

Western PA CoC Written Standards Training 2025: Standards for All Projects

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COC

PART 1 - MARCH 13, 2025

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Thank you Written Standards Committee!

Learning Objectives

- This is a high-level training which can be referred to and/or shared with new staff so that standards may be applied consistently in your organization.
- Establish an understanding of:
 - what is included in the written standards
 - which standards pertain to your programs
 - how the document is structured/ organized and a timeline for implementation
 - How the written standards relate to your work
 - how implementation of the WS affects recordkeeping, staffing, and case management
 - where to find more information about the WS and suggested best practices

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
- Optional Forms and Templates – separate document. Not required, but available as a resource

What are the Written Standards?

- Required by HUD
- 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

Who needs to follow the Written Standards?

- All CoC and ESG funded programs
 - Emergency Shelter, Transitional Housing, Rapid Rehousing, Joint Transitional/ 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 June 30, 2025



Notable Changes and Updates

Major Changes and Updates

Coordinated Entry

Updated entire document to be consistent with CE 2.0 Policies and Procedures (including roles and responsibilities, diversion, prioritization, case conferencing, etc.)

VAWA

Entire section added around requirements for providers related to VAWA/Violence Against Women Act (per 2022 VAWA Reauthorization)

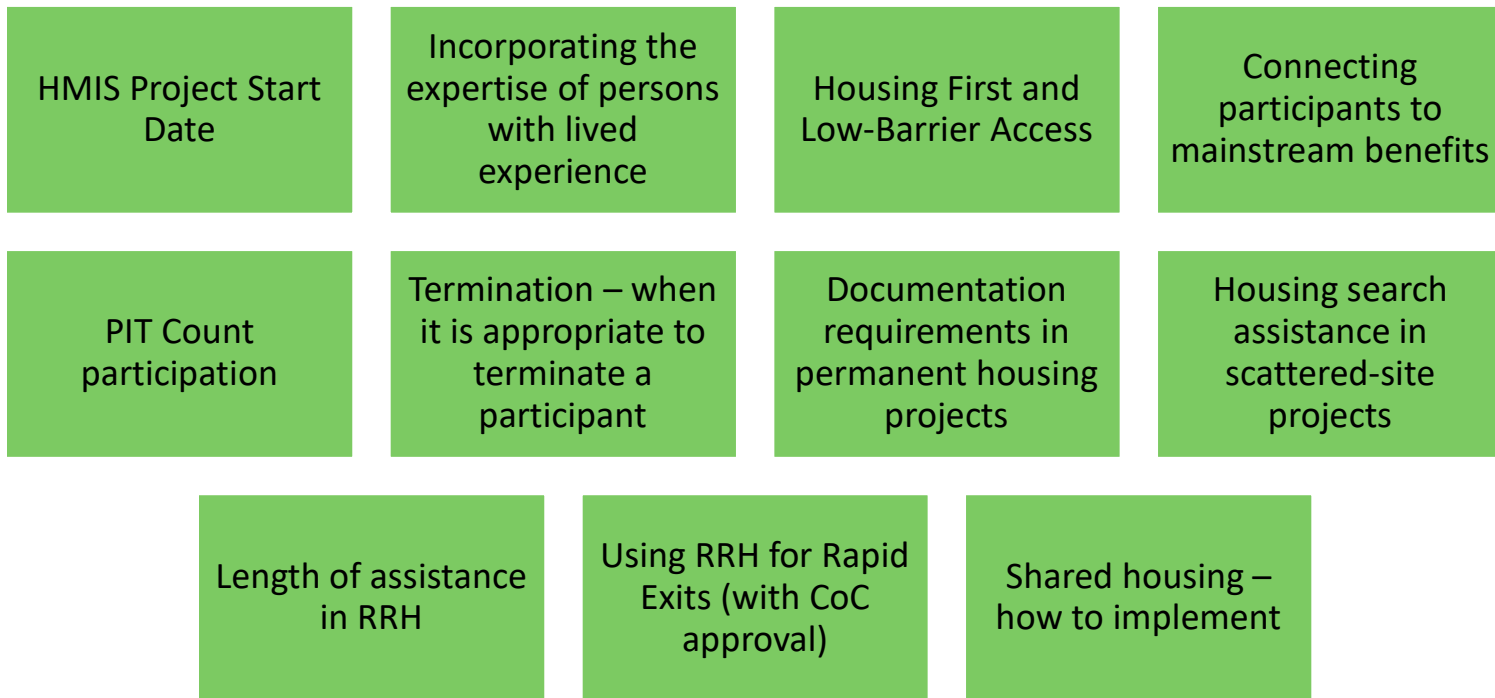
Transfers


Transfer Policy/Process Updated – Including transfers between project types, between same project type, and emergency transfers

YHDP

Appendix added on standards for Youth Homelessness Demonstration Program (YHDP) projects, with input from Youth Action Board

Detail or Clarification Added about Expectations for Grantees:





Standards for All CoC- and ESG-Funded Programs

Applications for Funding

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

- Expectations by project type related to Coordinated Entry participation are outlined in this section.
- **CoC-funded TH, RRH, TH-RRH, and PSH Projects; ESG-funded RRH Projects:**
 - Serve exclusively participants who are referred to them via the Coordinated Entry case conferencing process; and
 - Participate in the case conferencing process for their Region as part of the Prioritization and Referral phases of CES; and
 - Bring all housing openings to case conferencing; and
 - Follow the CoC's Order of Priority

Coordinated Entry Participation

- **ESG-funded Street Outreach, Emergency Shelter, and Homelessness Prevention Projects**
 - Provide the Access, Diversion, and Assessment phases of CES
 - To the extent the project is funded to do so: provide the Prevention and Rapid Exit phases of CES
 - Participate in the case conferencing process for their Region as part of the Prioritization and Referral phases of CES
 - *(Street Outreach)* Participate in their Region's Street outreach network, if applicable

CoC Participation

- CoC recipients should participate in:
 - CoC meetings
 - RHAB/Collaborative meetings
 - Required CoC trainings
- ESG recipients encouraged to participate and may be required to participate per DCED.

Diversion

All Access Point, Street Outreach, and Emergency Shelter projects will attempt to return the participant to safe housing using Diversion techniques as part of the housing problem-solving (HPS) approach to services. This can include:

- strengths-based problem-solving conversations
- identifying community supports
- offering lighter touch solutions

Enrollment & HMIS Project Start Date

- Enrollment should be based on eligibility and CE prioritization
- Not other factors such as residency

Enrollment & HMIS Project Start Date

Per HUD, the project start date in HMIS is based on project type:

- **Street Outreach:** Date of first contact with the participant
- **Emergency Shelter:** Night the participant first stayed in the shelter
- **Transitional Housing:** Date the participant moves into the residential project
- **Service Projects (Services Only, Homelessness Prevention, Coordinated Entry):** Date the participant first began working with the project and generally received the first provision of service

Enrollment & HMIS Project Start Date

- **Permanent Housing, including Rapid Re-Housing:** Date the participant was admitted into the project. To be admitted indicates the following factors have been met:
 - Information provided by the participant or from the referral indicates they meet the criteria for admission;
 - The participant has indicated they want to be housed in this project; and
 - The participant is able to access services and housing through the project. The expectation is the project has a housing opening (on-site, site-based, or scattered-site subsidy) or expects to have one in a reasonably short amount of time.

Enrollment & HMIS Project Start Date

- Project start date and housing move-in date should only be the same **IF** the participant moves in to housing the same day that you start working with them and enroll them in the project (example: site-based project where someone can move in immediately).
- If it takes 60 days for a participant to find a unit after you begin working together, the move-in date would be 60 days after the start date.

Environmental Review

- CoC - environmental review required (unless exempt)
 - **Helpful chart:** <https://www.hud.gov/sites/dfiles/CPD/documents/Part58-CoC-FlowChart.pdf>
- ESG - environmental review 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

- All CoC and ESG-funded organizations must manage projects in accordance with federal and local nondiscrimination and equal opportunity provisions, as codified in:
 - the Fair Housing Act
 - Section 504 of the Rehabilitation Act
 - Title VI of the Civil Rights Act
 - Titles II & III of the Americans with Disabilities Act
 - HUD's Equal Access Rules

Fair Housing and Equal Access – Key Requirements

- Zero-tolerance policy prohibiting intentional discrimination based on actual or perceived disability, race, ethnicity, color, national origin, ancestry, religion, age, sex, marital status, familial status, source of income, or domestic or sexual violence victim status, ensuring that all participants are afforded equal opportunities
- Persons with disabilities may be entitled to reasonable accommodations.
- Agencies should have a complaint procedure for participants to report discrimination.

HMIS Participation

- All projects (except those operated by victim service providers) must enter data into PA HMIS accurately and timely (within 7 days).
- DV-dedicated projects operated by victim service providers must use a DV comparable database.

Knowledge Check 1

For permanent housing projects in HMIS, are the project start date and housing move in-date the same date?

- Yes (Always)
- Maybe (Sometimes)
- No (Never)

Households with Children

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 so as not to disrupt the children's education
- 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.

Housing First and Low-Barrier Access

All projects must follow Housing First and Low-Barrier access principles.

- Minimal barriers to entry – admission practices based on HUD eligibility that promote accepting participants, Not screening them out due to barriers.
- Supportive services are voluntary, housing-focused, and participant-driven, emphasizing engagement and problem-solving.
- Participation in services or project compliance is not a condition of enrollment.
- While it is acceptable for RRH projects to require all participants to meet with a case manager, a participant must not be evicted from, or terminated from, the project for failure to meet with the case manager.

Housing First and Low-Barrier Access

- Leases or occupancy agreements cannot have stipulations that would not be found outside of a standard rental agreement.
- Use of alcohol or drugs in and of itself (without other lease violations) is not considered reason for eviction.
- The project prioritizes those with the highest need for services (according to CE).
- Project staff are trained in evidence-based practices for participant engagement such as motivational interviewing and person-centered counseling.
- Services are informed by a harm reduction philosophy.

Incorporating the Expertise of Persons with Lived Experience (PWLE):

- Each recipient and subrecipient must have minimum of 1 homeless or formerly homeless individual on board of directors (or equivalent policymaking body) OR must receive a waiver from HUD for alternate plan to consult with persons with lived experience when making policies and decisions.
- Providers expected to create their own plans and strategies for incorporating the expertise and perspectives of PWLE into project design and delivery. **Providers should take substantive actions to incorporate the input and expertise of persons with lived experience of homelessness into program design, implementation, and improvement.**

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

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

Mainstream Benefits

Projects should:

- Support participants to obtain benefits for which they are eligible (health, social, employment) and that meet their needs
- Provide transportation assistance to attend mainstream and community resource appointments, employment training, educational programs, and jobs
- Follow up with participants at least annually to ensure they applied for and are receiving mainstream benefits
- Ensure participants have access to assistance to apply for SSI/SSDI (if eligible), provided by either the project, subrecipient, or partner agency

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

All projects are expected to strive to meet CoC Performance Goals as outlined in the CoC/ESG quarterly monitoring reports and/or the CoC renewal evaluation standards. This includes:

- 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. This includes:

- Ensure HMIS enrollments are up-to-date for PIT count. If not using HMIS (VSPs, etc.), complete and submit sheltered PIT forms.
- Complete CoC's Housing Inventory Count survey.

Point in Time Count Participation

Projects must participate in the annual PIT Count, including participation in unsheltered count. This includes:

- Unsheltered PIT:
 - a) serving as the county unsheltered PIT Count coordinator if no other county coordinator has been identified, including submitting the county's data to the CoC; and/or
 - b) participating as a volunteer on the night of the unsheltered count.

Knowledge Check 2

Can a participant be evicted from, or terminated from, a CoC project for failure to meet with their case manager?

- Yes
- No
- Maybe

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

- Housing Projects should utilize the CES tools and processes, *specifically regional case conferencing*, to identify the highest priority households that meet their eligibility criteria.
- All projects should participate in regional case conferencing to identify the next highest priority households for any project vacancies.
- In general, households are prioritized based on a combination of:
 - Housing and Service Needs Assessment
 - Chronic homelessness status (all CoC funded PSH projects are chronic-dedicated)
 - Length of time homeless

Project Evaluation

- CoC projects are evaluated annually through the CoC renewal scoring process and evaluated quarterly through CoC/ESG Quarterly Monitoring Reports. CoC may require a Quality Improvement Plan if projects are not meeting expectations.
- ESG projects are evaluated through the CoC/ESG quarterly monitoring reports. DCED monitors all of its ESG subrecipients.

Termination

- Projects should have a formal procedure for terminating assistance.
- Eviction by a landlord in scattered site should not automatically result in termination from program.
- Assistance should only be terminated in the most severe cases, when no other viable alternative is available, and when interventions supporting the household to remain in the project have been unsuccessful. Projects should make multiple, documented attempts to bring the household into compliance with their lease or occupancy agreement.

Termination

- Should follow a Housing First Approach
 - While it is acceptable for projects to require all participants to meet with a case manager, a participant must not be evicted from, or terminated from, the project for failure to meet with the case manager.
 - Substance use in and of itself (without other lease violations) is not a reason for termination.
- 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

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/methods should be made to contact).
- Participants who are repeatedly given notices from their landlord or provider for non-payment of their portion of the rent, damaging the unit, harassing other tenants, criminal activities, or continued lease violations despite warnings.
- Agency should document reasonable efforts and interventions to support participant and prevent termination.
- Project termination should be seen as a last resort.

Possible Reasons for Termination

Termination *may* occur:

- In some severe cases (e.g., violence, or serious threats of violence, toward Project staff, volunteers or other participants/tenants; unable to live safely alone/unsupervised in their home), termination from the project may occur.
- Projects with operating or leasing dollars that utilize occupancy agreements or subleases with participants must follow applicable landlord/tenant laws when terminating assistance.

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.
- 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.
- ***This will be covered in detail in Written Standards Training Part 2.***

Transfers

Transfers between projects within the same project model (e.g., RRH to RRH, 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 household internally, they should email the Regional CE Specialist requesting the household be reviewed at the next regional case conferencing meeting.

Transfers

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

- The provider will be expected to present information about why the household needs a transfer, including information about the efforts made by the current provider to meet the household's needs/ retain the household in the current program and how the household will benefit from being served by a different provider.

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 services (such as PSH) may be needed.
- Project transfers may be made from RRH to PSH so long as the household meets the eligibility criteria for the PSH project.
- All transfers from one project model to another must begin with an email to the Regional CE Specialist requesting the household be reviewed at the next Regional case conferencing meeting.

Transfers

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

- To request a transfer to PSH, RRH providers are expected to gather all information necessary to determine if a household meets the chronic homeless definition (disability information and verification of homelessness).
- The provider will be expected to present information about why the household needs a transfer, including information about the efforts made by the current provider to meet the household's needs and how the household will benefit from being served by a different provider.

Knowledge Check 3

True or False:

If a person in RRH or PSH 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 not sure if we consistently 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/ eligible costs
- Documentation of the receipt and use of program 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/Homelessness Status
 - Third-party documentation (preferred)
 - Intake worker observation
 - Self Declaration/ Certification
- Goal Plans/Housing Stability Plans
- Informed Consent/Confidentiality (including HMIS Consent)


Participant Recordkeeping (part 2)

- Income Documentation
 - Guidance on calculating annual income is provided in Written Standards
 - 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, Self-Declaration of Income Form can be used.
- 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:

A participant must provide third party income documentation in order to be eligible 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/Goal Plan (participant-driven)
- Creative problem solving
- Linkage to community-based services
- Promote access to and effective utilization of mainstream benefits:
 - Transportation assistance
 - Assistance with enrollment in income and non-income benefits
 - Follow-up at least annually to ensure benefits are received and renewed
 - Ensure access to SSI/SSDI technical assistance

Job Description and Duties (continued)

Typical case management duties (continued):

- Engage participants in a manner that is respectful, incorporates strengths-based approaches, and participant choice
- Help households address housing barriers (credit history, arrears, legal issues)
- Inform households of their eligibility for educational services and ensure children are enrolled in school and connected to appropriate services in the community
- Collect required documentation

Job Description and Duties (continued)

Typical case management duties (continued):

- Provide or assist the household with connections to resources that help them improve their safety and well-being and achieve their long-term goals: childcare, education, employment and job training, financial literacy, health, legal services, substance use recovery, among others
- Assist households with finding, moving into, and maintaining housing.
 - 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
- Housing-Focused
- Trauma-Informed Care
- Progressive Engagement
- Housing First

Frequency

- CM should be in direct contact with participant at least once a month (or more, depending on needs).
- Frequency, duration, and level of CM support should be based on the unique needs and situation of every participant.
- The intensity of CM can and will change over time for every participant.
- Case management is always offered to anyone enrolled in programming and is strengths-based, trauma-informed, progressive, culturally competent, and person-centered.

Location/Timing

- Should occur at whatever location works best for the participant
- Timing should be flexible/based on participant availability to meet before or after “typical” working hours.

Knowledge Check 5

True or False:

All participants in a project should receive the same level of case management.

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



Appendices and Templates

Appendices

HUD Requirements for Written Standards

CoC Non-Discrimination Policies

CoC Access/Barriers Policy

DV Emergency Transfer Plan (more info in WS training part 2)

VAWA Requirements for Housing Providers (more info in WS training part 2)

HMIS Consent Form

CoC Fair and Equal Access Policy

YHDP Written Standards

Tips and Guidance for Engaging Persons with Lived Experience

Optional Forms and Templates (Supplemental Resource)

- Eligibility documentation forms (homelessness, fleeing DV, chronic, disability)
- Verification of income forms (third-party or self-certification)
- Internal grant management forms (enrollment approval, grant payment approval)
- Case management related forms (housing plan, crisis plan)
- Lease and landlord related forms (sample landlord/agency rental agreement, lease review sheet, apartment walk-through, links to inspection forms)
- CoC Desk Monitoring Tools (link to tools)



Next Steps

Next Steps

- [Register](#) for **Written Standards Training Part 2: VAWA, Emergency Transfer Plans, and Serving Survivors of Gender-Based Violence**
Wednesday, March 26th, 10am-12pm (Zoom)

Next Steps

All program staff should watch recording for their specific project type no later than April 30th (links will be sent out after WS trainings are completed and posted on website: <https://pennsylvaniacoc.org/western-pa-coc-written-standards>).

- 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 April 30, 2025 that their program(s) have reviewed the WS (including appendices), understand them, will implement them, and will ensure that all new hires review the standards and recorded CoC trainings within 60 days of hire:
<https://survey.alchemer.com/s3/8216721/Western-PA-CoC-Written-Standards-Acknowledgment-Form-2025>
- If there are standards that programs are not implementing, make a plan to implement those standards by June 30, 2025.
- Feedback on the standards is welcome year-round:
<https://survey.alchemer.com/s3/7127925/Western-PA-CoC-Written-Standards-Annual-Feedback>

Questions?

- Email westerncoc@pennsylvaniacoc.org
- All Written Standards materials will be posted here:
<https://pennsylvaniacoc.org/western-pa-coc-written-standards>

