

Appendix A: Summary of Findings and Recommendations

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Homebase’s recommendations for strengthening Eastern Pennsylvania CoC’s coordinated entry system are detailed in the evaluation. Additionally, they are presented here as a consolidated list with proposed prioritization to highlight areas for critical, important, and suggested opportunities for improvement and, within those categories, short-term, medium-term, and long-term strategies.

Critical Opportunities for Improvement

Short-Term Strategies

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
<i>Access, Prioritization, and Referral</i>	CES policies and procedures do not comply with HUD requirements related to system access and assessment.	Develop and implement a process to enable CES participants to file a nondiscrimination complaint and properly notify all participants of their rights.
<i>Assessment</i>	CES policies and procedures do not comply with HUD requirements related to system access and assessment.	Develop and implement policies establishing that the CES assessment process cannot require disclosure of specific disabilities or diagnosis.
<i>Prioritization and Referral</i>	CES policies and procedures do not comply with HUD requirements related to prioritization and referral.	Describe conditions under which participants maintain their place in CES prioritization lists when they reject referral options.

Medium-Term Strategies

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
<i>Access</i>	CES access points are inaccessible to households seeking housing and services in general and especially non-English speakers; the Central Valley and Lehigh Valley RHABs appear underrepresented on the by-name list.	Expand the CoC coordinated entry grant to hire more 211 staff and compensate non-211 access points. Prioritize bilingual staff for open positions.
<i>Access</i>	CES policies and procedures do not comply with HUD requirements related to system access and assessment.	Develop and implement a process to ensure access to emergency services during hours when CES processes are not operating.
<i>Prioritization and Referral</i>	CES policies and procedures do not comply with HUD requirements related to prioritization and referral.	Consult with legal counsel regarding its use of familial status, intellectual and developmental disability, and physical and behavioral health challenges as prioritization criteria.

Element	Finding	Recommendation
<i>Prioritization and Referral</i>	<p>Adult-only households with disabilities wait longer for permanent housing than those without disabilities, and people with higher VI-SPDAT scores are no more likely to access permanent housing through coordinated entry than people with lower scores.</p>	<p>Design and implement a uniform and coordinated referral process for all beds, units, and services available at participating projects whereby, for example:</p> <ul style="list-style-type: none"> • Housing programs track capacity and anticipated vacancies in HMIS, and eligibility requirements are tracked and updated in HMIS (alternatively, in a spreadsheet). • Regional Managers are responsible for sending referrals via HMIS to fill anticipated housing program vacancies based on the coordinated entry prioritization policy and program eligibility requirements. • Housing programs are required to respond to every referral in HMIS, and coordinated entry policies specify a limited set of reasons that warrant a referral denial, such as: <ul style="list-style-type: none"> ○ Client could not be located ○ Client declined services ○ Client is ineligible ○ Client is housed ○ Client is working with another housing program ○ Client is banned at agency/program ○ Client is incarcerated ○ Client is deceased ○ Other reasons, as needed/identified by the CoC • In cases where a referral is denied, housing programs are required to enter a referral denial reason (set up as a standard drop-down menu in HMIS) and may provide a message (set up as a comment field) to support more appropriate future referrals for the household. • Regional Managers are empowered by coordinated entry policy to monitor referral denials to ensure that housing programs are screening in vulnerable households, and referral denial rates and reasons are considered in evaluating funding applications. • Targeted technical assistance is provided to permanent housing programs to build capacity and support them in lowering barriers and implementing Housing First, as needed.

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
<i>System Governance and Management</i>	Coordinated entry governance should be restructured to clarify roles and responsibilities, open lines of communication and collaboration, and empower partners to effectively carry out their duties.	<p>Consider redesigning the coordinated entry governance structure as follows:</p> <ul style="list-style-type: none"> Regional Managers are responsible for making and monitoring referrals to permanent housing programs and are granted the authority to monitor referral denials, push back where appropriate, escalate issues to the Coordinated Entry Manager for support as needed, and address discrimination complaints. Regional Managers meet weekly to case conference and troubleshoot issues related to system operations. The Coordinated Entry Manager trains Regional Managers and assessors, coordinates Coordinated Entry Committee and Regional Manager meetings, monitors assessment score distributions across RHABs and access point agencies, and supports Regional Managers in addressing referral rejections as needed. The Coordinated Entry Committee meets monthly to review coordinated entry system performance and address workflow and policy issues. The Committee has the authority to revise policies and procedures that do not fundamentally alter the core design of the system. The Committee includes the Regional Managers, the Coordinated Entry Manager, 211 and non-211 access point representatives, shelter representatives, and supportive housing program representatives. The CoC Board is responsible for overseeing major system changes, e.g., assessment overhaul (not minor edits), changes in prioritization criteria, changes in releases of information. The Board includes the Coordinated Entry Manager and two Regional Manager representatives.

Long-Term Strategies

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
<i>Assessment</i>	VI-SPDAT score distributions were significantly different when comparing across agencies, regions, and assessors, and assessments administered by 211 agencies had significantly lower scores than those administered by non-211 access points.	Consider integrating housing problem solving into coordinated entry. Provide housing problem solving services as the first step in the access and assessment workflow to support households in resolving their housing crises. Even where housing problem solving is unsuccessful in identifying a temporary or permanent housing solution, it can be a powerful way to build trust and rapport with households before administering the coordinated entry assessment.

Element	Finding	Recommendation
<p><i>Prioritization and Referral</i></p>	<p>Only 17% of households placed on the by-name list wind up enrolling in permanent housing. A significant number of households simply time out from the list per the CoC policy and are removed despite their continued need for assistance.</p>	<p>Consider integrating housing problem-solving into coordinated entry to support households in identifying choices and solutions to quickly end their housing crisis and preserve emergency shelter beds and supportive housing resources for households who have no alternative options. Consider the following resources and examples: Innovative Practices in Housing Problem-Solving, Tracking Dynamic Housing Problem Solving Conversations, and Santa Clara County Continuum of Care Housing Problem Solving Guidelines.</p> <ul style="list-style-type: none"> • Train (on an ongoing basis) 211 and non-211 access point staff, shelter staff, and diversion program staff in housing problem solving techniques, including how apply motivational interviewing to have creative conversations that support participants in identifying and leveraging household strengths, support networks, and other resources in overcoming barriers to housing stability and identifying potential solutions to their housing crisis. Train staff to serve as mediators to assist households in having difficult conversations with individuals in their support network, such as friends and family, employers, debt collectors, and landlords. • Set up a flex fund accessible by access points and shelters to provide limited financial assistance for solutions that require monetary support, such as: <ul style="list-style-type: none"> ○ Move-in costs, including deposit and first month’s rent, moving supplies, the cost of a moving truck, and storage ○ Rental application fees and payments for background and credit checks ○ Fees for securing identification documents, birth certificates, and social security cards ○ Transportation, including bus tickets for both local transport and to facilitate relocation to verifiable, safe housing out-of-the-area, car repair for ending homelessness (e.g., for travel from temporary/permanent housing to school/work ○ Previous housing debt/rental arrears if resolving will facilitate an immediate housing placement ○ Utility deposits and arrears needed to secure housing ○ Certifications or license fees related to employment ○ Household expenses such as groceries or cleaning supplies ○ Fees for temporary childcare or other children’s activities

Important Opportunities for Improvement

Short-Term Strategies

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
<i>Assessment</i>	VI-SPDAT score distributions were significantly different when comparing across agencies, regions, and assessors, and assessments administered by 211 agencies had significantly lower scores than those administered by non-211 access points.	Consider requiring ongoing assessment training (e.g., annual refreshers with brief check-ins between trainers and assessors) and include training on trauma-informed communication.
<i>System Governance and Management</i>	Data quality is too poor to conduct an analysis of system equitableness.	Implement a data quality management process , prioritizing HUD Universal Data Elements and including training and targeted technical assistance to address data timeliness, completeness, and accuracy among access point agencies, shelter staff, and other CoC partners.
<i>System Governance and Management</i>	There is a desire among CoC partners for more open conversations about system performance.	Provide regular updates on data related to the functioning of coordinated entry through committee and case conferencing meetings, public dashboards, and/or other channels. <ul style="list-style-type: none"> • Highlight success in areas such as number of referrals and housing stability of persons connected to housing programs via coordinated entry. • Provide data regarding referral rates (consider breaking down by VI-SPDAT score) and timelines to access point agencies to support them in setting clear expectations with clients.

Medium-Term Strategies

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
<i>Access</i>	CES policies and procedures do not comply with HUD requirements related to system access and assessment.	Develop and implement procedures documenting steps taken to ensure access points are accessible to individuals with disabilities.
<i>Access</i>	CES policies and procedures do not comply with HUD requirements related to system access and assessment.	Develop and implement procedures documenting steps taken to ensure effective communication with individuals with disabilities.

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
<i>Assessment</i>	CoC partners are concerned that the VI-SPDAT is biased and re-traumatizing and that it does not capture vulnerability in an accurate manner as fear, stigma, and cultural norms prevent people from responding openly to the invasive and sensitive questions.	Partner with persons with lived experience of homelessness to develop and pilot alternative formulations of assessment questions to minimize re-traumatization and more effectively identify conditions and experiences affecting vulnerability.

Long-Term Strategies

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
<i>Access</i>	CES access points are inaccessible to households seeking housing and services in general and especially non-English speakers; the Central Valley and Lehigh Valley RHABs appear underrepresented on the by-name list.	While expansions in system access are recommended across all regions, the CoC might consider making targeted future investment in Central Valley and Lehigh Valley access points to address inequities between RHABs.
<i>Assessment</i>	VI-SPDAT score distributions were significantly different when comparing across agencies, regions, and assessors, and assessments administered by 211 agencies had significantly lower scores than those administered by non-211 access points.	Monitor VI-SPDAT score distributions by assessment type, prioritizing review of scores from agencies that administer the most assessments, to identify inconsistencies. Access point agencies should consider monitoring the distributions of scores by assessor while the CoC should consider monitoring the distribution of scores by region and agency. When irregularities immerge, communicate with agencies and staff to identify reasons why assessments may not fit a normal distribution or be different than neighboring agencies. Provide training and targeted technical assistance as needed.
<i>Prioritization and Referral</i>	Only 17% of households placed on the by-name list wind up enrolling in permanent housing. A significant number of households simply time out from the list per the CoC policy and are removed despite their continued need for assistance.	Consider redesigning the prioritization criteria so that only households that are guaranteed to be referred within 90 days are placed on the by-name list, e.g., by setting an assessment score floor for inclusion on the list. Provide a warm hand-off to shelter and diversion programs trained in housing problem solving for those households that do not score high enough to be prioritized for permanent housing programs.
<i>System Governance and Management</i>	CoC Board membership should strive to be reflective of the communities that the CoC serves – both in terms of race and ethnicity but also lived experience of homelessness.	As a CoC, define the identities and experiences that the CoC Board should represent and revise the Governance Charter to include a diversity mechanism to meet these goals. <ul style="list-style-type: none"> Some principles to help start this process include:

Element	Finding	Recommendation
		<ul style="list-style-type: none"> ○ Develop a membership profile chart that defines and tracks what special skills and qualities the Board will require of its members (see here for an example on pp. 7-8) ○ Ensure readability and accessibility of materials and communications ○ Determine who is making decisions about recruitment (current members, a sub-committee, the chairs, someone else?) and standardize this process. Consider building a standard rubric (e.g., CoC Board Rubric) ○ Acknowledge and address bias in the selection process. ● Homebase has also identified and recommends the following resources: <ul style="list-style-type: none"> ○ “Equity, Diversity and Inclusion in Recruitment, Hiring and Retention,” Desiree Williams-Rajee, Kapwa Consulting (2018). Prepared for Urban Sustainability Directors Network (USDN). ○ “Equity in Recruiting, Selecting and Retaining New Members.” (n.d.). Homebase. ○ “Toolkit for Employing Individuals with Lived Experience Within the Public Mental Health Workforce.” (2014). Working Well Together. ○ “Using Outreach to Increase Access.” (n.d.) Community Toolbox.

Suggested Opportunities for Improvement

Short-Term Strategies

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
<i>Prioritization and Referral</i>	Getting in touch with households that have been identified through coordinated entry can be difficult.	Develop a more comprehensive approach for collecting contact information, including various emergency and back-up contacts.
<i>Prioritization and Referral</i>	Getting in touch with households that have been identified through coordinated entry can be difficult.	<p>Develop a list of recommended strategies to support permanent housing staff in locating matched households by:</p> <ul style="list-style-type: none"> • Leveraging HMIS alerts, stored contact information, service histories, case notes, program exit destinations, etc. • Linking with outreach teams and other service providers • Visiting homeless hotspots • Making use of community contacts, such as GA case managers, medical social workers, homeless advocates, etc. • Making use of online correctional system resources, such as court public portals and inmate locator tools
<i>System Governance and Management</i>	System changes are very frequent, and it is challenging for CoC partners to keep up.	Release updates on a quarterly or biannually (rather than a rolling) basis. Provide a written summary of updates, live and recorded training (where applicable), and office hours to discuss changes.

Medium-Term Strategies

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
<i>Assessment</i>	VI-SPDAT score distributions were significantly different when comparing across agencies, regions, and assessors, and assessments administered by 211 agencies had significantly lower scores than those administered by non-211 access points.	Identify assessment strategies leveraged by agencies that have consistent VI-SPDAT score distributions to inform ongoing technical assistance, training, and policy updates.

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
System Governance and Management	Data quality is too poor to conduct an analysis of system equitableness.	If the CoC wishes to analyze the experience of a specific population, data must be captured for both the ingroup and the outgroup. For example, if the CoC wishes to analyze the pathway through the system for those fleeing domestic violence, every head of household who is enrolling in coordinated entry must be asked the domestic violence question and that data must be recorded for all regardless of gender, age, and household type.

Long-Term Strategies

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
Access	CES access points are inaccessible to households seeking housing and services in general and especially non-English speakers; the Central Valley and Lehigh Valley RHABs appear underrepresented on the by-name list.	Consider exploring the option of an online client portal to complete or revise assessments, upload documents, receive housing match notifications, and communicate and coordinate appointments with case managers.
Assessment	CoC partners are concerned that the VI-SPDAT is biased and re-traumatizing and that it does not capture vulnerability in an accurate manner as fear, stigma, and cultural norms prevent people from responding openly to the invasive and sensitive questions.	<p>Stay attuned to the national conversation, emerging ideas, and HUD guidance around coordinated entry prioritization and assessment approaches. There is no simple solution to this problem, but new ideas and concepts may emerge that provide a clearer path forward. Any system changes or redesign should be carefully analyzed and vetted by legal counsel to ensure full compliance with state and federal laws including Fair Housing. Notable developments in assessment and redesign efforts across the country include:</p> <ul style="list-style-type: none"> Allegheny County CoC worked with university researchers to develop an assessment process based on a predictive risk model to calculate the likelihood of three types of harmful events occurring in a person’s life if they remain unhoused over the next 12 months: a mental health inpatient stay, a jail booking and frequent use (4+ visits) of hospital emergency rooms. The process/tool assigns a risk score that is used in combination with history of chronic homelessness as part of the housing prioritization process. Hennepin County CoC has removed the VI-SPDAT from the coordinated entry process to prioritize households for permanent supportive housing and rapid rehousing openings solely based on disability status, chronically homeless status, and length of time

Element	Finding	Recommendation
		<p>experiencing homelessness. The CoC has also incorporated client choice into the housing match process by designing an assessment that estimates program eligibility, explains program and housing models (e.g., PSH, RRH, SROs, shared housing, on-site services, recovery focus), and poses questions regarding client preferences related to these options, housing location, accommodations related to health and disability, and any culturally specific services preferred by the client. The CoC is currently working to identify a series of questions to capture medical fragility to take the place of disability status as a prioritization criterium.</p> <ul style="list-style-type: none"> • <u>Chicago CoC</u> is piloting a six-question assessment designed by a CoC work group and testing various scoring options. Pilot assessment questions are: <ol style="list-style-type: none"> 1. Have you ever in your life, spent any amount of time in a juvenile or adult correctional facility, jail, prison, or detention center? 2. Growing up, did your family experience housing instability such as frequently moving due to financial reasons, living with other families, relatives, (also known as doubling up), living in a shelter, living in nightly or monthly rentals, or anything like that? 3. Have you ever been discriminated against because of your sexual orientation or gender identity? 4. Do you identify as a Black, Indigenous/Native, and/or a Person of Color who has been discriminated against because of your race or ethnicity? 5. Have you experienced violence in a home where you lived or seen others experience violence in a home where you lived? Violence can be physical or emotional. 6. Are you currently being hurt or experiencing violence on the streets or in a shelter or attempting to avoid people who have hurt you since experiencing homelessness?

<i>Element</i>	<i>Finding</i>	<i>Recommendation</i>
<i>Prioritization and Referral</i>	All households in Central Valley and households without children in Lehigh Valley were significantly less likely to enroll in permanent housing projects compared to the overall CoC average and compared to other regions.	While expanding housing opportunities is important for households across the entire system, the CoC might consider making targeted investments in Central Valley and Lehigh Valley.