Western PA CoC Written Standards Training 2021: Standards for All Projects

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Learning Objectives

- Establish an understanding of what is included in the written standards, which standards pertain to your programs, how the document is structured and a timeline for implementation

- Relate the written standards to your work as homeless programming providers to ensure that you can recognize how implementation affects recordkeeping, staffing, and case management

- Identify where to find more information about the standards and suggested best practices

- Provide a high-level training which can be referred to or shared with new staff so that standards may be applied consistently in your organization

Structure of Written Standards

- Standards for all project types
  - Includes recordkeeping and case management standards
- Standards by project type – specific standards that must be followed if you are operating PSH, RRH, etc.
  - *These will not be covered today. Separate, short recordings will be provided covering each project type.*
- Appendices
- Templates – separate document. Not required, but available as a resource

What are the Written Standards?

- Provide guidance for CoC and ESG programs related to service delivery

- Ensure that all programs are operating in a consistent, coordinated way that is compliant with HUD and CoC standards

- Required by HUD

Who needs to follow the Written Standards?

- All CoC and ESG funded programs

  - Emergency Shelter, Transitional Housing, Rapid Rehousing, Permanent Supportive Housing, Supportive Services Only (including Coordinated Entry), Street Outreach, Homeless Prevention

- Other programs not funded by CoC and ESG are encouraged to follow the standards

What is the timeline for implementing the updated Written Standards?

- Most requirements in the standards are not new, and programs should already be implementing them

- **For any new requirements that your program is not already implementing**: Full implementation of Written Standards by September 1st, 2021

Standards for All CoC- and ESG-Funded Programs

Applications

CoC projects

submit annual renewal application for project funds to CoC

ESG projects

non-renewable/submit applications according to DCED process

Conflict of Interest

CoC projects and ESG projects must follow HUD guidance related to:

- Procurement

- CoC Board

  - may not be involved in discussion around their own agency funding

- Personal financial gain from HUD activities

Coordinated Entry Participation

- May only accept referrals and fill vacancies using CE By Name List:

  - CoC funded TH, RRH, and PSH

  - ESG RRH

- Projects must follow the CE Order of Priority

CoC Participation

- CoC recipients should participate in:
    - Semi-annual CoC meetings
    - RHAB/Collaborative meetings
    - Required CoC trainings
- ESG recipients encouraged to participate

Diversion

All Projects (especially CE and ES) should explore all options prior to enrolling a household into the homeless system

- strengths-based problem-solving conversations

- identifying community supports

- offering lighter touch solutions

Enrollment

- Enrollment should be based on eligibility and CE prioritization

- NOT other factors such as residency

Environmental Review

- CoC - environmental review required (unless exempt)

  - **Helpful chart:** https://files.hudexchange.info/resources/documents/CoC-Program-Environmental-Review-Flow-Chart.pdf

- ESG - some level of environmental review and clearance required (unless exempt)

  - **Helpful chart:** https://files.hudexchange.info/resources/documents/Levels-of-Environmental-Review-for-ESG-Components-Matrix.pdf

Faith-Based Activity

Faith-based orgs may:

- Receive federal funds and continue to carry out its mission

- Use facility space (including sanctuary, chapel, prayer hall) to carry out activities under federal program without removing religious art, icons, scriptures, or other religious symbols

- Offer religious activities

  - Must be offered separately, in time or location, from federally funded activities, and participation must be voluntary for program participants

Faith-Based Activity

Faith-based orgs may not:

- Use federal funds for explicitly religious activities

- Discriminate against a client or potential client on the basis of religion, religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice

Fair Housing and Equal Access - Key Requirements

All projects should have written policies that align with the following:

- Prohibit discrimination in housing on the basis of Race, Color, National origin, Religion, Sex, Familial status, Disability

- Transgender persons in single-sex programs must be ofdered placement according to their gender identity

- Housing and services should be provided in the most integrated setting possible

Fair Housing and Equal Access - Key Requirements (continued)

All projects should have written policies that align with the following:

- Persons with disabilities may be entitled to reasonable accommodations/ modifications

- Agencies should have a complaint procedure for clients to report discrimination

Knowledge Check 1

Which of the following statements is FALSE?

A. Transgender persons should be offered placement in housing according to their gender identity

B. CoC and ESG RRH programs must fill all program vacancies from the By Name List

C. Faith-based programs may require participants to attend religious services

D. CoC Board members may not be involved in discussion around their own agency funding

HMIS Participation

- All projects (except DV) must enter data into PA HMIS accurately and timely (within 7 days)

- DV projects must use DV comparable database

Homeless Participation

- **CoC and ESG:** Each recipient must have minimum of 1 homeless or formerly homeless individual on board of directors (or equivalent policymaking body)

  - ESG: Except state agencies

  - CoC: This also applies to sub-recipients

- **All:** As much as possible, 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

Households with Children

For projects that serve households with children:

- Must take the educational needs of children into account when families are placed in housing and as much as possible, place families with children as close as possible to their school of origin

- A staff person must be designated as the educational liaison (ensure that children are enrolled in school and connected to appropriate community services)

- Cannot deny assistance or separate members of a family based on gender or age

- 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

Inspections

Rental Housing must meet minimum standards:

- CoC: Housing Quality Standards

- ESG: Minimum Habitability Standards

Limited English Proficiency

Programs should take steps to ensure meaningful access by individuals with Limited English Proficiency, regardless of the language spoken

- Could include providing language assistance services, including oral and written translation, where necessary

Matching Funds

- CoC requires 25% match (except for leasing dollars) - cash or in-kind

- ESG projects should follow guidance from their contract year

Performance Measures

Projects should all work toward the CoC's Performance Goals, including:

- Reducing length of time homeless

- Reducing returns to homelessness

- Increasing Income

- Exiting to permanent housing

- High quality data entry in HMIS

Point in Time Count Participation

Projects must participate in the annual PIT Count, including participation in unsheltered count if needed

Knowledge Check 2

Fill in the Blank *(in the Chat Box):*

Projects should enter data into HMIS within _____ days.

Pulse Check 1

If your program serves households with children, does your program have a staff person who is designated as the educational liaison that will ensure that children are enrolled in school and connected to appropriate community services?

- Yes

- No

- Not Sure

- N/A - my program does not serve households with children

Prioritization

- CoC and ESG funded housing projects must follow the CoC's Order of Priority when filling vacancies

- You can find the specific prioritization for your project type in the standards

- In general, households are prioritized based on a combination of:
  - Chronic status (all CoC funded PSH projects are chronic-dedicated)
  - Severity of needs, as indicated by VI-SPDAT score
  - Length of time homeless

Project Evaluation

- Projects should be evaluating and reporting on project outcomes

- CoC may require a Quality Improvement Plan if projects not meeting expectations

Termination

- Projects should have a formal procedure for terminating assistance

- Eviction by landlord in scattered site should not automatically result in termination from program

- Assistance is terminated in only the most severe cases. Every effort should be made to allow participant to remain in project

Termination

- Should follow a Housing First Approach

- Termination does not prevent future assistance

- Termination should not result in a return to homelessness (should be referred for other services)

Possible Reasons for Termination

Termination *will* occur if participant:

- Is institutionalized or incarcerated for 90 days or more (PH Projects only)

- Moves out of the service area

- Voluntarily exits the project

- Passes away

- In most severe cases (violence, significant safety risk), termination may be immediate

Possible Reasons for Termination

Termination *may* occur:

- Participant has moved out of their unit and the project is unable to make contact with the participant(multiple attempts should be made to contact)

- Participants who repeatedly and/or seriously violate project rules or conditions

  - This should focus on safety-related violations.

  - Agency should document reasonable efforts and interventions to support participant and prevent termination

Termination Procedures

Must have a formal (written) process that should include the following:

- Participant provided with a written copy of project rules and the termination process before the participant begins to receive assistance

- Provide written notice to the participant containing a clear statement of the reasons for termination

Termination Procedures (continued)

Must have a formal (written) process that should include the following:

- 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

- Prompt written notice of the final decision to the Project participant

Transfers

Emergency Transfers due to Domestic Violence, Dating Violence, Sexual Assault or Stalking

- Must allow participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the participant's current unit to another unit

- If a different unit is not available within your own program, CoC/ESG providers will work with the Western PA CoC's CES to enact an emergency transfer

Transfers

Transfers between projects within the same project model (e.g., PSH to PSH)

- When a current household must transfer to another Project within the same Project model (e.g., PSH to PSH), the provider should prioritize the household for resources operated by/available through their own organization

- If the provider cannot transfer the client internally, they should complete a Transfer Request Form (see appendix)

Transfers

Transfers from one project model to another (e.g., RRH to PSH)

- In a situation where a participant needs a higher level of care than what is available in RRH program, a transfer to more intensive service (such as PSH) may be needed

- Project transfers may be made from RRH to PSH so long as the household meets the eligibility criteria

- All transfers from one project model to another must begin with the completion of the **Transfer Request Form**

Knowledge Check 3

True or False:

If an RRH or PSH participant is evicted from their unit by their landlord, the program can automatically terminate them.

Pulse Check 2

My program has a formal written termination procedure.

- Yes, and we consistently follow it

- Yes, but we do not always follow it

- Not Sure

- No

Record Keeping Requirements for All Programs

Financial Recordkeeping

- Documentation of all costs charged to the grant

- Documentation that funds were spent on allowable costs

- Documentation of the receipt and use of project income

- Documentation of compliance with expenditure limits and deadlines for expenditure

- Retain copies of all procurement contracts as applicable

- Documentation of amount, source and use of matching resources

Financial Recordkeeping: Record Retention

- In general, all records should be retained for 5 years after the expenditure of all funds related to the grants

- Retention period is longer for acquisition, rehabilitation new construction, renovation*, conversion*:

  - ESG 10 years

  - CoC 15 years

*HUD had some specific language about this (see citations in Standards)

Participant Recordkeeping (part 1)

- CE Participation

- General Eligibility (program eligibility)

- Housing/Homeless Status

  - Third-party verification preferred

- Goal Plans/Housing Stability Plans

- Informed Consent/Confidentiality (including HMIS Consent)

Participant Recordkeeping (part 2)

- Income Documentation

  - Income should be verified through bank statements, award letters and/or recent paystubs when possible. When this is not possible, a letter from the employer, stating wages, will also suffice.

  - If no way to verify income, can use Self-Declaration of Income Form

- Termination

  - Provide participant w/ written copy of project rules, written notice re: termination, review of decision if requested, prompt written final notice

Knowledge Check 4

True or False:

If a participant cannot provide third party income documentation, they are not eligible for a CoC or ESG funded program.

Case Management Standards for All Programs

Job Description and Duties (part 1)

Typical case management duties:

- Development of Housing Stability Plan (led by client)

- Creative problem solving

- Linkage to benefits and community based services

- Help households address housing barriers

- Collect required documentation

Job Description and Duties (continued)

Typical case management duties:

- **Scattered Site:** Housing location, lease negotiation, determine rent reasonableness, inspection

- **SSO, ES and TH:** Assist households to identify permanent housing options

Principles of Case Management

Person-Centered

Principles of Case Management

Housing-Focused

Principles of Case Management

Trauma-Informed Care

Principles of Case Management

Progressive Engagement

Principles of Case Management

Housing First

Housing First and Low Barrier Access

Housing First, not Housing Ready. Housing is the foundation to build on.

- Not screening out participants based on: substance use, completion of treatment, participation in services, poor credit or financial history, income, minor criminal convictions, or behaviors that indicate lack of "housing readiness"

- Service plans are client-driven

- Participation in services not a condition of staying in program*

- Use of drug and alcohol (without other lease violations) not considered reason for eviction by agency

Housing First and Low Barrier Access

Housing First, not Housing Ready. Housing is the foundation to build on.

- Prioritize those with highest need for services

- Use techniques like motivational interviewing

- Harm reduction philosophy: Addiction may be a part of a client's life; offering education regarding how to avoid risky behaviors and engage in safer practices

Frequency

- Depends on unique needs and situation of every participant.

- Typically CM should be in touch at least once a month (or more, depending on needs)

- Those receiving Rental Assistance and/or Financial Assistance will always be offered case management

Location/Timing

- Should occur at whatever location works best for client

- Timing should be flexible/based on client availability

Knowledge Check 5

Name one of the principles of case management *(in the chat box)*:

_____

Pulse Check 3

How is your program doing related to implementing the principles of case management?

- 5 - Very well: these principles guide how we run our program every day

- 4 - Pretty well: most areas are strong and a few areas of improvement

- 3 - Fair/Average: some areas are good but need improvement in several areas

- 2 - Needs Work: We need improvement in most areas

- 1 - Not well: we need to work on all areas

Next Steps

All programs watch recording for their specific project type no later than July 1st (links will be sent out/posted on website).

- All recordings less than 30 minutes

- Includes project-level standards around:

  ✓ Access

  ✓ Eligibility

  ✓ Prioritization

  ✓ Documentation

  ✓ Duration and Amounts

  ✓ Minimum Standards

  ✓ Case Management

  ✓ Performance Measures

Next Steps

- All CoC and ESG funded programs sign off by July 1st that their program(s) understand the standards, and will implement them: http://s.alchemer.com/s3/WS-Form

  - If there are standards that programs are not implementing, make a plan to implement those standards by Sept. 1, 2021.

- Feedback on the standards is welcome year-round: http://s.alchemer.com/s3/West-Written-Standards-Feedback

Questions?

● Email westerncoc@pennsylvaniacoc.org