

# Appendix D: Summary of Compliance with HUD Requirements

Homebase conducted an assessment of Eastern Pennsylvania CoC’s compliance with HUD requirements related to coordinated entry utilizing HUD’s Coordinated Entry Self-Assessment Tool.<sup>1</sup> Information to inform this assessment was collected via provider, stakeholder, and consumer interviews and focus groups, stakeholder survey responses, an access point directory analysis, and a review of relevant policies and procedures.

For each required section, the coordinated entry system was determined to be either:

1. *Compliant* with HUD requirements;
2. *Policy Update Needed*, indicating that a policy either did not exist or was currently common practice but not documented in written policies and procedures as required;
3. *Area for Improvement*, indicating that the CoC would want to focus on this area in improve compliance with HUD requirements;
4. *Undetermined*, indicating that there was not enough information to come to a determination regarding compliance; or
5. *N/A*, where the HUD requirement is not applicable to the community’s coordinated entry system.

## Access

HUD Requirement	Compliance Assessment
A.2. Coordinated entry system (CES) covers the entire geographic area claimed by the CoC.	Compliant
A.3. CES is easily accessed by households seeking housing or services.	Area for Improvement
A.4. CES is well-advertised.	Compliant
A.5 CES includes a comprehensive and standardized assessment tool(s).	Compliant
A.6 CES provides an initial, comprehensive assessment of individuals and families for housing and services.	Compliant
A.7. CES includes a policy to address the needs of households fleeing domestic violence who are seeking shelter or services from non-victim service providers.	Compliant
A.8. The CoC, in consultation with Emergency Solutions Grants (ESG) recipients, has established and consistently follows written standards for providing CoC assistance.	Undetermined

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<sup>1</sup> The Self-Assessment Tool contains HUD requirements, recommendations, and optional sections. For purposes of this assessment only “Required” sections were reviewed. For more information, see HUD’s Coordinated Entry Self-Assessment, available at: [hudexchange.info/resource/5219/coordinated-entry-self-assessment/](http://hudexchange.info/resource/5219/coordinated-entry-self-assessment/)

HUD Requirement	Compliance Assessment
A.9. CoC and ESG recipients work together to ensure the coordinated entry process allows for screening, assessment and referrals for ESG projects.	Undetermined
<p>A.10. If multiple CoCs have joined together to use the same regional CES, written policies and procedures describe the following:</p> <ul style="list-style-type: none"> <li>• The relationship of the CoCs’ geographic areas to the geographic area covered by CES; and</li> <li>• How the requirements of ensuring access, standardizing assessments, and implementing uniform referral processes occur in situations where a CoC’s geographic boundaries and the geographic boundaries of the CES are different.</li> </ul>	N/A
A.11. CoC affirmatively markets housing and services to all eligible persons.	Compliant
A.12. CES policies include a strategy to ensure the CE process affirmatively markets to all eligible persons.	Compliant
A.13. CES policies ensure all people in different subpopulations have fair and equal access to the CE process.	Compliant
A.14. CoC has developed and operates a CES that permits recipients of Federal and State funds to comply with applicable civil rights and fair housing laws.	Compliant
B.1. CoC offers the same assessment approach at all access points and all access points are usable by all people who are experiencing or at risk of homelessness.	Area for Improvement
B.2. CoC ensures that households can be served at all of the access points for which they qualify as a target population.	Compliant
B.3. CoC provides the same assessment approach, including standardized decision-making, at all access points.	Compliant
B.4. CoC ensures participants may not be denied access to CES because they have been a victim of domestic violence, dating violence, sexual assault or stalking.	Compliant
B.5. CES access points are easily accessed by individual and families seeking homeless or homelessness prevention services.	Area for Improvement
B.6. CES processes allow emergency services to operate with as few barriers to entry as possible.	Compliant
B.7. CES policies document a process to ensure access to emergency services during hours when CES processes are not operating.	Area for Improvement

HUD Requirement	Compliance Assessment
B.9. CES access points cover and are accessible throughout the CoC.	Area for Improvement
B.10. CES policies document steps taken to ensure access points are accessible to individuals with disabilities.	Area for Improvement
B.11. CES policies document steps taken to ensure effective communication with individuals with disabilities.	Area for Improvement
B.12. CES access points offer materials in multiple languages to meet the needs of minority, ethnic, and groups with Limited English Proficiency.	Compliant
B.13. People fleeing domestic violence and victims of trafficking have safe and confidential access to the CES process and immediate access to emergency services.	Compliant
B.14. Street outreach efforts funded under the ESG or the CoC program are linked to and coordinated with CE.	Undetermined

## Assessment

HUD Requirement	Compliance Assessment
C.1. CoC consistently applies one or more standardized assessment tools, applying a consistent process in order to achieve fair, equitable, and equal access to services.	Area for Improvement
C.2. CES policies describe the standardized assessment process, including assessment information, factors, and documentation of criteria used for uniform decision-making.	Compliant
C.3. CoC maintains written policies that prohibit screening people out of the CES due to perceived barriers to housing or services.	Compliant
C.4. CoC provides training opportunities at least once annually to organizations and or staff persons at organizations that serve as access points or administer assessments.	Compliant
C.5. CoC's CES training curriculum includes a review of CE policies and procedures, requirements for use of assessment information to determine prioritization, and criteria for uniform decision-making and referrals.	Compliant
C.6. Participants are informed of the ability to file a nondiscrimination complaint.	Area for Improvement

HUD Requirement	Compliance Assessment
C.7. CES participants are allowed to decide what information they provide during the assessment process and to refuse housing and service options without limiting their access to other forms of assistance.	Compliant
C.8. CoC has established written policies and procedures concerning protection of all data collected through the CES assessment process.	Compliant
C.9. CoC has established written policies establishing that the assessment process cannot require disclosure of specific disabilities or diagnosis. This information may only be obtained for purposes of determining program eligibility to make referrals.	Area for Improvement

## Prioritization

HUD Requirement	Compliance Assessment
D.1. CoC uses the CES to prioritize homeless persons within the CoC based on a set of criteria that are documented, made publicly available and applied consistently. CoC's written policies include information with which prioritization decisions are made.	Area for Improvement
D.2. CoC's written CES policies and procedures include the factors and assessment information with which prioritization decisions are made for all homeless assistance.	Compliant
D.3. CoC's written CES policies distinguish between interventions that will not be prioritized based on vulnerability (e.g., crisis response) and those that will (e.g., permanent housing).	Compliant
D.4. CoC does not use data from the assessment process to discriminate or prioritize households on a protected basis (e.g., race, gender identity) and CES policies document how determining eligibility is a different process than prioritization.	Area for Improvement
D.5. CES policies document process for participants to file a nondiscrimination complaint.	Area for Improvement
D.7. CoC's policies document conditions under which participants maintain their place in CES prioritization lists when the participant rejects referral options.	Area for Improvement
D.8. If the CoC manages prioritization order using a "Prioritization List," CoC extends the same HMIS data privacy and security protections prescribed by HUD for HMIS practices in the HMIS Data and Technical Standards.	Compliant
D.9. If separate access point(s) for homelessness prevention services exist in the CoC, written CES policies and procedures describe the process by which persons will be prioritized for referrals to homelessness prevention services.	N/A

## Referral

HUD Requirement	Compliance Assessment
E.1. CES includes uniform and coordinated referral processes for all beds, units, and services available at participating projects.	Area for Improvement
E.2. CoC and projects participating in the CES do not screen potential participants out for assistance based on perceived barriers to housing or services.	Area for Improvement
E.3. CoC- and ESG-program recipients and subrecipients use the CES as the only referral source for filling vacancies in units funded by CoC and ESG housing program funds.	Compliant
E.4. CoC and all agencies participating in the CES comply with the equal access and nondiscrimination provisions of Federal civil rights laws.	Undetermined
E.5. CoC's referral process is informed by Federal, State, and local Fair Housing laws and regulations and ensures participants are not "steered" toward any particular housing facility or neighborhood because of race, color, national origin, religion, sex, disability, or the presence of children.	Compliant