

To Ernestina Simmons, Director of the Mayor's Office of Homeless Services:



We are writing to you from Housing our Neighbors, an advocacy organization of folks with lived experience of homelessness and allies who support the dignity and wellbeing of those experiencing homelessness. **We are troubled by the department's proposed policy allowing residents only a 90 day stay in city shelters, with potential for an additional 30 day extension.**

First, we are troubled that there was only a 7 day window to respond to this policy change which we were notified about through channels outside of MOHS and the CoC. We were not provided an opportunity to comment, and this decision sidelined the opinions of folks most vulnerable to the effects of this proposed change. From conversations with folks who have found housing through Coordinated Access, we know it takes at a minimum 6 months. Navigating the HCV process is often delayed and takes longer than intended, for example if there needs to be reinspections of properties. We also question how this policy would be implemented if adopted: Would individuals who currently have shelter stays longer than 90 days be kicked out upon adoption? Would the policy come into effect at the same time for everyone, likely causing a situation where hundreds of people are kicked out of shelters at once?

Second, we acknowledge that it is frustrating that there is not enough shelter capacity and that folks who need shelter resources may not be able to access them, but restricting access to shelters will only cause more harm. Our conversations with folks about their experiences in the shelters, many of whom feel safer living on the street, runs in direct opposition to the narrative that folks are free loading or taking advantage of shelter stays. Ultimately, this is an issue of a lack of affordable and dignified housing options and people who are unable to afford rents or mortgages.

Third, many of the existing procedures for accessing shelters are flawed and setting a limit on shelter stays will not solve the underlying problems. Folks have challenges even accessing the Coordinated Access line and rarely are they able to speak to anyone when they do. The resources provided by MOHS and the City of Baltimore are outdated and several numbers are disconnected. Hearing that Beans and Bread, one of the main resources to connect people to Coordinated Access, was without an intake coordinator for the better part of this summer again speaks to the lack of basic functioning with programs that support folks experiencing homelessness. Our shelter survey indicates significant challenges with grievance processes that are inadequate and that many residents don't know exist. Many residents expressed fears of reporting substandard conditions as they felt like they would be unjustly targeted. We need to ensure that folks' 1st amendment rights are protected.

Fourth, our survey again highlights the challenges that residents feel related to staff treatment. Staff are not properly trained to work with people who have

experienced the trauma of homelessness and, all too often, people are blamed by case workers for issues that are structural in nature. In this way, would poor and harmful case management support be improperly labeled as a “lack of engagement and participation” on the part of the residents? How can we ensure that there isn’t selective enforcement of rules and regulations? How are we making sure that the wider system of homeless services is operating from a trauma responsive perspective, recognizing that homelessness is an extremely traumatic experience? Additionally, how can policies and procedures support staff in their work with residents and reduce barriers and red tape for folks to receive what they really need, housing?

While we recognize and acknowledge that challenges around homelessness and housing affordability do not fall solely on MOHS to fix, setting a cap on shelter stays will further traumatize those who are experiencing homelessness and not alleviate the structural issues that bring about homelessness in the first place. **We believe that the best and most humane policy would be to place no limits on city shelter stays and we ask that you rescind this proposal.** We look forward to discussing this issue with you further and hope that in the future we can be brought into these important conversations to provide our perspective on issues that affect those within our organization and those that we connect with in our work.

Sincerely,

Housing our Neighbors

City of Baltimore Family and Adult Emergency Shelter Length of Stay Policy

Purpose

The purpose of this policy is to establish pre-determined lengths of stay for the family emergency shelter system and outline criteria for requesting extensions for City funded shelters.

Background

Emergency shelters are a critical part of the homelessness response system in the City of Baltimore. Emergency shelters are designed to be a temporary alternative to unsheltered homelessness.

Data suggests that long lengths of stay and low turnover rates in City funded shelters contribute to prolonged experiences of homelessness unsheltered homelessness for individuals and families. The need to quickly move residents through the emergency shelter system via placement into permanent housing through the Coordinated Access System (CAS) will lead to improved access to shelter for those in need as well as better outcomes for all Baltimoreans experiencing homelessness.

Emergency Shelter Length of Stay Policy

Due to the temporary nature of emergency shelters, lengths of stay are limited, and differ based on household composition.

A household's length of stay is defined as one continuous length of stay from the first day of enrollment into a City of Baltimore funded shelter up to the date of exit from the shelter system. This includes the total number of days a household is enrolled in the shelter system continuously, including any transfers between shelter locations.

Adult Emergency Shelter Lengths of Stay

Stays in the adult emergency shelter system are designed to provide temporary accommodation on an emergency basis while working towards other housing plans and therefore are limited to an initial period of 90-days. Adult households will be eligible to apply for 30-day extension.

Family Emergency Shelter Lengths of Stay

Stays in the family emergency shelter system are also designed to provide temporary accommodation on an emergency basis while working towards other housing plans. Due to the high degree of vulnerability families experience while unsheltered, lengths of stays

for families residing in emergency shelter are limited to an initial period of 120-days. Families will be eligible to apply for an extension for an additional 30-days.

Extension Policy

Due to the dynamic nature of homelessness, adults and families residing in the emergency shelter system are eligible to request length of stay extensions to account for additional time that may be needed to move into permanent housing.

Adult Emergency Shelter Extensions

Adults residing in emergency shelters may be eligible for an extension of up to 30-days if they meet the specific criteria outlined in this policy. The maximum length of stay for adults residing in emergency shelters is 120-days.

Active Participation in Housing Search

Individuals must demonstrate active engagement and participation in housing navigation services including case management, housing problem solving/diversion, and services that address barriers to housing, as well as disclose all sources of income and maintain compliance with the rules and requirements outlined in the Shelter Participant Participation Policy. Individuals may also be eligible for an extension if there is documented evidence of efforts made to secure permanent housing through resources available outside of Coordinated Access System, such as unsubsidized or subsidized housing affordable housing programs, living with family, friends or other housing options.

Ineligibility for Emergency Shelter Extension

Individuals may be deemed ineligible for an extension if there is documented evidence of declining permanent housing resources without extenuating circumstances, if there is documented evidence of a lack of engagement and participation in housing navigation services, case management, etc., and violations of the Shelter Participant Participation Agreement Policy.

Family Emergency Shelter Extensions

Families residing in emergency shelters may be eligible for an extension of up to 30-days if they meet the specific criteria outlined in this policy. The maximum length of stay for families residing in emergency shelters is 150-days.

Active Participation in Housing Search

Families must demonstrate active engagement and participation in housing navigation services including case management, housing problem solving/diversion, and services that address barriers to housing, as well as maintain compliance with the rules and requirements outlined in the Shelter Participant Participation Policy. Families may also be eligible for an extension if there is documented evidence of efforts made to secure permanent housing through resources available outside or through the Coordinated Access System.

Ineligibility for Emergency Shelter Extension

Families may be deemed ineligible for an extension if there is documented evidence of declining permanent housing resources without extenuating circumstances, if there is documented evidence of a lack of engagement and participation in housing navigation services, case management, etc., and violations of the Shelter Participant Participation Agreement Policy.

Emergency Shelter Extension Criteria

Emergency shelter staff serving both Adults and Families may approve a 30-day extension using any of the following criteria:

1. Housing Pending

The household has a documented housing placement pending through either a housing problem-solving/diversion resolution or the CAS that will result in a permanent housing placement within the 30-day period; the household has accepted placement through rapid rehousing (RRH) or permanent supportive housing (PSH); or the household is enrolled in RRH or another permanent housing program (such as through the Housing Authority of Baltimore City) and is actively searching for a housing unit.

2. Medical

The household has written documentation from a medical/healthcare provider acknowledging a current medical or mental health course of treatment that will be resolved or completed during the 30-day period.

Required Documentation

Shelter staff should take steps to verify the above information and document in a case note in the Homeless Management Information System (HMIS).

Procedure

Shelter staff shall meet with each resident monthly to discuss progress towards their housing goals upon the end of their stay in the emergency shelter. Within 14 calendar days prior to the end of their initial stay, their housing plan must be reviewed. In cases where there is no housing plan due to the participants lack of attendance or participation in case management, extension request will be denied.

Extension Approval

If the individual or family is approved for an extension, shelter staff shall document the approval in the household's HMIS record.

Notification of Extension

Shelter staff shall notify the household of the extension approval or denial verbally and in writing.

Emergency Shelter Extension Request Form

Instructions

Shelter staff are to meet with individuals or families residing in emergency shelter at least 14 calendar days before the end of the initial length of stay to begin discussion potential exits or extensions. Staff shall collect the required documentation to justify the extension request and enter the information in HMIS.

Household Information

Date of Entry into Shelter: _____

Date of Extension Request: _____

Shelter Name: _____

Shelter Type: ☐ Adult Shelter ☐ Youth Shelter ☐ Family Shelter

Verification of Income (provide amount of income reported): _____

Household HMIS ID: _____

Extension Justification

Extension Justification: ☐ Housing Pending ☐ Medical

Documentation Obtained: ☐ Yes ☐ No

Date of most recent service plan: _____

Briefly provide a written explanation for the extension request:

Extension Request Determination Factors

To be eligible for an extension, the household must meet the following criteria:

- Be active in housing search, housing navigation services, problem solving/diversion conversations.
- Have an active coordinated access system assessment if problem solving/diversion conversations have been unsuccessful.
- Be in compliance with the requirements established in the Emergency Shelter Participation Agreement Policy.
- Report all sources of income.
- Provide documentation to justify the type of extension requested

Extension Determination

- ☐ Based on the information collected, the household shall be granted a 30-day extension. The extension shall begin on (date) _____ and end on (date) _____.
- ☐ Based on the information collected, the household shall not be granted a 30-day extension due to the following factors:

Emergency Shelter, Outreach, and Housing Navigator Pre-Match Policies and Procedures

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Shelter Participant Participation Policy and Agreement

Background

To ensure accessibility to the households in need, the Coordinated Access System (CAS) provides access to services from multiple, convenient physical locations. Households have access to assessment at various points of entry within the homeless system. The most common entry points will be navigating agencies and emergency shelters. Included in the assessment packet is a consent for release of information for Coordinated Access.

Shelter Intake & Participant Orientation

Programs should ensure all materials for tenants are written in plain language, and that staff assists tenants in understanding the content of written materials, when necessary. Any intake/application forms can be completed orally to accommodate persons of varying literacy levels, written materials are made available in multiple languages upon request.

The program should educate the new participant about its policies and practices regarding housing opportunities, the array of care, treatment, or services provided, and how to contact the program at any time of the day. Additionally, the program should be aware of and incorporate reasonable accommodations into their service provision and program requirements.

Shelter Participation Policy & Agreement

Overview

Emergency Shelter aims to address emergency housing needs while working alongside Participants to create individualized support and service plans. As such, our goal is to work collaboratively to provide services and support to shelter residents. This agreement aims to discuss the role of the Shelter Program in partnering with you as well as your role as a Participant in the shelter.

Policy

The purpose of the Shelter Participation Policy & Agreement is to establish a clear policy and expectations for both shelter programs and Participants residing in emergency shelters within the City of Baltimore utilizing HUD Emergency Solutions Grant (ESG), State Division Homeless Solutions Program, and City of Baltimore General Funds. This policy was created to reduce the length of stay in emergency shelter settings within the City of Baltimore, and to facilitate exits to permanent housing so that those residing in emergency shelter settings can quickly identify safe and stable housing.

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Procedure

1. Shelter staff will present and explain the Shelter Participation Policy & Agreement to all participants residing in the shelter and co-create a housing plan that identifies every permanent housing option they are eligible for.
2. Sign the Shelter Participation Agreement - Shelter case managers will work with participants to sign the agreement. The agreement outlines the following information:
 - a. The services and support available to the participant while they are residing in the shelter.
 - b. The expectations for Participants for the first 60 days of their shelter stay.
 - c. Voluntary supportive services and linkages to services including, but not limited to:
 - i. Savings and financial education programs
 - ii. Behavioral and physical health referrals
 - iii. Intimate partner violence supportive services
 - i. Veteran services
 - iv. Educational and employment services
 - v. Rapid resolution/problem solving conversations that identify possible permanent housing placements outside of the Coordinated Access System (CAS)
 - d. Acknowledgement of the requirements as a recipient of shelter services
 - e. Acknowledgement to abide by the health and safety rules and regulations
3. Complete the Coordination Access Assessment - If the participant has not already done so, or if their assessment is not current, all participants must complete the Coordinated Access Assessment after 30 days of entry into the shelter. The shelter program will ensure a case manager, or a housing navigator is available after 30 days of entry into the shelter to complete the assessment.

Shelter Participation Agreement Form

Participation Agreement Date:
Participant Name:
Provider Official Name:
Shelter Program Name and Location:

The primary purpose of **emergency shelter** is to provide a **temporary shelter** for those experiencing homelessness including specific populations, such as women, children, and the elderly.

This agreement is between the above-named Participant and the above-named shelter program provider.

The **[Shelter Program Name]** agrees to work in partnership with **[Participant Name]** by providing emergency shelter and support geared towards ending homelessness.

1. **[Shelter Program Name]** will provide emergency shelter and case management for a period of 1-30 days aimed at assisting Participants with rapidly exiting shelter.
2. Within 3 days of entry into the shelter, the Participant will meet with the case manager to develop a housing plan.
3. Participants are expected to meet with their case manager at least twice per month to work on a housing plan.
4. After 31 days, Participants must meet with their case manager to complete the Coordinated Access Assessment to assist with access to housing options.
5. After each 30-day interval, the Participant will need to meet face to face with the case manager to discuss the housing plan and work towards obtaining permanent housing.
6. The Participant and the case manager will meet in person to review the housing plan in detail at least quarterly.
7. The Participant must work with a housing navigator to collect the necessary documentation to complete the navigation process within 60 days of entry into the shelter.
8. If applicable, the Participant will complete their application for Temporary Cash Assistance (TCA), food stamps, and other entitlement benefits within 30 days of entry.
9. The Shelter Program will provide the participant with information about relevant

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supportive services including, but not limited to children, participants with disabilities, protective service needs, disabilities, and veterans.

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10. The Shelter Program will provide the participant with linkages and referrals for relevant services which include but are not limited to savings and financial education programs, medical, behavioral health (mental health and substance abuse), domestic violence, veteran, educational, and employment.

The **[Participant Name]** agrees to abide by the following requirements as a shelter resident:

1. To complete a coordinated access assessment after 30 days of enrollment in the emergency shelter.
2. To receive case management services to support transition to permanent housing.
3. To abide by all health and safety rules and regulations in housing. Failure to comply may result in termination and the participant barred from future shelter access. The following behaviors are prohibited in the shelter facility:
 - a. Fire related incidents (which includes smoking in the building, lighting matches, starting fires, etc.).
 - b. Physical violence to other participants or staff.
 - c. Sexual violence to other participants or staff.
 - d. Terroristic threats towards other participants that includes but is not limited to the following:
 - i. Cause a reaction that results in calling emergency services (911)
 - ii. Prevent or interrupt the use of a building, facility or meeting area
 - iii. Place the public in fear for their safety
 - iv. Influence the activities of the federal, state or local governments
 - e. Possession of a weapon on-site.
 - f. Destruction of housing property or the property of staff or other participants.
 - g. Possession, sale, use, or distribution of drugs and alcohol on-site.
 - h. Illegal activity onsite (theft, sexual assault, stealing, etc.).
 - i. Persistent verbal abuse.
 - j. Refusing reasonable mandatory searches conducted by staff and/or security.
 - k. Repeated incidents of smoking in the facility.
4. To work with your case manager and other housing services providers to utilize housing services that identify housing offers.
5. Families with children: The parent(s) or guardian(s) agree to provide adequate and appropriate care and supervision for all children in their care.
6. Children must attend school on a daily basis.
7. Children under 18 cannot be left unsupervised in the shelter.
8. To provide advance notice regarding the need for overnight absence from the shelter program and, where applicable, provide documentation to the shelter provider verifying the visit (i.e. documentation from the hospital, court orders, etc.).

Please note that the behaviors/policies listed in this document are to protect the health and

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safety of all participants in the facility. Participants who do not follow the listed processes may receive termination or discharge from the shelter facility.

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Participant Rights

All participants in shelter programs have the following rights:

1. To file a grievance using the established Participant Grievance Requirements as established in the [CoC and ESG Written Standards](#).

☐ Participant has received a copy of the Participant Grievance Policy and Form

2. To be treated with respect and dignity.
3. To receive all assessments that will facilitate the placement into permanent housing.
4. To be informed of Shelter Participant Rights

1. To not be charged a fee to reside in a shelter.

5. To receive all services for which they are eligible.

6. To receive reasonable accommodation and/or modification if you are living with a disability.

☐ Participant has received a copy of the Reasonable Accommodation/Reasonable Modification Policy and Request Form (found in the CoC and ESG Written Standards)

I hereby acknowledge that I have received the participation agreement and have had the opportunity to discuss the program's rules and expectations.

Participant Name
Date

Participant Signature

Provider Name
Date

Provider Official Signature

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Shelter Resident Service Plan Template

Participant Name: _____

Today's Date: _____

Shelter Intake Date: _____

Shelter Name Date: _____

Case Manager Name: _____

Contact Information: _____

PURPOSE OF THIS SERVICE PLAN

This service plan is intended to prepare the client for housing sustainability and self-sufficiency and focusing on identifying possible housing resources through rapid resolution and diversion efforts during the initial 30 days of shelter stay. This plan is aimed at ensuring that the participant has the necessary resources and support systems in place to either exit the shelter or transition to permanent housing with minimal disruption.

For clients that have been enrolled in the shelter for longer than 30 days, long term goal planning is required along with completion of the Coordinated Access Assessment.

SMART Goals: Goals developed should be specific, measurable, achievable, realistic, and timebound.

Housing Goals:

1. **(Short-term goal)** For all clients, please identify 1-3 short term goals to secure temporary or permanent housing through rapid resolution from emergency shelter (e.g., family, friend, or community housing).

a.

b.

c.

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2. **(Long-term goal)** For clients that have been residing in the shelter for longer than 30 days, please identify 1-3 long term goals to secure, stable, and permanent housing.

- a.

- b.

- c.

3. **(Ongoing goal)** For all clients, please identify 1-3 ongoing goals that will support housing sustainability and avoid future shelter stays.

- a.

- b.

- c.

Income Goals:

1. **Increase income through employment, earned income, or entitlement benefits such as TCA/Food Stamps, SSI and etc.:** For all clients, please identify 1-3 income related goals or action steps that can be taken to increase income/access benefits

- a.

- b.

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c.

Financial Stability: For all clients, please identify 1-3 goals that will assist with achieving financial stability (for example: Apply for rental assistance programs or subsidies to secure long-term affordability)

a.

b.

c.

Resources/Referrals: For all clients, please list any resources shared or referrals made to support the client's overall housing goals and connections for additional services while working on goal setting.

Next Review and Plan Update (Date/Place):

- Date: _____
- Location: _____

Signatures

Participant Signature: _____

Date: _____

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Case Manager Signature: _____

Date: _____

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Involuntary Discharge Policy

Program participants being involuntarily discharged due to reasons other than violence or threatening behavior must receive written notice from the program at least 30 days in advance. The written notification must include the anticipated discharge date, rationale for the discharge, how the participant can appeal the discharge date, and who may be available to assist them in an appeal, such as a legal services organization.

In reviewing involuntary discharge decisions, consideration should be given to mitigating circumstances of the household, such as disability, culpability, the seriousness of the case, whether the reason for discharge can be cured, and the effects of termination on family members.

Some examples of reasons that could lead to discharge are listed but not limited to the items below:

- Exhibiting behavior that is disruptive and/or threatening to others.
 - Examples include: verbal, physical, or sexual harassment, threats and/or violent behavior, nudity, etc
- Excessive damage to facility, common area or building
- Smoking outside of designated areas
- Possession of a weapon(s)
- Possession, use, or distribution of alcohol or illegal drugs

The program must provide individuals served with a written agreement that specifies the rights and responsibilities of participants as well as the program's. The written agreement includes the time limits in the program, program recertification/reassessment processes, and other important information on participation in CAS.

Shelter Participants who wish to file a grievance may do so using the grievance procedure outlined in the Participant Grievance Requirements within the CoC and ESG Written Standards.

Youth Shelters

The Baltimore City Continuum of Care recognizes that minors experiencing homelessness without a parent or guardian and unhoused young adults ages 18 to 25 have unique needs related to emergency shelter. While this full Standards of Care applies to shelters for minor youth and young adults, the following additional standards are intended as a supplement to address these unique needs.

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Youth shelters must develop, implement, and document inclusive outreach strategies, including efforts to connect with Trans and LGBTQIIA+ youth, unhoused youth who are staying outside or in places not meant for human habitation, and youth with disabilities.

All supportive services offered by youth shelters must be voluntary, developmentally appropriate, and actively affirming of LGBTQIIA+ youth. In addition to the supportive services list, youth shelters serving minors and/or young adults must offer the following supports, whether directly or through partnership or contractual agreement with other providers:

- Life skills training, including but not limited to financial literacy, household maintenance, food preparation, self-care and hygiene, personal skills, relationships, parenting, communication and conflict management, etc.;
- Youth-centered, culturally responsive, and equitable mental health services;
- Family reunification and family finding support, as appropriate, including supports to enable youth to live with chosen family;
- Transportation support, including but not limited to subsidizing public transit, such as providing weekly or monthly bus passes, and providing assistance with transit navigation;
- Systems navigation, such as support navigating legal, child welfare, education, health care, housing, and public benefits systems;
- Assistance obtaining vital records and identification.

In addition to the staff training listed on page 6, youth shelter staff must receive training on the following topics:

- Adulthood and positive youth development;
- Education rights pursuant to the federal McKinney-Vento Act;
- Legal rights of, and community resources available to, minor youth, including minors who are not in the physical custody of a parent or guardian;
- Human trafficking;
- Supporting pregnant and parenting youth; and
- Workforce development programs for youth and young adults, including paid apprenticeship programs.

Youth experiencing homelessness are experts on their own experiences and needs. Youth shelters in the Baltimore City CoC must provide meaningful opportunities for youth to give feedback and participate in decision-making regarding, but not limited to, program design, services, policies and rules, and hiring. Youth shelters are encouraged to hire peer staff and to compensate former residents and other currently or formerly homeless youth for participating on the organization's board of directors or advisory boards.

Youth shelters must provide 24-hours access to shelter facilities for residents.

For instance, shelters may not exclude youth from the premises because they missed

curfew or require them to leave shelter premises during certain hours. Shelters are strongly encouraged to incorporate a no-barrier drop-in center into their programming, to serve the broader community of unhoused youth not residing at the shelter.