

# Sacramento Community Standards

## Sacramento Continuum of Care

Version 1.0 (Draft for SPC Review)

December 4, 2023

### Public Comment Summary

This document summarizes comments received during the public comment period for the draft Sacramento Community Standards that occurred 10/26/2023 – 11/16/2023. All comments and specific responses to each comment were reviewed by the LHAP Standards Development Team (SDT), with key themes and general responses summarized below. Specific changes to standards based on public comment are included in track changes in the attached Draft for SPC Review document.

Thirteen (13) responses were submitted via online survey and one response was submitted via email representing the following:

- 5 people with lived experience
- 2 community advocates
- 4 homeless/housing services providers
- 2 local government representatives
- 1 Medi-Cal Managed Care Plan

Organizations represented:

- City of Sacramento -- Department of Community Response, Housing Office
- Mercy Housing
- Saint John's Program for Real Change
- Lutheran Social Services
- Sacramento County -- Behavioral Health
- Maison Benie Coalition
- Health Net

Overall, commenters offered thoughtful and specific feedback. Many of those with lived experience offered personal reflections and insights and stressed the need for person-centered, ethical, and effective service access and support. Commenters were asked to provide input and recommendations by section, starting with the Principles stated in the introduction, then General Standards, and then comments by standards for each Program Type.

### Principles

#### **Comment summary:**

Request to add "person-centered" (F.2) and to clarify allowance for sober living environments (F.6).

#### **Response:**

Added reference to "person-centered". Left F.6 as-is, since principle states programs may base program policies on whether or not a participant is using substances where allowed in standards.

#### **Comment summary:**

Request to specify non-discrimination based on mental health status or compliance with mental health programs, as well as non-discrimination for persons with criminal records.

**Response:** Standards address non-discrimination based on disabling conditions, which is inclusive of mental health status. Edited to incorporate reference to non-discrimination based on criminal record unless otherwise restricted by law or funding requirements.

### General Comments

#### **Comment summary:**

Concern standards do not reflect health system relationships or programs and instances when participants are being paired with services that are CoC Program vs CalAIM funded.

#### **Response:**

Additional stakeholder work related to health systems and health care resources (e.g., CalAIM) integration is needed and can be accounted for in next update to standards.

**Comment summary:**

Request to further stress linkages in area of education, training, and career development.

**Response:**

Edited to further emphasize.

**Comment summary:**

Concern whether providers have the capability and resources to meet the proposed standards and potential unintended consequences and trade-offs; that standards are overly prescriptive and operational, currently unattainable, and would impede program operations and conflict with other funding requirements.

**Response:**

Edited to further emphasize standards are in part aspirational and providers are not expected to immediately meet all standards, as compliance may be dependent on sufficient funding and other external factors. The introduction explains the intent of SSF/CoC, the City, County, and SHRA with regard to expectations for compliance and related dependencies.

**Comment summary:**

Concern standards should clearly delineate which standards are meant to apply to services funded by SSF, the City of Sacramento, and the County of Sacramento.

**Response:**

The Standards Development Team, comprised of SSF/CoC, City, County, and SHRA representatives, determined that, unless otherwise specified, standards are applicable to all project types regardless of funding source.

**Comment summary:**

Request to remove standard requiring each agency governing board to include at least one person with current or past lived experience due to state Volunteer Protection Act law restrictions and the inability of persons with lived experience to meet the fiduciary and fundraising obligations of a governing board.

**Response:**

No change. People with lived experience are essential contributors to governance. Federal funding requires such inclusion and issues related to compensation for non-profit board members are not prohibitive.

**Comment summary:**

Concern standards 2.1.6 and 2.1.7 do not allow for programs that provide and require specialized services (e.g., employment training, sober living environments) and that programs will not be able to require services certain funders require or is otherwise part of the existing program model.

**Response:**

The standards allow for programs that offer specialized services, including recovery housing and shelter environments (“sober living”) and related program eligibility and participation requirements when required by a program funder, so long as such services are provided consistent with Housing First practices for recovery housing. Standards apply to all programs, including those funded to provide specialized services, unless otherwise prohibited or indicated in the standards.

Language under 2.1.6, edited to further clarify such programs are expected to operate in accordance with Housing First practices (e.g., as specified for recovery oriented programs in HUD’s *Recovery Housing Policy Brief* (<https://files.hudexchange.info/resources/documents/Recovery-Housing-Policy-Brief.pdf>).

Standard 1.7 explicitly permits disability-related service participation requirements: “...programs may not require any program participant to participate in supportive services (or be compliant with medications they are prescribed) that are related to a participant’s disability, except where required by funding or otherwise authorized by the CoC and program funders.... Other non-disability related services (e.g., parenting classes, employment readiness services) are generally not required, unless authorized by the CoC and program funders.”

**Comment summary:**

Request to change all references to “federal funding” to “federal HUD funding”.

**Response:**

No change. References to federal funding are intended to be general and typically reflect uniform requirements for federal funding based in federal law (e.g., audit requirements for recipients of federal

funding). Other references allude to other applicable “federal, state, and local funding” requirements and are not particular to HUD.

**Comment summary:**

Request to remove standard related to outreach to minority and women’s businesses and vendors.

**Response:**

Edited to more generally refer to agency procurement adhering to applicable federal, state and local law.

**Comment summary:**

Request to include consideration for system-level grievance and appeal rights and processes.

**Response:**

Standard added to reflect client rights to system-level grievance and appeal processes when available and appropriate.

**Comment summary:**

Request to remove standard pertaining to establishing annual performance goal applicable to program type and in concert with CoC and local funders.

**Response:**

No change. The standard does not create additional goal-setting requirements but rather codifies work underway to standardize performance metrics, goal setting, performance monitoring, and improvement.

**Comment summary:**

Request to modify standard related to having agency staff serve as non-conflicted client rights officer and allow SSF/CoC to support this function.

**Response:**

Edited for clarity. Having internal non-conflicted client rights officer (e.g., to hear and resolve appeals and client grievances) is standard best practice. Language edited to allow for more flexible approach using third party (e.g., CoC) in event agency does not have non-conflicted staff.

**Comment summary:**

Request to modify standard pertaining to clients having right to choose their own housing or reject substandard housing to provide clients with right to submit an appeal to a non-conflicted CoC client rights officer or ombudsman.

**Response:**

Edited to include reference to housing choice “within reasonable limits.” The standards address means for client rights-related appeals.

**Comment summary:**

Request to modify training standards to clarify applicability and expectations for staff for training when topic is not related to their role/function.

**Response:**

Edited to clarify training topics are applicable as relevant.

**Comment summary:**

Request to remove requirement that client/staff ratios be set by agreement with one or more local funders and/or the CoC/SSF.

**Response:**

No change.

**Comment summary:**

Request to clarify responsible entity with regard to requirements for programs with on-site service facilities, shelters and housing programs having staff on duty trained in CPR, administration of NARCAN, etc.

**Response:**

No change. Compliance with standards and applicable entity can be determined by program funder(s) and via monitoring.

**Homelessness Prevention**

**Comment summary:**

Request to remove standard 3.D.1 and similar standards regarding client referral via CAS and/or other pathways that may conflict with program funding requirements.

**Response:**

No change. Standards include language allowing for exceptions (e.g., "...and/or other referral pathways approved by program funders."

**Comment summary:**

Request to remove standard 3.F.3.a.iv as it inhibits programs of their ability to conduct basic, efficient operations and may create safety issues for staff if meetings must occur in clients' homes.

**Response:**

Edited Homelessness Prevention and Rapid Rehousing standards to reflect consideration for staff safety and appropriateness of where and when participants are engaged.

**Street Outreach**

**Comment summary:**

Concern standards do not reflect different types of street outreach programs that are more service-focused vs housing-focused.

**Response:**

Description of street outreach revised to clarify.

**Emergency Shelter**

**Comment summary:**

Concern that standards do not address how the system assists clients with service restrictions/bans.

**Response:**

Referred to CoC Coordinated Access System (CAS) Core Team.

**Rapid Rehousing (RRH) & Rehousing Assistance**

**Comment summary:**

Request to edit standards to reflect certain RRH funding sources allow for up to three years of assistance.

**Response:**

Edited to remove specific time limits, but indicated RRH is time-limited.

**Permanent Supportive Housing (PSH)**

**Comment summary:**

Concern that PSH eligibility standards related to literal homelessness and disability would restrict PSH programs.

**Response:**

No change. PSH programs that are part of the homeless crisis response system (included in annual inventory submitted to HUD) require participants to be literally homeless and disabled to qualify.

**Comment summary:**

Concern that PSH standards restrict projects to only serving people experiencing chronic homelessness.

**Response:**

No change. Standards do not include such restrictions and indicate that people who are chronically homeless are generally prioritized.

**Comment summary:**

Concern that not all single site PSH programs have funding to provide furnishing.

**Response:**

No change. Programs should strive to meet standards, including with additional funding and/or partnerships where needed.

**Comment summary:**

Concern that the timeframe for exiting participants who abandon a unit is too stringent.

**Response:**

No change. Standard is consistent with HUD requirements and allows for exceptions.

**Comment summary:**

Concern that standards pertaining to having written income determination procedures for rent and utility assistance does not allow for variation across sites (e.g., where some sites include utilities and others do not).

**Response:**

No change. Standards allow for agency and program-level variation in procedures.