

**WESTERN PA CONTINUUM OF CARE  
COC PROGRAM OPERATING STANDARDS  
Approved by CoC Board, 10/5/16**

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**In accordance with the Continuum of Care Regulations (24 CFR, Part 578); policies and requirements referenced in HUD's annual Notice of Funding Availability (NOFA); and best practices for serving individuals and families experiencing homelessness, the following standards must be implemented by all CoC-funded projects.**

- In accordance with HUD's requirements for operating Continuums of Care (§ 578.7) and the required agreements of CoC-funded projects (§ 578.23 (c)), CoC-funded projects must:
  - Attend semi-annual CoC meetings.
  - Participate in subcommittees and ad-hoc work groups.
  - Participate in the CoC's Homeless Management Information System (HMIS) in accordance with the HMIS privacy, security and data quality plans. Domestic violence programs must enter data into an HMIS-equivalent system and provide non-identifying data to the CoC upon request.
  - Participate in the annual point-in-time count, including participation in the unsheltered count if needed.
  - Evaluate and report project outcomes. Projects that do not meet an expected threshold will be required by the CoC to develop and implement a Quality Improvement Plan.
  - Participate in the CoC's Coordinated Entry System. This includes consistently following the CoC's written standards for providing Continuum of Care assistance, including the minimum requirements set forth in § 578.7(a)(9), and use a single prioritized waiting list.
  - Submit annual application for project funding to the CoC, in compliance with the CoC's timeline, for submission to HUD.
  - Take the educational needs of children into account when families are placed in housing and to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education.
    - In addition, CoC-funded projects are required to ensure educational enrollment among all children and youth experiencing homelessness, including school and early childhood education enrollment, connections to appropriate services in the community, and information about rights under the McKinney-Vento Education Act.
- In accordance with the annual CoC NOFA and identified effective practices, the CoC requires all CoC-funded projects to operate in accordance with a Housing First approach. Service delivery should be client-centered and culturally competent.
- CoC-funded projects must follow § 578.73 Matching requirements.
- CoC-funded projects must follow § 578.75 General operations, including: State and local requirements such as building codes; Housing quality standards; ensure the

unit is a suitable dwelling size. In addition, all projects not exempt are required to complete an environmental review per § 578.31.

- CoC-funded projects must follow § 578.75 General operations (g) Participation of homeless individuals.
  - (1) Each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part. This requirement is waived if a recipient or subrecipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.
  - (2) Each recipient and subrecipient of assistance under this part must, to the maximum extent practicable, involve homeless individuals and families through employment; volunteer services; or otherwise in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project.
  
- CoC-funded projects must follow § 578.77 Calculating occupancy charges and rent.
  
- CoC-funded projects must follow § 578.87 Limitation on use of funds (b) Faith-based activities.
  
- CoC-funded projects must follow § 578.91 Termination of assistance to program participants.
  - (a) Termination of assistance. The recipient or subrecipient may terminate assistance to a program participant who violates program requirements or conditions of occupancy. Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same individual or family.
  - (b) Due process. In terminating assistance to a program participant, the recipient or subrecipient must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:
    - (1) Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
    - (2) Written notice to the program participant containing a clear statement of the reasons for termination;
    - (3) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
    - (4) Prompt written notice of the final decision to the program participant.
  - (c) Hard-to-house populations. Recipients and subrecipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases.
  
- In accordance with § 578.93 Fair Housing and Equal Opportunity, CoC-funded projects must follow:

- (a) Nondiscrimination and equal opportunity requirements. The nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) are applicable.
- (b) Housing for specific subpopulations.
- (c) Affirmatively furthering fair housing. A recipient must implement its programs in a manner that affirmatively furthers fair housing, which means that the recipient must:
  - (1) Affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities;
  - (2) Where a recipient encounters a condition or action that impedes fair housing choice for current or prospective program participants, provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan; and
  - (3) Provide program participants with information on rights and remedies available under applicable federal, State and local fair housing and civil rights laws.
- (d) Accessibility and integrative housing and services for persons with disabilities. Recipients and subrecipients must comply with the accessibility requirements of the Fair Housing Act (24 CFR part 100), Section 504 of the Rehabilitation Act of 1973 (24 CFR part 8), and Titles II and III of the Americans with Disabilities Act, as applicable (28 CFR parts 35 and 36). In accordance with the requirements of 24 CFR 8.4(d), recipients must ensure that their program's housing and supportive services are provided in the most integrated setting appropriate to the needs of persons with disabilities.
  - All provider organizations are expected to promote participant choice in (1) the provision of services and (2) ensure the location of housing.
  - Provider organizations are expected to coordinate and collaborate when a participant moves from one program to another or when more than one program is serving the same participant.
- (e) Prohibition against involuntary family separation. The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives funds under this part.
  - See HUD FAQ # 1529, which is relevant to this requirement.  
<https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included/>
- CoC-funded projects must follow HUD's Equal Access to Housing
  - On September 21, 2016, HUD published a final rule in the Federal Register entitled "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs." Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity in programs and shelter funded under programs administered by HUD's Office of Community Planning and Development (CPD). This rule builds upon HUD's February 2012 final rule entitled "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity" (2012 Equal Access Rule), which aimed to ensure that HUD's housing programs would be open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.
  - Equal Access in Accordance with Gender Identity Final Rule – 2016
    - <https://www.hudexchange.info/resources/documents/Equal-Access-Final-Rule-2016.pdf>
  - Equal Access to Housing Final Rule – 2012

- [https://www.hudexchange.info/resources/documents/EqualAccess\\_FinalRule\\_2.3.12.pdf](https://www.hudexchange.info/resources/documents/EqualAccess_FinalRule_2.3.12.pdf)
- CoC-funded projects must follow HUD Notice CPD-15-02: Appropriate Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities, which provides guidance to Emergency Solutions Grants (ESG), Continuum of Care (CoC), and Housing Opportunities for Persons With AIDS (HOPWA) funded providers on how best to provide shelter to transgender persons in a single-sex facility and on appropriate and inappropriate inquiries related to a potential client’s sex for the purposes of placing transgender persons in temporary, emergency shelters, or other facilities with shared sleeping areas or bathrooms.
- CoC-funded projects must follow § 578.95 Conflicts of interest.
- CoC-funded projects must follow § 578.103 Recordkeeping requirements, as well as the recordkeeping recommendations of HUD CPD Notice 16-11 regarding: Evidence of Severe Service Needs; Evidence that the Recipient is Following the CoC’s Written Standards for Prioritizing Assistance; and Evidence that there are no Households Meeting Higher Order of Priority within CoC’s Geographic Area.
- CoC-funded projects are expected to adhere to all additional program requirements within the CoC regulations (24 CFR Part 578), as well as new requirements mandated by HUD and the Western PA Continuum of Care.

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Organization Name: \_\_\_\_\_

Project Name: \_\_\_\_\_

Project Manager – Name: \_\_\_\_\_

Project Manager – Contact information: \_\_\_\_\_

My signature below acknowledges that I have received and reviewed these CoC Program Operating Standards and understand the expectations of HUD and the Western PA Continuum of Care for operating my CoC-funded project.

\_\_\_\_\_  
Signature of Project Manager

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Executive Director

\_\_\_\_\_  
Date