

**Minutes of the
Homeless Continuum of Care of Stark County's
September 20, 2017 Central Intake and Assessment Committee Meeting**

Attendance. The following members of the Central Intake and Assessment Committee attended the meeting: Frank Aquino; Renee Biggums; Amy Dornack; Amanda Fletcher; Jennifer Keaton; Tracey Lane; Lisa Waikem; and Jean Van Ness. In addition, Tammy Geiger of Alliance for Children and Families attended the meeting as a representative of missing Committee member Shirene Starn Tapyrik. HCCSC Board Chair and Stark Housing Network Executive Director Kurt Williams also attended the meeting along with the Network's Executive Assistant, Melissa Terrell.

News about Committee Members. Jean started the meeting around 9 a.m. by notifying those present that Jack French had resigned from the Committee and read them part of the e-mail he had sent to her, expressing his appreciation for being given the opportunity to work with the CoC.

Jean also informed Committee members that Nellie Rogers resigned from the Committee in July after taking a new job at the VA and will be replaced on the Committee by her successor at the VA: Reaver Nelson.

Review of Business Conducted at July 12, 2017 Meeting and Review of What Remains to be Done to Comply with HUD 2017 Guidance on Coordinated Entry. Jean explained that work on the CoC's HUD application had prevented her from completing the minutes of the July meeting and indicated that these minutes would be submitted to the Committee for approval at its October meeting.

Since it had been two months since the Committee's last meeting, Jean reviewed the matters that had been discussed at the July meeting and this led to further discussion of some of these matters. During that discussion, Jennifer Keaton reported that the Hotline had completed the flowchart that the Committee reviewed at July's meeting and distributed that flowchart to Committee members. She also indicated that the document would be distributed at the Homeless Services Collaborative meeting that afternoon.

New Committee to Review Transfers and Prospective Evictions

Jennifer reported that there had been no action yet to establish a committee to review PSH transfers. This led to additional discussion about an expanded role for such a committee. There appeared to be consensus among Committee members that the new committee should review, not only requests for transfers, but also possible eviction – that, in other words, it should act, not just as a “transfer committee,” but as a “transition committee.” There also appeared to be consensus about the following related issues:

- That the transition committee should serve clients who are not able to request a Housing Promotion meeting in the same way that Stark MHAR's Housing Promotion group serves clients who are eligible to receive case management services through Stark MHAR.
- That someone representing the HCCSC's coordinated entry system should participate in StarkMHAR's Housing Promotion meetings, which are chaired by Frank Aquino
- That there will be cases in which requested transfers are “no brainers” and will require no case conferencing, including cases where different housing is needed to accommodate a disability or to serve an individual or family that is expecting another child.

- That in cases where a provider is proposing to evict an individual or family from housing, the provider staff should be required to document what they have done to resolve the problems contributing to the decision to evict
- That the transition committee should consist of willing individuals who are currently participating in Quality Assurance meetings
- In the event that case conferencing is necessary to discuss requests for transfers or possible evictions, the transition committee should convene, probably by conference call, within 2 days, and discussion and resolution of the case presented should go forward as long as at least 3 committee members are available to participate in the discussion.

New Committee to Review By-Name List

It has always been the intent that Quality Assurance meetings would be used for case conferencing about hard-to-serve clients at the top of the CoC's prioritization list. However, Committee members agreed that:

- Meetings to review the "top ten" households on CoC's "by-name list" and develop housing solutions for those people should take place on a weekly basis
- As in the case of the transition committee, people participating in the Quality Assurance meetings should be asked to participate in these weekly case conferencing meetings
- That the meeting should take place in person rather than by phone to ensure that more collective energy and resources are mobilized to find housing solutions in difficult cases

Lisa volunteered to host the weekly meetings in SMHA's conference room at 8:30 on Friday mornings.

Discussion of Technical Assistance Needed. Jean informed the Committee that Kurt had contacted Jonathan Cox, our HUD-assigned technical assistance provider, and that, before meeting with the Committee in October to provide the assistance we need in implementing HUD's new guidance on coordinated entry, Cox wanted a preview of our questions. Accordingly, Jean requested that the Committee review the excerpts she had presented at the July meeting from HUD's 6/15/17 guidebook entitled *Coordinated Entry: Core Elements* (the Guidebook) and develop a list of questions for Cox. Areas of confusion and concern identified by the Committee included the following:

1. The Guidebook says that a CoC's policies and procedures must ensure that participants can freely abstain from disclosing and sharing information without fear of denial of services resulting from the refusal "although certain funders might require disclosure of certain pieces of information for purposes of establishing or documenting program eligibility." The Guidebook also says, "The CEP must allow people presenting to the crisis response system to refuse to answer assessment questions and to reject housing and service options offered without their suffering retribution or limiting their access to assistance." Questions pertaining to this guidance include:
 - How can we consistently and effectively use an objective assessment tool if clients are able to refuse to answer questions posed by the tool at will without suffering any consequences?
 - Some of our most difficult cases involve people who seem happy to circulate endlessly in shelter and who routinely turn down every option presented to them? Is it correct that, in such cases, we have to continue indefinitely to serve such people without

providing any disincentive to their recalcitrant conduct by, for example, removing them to the bottom of the wait list?

2. The Guidebook also states, “Assessment tools that generate a prioritization score are a good place to start, but additional factors need to be considered such as individual participant circumstances and the manner in which individuals respond to challenges and circumstance of their lived experience.” It goes on to say, “The CoC should consider how other information, including assessor judgment, can be included in its prioritization process without jeopardizing the integrity of the process.” The primary question raised by this guidance is this:
 - Just a few years ago, when insisting that CoCs adopt a common assessment tool, HUD seemed intent on removing discretion and individual judgment from the assessment and service prioritization process and, in so doing, making the process much less subjective. How does HUD now propose that we reintroduce discretion/individual judgment without destroying the objectivity/integrity of the process? This seems like a slippery slope.
3. The Guidebook says, “if no PSH resources are available, the highest need or highest prioritized person should be offered other appropriate resources the CoC has available.” The questions we have regarding this guidance are as follows:
 - At this point, the CoC has very little TH to speak of. Therefore, we have only RRH to offer high needs people who qualify for PSH but can’t get into PSH immediately. Are we to interpret this guidance to mean that we have to use RRH to serve these people even though (1) we have very few homeless living on the street and, thus, no need to put people who qualify for PSH in RRH in order to get them off the street; (2) this population will consume a large percentage of RRH resources and greatly reduce the number of people we can serve through RRH; and (3) this practice seems likely to result in poor outcomes for our RRH programs?
 - Does HUD have any examples of communities that are successfully using RRH to serve PSH-qualified clients with severe needs?
4. Is it incumbent upon the CoC to present a client with all choices for housing if more than one choice is available, or is it acceptable to establish a rule which prevents housing providers from contacting clients and presenting them with other housing options once another provider has begun working with the client to fill an available vacancy?

Discussion of Rule Allowing Bypassing Hard-to-Serve RRH Client if Housing for Client Lower on the List Become Available. The Committee next discussed the policy currently incorporated in Section VII.C. of the HCCSC’s *Policies Governing Eligibility and Prioritization to Receive CoC Assistance and Standards for Administering Assistance*. That policy reads as follows: “Although rapid re-housing projects must make a diligent effort to serve clients in the order of priority outlined in this section they may deviate from that order when housing becomes available that does not meet the needs of households with higher priority but does meet the needs of those with lower priority.”

Jean indicated that this section was included in one of the earliest versions of these policies. As far as she could recall, the rationale for it revolved around concerns that RRH projects would be paralyzed by efforts to rapidly re-house high-priority clients who, for reasons beyond the control of RRH staff, could not find landlords willing to house them or housing suitable for their needs. Another rationale for the

policy was that suitable housing for RRH is not always readily available in the community and that, when it becomes available, RRH projects should make use of it to serve a waiting client even if that client is not at the top of the prioritization list. However, Jean noted that, militating against this policy is the fact that, because RRH resources are limited, the license to bypass hard-to-serve clients in favor of those who are easier to serve can result in an exhaustion of resources before appropriate housing can be found for hard-to-serve clients.

There appeared to be consensus that the current policy allowing RRH projects to bypass hard-to-serve clients had to be eliminated. Jennifer noted that RRH projects may give up too easily on hard-to-serve clients who don't have the ability to follow through on their own. She and others opined that the solution to this problem lies in projects providing more "hand-holding" to help clients identify and secure suitable housing. Due to limited resources, this might mean that RRH projects would have to reduce their caseloads. However, Committee members also thought that RRH projects should consider recruiting and deploying volunteers to provide assistance to clients that have difficulty finding housing on their own.

Discussion of Methods for Operationalizing Notice to Clients of Right to File Fair Housing Complaint with CoC. Jean informed the Committee that, at its September meeting, the HCCSC Board had approved some slight changes to the HCCSC's Fair Housing and Equal Access policies and that, during the Board discussion of these changes, Amanda had raised a question about how providers were expected to operationalize the requirement in those policies that providers give clients notice of their rights to file a grievance with the CoC when they believe their rights have been violated.

Melissa informed the Committee that she was working on grievance procedures for clients who wished to complain to the CoC about actions adversely affecting them. Jean recommended that Melissa look at the procedures the CoC has in place currently to enable clients to pursue particular kinds of grievances and decide whether or not there should be one all-encompassing grievance procedures. If there is going to be one all-encompassing grievance procedure, existing policies that include procedures for pursuing particular types of grievances will have to be changed.

Adjournment. There being no further business, the meeting was adjourned around 11 a.m.