

Services to End and Prevent Homelessness

Residency Policy

January 2025

Agenda

Foundation

Purpose

Population Served

New Policy

Program Types

General Notes

Take-aways

Foundation



Senior leadership asked SEPH to revise the policy to address concerns with the previous approach, which limited individuals' ability to move between states.



The goal was to create a policy that is trauma-informed, person-centered, does not add barriers to access to services, and supports compassionate service delivery.



SEPH worked with various CoC staff and consulted with neighboring jurisdictions to learn about their policies.



Policy reviewed and approved by the County Attorney's Office and County Executive.

Purpose of change to policy

- Remove durational requirements related to the length of time residing in Montgomery County.
- Eligible households may receive services regardless of where they lost housing.
- Correct inequities and inefficiencies in the coordinated entry system for people who do not meet current residency eligibility.
- Policy does not change the implementation of best practices. DIVERSION should still be the first intervention for households seeking support.
- Provide clear policies and procedures for HHS and the Continuum of Care.
- Guidance on how to determine if a household is better served in Montgomery County or at another jurisdiction where they are already connected to resources.

Populations served – HUD Definition

Four Categories in the Homeless Definition

Category 1: Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

1. Has a primary nighttime residence that is a public or private place not meant for human habitation; **or**
2. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); **or**
3. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Note: An individual or family only needs to meet one of the three subcategories to qualify as Homeless Category 1: Literally Homeless.

Populations served – HUD Definition

Four Categories in the Homeless Definition

Category 2: Imminent Risk of Homelessness

An individual or family who will imminently lose their primary nighttime residence provided that:

1. Residence will be lost within 14 days of the date of application for homeless assistance;
2. No subsequent residence has been identified; *and*
3. The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Note: Includes individuals and families who are within 14 days of losing their housing, including housing they own, rent, are sharing with others, or are living in without paying rent.

Populations served – HUD Definition

Four Categories in the Homeless Definition

Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

1. Is fleeing, or is attempting to flee, domestic violence;
2. Has no other residence; and
3. Lacks the resources or support networks to obtain other permanent housing

Note: For the purposes of this binder, “Domestic Violence” includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).

EXEMPT FROM POLICY DUE TO THE VIOLENCE AGAINST WOMEN ACT (VAWA)

- Category 4 households do not have to prove residency to receive services.

Residency Policy

- The policy document guides the mandated changes to the residency policy per project and population type.
 - Please reference the revised policies to update your respective project and program manuals and guidelines.
 - This document uses the term “household” to refer to an adult-only household (individual), a household with multiple adults, or a household with minor children.
- The following slides review the policy by project type.



Residency Policy

Prevention

Current

- Requires households to show residency for at least 3 months for formal leases.
- Requires households to show residency for the past 6 months for informal leases.

New

- Remove durational requirements.
- Follow all other existing eligibility requirements.
- Must be residing in Montgomery County to receive prevention services.

Residency Policy

Diversion

No Change

Diversion programs serve all households in **HUD categories 1, 2, and/or 4** seeking services.

A fundamental part of diversion is to connect individuals to safe alternatives to sheltered and unsheltered homelessness.

- Reconnect with jurisdictions where they receive services
- Coordinate connections with family and friends.

Residency Policy

Outreach

No Change

Outreach providers support all households experiencing unsheltered homelessness in Montgomery County regardless of where they lost housing and for how long they have resided in Montgomery County.

Residency Policy

Emergency Shelter

Current

Must have lost housing in Montgomery County.

Must have resided in Montgomery County for nine months before they are eligible for coordinated entry housing matches.

Attempt Diversion before referring to shelter.

Provide shelter to individuals who may not be residents when we have shelter space.

New

Households are eligible for shelter regardless of where they lost housing and for how long they have resided in Montgomery County.

Residency Policy

Emergency Shelter

New

To be eligible for emergency shelter services:

Households with Children must be considered homeless under the **HUD categories 1 and/or 4** (see attachment). Households under category 4 (fleeing Domestic Violence/Human Trafficking) **do not** have to demonstrate residency in Montgomery County.

Emergency shelters that provide shelter due to inclement weather (hypothermia or hyperthermia) may serve all Households seeking shelter regardless of their residency in Montgomery County.

Diversion options must be explored, pursued, and documented before referring a household to an emergency shelter.

Staff must conduct an assessment to determine whether a household is residing in Montgomery County.

Staff should assist households in obtaining the necessary documentation and make every attempt to minimize barriers to shelter entry.

Please inform households at the time of referral that they must demonstrate residency in Montgomery County to be eligible for emergency shelter.

Residency Policy

Emergency Shelter

New

At least two of the below are needed to verify residency.

List of possible determining factors and documentation:

- Receiving benefits (including health insurance) from Montgomery County
- Photo ID showing a Montgomery County address.
- Government or utility mail showing a Montgomery County address.
- Documentation of last (most recent) place of residency.
- Children currently in physical and legal custody enrolled in Montgomery County Public Schools. (families only)
- Eviction notice (informal or formal) for a residential unit located in Montgomery County.
- Pay stubs or proof of employment in Montgomery County.
- Legal document explaining mandate to remain in Montgomery County.

Residency Policy

Emergency Shelter

New

Provide documentation within five days of shelter entry.

If the household does not provide these documents, the provider and household will create a plan to exit the shelter to a safe destination.

The provider must make an effort to connect the household to services to ensure they are not discharged to unsheltered homelessness.

A household may not be terminated from a shelter program if it has not secured a safe alternative to shelter.

Transparency and outlining clear program expectations with program participants are essential to providing Trauma-Informed Services.

Please explain this policy to program participants before program entry and during intake.

Residency Policy

Coordinated Entry Housing Match List

Current

Must have lost housing in Montgomery County.

Must have resided in Montgomery County for nine months before they are eligible for a housing referral.

New

There is no durational requirement and need to demonstrate client lost housing in Montgomery County.

Must meet all other current requirements, such as completing assessments and obtaining documentation to verify residency and other housing eligibility requirements.

General Notes

- The policy was not created in response to increased demand for services.
- The policy does solve for limited capacity and resources, it was not created to reduce inflow.
- Diversion must continue to be the primary intervention for households seeking crisis resolution support.
- SEPH will inform all partners and neighboring jurisdictions of the new policy.
- Case Managers should support households and help them obtain the required documentation.
- Identification can be any type and does not have to be a State-issued ID. It can be expired.
- What can we do to address the possible increase in demand and no increase in service capacity:
 - Use data to support advocacy for housing and other resources.
 - Use data to demonstrate trends, which interventions work, and how increased funding can support the CoC.

Frequent Questions

What if a household says they want to live in Montgomery County, but cannot provide two documents?

- Explain the residency policy for shelter and the support your program can provide using a person-centered and trauma-informed approach. Use your assessment to determine if shelter is still an appropriate intervention based on the person's needs.

What if the household enrolls the school-aged children in school using their temporary address?

- They can use the proof of school enrollment as one of the required residency documents.

What if the identification card with the Montgomery County address is expired?

- It can still be used as one of the residency documents.

What if the household does not provide documentation within five days of shelter entry?

- Use a person-centered approach to identify barriers to obtaining the documentation and support the household to overcome those barriers. If they are unable to provide it because none of the items apply, then create a plan to quickly resolve their episode of homelessness and exit the program.

Take Aways



The main change – durational requirements related to the length of time residing in Montgomery County were removed.



The new policy is effective February 1, 2025



SEPH will follow-up with SEPH staff and contracted providers at regularly scheduled meetings to discuss concerns with policy implementation.

Questions & Answers



Thank you

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January 2025