently included.

proves a Transitional Housing model for asylum seekers/refugees and victims of human trafficking is successful in moving people into self-sufficiency and permanent housing.	
No [5 respondents provided this comment]	Thank you for your response.
I think that clients should try to set up a budget plan to sustain them before they leave transitional housing.	Thank you for your response. The Essential Program Elements reference that services may include financial counseling, and the language is now expanded to include budgeting skills.
Comments in response to the section "Rapid Rehousing"	
Specific comments sought: Should RRH programs require clients to pay any portion of their income towards rent?	
Yes [8 respondents provided this comment]	Since the majority of respondents stated that RRH programs should require clients to pay any portion of their income towards rent, the Written Standards will continue to reflect this.
Specific comments sought: If yes, is the proposed graduated payment plan as given in the Written Standards appropriate? If not, please suggest an alternative.	
Yes/it's okay as is [6 respondents provided a comment in one of these formats]	Since the majority of respondents stated that the proposed graduated payment plan as given in the Written Standards is appropriate, the Written Standards will continue to reflect this.
No, based on income	
?	
Specific comments sought: Should there be a limit to the number of times (not the number of months) that an individual/family may receive RRH assistance? If so, what should this limit be?	
2 times over a five year period	Thank you for your response.
No, but with conditions. If medium-term rental assistance does not lead to self-sufficiency, then a reevaluation of services is needed.	
No, the number of months will allow better service	
life has many twists and turns one strike is never enough	
yes 3 months	
Yes, no more than 3 times	
Yes, 2 times	
Yes	
The Written Standards state that for utility deposits, payments, or arrears, the maximum amount of assistance to be provided is either 6 months or \$2,500, whichever comes first. Specific comments sought: Is this an appropriate timeframe and/or dollar amount to place on the amount of utility assistance to be provided? If not, what is a more appropriate amount?	
Appropriate time and amount/yes/yes, especially if the client has been on the budget plan [5 respondents provided a comment in one of these formats]	Thank you for your responses. Since the majority of respondents indicated that the maximum amount of assistance to be provided for utility deposits, payments, or arrears is appropriate as either 6 months or \$2,500, whichever comes first, this will continue to be reflected within the
An amount that will keep the utility on and make an arrangement to find long term support	

it gets cold in Michigan so the time of year for that type of a support should be doing the colder months of course you have to pay utilities all year round but the amount should be limited to the time of the year so that 2500 should be allocated more so during the winter months than during the summer months so the six-month cover that area I don't think so	Written Standards.
No, 1 year to \$2,500	
Specific comments sought: Should there be a limit to the TOTAL amount of rental assistance, security deposits, and utility assistance a person may receive? If so, what should this limit be, in either months or dollar amount?	
No, but with conditions. See above. [Respondent's above comment: If medium-term rental assistance does not lead to self-sufficiency, then a reevaluation of services is needed.]	Thank you for your response. A limit on rental assistance and security deposits is not recommended at this time due to the varying needs of individuals requesting these forms of assistance.
Yes [3 respondents provided this comment]	
that's a tough question to answer because a lot of it depends on the individual's and there needs the individual may be having trouble in all the areas that you think speaking of	
No	
In dollars it should be 900.00 for security deposits and 1 <sup>st</sup> month rent, and for utility no more than 800.00 dollars	
Specific comments sought: Do you have any comments about how the Rapid Rehousing program model is described?	
None at this time/no [7 respondents provided a comment in one of these formats]	Thank you for your response.
Specific comments sought: Do you have any additional comments about the Rapid Rehousing program model?	
None at this time/no [8 respondents provided a comment in one of these formats]	Thank you for your response.
Comments in response to the section "Permanent Supportive Housing"	
Specific comments sought: Do you have any comments about how the Permanent Supportive Housing program model is described?	
TAY...	Thank you for your response. At this time, the existing elements will remain as is in order for them to apply to all populations served within the program models.
None at this time/no [5 respondents provided a comment in one of these formats]	Thank you for your response.
Yes, if PSH is described with no imposed time limits why do we have an annual reassessment using common tool to determine households ready for move on in essential elements?	Thank you for your response. Annual reassessments should be conducted to help determine any additional service needs the participant may require. If a participant reaches a

	level of stability, he/she may be a candidate for moving on from PSH. The language in Essential Program Elements has been modified to reflect this.
Yes, if there a waiting list, and how long does it take to get into permanent supportive Housing	Thank-you for your response. The waiting list for PSH and the length of time it takes to get into permanent housing varies, depending on vacancy availability and the length of time it may take a person to complete the navigation process.
Specific comments sought: Do you have any additional comments about the Permanent Supportive Housing program model?	
No other comments/none at this time [9 respondents provided a comment in one of these formats]	Thank you for your response.
Under elements, will zero income individuals pay zero for rent or will there be a minimum...I would suggest setting a minimum amount for clients even with zero income.	Thank you for your response. At this time, no minimum payment amount will be required for individuals who have zero income in order to reduce barriers to entry.
Yes on pg. 14 measurements. In % of slots that will be filled with CAM why measure a mandate? If you would like to use it and avoid bias you may want to frame it as % of new entries after full CAM implementation that utilized the coordinated assessment	Thank you for your response. This measure is included so that the CoC may have a way of monitoring the extent to which providers fill their units via the CAM process.
Comments in response to the section "Safe Haven"	
Specific comments sought: Do you have any comments about how the Safe Haven program model is described?	
CCSS believes that requiring that Substance Use Services on site is not a standard of Safe Haven Programs as dictated by HUD and would present an undue burden at CCSS for HAND to require this at this time without adequate warning.	Thank you for your comment. The Essential Program Element of providing clinical and substance abuse services on-site has been removed. Instead, language has been added that linkages to treatment will be made, and that this treatment may include substance abuse, mental health, or physical rehabilitation as per the client's needs and desires.
No comment/none at this time [6 respondents provided a comment in one of these formats]	Thank you for your response.
Specific comments sought: Do you have any additional comments about the Safe Haven program model?	
In case you are wondering why I am answering questions for CCSS, it is because I was asked to do so by Rev. Faith Fowler - Executive Director.	Thank you for your response.
No comment/none at this time [7 respondents provided a comment in one of these formats]	