

Berks County Continuum of Care Policies and Procedures

Berks Coalition to End Homelessness, Inc.

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Introduction

Berks Coalition to End Homelessness, Inc. began its roots as a volunteer group to address the problems of homelessness in the Reading area, and extended parts of Berks County, PA. Since then it has grown to over 60 agencies, business, and individuals, working toward preventing, reducing, and ending homelessness in Berks County. In 2008, BCEH applied for non-profit cooperation status and is a 501(c)3.

Overview of the Continuum of Care Process

The U.S. Department of Housing and Urban Development (HUD) funds homeless services nationally, requiring a Continuum of Care process. Annually, HUD releases a Notice of Funding Availability (NOFA) for renewal, new, and sometimes for bonus housing projects. The Continuum of Care requires a gaps assessment process, a community plan, and applications to HUD for funding.

CoC Background

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act. Among other changes, the HEARTH Act consolidated the three separate McKinney-Vento homeless assistance programs (Supportive Housing Program, Shelter Plus Care program, and Section 8 Moderate Rehabilitation Single Room Occupancy program) into a single grant program known as the Continuum of Care (CoC) Program. HUD published the Continuum of Care Program interim rule in the Federal Register on July 31, 2012. The rule is posted on HUD's website and governs the CoC Program. The CoC Program is designed to assist individuals (including unaccompanied youth) and families experiencing homelessness, and to provide the services needed to help such individuals move into transitional and permanent housing, with the goal of long-term stability. The program promotes community-wide planning and strategic use of resources to address homelessness; improved coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness; improved data collection and performance measurement; and allows each community to tailor its program to the particular strengths and challenges within that community.

Each year, HUD awards CoC program funding competitively to nonprofit organizations, states, units of local government, and/or instrumentalities of state or local government collectively known as recipients. In turn, recipients may contract or subgrant with other organizations or government entities, known as subrecipients, to carry out the grant's day-to-day program operations. In recent years, the HUD CoC program has shifted focus to emphasize permanent supportive housing and rapid re-housing for chronically homeless people. Transitional housing is still funded, but requires extra justification. HUD continues to offer occasional funding for bonus

projects. In both 2014 and 2015, HUD offered the opportunity to fund new permanent supportive housing through a bonus. Since 2001, HUD has required the use of a Homeless Management Information System (HMIS) to better serve individuals and monitor the performance of CoC recipients.

Continuum of Care (CoC) Program

The CoC Program interim rule clarifies the CoC's responsibilities related to HMIS and specifies HMIS as an eligible cost at the community and project level.

The CoC Program interim rule specifies that the CoC is responsible for:

- Selecting an HMIS software solution
- Designating an eligible applicant to serve as the HMIS lead and manage the system
- Providing oversight for key HMIS policies
- Working with the HMIS lead to ensure consistent provider participation (Exhibit 1)
- Ensuring the quality of HMIS data

Once the CoC achieves high participation rates among projects that serve persons experiencing homelessness, then the CoC can use the data in HMIS to support its planning and operational responsibilities.

HUD expects CoCs to use HMIS data to track their progress in meeting CoC and project-specific performance goals, to support community-wide planning, and to identify how best to direct resources to prevent and end homelessness. CoCs need high-quality HMIS data to complete the homelessness components of the Consolidated Plan and to meet HUD reporting requirements, such as the required Annual Performance Report (APR) and Annual Homeless Assessment Report (AHAR). Finally, HMIS data are essential to documenting a CoC's qualifications as a high-performing community.

The CoC Program interim rule specifies HMIS as an eligible use of CoC Program funds. CoC funds can be used to support the expense of operating the HMIS, under the HMIS program component, and the expense of contributing data, as an eligible cost under the other program components. Only the HMIS lead designated by the CoC may apply under the HMIS program component, but agencies that use the HMIS can add an HMIS line item to their budget and use CoC funds for the costs of attending training on HMIS, data collection and data entry.

Per Section 578,57 (a) (3) of the CoC Program interim rule, CoC funds may be used to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data.

The HMIS lead designated by the CoC may apply for CoC program funds to establish and operate the CoC's HMIS. Under the HMIS program component, the HMIS lead agency may apply for funds to support:

- Leasing a structure in which the HMIS operates
- Operating the structure in which the HMIS operates
- Establishing, operating, and customizing a CoC's HMIS, including:
 - Hosting and maintaining HMIS software or data
 - Backing up, recovering, or repairing HMIS software or data
 - Upgrading, customizing, and enhancing the HMIS
 - Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients that use several software systems
 - Administering the HMIS
 - Reporting to providers, the CoC, and HUD
 - Conducting training in use of the HMIS, including travel to the training.

Structures used as a facility for HMIS activities may also be used for other purposes. However, funds will be available only in proportion to the use of the structure for HMIS activities. If eligible and ineligible activities are carried out in the same structure, any HMIS-related leasing or operating costs must be prorated according to the amount of time or square footage of space used for eligible versus ineligible activities (24 CFR 578.37(c)).

Applicants applying for CoC funding for projects under other components (i.e., Permanent Housing, Transitional Housing, Supportive Services Only, or Homelessness Prevention) may include costs associated with contributing data to the designated HMIS in their application. The eligible costs related to recipients' and subrecipients' use of an HMIS and contributions of data include:

- Hardware, equipment, and software costs
- Training and overhead
- Staffing

For detailed guidance on HMIS Eligible Costs and Activities under the new Continuum of Care (CoC) Program interim rule, please refer to the CoC Program Funding for HMIS User Guide.

Key Continuum of Care Terms

Terminology used by HUD and the Berks Coalition to End Homelessness, Inc. throughout the application process is very specific. Below is a partial glossary of terms.

APR is the Annual Performance Report that grantees submit to HUD. <https://www.hudexchange.info/resources/documents/e-snaps-CoC-APR-Guidebook-for-CoC-Grant-Funded-Programs.pdf>

E-snaps is the electronic grant management system that applicants use to upload their project application to HUD for CoC funding. <https://www.hudexchange.info/resource/2915/esnaps-features-and-functions/>

Grantees are individual agencies awarded funds directly from HUD through the Berks County CoC process and use these resources to provide homeless services and assist individuals and families to move into transitional and permanent housing.

Project Application: the term HUD uses for an individual project after it has been ranked by the Berks Coalition to End Homelessness, Inc. Ranking Subcommittee. Agencies submit to apply for individual project funding through a separate portion of the application. The Project Application is completed only based on ranking of an BCEH, Inc. Preliminary Application.

Sub-recipient refers to an organization that receives a CoC grant directly from the Continuum of Care: HUD's networks to allocate homeless grants. Collaborative Applicant: For the purpose of submitting the annual CoC application, BCEH, Inc. as lead agency, is considered the collaborative applicant. Homeless Management Information System (HMIS): Congressionally mandated for all programs funded through HUD homeless assistance grants to improve data collection and provide performance measurement. HMIS Vendor: the software technology that functions as HMIS (Bowman Systems)

Relevant Acronyms

AHAR Annual Homeless Assistant Report

APR Annual Performance Report

BCEH, Inc. Berks Coalition to End Homelessness

CDBG Community Development Block Grant

CoC Continuum of Care

ESG Emergency Shelter/ Services Grant

HIC Housing Inventory Chart

HMIS Homeless Management Information System

HOME Home Investment Partnerships Program

HRE Homelessness Resource Exchange

HUD Department of Housing and Urban Development

NOFA Notice of Funding Availability

PHC Project Homeless Connect

PIT Point in Time [count]

Berks Coalition to End Homelessness, Inc. CoC Application

Portions of the application are prepared by BCEH as well as individual applicants

Letter of Intent to Apply

Following HUD's announcement of the CoC Registration process, BCEH will request letters of intent to apply for funds. New applicants, renewal grantees and sub-recipients should all submit a letter stating their intent and the funds that they expect to request. This information may lead to additional availability for other organizations. BCEH will remind potential and current applicants of the letter of intent before the request, and follow up with renewal grantees and sub-recipients that do not respond. Immediately following the NOFA release, another letter of intent may be solicited for prospective new projects.

Preliminary Application

After HUD releases a Notice of Funding Availability (NOFA), the BCEH, and CoC Committee look for changes in HUD priorities or funding opportunities. Generally, HUD prioritizes services to chronically homeless, permanent supportive housing, and rapid re-housing. Sometimes HUD offers a bonus opportunity to develop a new project. Each year, HUD sets a limit for which the Berks County CoC is eligible to apply. There are often more requests than funding available. The Berks County CoC Preliminary Application is adapted accordingly, and released on the BCEH website and via email to advocates, organizations that serve homeless people, current recipients, and potential recipients. The application focuses on the agency project application, described below. The application includes the questions that are asked by HUD in the electronic submission program, e-snaps.

BCEH, Inc Preliminary Ranking Process

Ranking mirrors the HUD CoC criteria and the priorities of the Berks County Community Plan to Prevent and End Homelessness. Project ranking makes a priority of serving the chronically homeless in all CoC Program-funded permanent supportive housing, not just those units that are dedicated to that population.

- **Multi-year renewal applications.** Ranking for renewals includes their performance as per their Annual Performance Report (APR), which is the data they report to HUD through e-snaps.
- **First-year renewal applications** may not have APR data to report. If the grant has been executed within less than 12 months, the new preliminary application ranking emphasizes the progress in opening the project in the first year of activity. First-year preliminary applications allow for more detailed explanations because there is no APR data. Supporting documentation is required.
- **New preliminary applications** are ranked on their potential to meet the standards established by the Committee, be successful in managing a housing project, and in securing and implementing HUD funding and match. New applications should allow for more detailed explanations because there is no APR data. They must respond to threshold questions. Supporting documentation is required.

•**Bonus projects** are ranked similarly to new preliminary applications, when bonus opportunities are offered by HUD.

•**Under-performing projects.** Funds for projects that are determined to be underperforming, obsolete, or ineffective are reallocated to new projects that are based on proven or promising models. If a project is not meeting reporting requirements, not being used, not meeting community need, or not expending funds in a timely manner, it will likely be considered underperforming

Ranking Strategy

Following ranking, the subcommittee takes into consideration Tier 1 and Tier 2 allocation. Funding limits for Tier 1 and 2 are determined by HUD with projects ranked in Tier 1 considered to be top priority program applications most likely to be funded. The strategy is based on the most likely success for HUD funding. The ranking process considers project quality, cost, performance, use of other mainstream resources, alignment with local priorities. The application criteria and scoring may be updated annually to include new information from HUD contained within the NOFA and Continuum of Care application.

All rankings done by BCEH, Inc. is conducted in an ethical and legal manner so that all agencies can advocate for their programs in a fair process.

Appeal Process

It is up to the provider to elect the appeal process if they do not agree with awarded ranking or funding awarded. BCEH, Inc. follows HUD's procedures for the appeal process, which is 30 days after awarded have been officially announced by the Department of Housing and Urban Development. BCEH, Inc. will provide appeal instructions to any provider who is interested in that process.

Appeals must state the following:

- The agency name and authorized official
- Project name
- Reason for appeal, including a reference to specific deficiencies, errors, etc.
- Agency point of contact
- Additional documentation may be requested during an appeal review.

ESG Requirements

The ESG program provides funding to:

1. Engage homeless individuals and families living on the street;

2. Improve the number and quality of emergency shelters for homeless individuals and families;
3. Help operate these shelters;
4. Provide essential services to shelter residents;
5. Rapidly re-house homeless individuals and families; and
6. Prevent families and individuals from becoming homeless.

ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities (up to 7.5% of a recipient's allocation can be used for administrative activities).

Eligible Recipients

ESG is a formula grant program. Eligible recipients generally consist of metropolitan cities, urban counties, territories, and states, as defined in 24 CFR 576.2.

Metropolitan cities, urban counties and territories may subgrant ESG funds to private nonprofit organizations.

State recipients must subgrant all of their ESG funds (except for funds for administrative costs and under certain conditions, HMIS costs) to units of general purpose local government and/or private nonprofit organizations.

All recipients must consult with the Continuum(s) of Care operating within the jurisdiction in determining how to allocate ESG funds.

Beneficiary Eligibility

The minimum eligibility criteria for ESG beneficiaries are as follows: For essential services related to street outreach, beneficiaries must meet the criteria under paragraph (1)(i) of the "homeless" definition under § 576.2. For emergency shelter, beneficiaries must meet the "homeless" definition in 24 CFR 576.2. For essential services related to emergency shelter, beneficiaries must be "homeless" and staying in an emergency shelter (which could include a day shelter). For homelessness prevention assistance, beneficiaries must meet the requirements described in 24 CFR 576.103par. For rapid re-housing assistance, beneficiaries must meet requirements described in 24 CFR 576.104. Further eligibility criteria may be established at the local level in accordance with 24 CFR 576.400(e).

City ESG – For City ESG, BCEH gathers required and necessary information in order to submit invoice to the City of Reading. This will include invoices from other sub-recipients (example: Salvation Army) for a combined total which is included in the total amount of funds requested. Invoices are sent on a monthly basis, checks to sub-recipients are cut once money is received from the city, and monitoring for City ESG is done on an annual basis. Reports such as the CAPER, are submitted to the city, and HMIS/CoC Manager (BCEH) is responsible for ensuring that recipients are submitting CAPERS into Sage, through HMIS exports.

County ESG – For County ESG, BCEH gathers required and necessary information in order to submit invoice to the County of Berks. This will include invoices from other sub-recipients for a combined total which is included in the total amount of funds requested. Invoices are sent on a monthly basis, checks to sub-recipients are cut once money is received from the city, and monitoring for County ESG is done on an annual basis. Reports such as the CAPER, are submitted to the County, and HMIS/CoC Manager (BCEH) is responsible for ensuring that recipients are submitting CAPERS into Sage, through HMIS exports.

Eligible Program Components

Street Outreach

Essential Services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, transportation, and services for special populations. See 24 CFR 576.101.

Emergency Shelter

Renovation, including major rehabilitation or conversion, of a building to serve as an emergency shelter. The emergency shelter must be owned by a government entity or private nonprofit organization. The shelter must serve homeless persons for at least 3 or 10 years, depending on the type of renovation and the value of the building. Note: Property acquisition and new construction are ineligible ESG activities.

Essential Services, including case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

Shelter Operations, including maintenance, rent, repair, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

See 24 CFR 576.102.

Homelessness Prevention

Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not

meant for human habitation, or another place described in paragraph (1) of the homeless definition.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

Eligible costs include:

- Rental Assistance: rental assistance and rental arrears
- Financial assistance: rental application fees, security and utility deposits, utility payments, last month's rent, moving costs
- Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair

See 24 CFR 576.103.

Rapid Re-Housing

Housing relocation and stabilization services and/or short-and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

Eligible costs include:

- Rental Assistance: rental assistance and rental arrears
- Financial Assistance: rental application fees, security and utility deposits, utility payments, last month's rent, moving costs
- Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair

See 24 CFR 576.104

[Data Collection \(HMIS\)](#)

ESG funds may be used to pay for the costs of participating in and contributing to the HMIS designated by the Continuum of Care for the area. More information about using an HMIS is available on the HMIS page.

See 24 CFR 576.107

Administration

Up to 7.5 percent of a recipient's allocation can be used for Administrative activities. These include general management, oversight, and coordination; reporting on the program; the costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings; the costs of preparing and amending the ESG and homelessness-related sections of the Consolidated Plan, Annual Action Plan, and CAPER; and the costs of carrying out environmental review responsibilities.

State recipients must share administrative funds with their subrecipients that are local governments, and may share administrative funds with their subrecipients that are nonprofit organizations.

The Homeless Assistance Program (HAP) Homeless Assistance Program (HAP) is a county-directed program that offers a variety of supportive services to individuals and families experiencing or at risk for homelessness and who can demonstrate that, with HAP intervention, they will be able to meet their basic housing needs in the near future. HAP includes five components:

1. Bridge Housing
2. Case Management
3. Rental Assistance
4. Emergency Shelter
5. Innovative Supportive

Housing A county may choose to provide one, some, or all of the components as part of its program, depending upon its unique regional needs. HAP gives counties flexibility in creating their programs because human service agencies based at the local level are intimately acquainted with the local human services network and the needs of the community. The department expects that counties will select the components necessary to create a homeless assistance program that meets the following HAP objectives:

1. Provide homelessness prevention services that assist clients to maintain affordable housing.
2. Help people experiencing homelessness find refuge and care.
3. Assist people experiencing or near homelessness in attaining economic self-sufficiency.

Coordinated Entry

Coordinated entry is a process developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs. Provisions in the CoC Program

interim rule at 24 CFR 578.7(a)(8) require that CoCs establish a Centralized or Coordinated Assessment System.

The coordinated entry process makes referrals to all projects receiving Emergency Solutions Grants (ESG) and CoC Program funds, including emergency shelter, RRH, PSH, and transitional housing (TH), as well as other housing and homelessness projects. Projects in the community that are dedicated to serving people experiencing homelessness fill all vacancies through referrals, while other housing and services projects determine the extent to which they rely on referrals from the coordinated entry process.

BCEH, Inc. is the lead for Coordinated Entry Management, including 12 total access sites in Berks County. BCEH is responsible for training other agencies on system and assessment requirements, as well as monitoring the individuals on a monthly basis during Coordinated Entry Meetings.

Homeless Management Information System (as the CoC)

The U.S. Department of Housing and Urban Development (HUD) and other planners and policymakers use aggregate HMIS data to better inform homeless policy and decision making at the federal, state, and local levels. HMIS enables HUD to collect national-level data on the extent and nature of homelessness over time. Specifically, an HMIS can be used to produce an unduplicated count of homeless persons, understand patterns of service use, and measure the effectiveness of homeless programs. Data on homeless persons is collected and maintained at the local level. HMIS implementations can encompass geographic areas ranging from a single county to an entire state.

The HEARTH Act, enacted into law on May 20, 2009, requires that all communities have an HMIS with the capacity to collect unduplicated counts of individuals and families experiencing homelessness. Through their HMIS, a community should be able to collect information from projects serving homeless families and individuals to use as part of their needs analyses and to establish funding priorities. The Act also codifies into law certain data collection requirements integral to HMIS. With enactment of the HEARTH Act, HMIS participation became a statutory requirement for recipients and subrecipients of CoC Program and Emergency Solutions Grants (ESG) funds.

An HMIS can be used to:

- Produce an unduplicated count of persons experiencing homelessness for each CoC
- Describe the extent and nature of homelessness locally, regionally, and nationally
- Identify patterns of service use
- Measure program effectiveness

If the subrecipient is a victim services provider (defined by VAWA) it is prohibited from entering client-level data into an HMIS. Legal services providers, who can document that entering client-level data would violate client-attorney privilege, may be permitted to use a comparable database. CoC and ESG funds may be used to establish and operate a comparable

database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. It is up to the CoC to work with the HMIS lead to determine if a system is a comparable database. This means that it must be documented that the alternative system meets all HUD system requirements.

Berks Coalition to End Homelessness, INC. (BCEH, Inc.) is the HMIS lead for Reading & Berks County, providing administration services to all agencies and individuals connected to the Homeless Management Information System.

Emergency Food Panty

In January of 2019, BCEH, Inc. added an Emergency Food Pantry as a resource to the population of the homeless, as well as those in dire situations who are not homeless, to obtain food for a 1-2 day period until the individual or family can get an appointment to a regular food bank recommended by the Greater Berks Food Bank. The Emergency Food Pantry is located inside the BCEH, Inc. office from 8:00 A.M until 2:00 P.M Monday – Friday. The Emergency Food Pantry is closed when BCEH, Inc. is closed due to weather closings or holidays. When BCEH, Inc. and the Emergency Food Pantry is closed, it is updated on the website and social media. Required documentation must be filled out when applying for assistance, and it is strongly discouraged to use the emergency food pantry in lieu of a regular food bank. BCEH, Inc. includes a pamphlet of available resources for food served in the community, as well as food banks for a future appointment.

Friends of the Homeless Fund

The friends of the homeless fund is set up to help someone who is faced with a financial issue that could potentially cause that person to become homeless. FOTHF is for issues that are not covered by any other kind of government funding. The application for the funding is filled out by caseworkers or other agency workers on behalf of the client. It is a \$500 maximum. The application is forwarded to BCEH and then reviewed by a committee of three people, one of them being a BCEH board member for approval or denial. This decision will be made within 5 business days. If approved a check will be cut to the appropriated party.

Transitional Housing

BCEH currently has 2 transitional housing units that have leasing periods of <90 days for families, and 1 permanent housing unit for chronically homeless veteran families. BCEH, Inc. Coordinated Entry Manager accepts referrals. BCEH, Inc. along with other agencies, places persons into transitional and permanent housing programs based upon the Coordinated Entry system, and as a team to find the best fit for the individual. Individuals and families receive monthly visits with case management and financial goals to transition into permanent housing once the 90 days is up, or sooner.

Point in Time Count (PIT)

The Point-in-Time (PIT) count is a count of sheltered and unsheltered homeless persons on a single night in January. HUD requires that Continuums of Care (CoCs) conduct an annual count of homeless persons who are sheltered in emergency shelter, transitional housing, and Safe Havens on a single night. CoCs also must conduct a count of unsheltered homeless persons every other year (odd numbered years). Each count is planned, coordinated, and carried out locally. The Housing Inventory Count (HIC) is a point-in-time inventory of provider programs within a CoC that provide beds and units dedicated to serve persons who are homeless, categorized by five Program Types: Emergency Shelter; Transitional Housing; Rapid Re-housing; Safe Haven; and Permanent Supportive Housing.

BCEH, Inc. conducts annual PIT counts 1 time a year, the last week in January. BCEH, Inc. Coordinated Entry Manager and Street Outreach Manager collaborate with a team of individuals from other agencies to plan out routes and procedures for conducting the PIT.

PIT reports and data is sent to HUD and then released to the general public before the end of the year.

Interns & Volunteers

BCEH, Inc. will on occasion recruit interns from local universities and colleges to assist students in meeting graduation requirements for practicum. During these contract periods, there is a concrete contract between the school, the professor, the executive director, and the field instructor. All hours required by the university must be met by the student in order for BCEH, Inc. to sign off on the practicum documents.

BCEH, Inc. has 1-2 volunteers that assist with food bank procedures, quarterly newsletters and other tasks when it is needed.

Information and Referral

During business hours, BCEH, Inc. is a vital source to the community in receiving requests from individuals and families for assistance in personal crisis related to/or not related to homelessness. BCEH, Inc. is equipped with staff, regardless of title that will handle and relay information for shelters in Berks County that will serve the caller. For some calls, this may require additional screening, assessments, or time, in order to properly refer an individual to the right source. BCEH, Inc. will offer homeless individuals the option to come into the office to be assessed by Coordinated Entry to match in programs. Additionally, once assessed, these individuals are reviewed by Coordinated Entry teams for openings in housing programs.

