

HOMELESS CONTINUUM OF CARE OF STARK COUNTY

Board Meeting

Tuesday, December 12, 2017

9:30 a.m. at Goodwill Campus

Meeting Minutes

Members Present

De Ann Covey
Joann Breedlove
Marty Chumney
Cathy Jennings
Cheli Curran
Lynne Dragomier
Shirene Starn-Tapyrik
Julie Sparks
Rollin Seward
Amanda Fletcher
John Aller

SHN Staff

Marcie Bragg
Melissa Terrell

Guest

Natalie McCleskey
Scott Schnyders
Jennifer Keaton

Absent

Lt. Gabbard
Kimberly Kroh
Beverly Lewis
Kellie Johnson
Nedra Petro
Maria Heege

I. **Welcome/Approval of Minutes**

At 9:35 a.m. John Aller, who assumed the role of board chair upon Kurt Williams's resignation, called the meeting to order and welcomed everyone. John reminded everyone of the conflict of interest policy that the HCCSC Board follows.

Motion: John requested a motion to approve the September meeting minutes. Cheli made a motion, JoAnn seconded, and it was passed by a unanimous vote of all present except for John, Lynne and Shirene, who abstained.

Discussion:

- a. On page three of the September HCCSC Board meeting minutes, there is mention of Alliance for Families and Children (ACF) holding a *Step Up* program. Shirene has expressed that ACF does not have a *Step Up* program and requested the information be removed from the September HCCSC Board meeting minutes.
- b. Amanda Fletcher is retiring from the Operations Director position at ICAN. Amanda's last day will be the end of June, and ICAN has posted the Operations Director position. Amanda stated that she will be resigning from her position on the HCCSC Board at that time.
- c. Nedra Petro, HCCSC board member representing Jobs and Family Services will be retiring at the end of January 2018 and resigning her HCCSC board position. This will create an open position on the HCCSC Board.
- d. Jean Van Ness will continue to be a part of the HCCSC Board until a replacement for her position as past chair on the Board is considered by existing HCCSC Board members. Jean will continue to be a

part of the planning and implementation of transitions taking place with Coordinated Entry changes that are mandated by HUD and to assist anyway possible with the transition from Kurt Williams to Marcie Bragg as the Stark Housing Network (SHN) Executive Director.

II. Introduction of New Executive Director of the Stark Housing Network

John introduced the new SHN Executive Director, Marcie Bragg. John explained that the Stark Housing Network Inc., in conjunction with the Sisters of Charity Foundation of Canton and the HCCSC Board, formed a search committee to find a new executive director for the SHN. The committee had several applicants and interviews and Marcie was the front runner out of all the applicants. Marcie is the current Vice President of Mission Services at Goodwill industries of Greater Cleveland and East Central Ohio, Inc. (Goodwill) and has worked for Goodwill for the last nine years. Marcie has a back ground and a Master's in Business Administration. The Stark Housing Network Inc. is thrilled to have Marcie working in this capacity as the new Executive Director.

Marcie addressed the Board stating that she has been a long time resident of Stark County. Her work at Goodwill has inspired her to continue to work in an area of social service. Marcie explained that her position at Goodwill has shown her the need for stable housing and how unstable housing prevents social services from being effective in the lives of those who seek services. Marcie expressed that she has a background with regulations, grants and auditing. Marcie stated that she is happy to be a part of this organization and is committed to the continuous improvement of Stark County's homeless services.

III. Review/Discussion of Changes to the Coordinated Entry Guide (See Appendix 1)

Natalie and Scott will be the successors of Jean Van Ness's position as the Chair of the Central Intake and Assessment/Coordinated Entry committee. Natalie and Scott will co-chair the committee beginning in January 2018.

HUD issued Coordinated Entry guidance in January 2017 that outlines requirements and recommendations. Along with the guidance, HUD provided a self-assessment tool that CoCs were advised to use to evaluate their system. The Coordinated Entry guide, which was sent to the board via e-mail outlines seven sections of the Coordinated Entry system. Throughout these seven sections, HUD has made requirements that must be in effect by January 23rd 2018. HUD mandated that all CoCs across the nation follow these guidelines and that all requirements will be placed in the CoCs Coordinated Entry policies and procedures. The Central Intake and Assessment committee has spent the last year planning and implementing the HUD requirements.

Overview:

Natalie and Scott reviewed the committee's work to make appropriate revisions to each of the seven sections: Planning, Access, Assessment, Prioritization, Referral, Data Management and Evaluation.

Summary:

The HCCSC complies with a majority of the requirements, and the documents that the HCCSC Board has before them are the corresponding documents that codify the proposed changes. The Central Intake and Assessment committee will be meeting again on January 3rd to finalize details for Board approval. Any questions about these documents need to be addressed to Jean so she can finalize these documents and add additional changes or recommendations.

IV. Board Updates

Marcie addressed the HCCSC Board regarding the Executive Committee.

- Jean will be stepping off the committee.
- John will be staying on the committee for another year as the past chair.
- Lynne has agreed to stay on the committee on a temporary basis until her position can be filled.
- Lynne Dragomire has stepped up to fill a position on the committee.

It was suggested by SCDJFS that Danielle Lightner will assume Nedra's position on the HCCSC Board. The Executive Committee can approve this mid-term appointment.

V. Old Business/New Business

- a. Welcome to Rollin Seward to the HCCSC Board.
- b. Kurt Williams last day was Friday, December 8th as the Stark Housing Network Inc. Executive Director. Kurt has worked diligently for the Homeless Continuum of Care and has taken care of a number of items before he departed.
- c. There has been an Ohio Civil Rights complaint in the past that was filed against the Hotline on behalf of two people that had an advocate assisting them. StarkMHAR has received correspondence from the Ohio Civil Rights Service Commission that there are no findings and the complaint is being closed.

VI. Adjournment

John requested a motion to adjourn the meeting. Lynne motioned to adjourn the meeting at 10:35am.

Coordinated Entry Process Self-

Assessment

The U.S. Department of Housing and Urban Development (HUD) requires that Continuums of Care (CoC) establish and operate a coordinated entry (CE) process—and that recipients of CoC Program and Emergency Solutions Grants (ESG) program funding within the CoC’s area must use that CE process. The requirement was established in the 2012 CoC Program interim rule (24 CFR 578) and the 2011 Emergency Solutions Grants (ESG) interim rule (24 CFR 576). Details of the requirement, as well as additional policy considerations, are provided there and in several documents issued by HUD since:

- [HUD Coordinated Entry Notice CPD-17-01 – Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System](#) (2017)
- [HUD Prioritization Notice CPD-16-11 – Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#) (2016)
- [Coordinated Entry Policy Brief](#) (2015)
- [CoC Program interim rule: 24 CFR 578.7\(a\)\(8\)](#)
- [ESG interim rule: 24 CFR 576.400\(d\)](#)

E. Referral19

- [HUD Equal Access rule: 24 CFR 5.105\(a\)\(2\) and 5.106\(b\)](#)

Based on these documents, this tool identifies aspects of coordinated entry that HUD has determined are , as **Required** well as other aspects of CE functionality, operations, or management that it has **Recommended** as good practice but not required. Some unique design features of CE may be appropriate for some subpopulations or geographic areas but are not universally applicable across all CoCs; these are identified as **Optional**. The source document(s) for each Required item is noted in **bold**, and for each Recommended item if appropriate.

CoCs can use this **Coordinated Entry Self-Assessment** as a reference to help them identify key aspects of CE design, implementation, and management; compare this list against their existing CoC plans and/or practices to gauge the extent to which the CoC currently includes these elements; and as a general outline for a set of policies and procedures a CoC must adopt to support the ongoing management of CE processes and functions.

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Coordinated Entry Process SelfAssessment



** Required **

Deadline for Compliance.

1. CoC establishes or updates its coordinated entry process in full compliance with HUD requirements by February 1, 2018

**CoC Program interim rule: 24 CFR 578.7(a)(8)
HUD Coordinated Entry Notice: Section I.B**

Core Requirements since 2012.

CoC's coordinated entry process meets the requirements (below) established by the CoC Program interim rule. **CoC Program interim rule: 24 CFR 578.3 & 24 CFR 578.7(a)(8)**

- 2. CES covers the entire geographic area claimed by the CoC.
- 3. CES is easily accessed by individuals and families seeking housing or services.
- 4. CES is well-advertised.
- 5. CES includes a comprehensive and standardized assessment tool(s).
- 6. CES provides an initial, comprehensive assessment of individuals and families for housing and services.
- 7. CES includes a specific policy to guide the operation of the centralized or coordinated assessment system to

A. PLANNING

address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim specific providers.

Core Requirements.

8. CoC, in consultation with recipients of Emergency Solutions Grants program funds within the geographic area, has established and consistently follows written standards for providing Continuum of Care assistance which can guide the development of formalized policies and procedures for the coordinated entry process:
- Written standards provide guidance for evaluating individuals' and families' eligibility for assistance under 24 CFR Part 578.
 - Written standards provide guidance for determining and prioritizing which eligible individuals and families will receive transitional housing assistance.
 - Written standards provide guidance for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance.
 - Written standards provide guidance for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance.
 - Written standards provide guidance for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance.

CoC Program interim rule: 24 CFR 578.7(a)(8)

9. CoC and each ESG recipient operating within the CoC's geographic area must work together to ensure the CoC's coordinated entry process allows for coordinated screening, assessment and referrals for ESG projects consistent with the written standards for administering ESG assistance.

**CoC Program interim rule: 24 CFR
578.7(a)(8) ESG interim rule: 24 CFR
576.400(d) and (e)**





	<input type="checkbox"/>	
<p>Full Coverage.</p> <p>10. If multiple CoCs have joined together to use the same regional coordinated entry process, written policies and procedures describe the following:</p> <ul style="list-style-type: none"> • The relationship of the CoC(s) geographic area(s) to the geographic area(s) covered by the coordinated entry process(es); and • How the requirements of ensuring access, standardizing assessments, and implementing uniform referral processes occur in situations where the CoC’s geographic boundaries and the geographic boundaries of the coordinated entry process are different. <p style="text-align: right;">HUD Coordinated Entry Notice: Section II.B.1</p>	<input type="checkbox"/>	

** Required **

Marketing.

11. CoC affirmatively markets housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, handicap or who are least likely to apply in the absence of special outreach.

CoC Program interim rule: 24 CFR 578.93(c)

ESG Program interim rule: 24 CFR 576.407(a) and (b)

12. Coordinated entry written policies and procedures include a strategy to ensure the coordinated entry process is available to all eligible persons regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identify, or marital status.

HUD Coordinated Entry Notice: Section II.B.5

HUD Equal Access rule: 24 CFR 5.105(a)(2) and 5.106(b)

13. Coordinated entry written policies and procedures ensure all people in different populations and subpopulations in the CoC's geographic area, including people experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence, have fair and equal access to the coordinated entry process.

HUD Coordinated Entry Notice: Section II.B.5



ASSESSMENT NOTES



B. ACCESS

** Required **

Nondiscrimination.

14. CoC has developed and operates a coordinated entry that permits recipients of Federal and State funds to comply with applicable civil rights and fair housing laws and requirements. Recipients and subrecipients of CoC Program and ESG Program-funded projects must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws, including the following:



ASSESSMENT NOTES

- Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status.
 - Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance.
 - Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin under any program or activity receiving Federal financial assistance.
- Title II of the Americans with Disabilities Act prohibits public entities, which includes State and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housingrelated services such as housing search and referral assistance.

B. ACCESS

- Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

HUD Coordinated Entry Notice: Section I.D

**** Required ****

Access Models.

1. CoC offers the same assessment approach at all access points and all access points are usable by all people who may be experiencing homelessness or at risk of homelessness. If separate access points are identified to meet the needs of one of the five populations allowable by HUD's Coordinated Entry Notice, initial screening at each access point allows for immediate linkage to the appropriate subpopulation access point (e.g. unaccompanied youth who access CES at the access point defined for adults without children are immediately connected to the youth-specific access point).

HUD Coordinated Entry Notice: Section II.B.2.a



Accessibility.

2. CoC ensures that households who are included in more than one of the populations for which an access point is dedicated (for example, a parenting unaccompanied youth who is fleeing domestic violence) can be served at all of the access points for which they qualify as a target population.



ASSESSMENT NOTES

HUD Coordinated Entry Notice: Section

II.B.2.f 3. CoC provides the same assessment approach, including standardized decision-making, at all access points.

HUD Coordinated Entry Notice: Section II.B.2.a

4. CoC ensures participants may not be denied access to the coordinated entry process on the basis that the participant is or has been a victim of domestic violence, dating violence, sexual assault or stalking.

HUD Coordinated Entry Notice: Section II.B.12.e

5. CoC's access point(s) must be easily accessed by individual and families seeking homeless or homelessness prevention services.

HUD Coordinated Entry Notice: Section II.B.8

B. ACCESS

Marketing.

10. CoC's written coordinated entry policies and procedures document steps taken to ensure access points, if physical locations, are accessible to individuals with disabilities, including accessible physical locations for individuals who use wheelchairs, as well as people in the CoC who are least likely to access homeless assistance.

ASSESSMENT NOTES

HUD Coordinated Entry Notice: Section II.B.5.c

** Required **

11. CoC's written CE policies and procedures document steps taken to ensure effective communication with individuals with disabilities. Recipients of Federal funds and CoCs must provide appropriate auxiliary aids and services necessary to ensure effective communication (e.g. Braille, audio, large type, assistive listening devices, and sign language interpreters).

HUD Coordinated Entry Notice: Section II.B.5.c

12. CoC's access point(s) take reasonable steps to offer CE process materials and participant instruction in multiple languages to meet the needs of minority, ethnic, and groups with Limited English Proficiency (LEP).

HUD Coordinated Entry Notice: Section II.B.5.d

Safety Planning.

13. CoC has a specific written CE policy and procedure to address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers. At a minimum, people fleeing or attempting to flee domestic violence and victims of trafficking have safe and confidential access to the coordinated entry process and victim services, including access to the comparable process used by victim service providers, as applicable, and immediate access to emergency services such as domestic violence hotlines and shelter.

HUD Coordinated Entry Notice: Section II.B.10

B. ACCESS

Street Outreach.

14. Street outreach efforts funded under ESG or the CoC program are linked to the coordinated entry process. Written policies and procedures describe the process by which all participating street outreach staff, regardless of funding source, ensure that persons encountered by street outreach workers are offered the same standardized process as persons who access coordinated entry through site-based access points.

HUD Coordinated Entry Notice: Section II.B.6

Accessibility.

ASSESSMENT NOTES

Recommended

15. CoC's access points, if physical locations, are sited in proximity to public transportation and other services to facilitate participant access. A CoC or recipient of Federal funds may be required to offer some variation to the process, e.g., a different access point, as a reasonable accommodation for a person with disabilities. For example, a person with a mobility impairment may request a reasonable accommodation in order to complete the coordinated entry process at a different location.

16. CoC's access points provide connections to mainstream and community-based emergency assistance services such as supplemental food assistance programs and applications for income assistance.

Access Models.

B. ACCESS

Optional

17. CoC's access points provide virtual entry where individuals and families experiencing a housing crisis may present for initial assessment screening (e.g. a 211 or other hotline systems that screens and directly connects callers to appropriate crisis housing and service providers in the area).
18. CoC has multiple access points, each assigned to a specific sub-region within the CoC.
19. CoC has partnered with neighboring CoCs to create a single access point covering the multi-CoC region.
20. The CoC has multiple access points to facilitate access, coordinate entry processes, and improve the quality of information gathered for the following subpopulations:
- Adults without children;
 - Adults accompanied by children;
 - Unaccompanied youth;
 - Households fleeing or attempting to flee domestic violence; or • Persons at risk of homelessness.
21. CoC has a "no wrong door" approach in which a homeless family or individual can present at any homeless housing and service provider in the geographic area.



ASSESSMENT NOTES

Prevention Services.

22. CoC's CE process includes separate access point(s) for homelessness prevention so that people at risk of homelessness can receive urgent services when and where they are needed. If separate access points for homelessness prevention services exist in the CoC, written CE policies and procedures describe the process by which persons will be prioritized for referrals to homelessness prevention services.

HUD Coordinated Entry Notice: Section II.B.8

Safety Planning.

23. Victim service providers funded by CoC and ESG program funds are not required to use the CoC's coordinated entry process, but CoC- and ESG-funded victim service providers are allowed to do so. Or, victim service providers may use an alternative coordinated entry process for victims of domestic violence, dating violence, sexual assault, and stalking.

**Note – if an alternative CE process is used for victims of domestic violence, dating violence, sexual assault and stalking, that alternative process must meet HUD's minimum coordinated entry requirements.*

C. ASSESSMENT

**** Required ****

5. CoC's coordinated entry process training curricula includes the following topics for staff conducting



C. ASSESSMENT

assessments:

- Review of CoC’s written CE policies and procedures, including any adopted variations for specific subpopulations;
- Requirements for use of assessment information to determine prioritization; and • Criteria for uniform decision-making and referrals.



ASSESSMENT NOTES

** Required **

Assessment Process.

1. CoC consistently applies one or more standardized assessment tool(s), applying a consistent process throughout the CoC in order to achieve fair, equitable, and equal access to services within the community.
HUD Coordinated Entry Notice: Section II.B.2.a
2. CoC’s written policies and procedures describe the standardized assessment process, including assessment information, factors, and documentation of the criteria used for uniform decision-making across access points and staff.
HUD Coordinated Entry Notice: Sections II.B.2.g.1 and II.B.3
3. CoC maintains written policies and procedures that prohibit the coordinated entry process from screening people out of the coordinated entry process due to perceived barriers to housing or services, including, but not limited to, too little or no income, active or a history of substance abuse, domestic violence history, resistance to receiving services, the type or extent of a disability-related services or supports that are needed, history of evictions or poor credit, lease violations or history of not being a leaseholder, or criminal record.
HUD Coordinated Entry Notice: Section II.B.4



Assessor Training.

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. CoC updates and distributes training protocols at least annually. The purpose of the training is to provide all staff administering assessments with access to materials that clearly describe the methods by which assessments are to be conducted with fidelity to the CoC's coordinated entry written policies and procedures.

HUD Coordinated Entry Notice: Section II.B.14



Recommended

Assessment Process.



C. ASSESSMENT

10. CoC uses locally specific assessment approaches and tools that reflect the characteristics and attributes of the CoC and CoC participants.

11. CoC uses a valid, tested, and reliable assessment process which gathers only enough participant information to determine the severity of need and eligibility for housing and related services.

ASSESSMENT NOTES

HUD Coordinated Entry Notice: Section II.B.14

Client-Centered.

6. Participants must be informed of the ability to file a nondiscrimination complaint.

HUD Coordinated Entry Notice: Section II.B.12.g

Participant Autonomy.

7. CoC coordinated assessment participants are freely allowed to decide what information they provide during the assessment process, to refuse to answer assessment questions and to refuse housing and service options without retribution or limiting their access to other forms of assistance. Written policies and procedures specify the conditions for participants to maintain their place in coordinated entry prioritization lists when the participant rejects options.

**Note – Programs may require participants to provide certain pieces of information to determine program eligibility only when the applicable program regulation requires the information to establish or document eligibility.*

HUD Coordinated Entry Notice: Section II.B.11



C. ASSESSMENT

Privacy Protections.

8. CoC has established written policies and procedures concerning protection of all data collected through the CE assessment process.
HUD Coordinated Entry Notice: Section II.B.12
9. CoC has established written policies and procedures establishing that the assessment process cannot require disclosure of specific disabilities or diagnosis. Specific diagnosis or disability information may only be obtained for purposes of determining program eligibility to make appropriate referrals.
HUD Coordinated Entry Notice: Section II.B.11.f

12. CoC uses a phased approach to assessment which progressively collects only enough participant

information to prioritize and refer participants to available CoC housing and support services.

13. CoC employs a phased approach to assessment which segments the collection of participant information into the following stages:

- Initial Triage – resolving the immediate housing crisis; identification of the CoC crisis response system as the appropriate system to address the potential participant’s immediate needs.
- Diversion and/or Prevention Screening – examination of existing CoC and participant resources and options that could be used to avoid entering the homeless system of care.

Recommended

Assessor Training.

15. All staff administering assessments use culturally and linguistically competent practices, including the following:



C.) ASSESSMENT

- CoC incorporates cultural and linguistic competency training into the required annual training protocols for participating projects and staff members; and
- Assessments use culturally and linguistically competent questions for all persons that reduce cultural or linguistic barriers to housing and services for special populations.



- Crisis Services Intake – information necessary to enroll the participant in a crisis response project such as emergency shelter or other homeless assistance project.
- Initial Assessment – information to identify a participant’s housing and service needs with the intent to resolve participant’s immediate housing crisis.
- Comprehensive Assessment – information necessary to refine, clarify, and verify a participant’s housing and homeless history, barriers, goals, and preferences. Assessment information supports the evaluation of participant’s vulnerability and prioritization for assistance.
- Next Step/Move On Assessment – information revealed or known after an Initial Assessment is conducted when that new information may suggest a revised referral strategy. Or, re-evaluating participants who have been stably housed for some time and who may be ready for less intensive housing and service strategies.

14. CoC employs a Housing First oriented assessment process which is focused on rapidly housing participants without preconditions.

16. All assessment staff are trained on how to conduct a trauma-informed assessment of participants.



ASSESSMENT NOTES

C. ASSESSMENT

Special consideration and application of trauma-informed assessment techniques are afforded victims of domestic violence or sexual assault to help reduce the chance of re-traumatization.



17. All Assessment staff are trained on safety planning and other next step procedures if safety issues are identified in the process of participant assessment.

Client-Centered.

18. Physical assessment areas are made safe and confidential to allow for individuals to identify sensitive information or safety issues in a private and secure setting.
19. Assessment questions are adjusted according to specific subpopulations (i.e. Youth, Individuals, Families, and Chronically Homeless) and responses to questions. For example, if a participant is under the age of 18 questions related to Veteran status and experience with the armed services can be skipped.
20. Assessment questions and instructions reflect the developmental capacity of participants being assessed.
21. CoC's assessment process incorporates a person-centered approach, including the following:
- Assessments are based in part on participant's strengths, goals, risks, and protective factors.
 - Tools and assessment processes are easily understood by participants.
 - Assessments are sensitive to participants' lived experience.
 - Participants are offered choice in decisions about location and type of housing.
 - Participants are able to easily understand to which program they are being referred, what the program expects of them, what they can expect of the program, and evidence of the program's rate of success.

Incorporating Mainstream Services.

22. CoC includes relevant mainstream service providers in the following activities:
- Identifying people at risk of homelessness;
 - Facilitating referrals to and from the coordinated entry process;

C. ASSESSMENT

	<input checked="" type="checkbox"/>	ASSESSMENT NOTES
<div style="writing-mode: vertical-rl; transform: rotate(180deg); background-color: #8B4513; color: white; padding: 5px; font-weight: bold;">Recommended</div> <ul style="list-style-type: none"> Aligning prioritization criteria where applicable; Coordinating services and assistance; and Conducting activities related to continual process improvement. <p>23. CoC has established written CE policies and procedures describing how each participating mainstream housing and service provider will participate, including the process by which referrals will be made and received.</p>	<input type="checkbox"/>	
<div style="writing-mode: vertical-rl; transform: rotate(180deg); background-color: #2E8B57; color: white; padding: 5px; font-weight: bold;">Optional</div> <p>Assessment Process.</p> <p>24. CoC uses a publicly available, rather than locally specific, standardized assessment tool(s) to facilitate their assessment process (e.g. VI-SPDAT or vulnerability index-service prioritization decision assistance tool).</p> <p>25. CoC allows Veteran Affairs (VA) partners to conduct assessments and make direct placements into any homeless assistance program, with the method for doing so included in the CoC’s coordinated entry policies and procedures and written standards for affected programs.</p>	<input type="checkbox"/> <input type="checkbox"/>	
<p>Street Outreach.</p> <p>26. Street outreach activities incorporate the assessment process, in part or whole, into street outreach activities or separate the assessment process so that it is only conducted by assessment workers who are not part of street outreach efforts.</p>	<input type="checkbox"/>	



**** Required ****

Core Requirements.

1. CoC uses the coordinated entry process to prioritize homeless persons within the CoC's geographic area:
 - Prioritization is based on a specific and definable set of criteria that are documented, made publicly available and applied consistently throughout the CoC for all populations.
 - CoC's written policies and procedures include the factors and assessment information with which prioritization decisions are made.
 - CoC's prioritization policies and procedures are consistent with CoC and ESG written standards under 24 CFR 578(a)(9) and 24 CFR 576.4.

**Note – Refer to HUD Prioritization Notice: CPD-16-11 for detailed guidance on prioritizing persons experiencing chronic homelessness and other vulnerable homeless populations in permanent supportive housing.*

HUD Coordinated Entry Notice: Section II.B.3

2. CoC's written CE policies and procedures include the factors and assessment information with which prioritization decisions are made for all homeless assistance.

HUD Coordinated Entry Notice: Section II.B.3

Emergency Services.

3. CoC's written CE policies and procedures clearly distinguish between the interventions that will not be prioritized based on severity of service need or vulnerability, such as entry to emergency shelter, allowing for an immediate crisis response, and those that will be prioritized, such as permanent supportive housing (PSH).

HUD Coordinated Entry Notice: Section II.B.7



D. PRIORITIZATION



ASSESSMENT NOTES

**** Required ****

Nondiscrimination.

4. CoC does not use data collected from the assessment process to discriminate or prioritize households for housing and services on a protected basis, such as race, color, religion, national origin, sex age, familial status,



D. PRIORITIZATION



ASSESSMENT NOTES

disability, actual or perceived sexual orientation, gender identify or marital status. CoC’s written policies and procedures for CE document how determining eligibility is a different process than prioritization.

**Note – In certain circumstances some projects may use disability status or other protected class information to limit enrollment, but only if Federal or State statute explicitly allows the limitation (e.g. HOPWA-funded projects may only serve participants who are HIV+ / AIDS).*

HUD Coordinated Entry Notice: Sections I.D and II.B.2.g(2)

5. CoC’s written CE policies and procedures document process for participants to file a nondiscrimination complaint.

HUD Coordinated Entry Notice: Section II.B.12.g

7. CoC’s written policies and procedures document conditions under which participants maintain their place in coordinated entry prioritization lists when the participant rejects referral options.

HUD Coordinated Entry Notice: Section II.B.9

Prioritization List.

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.

HUD Coordinated Entry Notice: Section II.B.3

Prevention Services.

9. If separate access point(s) for homelessness prevention services exist in the CoC, written CE policies and procedures describe the process by which persons will be prioritized for referrals to homelessness prevention services.

HUD Coordinated Entry Notice: Section II.B.8

D. PRIORITIZATION



ASSESSMENT NOTES

Recommended

Prioritization List.

10. CoC has established a community-wide list of all known homeless persons who are seeking or may need CoC housing and services to resolve their housing crisis. The community-wide list generated during the prioritization process, variously referred to as a "By Name List," "Active List," or "Master List," provides an

effective way to manage an accountable and transparent prioritization process.





Prioritization Factors.

11. CoC uses any combination of the following factors to prioritize homeless persons:

- Significant challenges or functional impairments, including physical, mental, developmental, or behavioral health challenges, which require a significant level of support in order to maintain permanent housing.
- High utilization of crisis or emergency services to meet basic needs.
- Extent to which persons, especially youth and children, are unsheltered.
- Vulnerability to illness or death.
- Risk of continued homelessness.
- Vulnerability to victimization, including physical assault, trafficking, or sex work.

HUD Coordinated Entry Notice: Section II.B.3



D. PRIORITIZATION



ASSESSMENT NOTES

Prioritization Process.

12. CoC identifies a prioritization entity, agency, or other decision-making entity empowered by the CoC to manage the process of determining and updating participant prioritization for available CoC housing and supportive services.
13. In cases where the assessment tool does not produce the entire body of information necessary to determine a household's prioritization, either because of the nature of self-reporting, withheld information, or circumstances outside the scope of assessment questions, the CoC allows case workers and others working with households to provide additional information through case conferencing or another method of case worker input.
14. CoC maintains a prioritization list such that participants wait no longer than 60 days for a referral to housing or services. If the CoC cannot offer a housing resource to every prioritized household experiencing homelessness within 60 days or less, then the CoC adjusts prioritization standards in order to more precisely differentiate and identify resources for those households with the most needs and highest vulnerabilities.



15. In the event that two or more homeless households within the same geographic area are

identically prioritized for the next available unit, and each household is also eligible for that

unit, the CoC selects the household that first presented for assistance in the

determination of which household receives a referral to

D. PRIORITIZATION



ASSESSMENT NOTES

Recommended

the next available unit.

Optional

Prioritization Process.

16. CoC establishes scoring criteria that translate the participant's current living situation and barriers impacting participant's ability to obtain and/or maintain housing into a numerical score that can also be used to inform the referral process.





**** Required ****

Referrals to Participating Projects.

1. CoC's CE process includes uniform and coordinated referral process for all beds, units, and services available at participating projects within the CoC's geographic area for referral to housing and services.
HUD Coordinated Entry Notice: Section II.B.3
2. Each CoC project establishes and makes publicly available the specific eligibility criteria the project uses to make enrollment determinations.
HUD Coordinated Entry Notice: Section II.B.3
3. CoC and projects participating in the coordinated entry process do not screen potential project participants out for assistance based on perceived barriers related to housing or services.
HUD Coordinated Entry Notice: Section II.B.3
4. CoC- and ESG-program recipients and subrecipients use the coordinated entry process established by the CoC as the only referral source from which to consider filling vacancies in housing and/or services funded by CoC and ESG programs.
HUD Coordinated Entry Notice: Section I.B

Nondiscrimination.

5. CoC and all agencies participating in the coordinated entry process comply with the equal access and nondiscrimination provisions of Federal civil rights laws.
HUD Coordinated Entry Notice: Sections I.D and II.B.3
6. 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.
HUD Coordinated Entry Notice: Sections I.D and II.B.3



Referrals to Participating Projects.

Recommended

7. CoC maintains and annually updates a list of all resources that may be accessed through referrals from the coordinated entry process.
8. Non HUD-funded CoC agencies participating in the coordinated entry process fill project vacancies only through referrals from the referring agency/entity.
9. CoC's written CE policies and procedures include standardized criteria by which a participating project may justify rejecting a referral.
10. CoC's written CE policies and procedures document uniform process for managing rare instances of referral rejection, as well as the protocol the coordinated entry process must follow to connect the rejected household with a new project.
11. Upon referral, CoC participants receive clear information about the project they are referred to, what participants can expect from the project, and expectations of the project.
12. CoC identifies a referral entity, agency, CoC-subcommittee, or other decision-making entity empowered by the CoC to manage the process of referring participants to available CoC housing and supportive services.
13. If a CoC participant is prioritized for permanent supportive housing (PSH) but no PSH resources are available, that participant is offered any other CoC resource available in the CoC's geographic area.
14. CoC establishes a minimum set of participant information associated with a referral and which will be shared by a referring agency/entity with the project receiving the referral.
15. CoC establishes alternate processes to identify suitable options when projects reject a participant and when participants reject a project.

E. REFERRAL



ASSESSMENT NOTES

Recommended

16. CoC employs a 'Housing Navigator' function to ensure efficient and effective enrollment, and subsequent movement from one CoC project to another. While specific 'Housing Navigator' functions will vary from CoC to CoC, typical duties include the following:



- Work closely with referral agencies regarding eligibility determination.
- Develop a Housing Stability Plan.
- Complete housing applications.
- Perform housing search and placement.
- Outreach to and negotiations with landlords.
- Assisting with submitting rental applications and understanding leases.
- Addressing barriers to project admissions.



Participant Autonomy.

17. CoCs incorporate a person-centered approach into the referral process. That approach is documented in CoC's written policies and procedures for coordinated entry management. A person-centered approach includes:

- Participant choice in decisions such as location and type of housing, level and type of services, and other project characteristics, including assessment processes that provide options and recommendations that guide and inform participant choice, as opposed to rigid decisions about what individuals and families need.
- Clear expectations concerning where participants are being referred, entry requirements, and services provided.



Optional

Referrals to Participating Projects.

18. CoC establishes referral zones or referral regions within the geographic area of the CoC. These referral zones are designed to avoid forcing persons to travel or move long distances to be assessed or served.

19. CoC transmits participant referral information electronically, via the CoC's HMIS or other data management system.





Required

Core Requirements.

1. When using an HMIS or any other data system to manage coordinated entry data, CoC ensures adequate privacy protections of all participant information per the HMIS Data and Technical Standards at (CoC Program interim rule) 24 CFR 578.7(a)(8).

HUD Coordinated Entry Notice: Sections II.B.3 and II.B.13

Privacy Protections.

2. CoC's written CE policies and procedures include protocols for obtaining participant consent to share and store participant information for purposes of assessing and referring participants through the coordinated entry process.

HUD Coordinated Entry Notice: Section II.B.12

3. CoC prohibits denying services to participants if the participant refuses to allow their data to be shared unless Federal statute requires collection, use, storage, and reporting of a participant's personally identifiable information (PII) as a condition of program participation.

HUD Coordinated Entry Notice: Sections II.B.12.c and II.B.13

4. If using HMIS to manage coordinated entry functions, CoC ensures all users of HMIS are informed and understand the privacy rules associated with collection, management, and reporting of client data.

HUD Coordinated Entry Notice: Section II.B.12

Recommended

HMIS Use.

5. CoC uses HMIS as part of its coordinated entry process, collecting, using, storing, sharing, and reporting participant data associated with the coordinated entry process.

Privacy Protections.

6. CoC only shares participant information and documents when the participant has provided written consent.



Optional	<p>Data Systems Management.</p> <p>7. CoC imports and exports data to support collaboration between homeless service providers and mainstream resource providers (Medicaid, criminal justice re-entry programs, healthcare services, etc.).</p> <p>8. CoC integrates data between multiple data systems to reduce duplicative efforts and increase case coordination across providers and funding streams.</p> <p>9. CoC manages and maintain a list of referral resources in a systematic way that encourages high data quality and utilizes the AIRS Taxonomy to ensure uniformity in naming and describing resources.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>HMIS Functionality.</p> <p>10. CoC automates coordinated entry processes including resource prioritization, prioritization list management, and eligibility determination.</p>	<input type="checkbox"/>		

Recommended	<p>** Required **</p> <p>Core Requirements.</p> <p>CoC consults with each participating project and project participants at least annually to evaluate the intake, assessment, and referral processes associated with coordinated entry. Solicitations for feedback must address the quality and effectiveness of the entire coordinated entry experience for both participating projects and households.</p> <p style="text-align: right;">HUD Coordinated Entry Notice: Section II.B.15</p>	<input type="checkbox"/>	
	<p>5. CoC ensures that evaluation is part of the implementation planning process from the inception of CE:</p> <ul style="list-style-type: none"> Determine which aspects of the effectiveness of the system will be measured. Determine which aspects of the process will be evaluated for fidelity to the policies and procedures. Determine how to gather data to track the selected measures. 	<input type="checkbox"/>	



Evaluation Methods.

2. CoC ensures through written CE policies and procedures the frequency and method by which the CE evaluation will be conducted, including how project participants will be selected to provide feedback, and must describe a process by which the evaluation is used to implement updates to existing policies and procedures.

HUD Coordinated Entry Notice: Section II.B.15



Privacy Protections.

3. CoC ensures adequate privacy protections of all participant information collected in the course of the annual coordinated entry evaluation.

HUD Coordinated Entry Notice: Section II.B.12



Evaluation Methods.

4. CoC incorporates system performance measures or other evaluation criteria into their required annual coordinated entry evaluation plan.



Recommended



- Determine whether and how to use the evaluation results to inform other aspects of the system planning and monitoring.

Stakeholder Consultation.

6. CoCs employ multiple feedback methodologies to ensure participating projects and households have frequent and meaningful opportunities for feedback. Feedback methodologies include the following:
- Surveys designed to reach either the entire population or a representative sample of participating providers and households;
 - Focus groups of five or more participants that approximate the diversity of the participating providers and households; and
 - Individual interviews with participating providers and enough participants to approximate the diversity of participating households.

