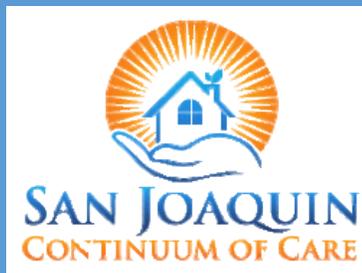


COORDINATED ENTRY SYSTEM POLICIES AND PROCEDURES

The San Joaquin County Coordinated Entry System is a critical component of the regional systematic approach and response to ending homelessness.



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Introduction & Overview

The San Joaquin County Coordinated Entry System (CES) of the San Joaquin Continuum of Care (SJCoC) facilitates the coordination and management of resources and services for the homeless. The function of CES is to quickly and equitably connect the highest need, most vulnerable persons in San Joaquin County to available housing and supportive services, in order to rapidly resolve their housing crisis and make homelessness rare, brief, and non-recurring in our region.

CES is a system designed to efficiently match people experiencing homelessness to available housing, shelter, and services. Through a coordinated partnership between all organizations and agencies serving the homeless in the community, CES identifies and prioritizes those who are most in need of assistance and provides crucial information that helps communities strategically allocate resources and identify gaps in service. San Joaquin County's CES employs a Housing First model that prioritizes individuals and families facing the highest vulnerability for permanent housing, or permanent supportive housing.

CES is a requirement for all US Department of Housing and Urban Development (HUD) Continuums of Care (CoC) as established by the HEARTH Act of 2009. It is designed to more effectively address the local response to homelessness by:

- Helping people move through the system faster by matching individuals and families to the right programs;
- Reducing new entries into homelessness by offering prevention and diversion resources; and
- Improving data collection and quality by providing accurate information on what kind of assistance consumers need.

Coordinated Entry is one essential piece of a broader system of housing and services for the homeless that rapidly returns people who experience homelessness to stable housing. Other elements include shifting investments towards interventions that achieve the best housing results and removing barriers such that there is an appropriate and effective housing intervention for everyone who needs one.

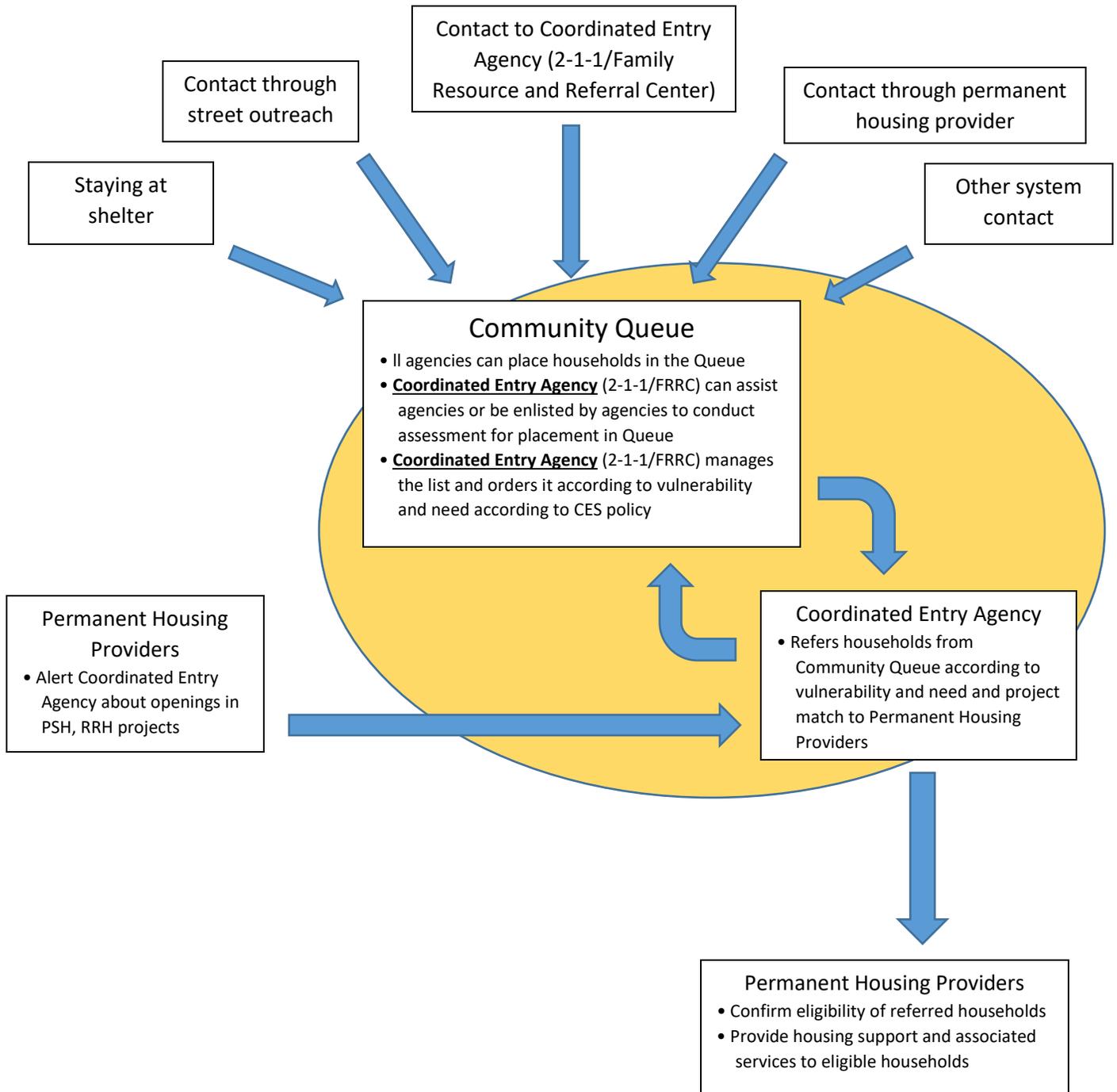
The CES Committee, a Standing Committee of the CoC reporting to the CoC Board of Directors, is responsible for ongoing oversight of the CES, as well as developing, monitoring the progress and impact of, and periodically recommending any necessary revisions to an implementation plan for a coordinated entry and assessment system for all homeless and prevention resources. For more information regarding the roles and responsibilities of the CoC Standing Committees, please visit their website at www.sanjoaquincoc.org.

Coordinated Entry is designed to act as the referral point to various permanent housing programs. Those in need of services contact an Access Point to complete an assessment. The household will receive the same assessment regardless of which Access Point they engage. This assessment provides information on the household's vulnerability and length of time experiencing homelessness. After completing the assessment, the household is placed in a queue of households eligible to receive a referral into various housing programs. Once a housing program has an opening, the Coordinated Entry System will provide the agency with a referral from the queue of those assessed, based off the program's eligibility criteria and the household's vulnerability. Coordinated Entry will always provide a referral to the most vulnerable household who also appears to meet the eligibility of the specific program.

Coordinated Entry System — Flowchart

“No Wrong Door” Model

Consistent with existing San Joaquin Continuum of Care policy



Once referred, the housing program must work with the household to document eligibility prior to providing housing. Though Coordinated Entry strives to always provide referrals to those who will qualify for the program, there are times when a household is referred to a program for which they do not qualify. As such, a referral from Coordinated Entry into any housing program is never a guarantee of housing.

It is important to note that the Coordinated Entry System is not a guarantee of services, nor is it a guarantee of services within a specific time. Coordinated Entry on its own does not provide any new housing services, but rather reorganizes the use of existing services within the community. Within the SJCoC the demand for services continues to be greater than services available, so despite the diligent efforts of the CES to ensure that participants quickly receive access to the most appropriate services and housing resources available, there is no guarantee of service provision. Coordinated Entry does not function on a first-come-first serve basis, but rather it prioritizes referrals based on need and vulnerability, while also accounting for the various eligibility criteria of participating housing programs. This means that a household new to Coordinated Entry may receive a referral into housing more quickly than a household who has been in Coordinated Entry longer. This also means that if a household with higher vulnerability does not meet the eligibility criteria for the program with a current opening, a household with lower vulnerability will receive the referral into the program.

Mission

Policy

All CoC Program and Emergency Solution Grant (ESG) Program-funded projects are required to participate in the local CES process. The CoC aims to have all homeless assistance projects participating in its CES process regardless of funding source(s), and will work with all local projects and funders in its geographic area to facilitate their participation in the CES. Participation may include making referrals to CES and/or accepting referrals from CES, but ultimately depends on the nature of the program.

An up-to-date list of all CoC and ESG-funded programs operating within the CoC will be provided by the CES Committee to the CES Management Entity. San Joaquin County and the City of Stockton are recipients of ESG program funds and maintain information regarding local ESG sub-recipients. San Joaquin County, as the Collaborative Applicant of the San Joaquin Continuum of Care, maintains information regarding CoC Program sub-recipients.

Procedure

The duties of the CES Committee as indicated in the SJCoC Governance Charter include monitoring the CES and Participating Agencies for effectiveness and as necessary recommend any changes to the system or corrective action. Once a Participating Agency has completed initial training, each project/agency participating in CES will submit data every six months from the HMIS that identifies details regarding that agency's CES utilization, including the number of participants its project referred, accepted, rejected, and/or served from the CES process. The CES Committee will review and discuss results of the data, and provide feedback to Participating Agencies as needed.

Vision

Policy

The CoC is committed to aligning and coordinating CES policies and procedures governing assessment, eligibility determinations, and prioritization with its written standards for administering CoC and ESG

program funds. A copy of the CoC and ESG written standards are included in Appendix XX of this document.

Procedure

The CoC will include at least one representative from a local ESG recipient in its membership of the CES Committee. Additionally, at least annually, representatives from the CoC and the ESG recipient agencies will identify any changes to their written standards and share those with the CoC's CES Committee so that the changes may be reflected in the CES P&P document.

Guiding Principles

Policy

The CoC establishes the following guiding principles for its CES:

- The CES will operate with a person-centered approach, and with person-centered outcomes.
- The CES will ensure that participants quickly receive access to the most appropriate services and housing resources available.
- The CES will seek to prevent individuals and families who are at imminent risk of experiencing homelessness.
- The CES will reduce the stress of the experience of being homeless by limiting assessments and interviews to only the most pertinent information necessary to resolve the participant's immediate housing crisis.
- The CES will incorporate cultural and linguistic competencies in all engagement, assessment, and referral coordination activities.
- The CES will implement standard assessment tools and practices, and will capture only the limited information necessary to determine the severity of the participant's needs and the best referral strategy for the household.
- The CES will integrate mainstream service providers into the system, including local Public Housing Authorities and VA medical centers.
- The CES will utilize HMIS for the purposes of managing participant information and facilitating quick access to available CoC resources.
- The CES will ensure that participants do not wait on the by-name list for an extended period.

Evaluation

Policy

The CES Committee shall be responsible for the review, possible revision, and approval of the CES Policies & Procedures prior to presentation to the CoC Board of Directors for adoption. The review process will be completed at least once annually. Suggestions for revisions to the document should be submitted to acheshire@sjgov.org.

Terms & Definitions

- **By-Name List:** a list of every known person in a community experiencing homelessness using information collected through HMIS and shared with their consent, including name, homeless history, barriers, and housing needs, enabling communities to track the ever-changing size and composition of those experiencing homelessness.
- **Case conferencing:** Local process for agencies to coordinate and discuss ongoing work with persons experiencing homelessness in the community, including the prioritization and by-name

list. The goal of case conferencing is to provide holistic, coordinated, and integrated services across providers, and to reduce duplication.

- Chronically homeless: HUD's definition: Chronically homeless means: (1) A "homeless individual with a disability," as defined in Section 401(9) of the McKinney-Vento Homeless Assistance Act, who: i. Lives in a place not meant for human habitation, a Safe Haven, or an emergency shelter; AND ii. Has been homeless continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in (i) above.
- Continuum of Care (CoC): Group responsible for the implementation of the requirements of HUD's CoC Program interim rule. The CoC is composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons.
- Continuum of Care (CoC) Program: HUD funding source to (1) promote community-wide commitment to the goal of ending homelessness; (2) provide funding for efforts by nonprofit providers, and state and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; (3) promote access to and effect utilization of mainstream programs by homeless individuals and families; and (4) optimize self-sufficiency among individuals and families experiencing homelessness.
- Emergency shelter: Short-term emergency housing available to persons experiencing homelessness.
- Emergency Solutions Grant (ESG) Program: HUD funding source to (1) engage homeless individuals and families living on the street; (2) improve the quantity and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly rehouse homeless individuals and families; and (6) prevent families and individuals from becoming homeless.
- Imminent risk of becoming homeless: An individual or household who will imminently lose (within 14 days) their primary nighttime residence provided that no subsequent residence has been identified and the individual or household lacks the resources or support networks needed to obtain other permanent housing.
- Homeless: An individual or household living in a place not meant for habitation, in an emergency shelter, or a hotel/motel paid by a unit of local government or non-profit organization; also include households currently fleeing a domestic violence situation or a household at imminent risk of becoming homeless.
- Homeless Management Information System (HMIS): Local information technology system used by a CoC to collect participant-level data and data on the provision of housing and services to homeless individuals and families and to persons at risk of homelessness. Each CoC is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards. In the SJCoC, Clarity by BitFocus is the selected software solution.
- Prioritization list: The list that indicates the priority status of those enrolled in the Coordinated Entry program.

- Public housing authority (PHA): Local entity that administers public housing and Housing Choice Vouchers (HCV) (aka Section 8 vouchers).
- Permanent supportive housing (PSH): Permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability.
- Rapid re-housing (RRH): Program emphasizing housing search and relocation services and short- and medium-term rental assistance to move homeless persons and families (with or without a disability) as rapidly as possible into permanent housing.
- Transitional housing (TH): Program providing homeless individuals and families with the interim stability and support to successfully move to and maintain permanent housing. Transitional housing funds may be used to cover the costs of up to 24 months of housing with accompanying supportive services. Program participants must have a lease (or sublease) or occupancy agreement in place when residing in transitional housing.
- Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT): A survey administered both to individuals and families to help determine risk and prioritization when providing assistance to persons who are homeless or at-risk of homelessness.

Roles & Responsibilities

- CoC Board of Directors: Responsible for the general oversight of the CE system, including the approval of the CE Policies & Procedures document.
- CES Coordinator: Staff position managed by the CES management entity responsible for supporting and managing day-to-day functions of CES, which may include any combination of the following: maintaining a prioritization list, assisting with matching participants to available housing resources, communicating referrals, facilitating case conferencing meetings, assisting with grievance and appeal processes, monitoring CES activity, and preparing CES monitoring and evaluation reports.
- CES Management Entity: Responsible for the day-to-day operations and administration of the CES. Family Resource and Referral Center is the designated CES Management Entity for the SJCoC.
- CES Committee: Standing Committee designated by the CoC Board to oversee and evaluate CES.
- Collaborative Applicant: Entity that acts on behalf of the CoC to apply for and receive CoC Program funds, and other eligible activities in accordance with 24 CFR 578. San Joaquin County is the designated Collaborative Applicant of the SJCoC.
- HMIS Lead Agency: Central Valley Low Income Housing Corporation operates the Homeless Management Information System on the CoC's behalf, and ensures the CES has access to HMIS software and functionality for the collection, management, and analysis of data on persons served by coordinated entry.
- Participating project: Agency or organization that has agreed to provide homelessness supports/services on behalf of the CoC. A participating project must execute a CES Participation Agreement (see Appendix XX) with the CES Committee. The Participation Agreement outlines the standards and expectations for the project's participation in and compliance with the policies and procedures governing CES operations. For a project to receive CoC or ESG Program funding from HUD, it is required to participate in coordinated entry.
- Referral partner: A type of participating project. Referral partner will receive and consider referrals to its project from the CES system. It will sign a Referral Partner Agreement (see Appendix XX) with the CES management entity affirming it is aware of and will adhere to all expectations for coordinated entry.

- Mainstream system provider: Agency or entity that can provide necessary services or assistance to persons served by coordinated entry. Examples of mainstream system providers include hospitals, mental health agencies, employment assistance programs, and schools.
- U.S. Department of Housing and Urban Development (HUD): Federal agency responsible for administering housing and homelessness programs including the CoC and ESG Programs.
- U.S. Department of Veteran Affairs (VA): Federal agency responsible for providing health care and other services, including assistance to end homelessness, to veterans and their families.

Target Population

Policy

The SJCoC's CES covers the CoC's entire geographic area. The geographic area of the SJCoC is the borders of San Joaquin County. HUD has determined that an effective coordinated entry process ensures that people with the greatest needs receive priority for permanent housing and homeless assistance available in the CoC, including PSH, Rapid Rehousing (RRH), and other interventions.

Fair Housing

Policy

All persons participating in any aspect of CES such as access, assessment, prioritization, or referral shall be afforded equal access to CES services and resources without regard to a person's actual or perceived membership in a federally protected class, including but not limited to race, color, national origin, religion, sex, age, familial status, or disability. Additionally, everyone in the CoC's geographic area, including but not limited to people experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence, shall have fair and equal access to the coordinated entry process.

Procedure

Each project participating in CES is required to post or otherwise make publicly available a notice (provided by the CoC; see Appendix XX) that describes coordinated entry. This notice should be posted in any areas where participants may congregate or receive services (e.g., waiting areas, dining halls, social services offices). All staff at each agency are required to know which personnel within their agency can discuss, explain, and provide access to CES to a participant.

Domestic Violence Survivor Access

Policy

All persons who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking shall have confidential access to coordinated entry within the CoC's geographic area.

Procedure

All CoC-defined access points shall conduct an initial screening of risk or potential harm perpetrated on participants as a result of domestic violence, sexual assault, stalking, or dating violence. In the event defined risk is deemed to be present, the participant shall be referred or linked to available specialized services and housing assistance, using a trauma-informed approach designed to address the particular service needs of survivors of abuse, neglect, and violence.

Equal Access

Policy

Participating agencies in the CES system must adhere to all jurisdictionally relevant civil rights and fair housing laws and regulations.

Procedure

The CoC has designated the CES Committee as the entity responsible for monitoring agencies that directly control housing units on compliance with all CES requirements, including adherence to civil rights and fair housing laws and regulations. Failure to comply with the following laws and regulations will result in a monitoring finding on the project, which may affect the organization's ability to access funding which requires compliance with these laws and regulations:

- Fair Housing Act
- Section 504 of the Rehabilitation Act
- Title VI of the Civil Rights Act
- Title II of the Americans with Disabilities Act
- Title III of the Americans with Disabilities Act

System Access and Workflow

Policy: General

The CoC adopts a “no wrong door” approach to CES, which ensures that no matter which homeless assistance provider a person goes to for assistance, he/she will have access to the most appropriate resources, referrals, and assessment and prioritization processes regardless of where that individual first presents for assistance.

Policy: Domestic Violence

In alignment with “no-wrong door” and in recognition of their special needs, the CoC has identified separate access points for victims of domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions (including human trafficking). Please see Appendix XX of this manual for a list of all access points in the community.

Procedure

Each homeless assistance provider designated by the CES Committee will provide access to the Coordinated Entry System for persons experiencing homelessness or at imminent risk of literal homelessness. All designated access points shall execute a CES Participation Agreement with the CES Committee; that is, an agreement that documents all required functions and responsibilities including consent to share household information with other HMIS participants to ensure CES access. Please see Appendix XX of this manual to review the standard CES Participation Agreement.

Policy

The CoC's entire geographic area is accessible to CES either through defined location-specific access points or by contacting 211 San Joaquin (211 SJ). A list of CES access points can be obtained from 211.

Procedure

Those presenting for services at any participating project within San Joaquin County will be entered into the CES by staff at the participating organization. The 211 hotline provides access to CES 24 hours a day, seven days a week without the need to otherwise present for services at a participating project. Assessments are conducted Monday through Friday, 8:30a – 5p.

American with Disabilities Act (ADA)

Policy

The CoC will ensure that CES services are accessible to persons with mobility barriers. All CES communications and documentation will be accessible to persons with limited ability to read and understand English.

Procedure

The CES management entity is responsible for ensuring that all CES materials are available in appropriate languages. In addition, CES participating agencies will, to the greatest extent practicable, provide communication accommodation through translation services to effectively and clearly communicate with persons who have disabilities, as well as with any person with limited English proficiency. CE management entity, with the assistance of the CES Committee, will provide visually and audibly accessible CES materials when requested by agencies or participants in CES. At 211, assessments are conducted Monday through Friday, 8:30a – 5p.

Screening and Assessment

Policy

Depending on the capacity and operations of the participating project, CES initial screening and assessment may only be available during restricted times, such as business hours and non-holidays. Regardless of when prospective participants present for services including during non-business hours, participants will still be able to access available services, including emergency shelter.

Procedure

In the event individuals present for services during non-business hours, those persons will still be able to access emergency shelter without first receiving an assessment through coordinated entry. CES screening and assessment will be completed on all emergency shelter participants within 3 business days after entry to emergency shelter.

Policy

The CES will ensure that all potentially eligible housing prevention participants will be screened for homelessness prevention assistance, regardless of the access point at which they initially seek assistance.

Procedure

Access points will coordinate information and referrals to ensure households meeting the definition of being “at imminent risk” of literal homelessness are provided coordinated access to CoC homelessness prevention services regardless of where the participant first contacts the CoC.

Street Outreach

Policy

Street outreach teams will function as access points to the CES, and will seek to engage persons who may be served through CES but who are not seeking assistance or are unable to seek assistance via projects that offer crisis housing or emergency shelter.

Procedure

Street outreach teams will be trained on CES and the assessment process, and will have the ability to offer CES access and assessment services to participants they contact through their street outreach efforts. Street outreach teams will be considered an access point for CES.

Assessment

Policy

The CoC's CES process will provide a standardized assessment to all CES participants, ensuring uniform decision-making and coordination of care for persons experiencing a housing crisis. The Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) is part of the assessment process used by the CoC for CES.

Procedure

All persons served by CES will be assessed using HMIS project enrollment data and the appropriate type of VI-SPDAT tool (single individual, family, or unaccompanied youth). All access points must use these elements to ensure that all persons served are assessed in a consistent manner, using the same process. In combination, HMIS project enrollment data and the VI-SPDAT documents a set of participant conditions, attributes, need level, and vulnerability, allowing the CES Coordinator to identify an appropriate service strategy for households on the CoC's prioritization list.

Policy

All projects participating in CES will follow the standard assessment and triage protocols of the system. The assessment process will progressively collect only that participant information which is needed to prioritize and refer participants to available CoC permanent housing services.

Procedure

Based on initial assessment of need by a participating agency, the household will be enrolled in the appropriate program(s). Staff at the participating project may either conduct the VI-SPDAT assessment, or refer clients to 211 staff to complete the assessment. Staff conducting the assessment will assist households in gathering required documentation (homeless history, current living situation, household member identification, documentation of barriers/disabilities, income, non-cash benefits) and updating client contact information.

Procedure

The CoC has adopted the following steps for different program types to engage and appropriately serve persons seeking assistance through the CES:

Emergency shelters:

1. An informal identification of the immediate housing crisis and living situation based on presentation of the household, and determining whether the CoC crisis response system is the appropriate system to address the potential participant's immediate needs.
2. Participating agency staff will examine existing CoC and participant resources and options that could be used to avoid the participant entering the homeless system of care and make necessary referrals.
3. Collection of all information necessary to enroll the participant in a crisis response project such as emergency shelter or other homeless assistance project.
4. Within 3 business day of enrollment participating agency staff will collect any additional information on a participant's housing and service needs, including completion of the VI-SPDAT tool.

5. Participating agency staff submits all household information to the prioritization list as soon as the vulnerability assessment has been completed.
6. Within 10 business days of a submission to the prioritization list, the CES management entity will seek information necessary to refine, clarify, and verify a participant's housing and homeless history, barriers, goals, and preferences. Assessment information supports the evaluation of the participant's vulnerability and prioritization for assistance. The CES Coordinator assigns a priority ranking to the household.
7. The CES Coordinator refers participant households to available programs based on eligibility and project openings.

Street Outreach:

1. An informal identification of the immediate housing crisis and living situation based on presentation of the household, and determining whether the CoC crisis response system is the appropriate system to address the potential participant's immediate needs.
2. Collection of all information necessary to enroll the participant in an existing Street Outreach program and make necessary referrals.
3. During subsequent outreach contacts participating agency staff will collect any additional information on a participant's housing and service needs, including completion of the VI-SPDAT tool.
4. Participating agency staff submits all household information to the prioritization list as soon as the vulnerability assessment has been completed.
5. Within 10 business days of a submission to the prioritization list, the CES management entity will seek information necessary to refine, clarify, and verify a participant's housing and homeless history, barriers, goals, and preferences. Assessment information supports the evaluation of the participant's vulnerability and prioritization for assistance. The CES Coordinator assigns a priority ranking to the household.
6. The CES Coordinator refers participant households to available programs based on eligibility and project openings.

Services only:

1. Collection of all information necessary to enroll the participant in an existing services program.
2. Participating agency staff will examine existing CoC and participant resources and options that could be used to avoid the participant entering the homeless system of care and make necessary referrals.
3. Identification of any immediate housing crisis and living situation based on presentation of the household, and make necessary referrals.
4. During subsequent contacts participating agency staff will collect any additional information on a participant's housing and service needs, including completion of the VI-SPDAT tool.
5. Participating agency staff submits all household information to the prioritization list as soon as the vulnerability assessment has been completed.
6. Within 10 business days of a submission to the prioritization list, the CES management entity will seek information necessary to refine, clarify, and verify a participant's housing and homeless history, barriers, goals, and preferences. Assessment information supports the evaluation of the participant's vulnerability and prioritization for assistance. The CES Coordinator assigns a priority ranking to the household.
7. The CES Coordinator refers participant households to available programs based on eligibility and project openings.

Transitional Housing (TH):

1. The prioritization for persons who are determined to be eligible for TH will be consistent with the CoC's scoring range for need and vulnerability associated with TH projects. The CoC will prioritize the following persons for TH:
 - a. Households fleeing or experiencing domestic violence as the primary cause of their current housing crisis.
 - b. Households consisting of unaccompanied youth.
 - c. Participants seeking treatment services for behavioral health conditions such as mental illness and/or substance use disorders.

RRH and PSH programs:

1. An informal identification of the immediate housing crisis and living situation based on presentation of the household, and determining whether the CoC crisis response system is the appropriate system to address the potential participant's immediate needs.
2. Participating agency staff will examine existing CoC and participant resources and options that could be used to avoid the participant entering the homeless system of care and make necessary referrals.
3. Collection of all information regarding the participant household's housing and service needs, including completion of the VI-SPDAT tool.
4. Participating agency staff submits all household information to the prioritization list as soon as the vulnerability assessment has been completed.
5. Within 10 business days of a submission to the prioritization list, the CES management entity will seek information necessary to refine, clarify, and verify a participant's housing and homeless history, barriers, goals, and preferences. Assessment information supports the evaluation of the participant's vulnerability and prioritization for assistance. The CES Coordinator assigns a priority ranking to the household.
6. The CES Coordinator refers participant households to available programs based on eligibility and project openings.

Policy

The CES process may collect and document participants' belonging to protected classes under Federal or State law, but will not consider protected classes as justification for restricting or limiting participant's referral options.

Policy

The CoC is committed to ensuring that all staff who assist with CES operations receive sufficient training to implement the CES system in a manner consistent with the vision and framework of CES, as well as in accordance with the policies and procedures of its CES system. The HMIS Lead Agency will be the agency responsible for training CES and participating project staff in the use of CES.

Procedure

The HMIS Lead Agency will provide initial training as necessary, and continuing training at least annual thereafter, for persons who will manage access point processes and conduct assessments related to CES. Training will be offered by the HMIS Lead Agency at no cost to the agency or staff, and will be delivered by an experienced and professional trainer. Topics for training will include the following:

- Review of CoC's written CES policies and procedures, including variations adopted for specific subpopulations;
- Requirements for use of assessment information to determine prioritization;
- Intensive training on the use of the CE assessment tool; and

- Criteria for uniform decision-making and referrals.

Policy

It is crucial that persons served by the CoC's CES have the autonomy to identify whether they are uncomfortable or unable to answer any questions during the assessment process, or to refuse a referral that has been made to them. In both instances, the refusal of the participant to respond to assessment questions or to accept a referral shall not adversely affect his or her position on the CES prioritization list.

Note that some funders require collection and documentation of a participant's disability or other characteristics or attributes as a condition for determining eligibility. Participants who choose not to provide information could be ineligible for specific services in these instances which would limit potential referral options.

Policy

The CoC is committed to ensuring that no information is used to discriminate or prioritize households for housing and services on a protected basis such as race, color, religion, national origin, sex, age, familial status, disability, actual or perceived sexual orientation, gender identify, or marital status.

Procedure

CES participants must be provided with information that details who the point of contact is for filing and addressing any nondiscrimination complaints, which can be filed by participants if they believe the nondiscrimination policy has been violated in their case during the CES process. Additionally, CES participants will be provided contact information on how to access the appeal process if they are not satisfied with or have any questions regarding how their complaints are handled. Participants should be referred to the CES management entity to file a discrimination complaint.

Policy

All participant information collected, stored, or shared in the operation of CES, regardless of whether or not those data are stored in HMIS, shall be considered personal and sensitive information with the full force of protection and security associated with data collected, stored, or shared in HMIS.

Procedure

The CoC must protect all participants' personally identifiable information (PII), as required by HUD's HMIS Data and Technical Standards, regardless of whether or not PII is stored in HMIS. All CES participating projects will ensure participants' PII will only be collected, managed, reported, and potentially shared in compliance with the CoC's approved HMIS Policies and Procedures which are in accordance with HUD established HMIS privacy and security requirements and standards.

Policy

Throughout the assessment process, participants must not be pressured or forced to provide CES staff with information that they do not wish to disclose, including specific disability or medical diagnosis information. This includes information that may, if not provided, restrict or preclude that participant's ability to access or otherwise be referred to a service which participating project staff determine to be appropriate for the participant's housing and/or service needs.

Policy

Participant assessment information should be updated at least once a year, if the participant is served by CES for more than 12 months. Additionally, staff may update participant records with new information as new or updated information becomes known by staff. Participating Agencies will be responsible for ensuring that all client information in CES is up to date and accurate. Active cases will be moved to inactive status by staff after no participant contact for 30 consecutive days.

Procedure

Individuals who choose not to participate in data collection upon initial assessment or project entry may later decide that their information can be collected and entered into HMIS. Participant data in HMIS can be updated throughout project enrollment to reflect emergence of new information, corrections to previously collected information, or additions of previously unanswered questions. The CoC strives to improve participant engagement strategies to achieve completion rates of required HMIS data elements that are as high as possible.

Prioritization

Policy

The CES management entity will use data collected through the CES process to prioritize homeless persons within the CoC's geography based on the factors identified in these policies and procedures. This prioritization will be used to rank CES participants for services on the prioritization list.

Procedure

Permanent Supportive Housing (PSH): The prioritization for PSH is consistent with HUD's Prioritization/PSH Notice. Persons eligible for PSH will be prioritized for available units based on the following criteria (applying the definition of chronically homeless set by HUD in its December 2015 Final Rule):

- 1st Priority—Chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs or vulnerability.
 - 2nd Priority—Chronically homeless individuals and families with the longest history of homelessness but without severe service needs or vulnerability.
 - 3rd Priority—Chronically homeless individuals and families with the most severe service needs or vulnerability.
 - 4th Priority—All other chronically homeless individuals and families not already included in priorities 1 through 3.
 - 5th Priority—Homeless individuals and families who are not chronically homeless but do have a disability and severe service needs or vulnerability.
 - 6th Priority—Homeless individuals and families who are not chronically homeless but do have a disability and a long period of continuous or episodic homelessness.
 - 7th Priority—Homeless individuals and families who are not chronically homeless but do have a disability and are coming from places not meant for human habitation or emergency shelters.
 - 8th Priority—Homeless individuals and families who are not chronically homeless but have a disability and are coming from transitional housing.
- Tie Breaker—When two households in the same priority are scored equally on the prioritized list, the following tiebreakers will be used in this order:
- a Veteran household
 - longest length of homelessness
 - lowest percent of median household income based on household size.

Rapid Re-housing (RRH): The prioritization for persons who are determined to be eligible for RRH will be consistent with the CoC's scoring range for need and vulnerability associated with RRH projects.

Additionally, the CoC has opted to prioritize the following persons for RRH:

1. Households with a single parent and 3 or more dependent children under the age of 6.
2. Households experiencing domestic violence.
3. Households consisting of unaccompanied youth.
4. Households with a previous episode of homelessness within the most recent 12 months.
5. Households with dependent children under the age of 18.
6. All other households who are literally homeless.

Policy

Services such as emergency shelter are a critical crisis response resource, and access to such services will not be prioritized.

Policy

The 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, called the by-name list. Once an individual or household has been entered into the CES and assessed using VI-SPDAT, they will be added to the prioritization list. The prioritization list will be organized according to household type, participant need, history of homelessness, vulnerability, risk, and related factors noted in these policies and procedures. The prioritization list provides an effective way to manage an accountable and transparent prioritization process.

Procedure

The CoC's prioritization list will be managed by the CES management entity and updated at least weekly. New participants will be added to the prioritization list and existing participants' rank order on the prioritization list will be managed according to the prioritization principles as established by the CoC's written policies and procedures governing CES operations and decision-making; once a referral has been made to a participating agency, that household does not have the referral revoked due to a change in the prioritization list.

Procedure

Based on the assessment results, households will be added to the prioritization list and referrals will be made by the CES Coordinator to participating agencies with appropriate programs.

Referral Process

Policy

All CES participating permanent housing projects will enroll new participants only from the CoC's CES referral process. To facilitate prompt referrals and to reduce vacancy rates, participating providers must notify the CES Coordinator of any known and anticipated upcoming vacancies in writing by email.

Procedure – Project or Sponsor based assistance

When a permanent housing vacancy occurs or is expected to occur in the immediate future, the provider agency with the vacancy must alert the CES Coordinator via email within 3 business days of the vacancy. The notification must include specific details of the opening/vacancy, including the project

name, unit size, location, and any funder-defined eligibility requirements. The CES Coordinator will use the vacancy information to make referrals to the participating agencies from the prioritization list.

Procedure – Tenant based assistance

When a tenant based permanent housing program opening occurs or is expected to occur in the immediate future, the provider agency alerts the CES Coordinator via email within 3 business days of the opening. The notification should include details regarding the opening, including the project name, length of subsidy, maximum subsidy amount, location (if any), and any funder-defined eligibility requirements. The CES Coordinator will use the provided information to make referrals to the participating agency from the prioritization list.

Policy

One of the guiding principles of CES is participant choice. This principle must be evident throughout the CES process, including the referral phase. Participants in CES may reject service strategies and housing options offered to them, without repercussion.

Procedure

Individuals and families will be given information about the programs available to them and provided choices whenever feasible based on assessment information, vulnerability and need scores, preliminary program eligibility pre-determinations, and available resources. Of the options available, participants will be afforded their choice of which project to be referred to; households cannot be referred to more than one project at a time. Households will only be referred to projects when they meet basic eligibility criteria (example: non-veterans will not be referred to programs serving only veterans). Households will only be referred once all program documentation has been assembled. If an individual or family declines a referral to a housing program, they remain on the prioritization list until the next housing opportunity is available.

Policy

There may be instances when agencies decide not to accept a referral from the CES. When a provider agency declines to accept a referred prioritized household into its project, the agency must notify the CES Coordinator of the denial and the reason for the denial.

Procedure

Refusals by projects are acceptable only in certain situations, including:

- The person or household does not meet the project’s eligibility criteria; accepting agencies make the final decision on eligibility.
- The person or household would be a danger to self or others.
- The services available through the project are not sufficient to address the intensity and scope of participant need.
- The project is at capacity and is not available to accept referrals at this time.
- The person/household cannot be contacted.
- Other justifications as specified by the participating project.

The agency must communicate the refusal to the CES Coordinator within 3 business days of making the refusal. The agency must notify the CES Coordinator why the referral was rejected, how the referred participant was informed, what alternative resources were made available to the participant, and whether the project staff foresee additional, similar refusals occurring in the future. This information will be shared by the CES Coordinator with the CES Committee for discussion and review.

Policy

Participants on the prioritization list must be referred to a participating project within 60 days.

Procedure

The CES management entity is responsible for reviewing the priority list at least weekly, and will convene a case conference for participants on the prioritization list for more than 30 days. The case conference meeting will include appropriate representation from each participating project within the CoC. The CES Coordinator will develop an agenda for the case conference and will lead the meeting.

Data Systems

Policy

All participating projects contributing data to CES must ensure participants' data are secured regardless of the systems or locations where participant data are collected, stored, or shared, whether on paper or electronically. Additionally, participants must be informed how their data are being collected, stored, managed, and potentially shared, with whom, and for what purpose in accordance with the CoC's HMIS Policies and Procedures.

Policy

Participating agencies must collect all data required for CES as defined by the CoC, including the "universal data elements" listed in HUD's HMIS Data Standards Data Manual.

Policy

Data can only be collected according to the defined privacy policies adopted by the CoC and included in the HMIS Policies and Procedures.

Procedure

As part of the assessment process, participants will be advised of the CoC's privacy policy, which identifies what data will be collected, what data will be shared, which agencies data will be shared with, and what the purpose of the data sharing is. Participants will have the option to decline sharing data; doing so does not make them ineligible for CES. Please see Appendix XX for a copy of the CoC's Privacy Policy.

Evaluation

Policy

Regular and ongoing evaluation of the CES will be conducted to ensure that improvement opportunities are identified, that results are shared and understood, and that the CES is held accountable.

Procedure

The CES will be evaluated by the CES Committee using HMIS data on a quarterly basis. Results will be published on the public CoC website, after they have been reviewed by the CES Committee. Each quarter, the CES Committee will conduct an evaluation of key outcomes for each participating project using data collected in the HMIS. The CES Committee has selected the following as key outcomes for CES:

1. Reduction in the length of time homeless (system and project level).
2. Reduction in the number of persons experiencing first-time homelessness (system and project level).

3. Increase in the number of placements into permanent housing (system and project level).
4. Number of persons prevented from entering homelessness.

Policy

Participating projects play a crucial role in the evaluation of CES. Participating projects will collect accurate and meaningful data on persons served by CES. In addition, participating projects will review evaluation results and offer insights about potential improvements to CES processes and operations.

Procedure

Each participating project will provide required evaluation to the CES Committee. While reviewing the data prior to submission to the CES Committee, participating project representatives are encouraged to communicate directly with HMIS Lead Agency and/or the CES Coordinator about any concerns or questions that they have, and to be detailed in their suggestions to the CES Committee about how best to interpret and use the evaluation results.