# Coordinated Entry Policies and Procedures v7.0



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# Overview

Vision

The purpose of Coordinated Entry (CE) is to ensure that all households experiencing homelessness have equitable access to housing resource connections to resolve their housing crisis.

The system aims to work with households to understand their strengths and needs, provide a tailored assessment process, and progressively engage households to connect to the housing and homeless assistance that will best support them. CE incorporates the principles of a system-wide housing first approach and prioritizes those with highest service needs through a Dynamic Prioritization model.

Coordinated Entry is designed to:

- Allow anyone who needs assistance during a housing crisis to know where to access assistance and to be progressively assessed in a standard and consistent way;
- Ensure that households who are experiencing homelessness gain access as efficiently and effectively as possible to available community interventions;
- Prioritize households for limited housing resources based on need and vulnerability;
- Provide clarity, transparency, consistency, and accountability throughout the assessment and prioritization process for households experiencing homelessness, community partners, and homeless and housing service providers; and
- Facilitate exits from homelessness to stable housing in the most rapid manner possible.

To achieve these objectives, Coordinated Entry includes:

- Offering connections to **Prevention/Diversion/Path to Home, and employment navigation and mainstream resources** as a first step in progressive engagement to solve the housing crisis.
- A standard and progressive assessment process to be used for all households who are seeking assistance, and procedures for determining the appropriate next level of assistance.
- Access to **guidelines** among homeless housing programs (transitional housing, rapid rehousing, and permanent supportive housing) regarding eligibility for services, screening criteria, prioritized populations, expected outcomes, and targets for length of stay.
- Establishment of **daily management structures** that include facilitating or participating in committees and forums including but limited to the Policy Advisory Committee, Case Conferencing, Regional Access Point (provider) meetings, and other continuous quality improvement forums that address daily operations and CE process flow.
- Establishment of **collaborative relationships** with Emergency Solutions Grants (ESG) recipients/providers to ensure consistent and realistic participation in CE.
- Supporting or building systems that assist in collaborating with mainstream resources.

- A clear process for ongoing **monitoring and evaluation** of CE and guidelines to adjust as needed for systems improvement.
- Consistent referral policies and procedures from CE to housing programs and other resources.
- The **Policies and Procedures** contained herein and detailing the operations of Coordinated Entry.

Since the Continuum of Care (CoC) Program interim rule was published in 2012, the Department of Housing and Urban Development (HUD) has learned a great deal about what makes a coordinated entry process most effective and has determined that additional requirements are necessary. Those requirements are outlined in the January 23<sup>rd</sup>, 2017 <u>Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System.</u>

In alignment with these requirements and guidance from HUD and the Washington State Department of Commerce, the Seattle / King County Continuum of Care has implemented and is committed to continuously improving a coordinated entry system for all households who are experiencing homelessness. CE, as described in these policies and procedures, is designed to meet the Federal and State requirements of a *Centralized or Coordinated Assessment System* which must adopt the following minimum requirements:

- 1. Cover the entire geographic area claimed by the CoC;
- 2. Be easily accessed by households seeking housing or services;
- 3. Be well-advertised;
- 4. Include a comprehensive, standardized assessment process and tools;
- 5. Provide an initial, comprehensive assessment of individuals and families for housing and services; and,

6. Include a specific policy to guide the operation of the centralized or coordinated assessment system to address the needs of households who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from <u>non-victim</u> specific providers.

In 2017, HUD included additional requirements CoCs must incorporate into a Coordinated Entry Process:

- 1. Full coverage for CoCs joining processes together and Balance of State CoCs
- 2. Use of Standardized Access Points and Assessment Approaches
- 3. Use of Standardized Prioritization in the Referral Process

4. Lowering Barriers by maintaining Coordinated Entry written standards that prohibit the coordinated entry process from screening people out of the coordinated entry process due to perceived barriers related to housing or services

5. Marketing

6. Street Outreach efforts funded under ESG or the CoC program must be linked to the coordinated entry process

- 7. Emergency services to operate with as few barriers to entry as possible
- 8. Homelessness prevention services funded with ESG
- 9. Referrals to participating projects to be uniform
- 10. Safety planning

# **Participation Requirements**

The Departments of Housing and Urban Development (HUD) and Veteran's Affairs (VA) have established guidance that instructs all CoC projects to participate in their CoC's coordinated assessment system. Any project that receives HUD funding (CoC Program, Emergency Solutions Grant, and Housing Opportunities for People with AIDS) or VA funding (Supportive Services for Veteran Families, Grant and Per Diem, Veterans Affairs Supportive Housing) must comply with the participation requirements as established by the corresponding CoC jurisdiction. Similarly, the Washington State Department of Commerce mandates that Consolidated Homeless Grant (CHG) and local homeless housing surcharge revenue (local document recording fees) grantees must maintain a coordinated assessment system where households experiencing homelessness are assessed and referred to the services that will help them obtain and maintain housing stability. Finally, local funders have also required the use of Coordinated Entry.

In, summary the following funding sources require the use of Coordinated Entry:

Continuum of Care	Emergency Solution Grant	Supportive Services for Veteran Families
City of Seattle General Funds	Veterans Affairs Supportive Housing	Consolidated Homeless Grant
King County Operating Rental Supports (local document recording fees)	United Way King County	

Seattle / King County Continuum of Care has developed a coordinated entry system with the following expectations:

- CoC projects must publish written standards for household eligibility and screening,
- CoC projects must communicate project vacancies, including bed/unit-specific information to the Coordinating Entity,
- Households experiencing a housing crisis must access CoC services and housing using CE-defined access points,
- CoC projects must enroll only those households referred according to the CoC's designated referral process, and CoC projects must commit to participate in the coordinating entities' planning and management activities as established by CoC leadership.

# **Participating Programs**

Participating Programs includes all Regional Access Points, agencies participating as Assessors and/or Housing Navigators, as well as housing programs required to participate in CE due to funding and/or contract requirements.

# See Appendix A. List of Participating Agencies

The Coordinating Entity will review and update this list periodically and reserves the right to add or remove agencies.

Given limited resources and to ensure quick access, shelters are not included in the CE referral process.

See Housing Inventory Maintenance, Exception to Participate, and New Housing Lease Up policies for more details.

# Homeless Management Information System (HMIS)

The Homeless Management Information System (HMIS) is a database used to record and track household-level information on the characteristics and service needs of homeless persons. HMIS ties together homeless service providers within a community to help create a more coordinated and effective housing and service delivery system.

The U. S. Department of Housing and Urban Development (HUD) and other planners and policymakers at the federal, state, and local levels use aggregate HMIS data to obtain better information about the extent and nature of homelessness over time. Specifically, HMIS can be used to produce an unduplicated count of homeless persons, understand patterns of service use, and measure the effectiveness of homeless programs. Regular updates to the HUD data standards are released and may result in changes in the operations of CE. Training and technical assistance is provided to all participating agencies, free of charge.

Due to new HUD data standards guidelines, starting April 1, 2020, Coordinated Entry Assessments (Housing Triage Tools) are now created and updated in a designated *Coordinated Entry System Agency* along with additional data entry requirements. VAWA agencies are the only exceptions, and will enter coordinated entry assessments and related activities under a coordinated entry program in their home agency. All trained Housing Assessors will have access to the Coordinated Entry System Agency.

Personal information is not entered in HMIS for people who are 1) receiving services from domestic violence agencies; 2) fleeing or in danger from domestic violence, dating violence, sexual assault or stalking situation; or 3) have disclosed HIV / AIDS status.

Bitfocus, Inc. is the HMIS vendor and System Administrator for King County, and uses Clarity Human Services software. Clarity has a Coordinated Entry function, which is used for CE, and the HMIS Release of Information is inclusive of CE, and affiliated processes. Bitfocus' responsibilities include data quality and technical support. The policies and procedures concerning the protection of all data collected for CE is outlined in the King County HMIS Standard Operating Procedures and HMIS End User Manual. These documents and additional information can be found on the HMIS website http://kingcounty.hmis.cc

# Disclaimer

*Coordinated Entry* is designed to coordinate and prioritize access to housing and homeless programs for households experiencing homelessness. There is no guarantee that a household will meet final eligibility requirements, be referred to a housing resource, or receive a referral to a particular housing option, nor does it ensure availability of resources for all eligible households.

# Access to Emergency Services

The coordinated entry process must allow for people experiencing a housing crisis to access emergency services with as few barriers as possible. HUD expects CoC designated coordinated entry access points to provide "unqualified" emergency access, meaning access is not limited to certain populations. Emergency access point service providers could include all types of emergency services such as homelessness prevention assistance, domestic violence and emergency services hotlines, drop-in service programs, emergency shelters, and other short-term crisis residential programs. Persons must be able to access emergency services independent of the operating hours of the CoC's coordinated entry processes for assessing need.

See Accessing Emergency Services policy for more information

See Accessing Emergency Services after Operating Hours policy for more information.

# **Key Components**

# Eligibility

As determined by the CoC Coordinating Board, eligibility for CE and a referral to homeless housing is based on the following criteria: Households are eligible for Coordinated Entry if they are primarily:

- Living and sleeping outside
- Sleeping in a place not meant for human habitation
- Staying in a shelter
- Fleeing/attempting to flee domestic violence
  - Households fleeing/attempting to flee are eligible for Coordinated Entry and can also access DV-specific resources
- Exiting an institution where they resided for up to 90 days and were in shelter or a place not meant for human habitation immediately prior to entering that institution.
- A young adult (18-24) who is imminently at risk of homelessness within 14 days, including those who are pregnant or parenting
  - Youth who are experiencing homelessness (including those who are pregnant or parenting) who are within 60 days of their 18th birthday are able to complete a Housing Triage Tool, but will not be able to be referred to housing resources until they turn 18, with the exception of emancipated minors.

Resources accessed through Coordinated Entry may have additional eligibility requirements.

# **Progressive Engagement**

CE is part of a progressive engagement approach in King County. This process includes screening for prevention, diversion, and completing components of the assessment process as needed for each household. Coordinated entry supports households to successfully end a housing crisis with the appropriate interventions which may include being prioritized for a referral to housing resources when one becomes available. The system prioritizes household choice and provides continual opportunity during the process for a household experiencing homelessness to engage in diversion resources. A household will only receive a referral to a program or resource that they have agreed to accept.

# Dynamic Prioritization:

King County Coordinated Entry uses a Dynamic Prioritization model to prioritize the most vulnerable households for the limited housing resources available in King County. Dynamic prioritization in coordinated entry systems promote the following ends:

- 1. *Effective inflow management* use of diversion and progressive assistance strategies to reduce demand for the most intensive CoC assistance
- Dynamic priority list management account for changing priority order as new people present and are added to a CoC's priority list/pool; continually readjusting to identify highest need persons

CE Policies and Procedures Page 10 Last updated: 4/25/2022 3. *Flexible use of Continuum of Care (CoC) assets* – adjust service strategies (i.e. amount, intensity, duration and type of assistance) to most efficiently serve the greatest number of people

For the most up to date information on Prioritization, see the Prioritization section of the KCRHA website at <u>https://kcrha.org/coordinated-entry/</u>

# Connecting to CE

# **Regional Access Points**

Regional Access Points (RAPs) are located in five sites across King County. RAPs work with households to solve a housing crisis, and when necessary complete the CE assessment process.

RAPs are accessible by public transportation and are located in an environment where additional community resources can be accessed as needed. In addition, the RAPs are accessible to individuals with disabilities, including accessing physical locations for individuals who use wheelchairs. The best way to access a RAP for screening to solve a housing crisis is to meet with a CE Assessor at the nearest RAP. Hours when a housing triage tool can be completed vary, and both walk-in and scheduled appointments are available. Detailed information is available on the KCRHA website (<u>https://kcrha.org/regional-accesspoints/</u>), and by calling 211.

Households may access any of the RAPs, and are not limited to the RAP closest to where they are staying.

In addition to RAPs, young adults, single adults, and Veterans can also access screening for crisis interventions through one of the population-specific locations listed on the KCRHA website. Information about these sites is also available by calling 211.

# Mobile Screening and Outreach\*

In the event that households are unable to access a Regional Access Point (RAP) to meet with a CE Assessor, the Regional Access Point is responsible for deploying staff to meet with households in the community.

Regional Access Points are responsible for outreach within their region to engage households experiencing homelessness who may experience barriers to accessing services. Individuals, households, advocates, and other stakeholders should contact their local Regional Access Point directly for more information.

\*Mobile Screening and Outreach is currently limited due to the COVID-19 pandemic.

# See Outreach and Community Based Assessor policy for more information.

In the event that emergency services are needed outside of the operating hours of a Regional Access Point, outreach teams and community partners performing triage must ensure that those experiencing a housing crisis can connect with emergency services during those non-operating hours.

See Accessing Emergency Services after Operating Hours policy.

### Diversion

Diversion is as a first step in a progressive engagement process to solving the homeless housing crisis. A function of each Regional Access Point is operating a diversion program called *Path to Home*. Diversion is offered *before* proceeding to the CE assessment process using household-driven, creative solutions to access permanent or temporary housing quickly outside of CE and the homeless housing system. A Diversion/Path to Home plan must come to fruition within 30-days (up to 45 days with extension) and last a minimum of 90-days. Diversion/Path to Home may include one-time financial assistance and is not a subsidy or long term assistance program.

For more information on Diversion in King County, please see the Seattle/King County Continuum of Care Diversion Guidelines and the Path To Home Manual on the <u>KCRHA website</u> under Forms and Documents.

# Assessment Process

At implementation of Coordinated Entry, All Home's Coordinating Board selected the VI-SPDAT to measure vulnerability as part of the Housing Triage Tool and prioritization process for CE. The VI-SPDAT (Vulnerability Index – Service Prioritization Decision Assistance Prescreen Tool), developed by OrgCode Consulting, is an assessment tool that aims to identify a household's level of service need.

As of February 28th, 2022, the VI-SPDAT will no longer be included in the Housing Triage Tool. The removal of the VI-SPDAT is a result of consistent feedback from our community about the invasive and traumatizing effect this tool has on households experiencing homelessness, as well as <u>data</u> indicating that the continued use of the VI-SPDAT for prioritization produces racially inequitable results.

Since October of 2020, Coordinated Entry has been prioritizing households based on COVID-19 guidance issued by <u>HUD</u> and the <u>Washington State Department of Commerce</u>. Coordinated Entry currently prioritizes Families, Single Adults, and Young Adults who are most disproportionately impacted by COVID-19, using factors determined by Seattle King County Public Health. For more information, please see the <u>COVID Prioritization Presentation</u> on the <u>KCRHA website</u>.

Although Coordinated Entry has not prioritized households based on a VI-SPDAT score since October of 2020, until February 2022 the VI-SPDAT was still required as part of the assessor workflow. Removing the VI-SPDAT as a requirement for entry into the CE system supports the values of equity, transparency, and accountability.

Coordinated Entry assessors will still complete a two-question Housing Triage Tool, labeled in HMIS Clarity as Seattle/King County Coordinated Entry- Housing Triage Tool (HTT). There will no longer be separate Housing Triage Tools for each household type —rather, the assessor will indicate in the Housing Triage Tool which household type applies.

Households with a Housing Triage Tool completed prior to this change do not need to complete a new Housing Triage Tool.

See Prioritization policy for more details.

It is important that the Housing Triage Tool information for any given household is up-to-date and accurate in HMIS for vulnerability, eligibility, and referral purposes, and that the triage tool indicates the household composition.

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+/living with AIDS).

# Case Conferencing

Case Conferencing ensures that the outcomes of the Housing Triage Tool more closely align with the community's prioritization process by accounting for unique population-based vulnerabilities and risk factors. In addition, it provides an opportunity to partner with agency staff that have direct contact with households experiencing homelessness in order to reduce barriers to accessing services.

During case conferencing meetings, households from the Priority Pool are matched to Housing Navigators and available housing resources. The Housing Navigators follow up and assist with collection of any documentation needed for a housing placement. Prior to and throughout the housing assignment process, the Navigator may also do regular outreach to an individual in an effort to build rapport and remain in contact with the household.

In order to maintain confidentiality, all associated staff participating in Case Conferencing are required to complete and sign a CE Case Conferencing Data Use Agreement. Staff that have not signed a CE Case Conferencing Data Use Agreement are not eligible to participate in case conferencing until the form is signed and dated.

See CE Case Conferencing Data Use Agreement.

# Referrals

Referrals will be made by the Coordinating Entity based on the prioritization policy and the standardized eligibility criteria from the Continuum of Care and contract requirements. For example, programs that serve only Veteran single adults will only receive referrals for Veteran single adults. CE will follow eligibility and screening criteria based on agreed upon requirements with the agency and funder(s).

# See the Housing Referral policy for more details.

A referral may be unsuccessful due to a household refusing the resource, by agency denial, or based on program eligibility requirements with CE. Any unsuccessful referral must be documented in HMIS by updating the Program Referral Status. CE may follow-up with the housing program and the household referred in order to understand the circumstances of the denied referral.

# Housing providers are responsible for assuring that a household meets the contractually required eligibility requirements for their program.

# See the Unsuccessful Referral policy for more details.

CE values household choice in the housing process. CE also strives to maintain low vacancy rates for the variety of housing programs available. In an effort to balance these values, the Refusal Policy, while flexible, has specific constraints to maintain efficiency. Eligible households are not limited in the number of resources they can refuse. CE documents refusals in order to better understand why eligible households refuse resources and identify changes that would support the needs of our community.

# See the Household Refusal Policy for more details.

CE promotes housing stability for households and recognizes that circumstances arise which may require an adjustment in a current housing situation. With a Mobility Request, eligible households are prioritized for transfer to another housing program.

# See the Mobility Request policy for more details.

The External Fill Policy allows a housing provider to fill available housing units' external of a CE referral when CE is unable to identify an eligible household. This policy is intended to be the last effort to ensure CE is making the best use of available housing resources. Communication during an external fill request allows CE and housing providers to work together to understand challenges of the CE referral process and support continuous quality improvement. External fills are used as an emergency tool after CE staff and housing providers have made every attempt to prioritize and house the eligible households on the Priority Pool through CE.

# See the External Fill policy for more details.

# Housing First

CE participating programs will make enrollment decisions based on standardized eligibility criteria determined by program funding. No household may be turned away from crisis response services or homeless designated housing due to lack of income, lack of employment, disability status, or substance use. Exceptions include instances when the project's primary funder requires the exclusion or a previously existing and documented neighborhood covenant/good neighbor agreement has explicitly limited enrollment to households with a specific set of attributes or characteristics. Funders restricting access to projects based on specific household attributes or characteristics will need to provide documentation to the Coordinating Entity providing a justification for their eligibility policy.

# Language Support

CE provides services in the language preferred by the household when completing a Housing Triage Tool and making a housing referral. If staff are unable to provide in-person interpretation, access to interpretation services is also available through a phone service. In addition, households needing hearing and speech disability are supported through 711 for Telecommunications Relay Service.

By having both RAPs and community based CE assessors, the Seattle / King County CoC supports all people that are eligible for CE to have fair and equal access to the coordinated entry system. This includes:

- Sub-populations such as households experiencing chronic homelessness, Veterans, families with children, youth, and survivors of domestic violence; and
- Households that have 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.

# Non-consenting

The non-consenting policy outlines how households that are de-identified in HMIS have equal access to housing resources and can be easily contacted by Coordinated Entry when they become available.

# **CE Process Flow**

**Step 1:** <u>Connecting to Coordinated Entry -</u> To ensure accessibility for eligible households, CE provides services from Regional Access Points located throughout King County. Eligible households can initiate an appointment in person through any of the designated Regional Access Points or by calling 211. Households can also complete a housing triage tool through community based Housing Assessors.

**Step 2**: <u>Diversion First</u> - *Housing Assessors* at RAPs have access to an array of services and mainstream resources to assist in resolving the immediate needs of a household and potentially end an episode of homelessness such as diversion opportunities, employment, education, transportation, public benefits, and legal services, among other resources.

**Step 3:** <u>Housing Assessment</u> - *Housing Assessors* are available to administer the Housing Triage Tool with eligible households. The tool is completed and tracked using HMIS.

**Step 4**: <u>Offer Crisis Intervention Services</u> – At the time of triage, *Housing Assessors* will connect households with emergency shelter or other crisis response services as appropriate and as available.

**Step 5**: <u>Housing Referral</u> – Households are prioritized based on the prioritization policy adopted by the Seattle / King County CoC. Information gathered from the Housing Triage Tool contributes to prioritization for available resources. Households not prioritized will be offered other services, such as diversion, connections to employment resources, short-term/emergency housing, or referral to other community supports.

#### Non-Discrimination Requirements

The Coordinating Entity takes all necessary steps to ensure that CE is administered in accordance with the Fair Housing Act by promoting housing that is accessible to and usable by persons with disabilities.

CE complies with the non-discrimination requirements of the Fair Housing Act, which prohibits discrimination in all housing transactions on the basis of race, national origin, sex, color, religion, disability status and familial status. This also includes protection from housing discrimination based on source of income. Additional protected classes under state law include sexual orientation (including gender identity), marital status, military discharge status, age (40+). Agencies cannot preference any protected class unless allowed by statute/regulation, or written waiver from their funding or regulatory body (i.e. U.S. Department of Housing and Urban Development).

All Partner Agencies take full accountability for complying with Fair Housing and all other funding and program requirements. Contracts require the Partner Agencies to use CE in a consistent manner with the statutes and regulations that govern their housing programs.

The Coordinating Entity maintains the CE Housing Inventory that outlines any funding contract that requires or allows a specific subpopulation of persons to be served. As a result CE may allow filtered searches for subpopulations while preventing discrimination *against* protected classes.

The Civil Rights and Fair Housing Laws and Requirements are outlined in Appendix C.

# Reasonable Accommodations

The Fair Housing Act prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, familial status, and disability. One type of disability discrimination prohibited by the Act is the refusal to make reasonable accommodations in rules, policies, practices, or services when such accommodations may be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling. A reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service that allows a person with a disability to use and enjoy housing, including public and common use areas.

See the Reasonable Accommodations policy for more details.

# **Conflicts of Interest**

In the event that a conflict of interest occurs between a household and CE staff, RAP staff, or housing provider, the staff must inform their supervisor, who will assign another staff to work with the household as appropriate.

# Stakeholder Input

Coordinated Entry staff members regularly engage with community based stakeholders for quality assurance and continuous improvement through:

- Monthly Policy Advisory Committee meetings
- Monthly regional homeless coalition meetings

• Ad-hoc system improvement meetings

# People fleeing domestic violence, dating violence, sexual assault, or stalking

CE addresses the needs of households who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking.

When a household is identified by a housing navigator to be in need of domestic violence (DV) services, that household is referred to the domestic violence system immediately via 211 or the Washington State Domestic Violence Hotline (1-800-799-7233).

In July 2019, the Coalition Ending Gender-Based Violence and Coordinated Entry began a partnership focused on:

1. Alignment and collaboration of DV services and Coordinated Entry

2. Increased level of expertise among housing and homeless providers in providing safe and accessible housing services to DV survivors in the Seattle – King County Continuum of Care (CoC).

# Referrals to Homelessness Prevention Services

All services that may support a household to prevent an episode of homelessness are accessible through 211.

The Youth Family Homeless Prevention Initiative (YFHPI) is a household-centered approach for youth and families at imminent risk of homeless that couples progressive engagement case management with flexible financial assistance to immediately address the issue placing the household at imminent risk. The YFHPI Providers can be found on the Homeless Prevention Resources Database website <a href="https://kcprevention.weebly.com/uploads/7/0/1/1/70112437/bsk\_yfhpi\_funding\_awards\_2016\_1.pdf">https://kcprevention.weebly.com/uploads/7/0/1/1/70112437/bsk\_yfhpi\_funding\_awards\_2016\_1.pdf</a>

# **Continuous Improvement**

The CE process will be monitored and reported on quarterly and annually to ensure it is operating effectively. Evaluation efforts will be led by the King County Performance Measurement and Evaluation (PME) Unit, with guidance from the System Performance Committee. An evaluation framework is provided in the Appendix.

The quarterly CE 120 Day review data will be shared with the Policy Advisory Committee where stakeholder feedback and recommendations for adjustments to the design of CE will be gathered. Through this process funders, providers, and people experiencing homelessness are able to provide input on the efficiency and effectiveness of CE.

Once participating project and project participants have provided input, the CE Policy Advisory Group will review the recommendations and propose policy and procedure changes that will improve the efficiency and effectiveness of CE.

# Roles

#### CE Assessors

CE Assessors are staff based at Regional Access Points, and also include community based Assessors (provider outreach teams and case managers). In order to ensure access for households who face physical or other barriers to accessing Regional Access Points or those who are disconnected from services, additional Housing Assessors are designated outside of Regional Access Points to administer assessments.<sup>1</sup>

Households can have a Housing Triage Tool completed at community-based locations, in addition to the Regional Access Points. Locations are published on the <u>KCRHA website</u>.

*Responsibilities* - All Housing Assessors have the ability to complete a Housing Triage Tool with eligible households. Housing Assessors' responsibilities include, but are not limited to the following:

- Operating as the initial contact for CE and communicating eligibility criteria;
- Exploring resources other than homeless housing programs, such as diversion or employment/education;
- Enrolling households in the Coordinated Entry System Program in HMIS and administering the Housing Triage Tool as needed;
- Documenting the household's responses into the database;
- Communicating the types of resources the household may be referred to;
- Ensuring information is input into the HMIS system accurately;
- Notifying households about other services/resources/programs they may be eligible for outside of CE, including housing through BHRD, Section 8, emergency housing, homeless prevention through YFHPI, and other community-based resources (employment services, behavioral health supports, domestic violence services, etc.); and
- Responding to requests by the Coordinating Entity.

*Training Requirements*- Housing Assessors are trained by CE certified trainers (T3s); the training includes the Bitfocus/Clarity General Webinar, assessment training, diversion, language access, how to conduct a trauma-informed assessments, progressive engagement, safety planning, cultural sensitivity/implicit bias training, and Veteran and domestic violence issues training. Information on Cooridnated Entry training is located on the <u>KCRHA website</u>.

Assessor Manual - The CE Housing Assessor Manual has more details on Assessor roles and responsibilities, the process of conducting and completing the triage tool, training, Release(s) of

<sup>&</sup>lt;sup>1</sup> Community-Based Agencies with trained assessors include YA Providers offering front-line case management and diversion resources, Emergency Shelters, Mobile Medical Van, Veteran Navigators and Veteran-serving agencies, Outreach teams, and agencies providing culturally tailored services.

Information, and HMIS data input requirements. The CE Assessor Manual is located on the <u>KCRHA</u> website under Forms and Documents.

*Certified Trainer (T-3) Manual* – The CE Certified Trainer Manual has more detail on the training process when training is administered by a certified T3 Assessor trainer, including prerequisites, the training process, and roles and responsibilities. The CE Certified Trainer (T-3) Manual is located on the <u>KCRHA</u> website under Forms and Documents.

Mandatory Reporting - Staff associated with Coordinated Entry and specifically Regional Access Points (RAP) are required to be mandatory reporters. Mandatory reporting ensures that the proper entities are notified when individuals or family members are at risk of neglect or abuse as outlined by the Washington Administrative Codes (WAC) <u>http://app.leg.wa.gov/wac/default.aspx?cite=246-16</u>. Individual or family member can include a dependent child, dependent adult, the elderly, or any member of society. See Mandatory Reporting policy for more details.

See Mandatory Reporting policy for more detail.

#### Housing Navigators

Housing Navigators are employees of homeless service providers and may be RAP staff who work with eligible households to prepare for a housing referral once they have been placed in the Priority Pool in order to expedite the occupancy process once a referral has been made. A Housing Navigator may work with an eligible household from housing triage through the referral and occupancy process, depending on the household's desire for that support. Housing Navigators' responsibilities include, but are not limited to the following:

- Participating in weekly Case Conferencing;
- Assisting household in obtaining necessary documentation required for housing;
- Collecting necessary documentation, securing additional financial assistance if needed, providing transportation, accompanying to potential housing options, etc.;
- Assisting households in navigating any challenges related to the housing process (application and/or inspection process, etc.); and
- Responding to requests by the Coordinating Entity.

The Housing Navigator Manual is located on the KCRHA website under Forms and Documents.

# Governance

Coordinated Entry adheres to the U.S. Department of Housing and Urban Development's guidance on management and governance of a coordinated entry system. Detailed information can be found in the Coordinated Entry Management and Data Guide:

https://files.hudexchange.info/resources/documents/coordinated-entry-management-and-dataguide.pdf

# Coordinating Entity

King County Regional Homelessness Authority is the *Coordinating Entity* that manages CE. The Coordinating Entity is responsible for:

- Creating and widely disseminating materials regarding services available through CE and how to access those services;
- Designing and delivering training, at least annually, to all key stakeholder organizations, including but not limited to the required training for Regional Access Points;
- Ensuring that pertinent information is entered into HMIS for monitoring and tracking the process of referrals including vacancy reporting and completion of assessments;
- Managing case conferences to review and resolve program denials, participant refusals, and flag review of vulnerability score in compliance with the protocols described in CE Operations Manual;
- Managing an eligibility determination appeals process in compliance with the protocols described in CE Operations Manual;
- Designing and executing ongoing quality control activities to ensure clarity, transparency, and consistency in order to remain accountable to households, referral sources, and homeless service providers throughout the coordinated access process;
- Making periodic adjustments to the CE as determined necessary, and;
- Updating policies and procedures.

# Policy Advisory Committee

The CE Policy Advisory Group will meet on a monthly basis and is responsible for:

- Understanding the daily operations of CE;
- Working with the Coordinating Entity to identify any policy implications in changes to daily operations;
- Approving policy and procedure recommendations from the Coordinated Entity to improve the efficiency and effectiveness of CE;
- Conducting racial equity analysis when designing policy or when evaluating performance;
- Holding accountability and providing support to the Coordinating Entity for fulfilling CE vision;
- Advising the Coordinated Entity based on CE performance data including the 120 day review and stakeholder input; and
- Providing vision and overarching structure recommendations to the All Home Coordinating Board and supports approved solutions to moving forward.

CE Policy Advisory Committee will include the following seats:

• 1-3 Leaders with lived experience role(s)

- 5-7 Funder roles
- 5-7 Provider roles
- 1 Coordinating Entity role
- 1 Evaluator role
- 1 Equity and Social Justice role
- 1 CoC roler

# **Coordinating Board**

The Coordinating Board determines how homeless housing is prioritized and accessed in the Seattle / King County CoC. The Coordinating Board will receive recommendations from the Coordinated Entry Policy Advisory Committee.

# **Glossary of Terms**

**Affordable Housing-** Non-time limited housing that is available to households with incomes less than 30%, 50% or 80% of area median income (AMI), also sometimes known as workforce housing. Housing projects may receive tax credits or other incentives in exchange for agreeing to set aside a certain number of units in the development for households with total incomes less than a particular percentage of AMI. Households must meet income requirements to be eligible for the units. Affordable housing may or may not have a rental subsidy.

**BNL-By Name List-** BNL, or By Name List refers to the broader list of households experiencing homelessness comprised of the Active List, Inactive List, and Priority Pool.

**CE (Coordinated Entry)** – The Coordinated Entry System for the King County HUD Continuum of Care (CoC) and the process where any household can seek to resolve their current housing crisis and when eligible, complete a phased housing assessment for possible referral to a CE housing resource.

**CE Participating Programs** – Any program that is required by its funding source to participate in coordinated entry, or has opted into the system to receive its referrals through coordinated entry.

**Priority Pool** – the cohort of households who are prioritized for resources through Coordianted Entry, including the Disengaged list.

**Coordinating Entity** – Refers to KCRHA; the entity that manages the CE system.

**Diversion** - A Housing First, person-centered, strengths-based approach to help households identify the choices and solutions that will end their homeless experience with limited interaction with the crisis response system.

**Dynamic Prioritization** – A method utilizing a prioritizing process (i.e. assessment result, unsheltered status, length of time homeless) to identify the most vulnerable households that can be housed within sixty days based upon available housing resources.

**Eligible Household** - CE serves all young adults, families, Veterans, and single adults who are literally homeless according to the category 1 HUD definition of homelessness or fleeing/attempting to flee domestic violence, and single young adults (ages 17.5-24) who are imminently at risk of homelessness within the next 14 days. See "Eligibility" section for details.

**Emergency Shelter-** temporary shelter from the elements and unsafe streets for homeless households. Emergency shelters typically address the basic health, food, clothing, and personal hygiene needs of the households that they serve and provide information and referrals about supportive services and housing. Emergency Shelters are indoors, and range from mats on the floor in a common space to beds in individual units. Some shelters are overnight only, while others operate 24/7.

**ESG (Emergency Shelter Grant)** – Grants from HUD that support homelessness prevention, emergency shelter, and related services.

Family – An individual or couple who is pregnant or parenting

**GPD (Grant and Per Diem)** – Funding offered through the VA to community agencies that provide supportive services and/or housing for homeless Veterans.

**HMIS (Homeless Management Information System)** – a web-based software application designed to record and store person-level information regarding the service needs and history of households experiencing homelessness throughout a Continuum of Care (CoC) jurisdiction, as mandated by HUD.

**HOPWA (Housing Opportunities for Persons with AIDS)** – A Federal program dedicated to the housing needs of people living with HIV/AIDS.

Household – An individual, couple, or family seeking to be housed together.

**Housing Assessors** – Staff based at Regional Access Points and other identified individuals who administer the housing triage tool with households who are eligible for Coordinated Entry.

**Housing Navigators** – Staff based at Regional Access Points and Youth agencies who work with eligible households to prepare for a housing referral once they have completed a housing triage tool. The Housing Navigator role may alternatively be filled by outreach staff or case manager.

**Housing Triage Tool** – Standard, population-specific question sets used to inform the prioritization process in CE. The Housing Triage Tools include questions from the VI-SPDAT suite of tools:

**HUD (The United States Department of Housing and Urban Development)** – HUD requires Continuums of Care to establish a *Centralized or Coordinated Assessment System* where households experiencing homelessness are assessed and referred

**Inactive Status-** Households identified as experiencing homelessness but have not interacted with the homeless system for at least ninety days and are assumed to have self-resolved their housing crisis or moved out of the community.

**Permanent Supportive Housing-** Permanent housing for a household that is homeless on entry, and has a condition or disability, such as mental illness, substance abuse, chronic health issues, or other conditions that create multiple and serious ongoing barriers to housing stability. Households have a long-term high level of service needs in order to meet the obligations of tenancy and maintain their housing. Tenants have access to a flexible array of comprehensive services, mostly on site, such as medical and wellness, mental health, substance abuse, vocational/employment, and life skills. Services are available and encouraged but are not to be required as a condition of tenancy.

**Permanent Housing with Supports (i.e. other permanent housing)** - Permanent housing for homeless households with a high to medium level of service needs. Services are needed in order for the homeless household to maintain housing stability and services are individualized and targeted based on the housing stability plan. Programs and services may be available on or off-site and the tenant holds a rental agreement.

**Progressive Engagement** – An approach to support households to quickly self-resolve their housing crisis by tailoring services to offer just what is needed, reserving more intensive services for those that need additional assistance.

**RRH (Rapid Re-Housing)** – A type of housing assistance that provides housing identification, move-in and rental assistance, and/or case management.

**RAP (Regional Access Point)** – Regional Access Points provide housing assessments and referrals to community resources. They are located in five sites across King County. Housing assessors and navigators are based at these sites.

**SSVF (Supportive Services for Veteran Families)** – Rapid Rehousing assistance for Veterans, including single households.

**Subsidized Housing-** Non-time limited housing that is supported by a rental subsidy. Generally, the tenant pays a portion of their monthly income towards rent and utilities, and the other portion of the rent is paid by the subsidy, up to a defined reasonable amount

**Transitional Housing-** A time-limited intervention intended to provide assistance to households who need more intensive or deeper levels of support services to attain permanent housing. Services continue to emphasize housing attainment through a housing-focused assessment and housing stability planning, which includes working with each household to identify resources in the community, to make referrals as needed, and to support on-going family and housing stability.

**VA** – The Department of Veteran Affairs; provides resources, including housing, for households who are Veterans

**VASH (Veterans Administration Housing Support)** – The HUD-VASH program combines Housing Choice Voucher rental assistance for homeless Veterans with case management and clinical services provided by the VA.

VI-SPDAT (Vulnerability Index- Service Prioritization Decision Assistance Tool) – A assessment developed and owned by OrgCode and Community Solutions that is utilized for single individuals, including veterans, to recommend the level of housing supports necessary to resolve the presenting crisis of homelessness. Within those recommended housing interventions, the VI-SPDAT allows for prioritization based on presence of vulnerability.

**YA (Young Adult)** – An individual who is 18-24 years old. There are programs targeted to serve individuals in this age range. Young adults may also be eligible for single adult programs.

# **Policies**

Housing Inventory Maintenance	Date Approved: 5/25/2016
Related Documents: Not Applicable.	

# Rationale

The Housing Inventory and HMIS data information must remain up to date in order for CE to support a smooth and appropriate referral for eligible households to housing. Each agency has submitted eligibility information and a program description for their housing programs. Programs are required to adhere to the agreed upon criteria.

# Policy

Housing Providers must notify Coordinated Entry of any contractual changes to housing programs that impacts program eligibility and referrals through CE. This may include: starting, adding to, or closing housing programs, a change in the service delivery model, adjustments to program eligibility requirements, pertinent policy change, etc.

# Procedures

- 1. The person identified as the Agency Lead is responsible for updating the Housing Inventory and should contact the CE team to notify them of a change and request that the Housing Inventory be updated.
  - Please provide the following information with the request for a change to the Inventory.
    - $\circ \quad \text{Name of Program}$
    - o <u>Requested</u> change
    - o <u>Reason</u> for change
    - <u>Effective date</u> of change
- 2. If the Coordinating Entity would like to change any language on the Housing Inventory and Screening Tool a similar email will be sent to the Agency Lead.

# Change in Agency Lead

If the Agency Lead responsible for updating the program inventory needs to change, please email the Bitfocus Helpdesk at at kcsupport@bitfocus.com with the subject: "Housing Inventory Maintenance".

Prioritization	Date Approved: 5/25/2016
Related Documents: Not Applicable.	

The Seattle/ King County CoC has limited housing resources available for people experiencing homelessness, and therefore must prioritize access to the resources.

# Policy

Coordinated Entry is currently prioritizing households based on COVID-19 guidance issued by HUD and Washington State Department of Commerce. CE policies have the potential to protect those most vulnerable to the virus' severe effects by speeding up connections to permanent housing for people at high risk of COVID-19 complications. In response, the Coordinated Entry Policy Advisory Committee approved the COVID Prioritization Policy to be in place during the COVID pandemic. Beginning October 12th, 2020 in order to quickly house people experiencing homelessness who are at high risk for developing serious and life-threatening health complications from COVID-19, Coordinated Entry will prioritize households for each Priority Pool who are most disproportionately impacted by COVID-19, for all housing openings, using factors determined by Seattle King County Public Health.

For detailed information on the current prioritization methodology, please see the *Prioritization* section of the <u>KCRHA website</u>.

- 1. Upon prioritization, households are referred to navigation services as needed, and any existing service connections will be alerted.
- 2. During case conferencing, households from the Priority Pool are matched to available housing resources for which they are eligible.
- 3. Household choice is a foundational principle of Coordinated Entry. Therefore, when a household is eligible for more than one resource, the household will be offered the various options.

Tiebreaking	Date Approved: 5/25/2016
Related Documents: Not Applicable.	

In cases where multiple prioritized households are eligible and interested for a given resource, tiebreakers are used in order to determine which household will be referred.

#### Family

- Length of Time Homeless
- Exits from Housing to Homelessness
- Indicated Mortality Risks
- Barriers to Documents
- Medical
- Mental Health
- Substance Use
- Barriers to Housing
- CPS Involvement
- Risk of Harm
- Domestic Violence

# Single Adults

Using the Vulnerability Assessment Tool (VAT)

- Survival Skills
- Basic Needs
- IndicaIndicated Mortality Risks
- Medical Risk
- Organization/Orientation
- Mental Health
- Substance Use
- Communication
- Social Behaviors
- Length of Time Homeless

#### Young Adults

- Length of Time Homeless and Type of Homelessness (HUD category 1/2/4)
- Exits to Homelessness
- Self-Sufficiency
- Barriers to Documents
- Medical Needs
- Mental Health
- Substance Use
- Barriers to Housing
- Risk of Harm
- Domestic Violence
- Exploitation

Housing Referral	Date Approved: 10/12/2017
Related Documents: Not applicable.	

CE refers prioritized households to resources based on eligibility, interest, and service match.

# Policy

Referrals to resources are based on:

- a) Eligibility
- b) household choice/interest Households have the right to reject housing and service options without retribution or limiting their access to additional housing options.
- c) Service match

Case Managers/Navigators are authorized to accept a housing referral on behalf of their household.

- 1. Households are nominated to resources by Housing Navigators through the Case Conferencing process.
- The responsibility to contact a household lies with the housing provider. The expectation is that
  a housing provider will attempt to contact a household at least 3 times, using all contact
  methods, over the course of 2 weeks before a denial is made.
- 3. Households and/or their case managers are expected to return call/email/etc. within 48 hours, to set the intake appointment.

When to Update/Conduct a New Housing Triage Tool	Date Updated: 3/22/22
Related Documents: CE Triage Tool	

To ensure information for any given household is accurate, Housing Triage Tools should be kept up to date in HMIS.

# Policy

Housing Triage Tools should be updated when household composition changes. This includes adjusting the drop-down option between population types: Single Adult, Family, and Young Adult based on household composition and/or pregnancy.

- A. Young Adult: for individuals 18-25
- B. Family: for households with at least one minor or pregnancy
- C. Single Adult: for individual households 25+

- 1. CE Housing Assessors will request that households notify them of any change in household composition that is reflected in the list above.
- 2. In these cases, the Housing Assessor will update the Housing Triage Tool in HMIS

	Date Approved: 2/23/2018
Sending Non-Consenting Household Information to	
CE for Purposes of Offering a Referral	
Related Documents: Not Applicable	

To ensure that households that are de-identified in HMIS have equal access to housing resources and can be easily contacted by Coordinated Entry as needed.

# Policy

Records that are de-identified in HMIS contain no information that can identify the household for contact. Coordianted Entry must have contact and eligibility information about the household in order to ensure equal access and to offer a housing resource when it becomes available. If household information is not received, CE will be unable to offer a housing resource.

- 1. A household (family, single adult, young adult) by need or request is de-identified by a housing assessor when entering a profile and triage tool/assessment in HMIS.
- 2. After entry into HMIS and de-identification is complete, the assessor will detail the name, date of birth, gender, and contact information for each household member, along with the HMIS UIs.
- 3. Send via secure email to <u>alex.ebrahimi@kcrha.org</u>

Unsuccessful Referrals (Agency Denials)	Date Approved: 5/25/2016
Related Documents: Denial Reason.	

CE promotes access for all eligible households in need of housing by overseeing an objective referral process in which all eligible households are treated in a consistent manner.

# Policy

A referral may be unsuccessful due to a household refusing the resource, by agency denial, or based on program eligibility requirements with CE. Any unsuccessful referral must be documented in HMIS. CE may follow-up with the housing program and the household referred in order to understand the circumstances of the returned referral.

# Housing providers are responsible for assuring that a household meets the contractually required eligibility requirements for their program.

# Procedures

- 1. Housing providers must accept a household who is referred and meets established eligibility criteria.
- 2. The housing provider must enter the reason for the unsuccessful referral in HMIS according to the program status definitions and include details regarding the reason the referral was unsuccessful in the notes section.

# Program Status Definitions

- a. *household did not call or show up* the housing provider is unable to reach the household for at least 48 hours and has attempted to reach them through any of the identified means
- b. Lack of Eligibility a referral was made based on the household's apparent eligibility, but due to overlooked or undisclosed information, the household is not eligible for the program. [i.e. additional information was disclosed/discovered impacting program eligibility]
- c. *Full capacity* the housing program is at full capacity and does not have an available resource for the referral that was sent.
- d. *household out of jurisdiction-* a referral was made and the housing provider discovered that the household is no longer in King County.
- e. *household refused services* a referral was made and a household refused the available resources after speaking with the housing provider and learning more about the program.
- f. *Disagreement with rules*-the household previously resided in the housing program they were referred to re-enrollment in the program would result in a significant health and safety risk.
- g. Self-resolved- household has found permanent housing outside of the CE system.
- h. *Falsification of documents*-household falsified documents such as a housing application, failing to disclose information that makes them ineligible for the program.

- i. *Otherwise Denied* the program is denying the person/family for some other reason not described above
- 3. The housing provider must inform the household of the reason the referral was unsuccessful.
- 4. CE staff may follow-up with the housing program and the household referred in order to understand the circumstances of the returned referral. If a referral is returned outside of agreed upon eligibility requirements, CE will not provide another referral to the housing provider until the current referral issue is resolved with funders and program staff.
  - a. If funders determine an unsuccessful referral was appropriate, CE will provide a new referral for the unit.
  - b. If funders determine an unsuccessful referral was inappropriate, the housing provider must proceed with accepting the original referral or file a formal grievance with the funding entity. CE will not provide a new referral until resolution has been reached.

Household Refusal	Date Approved: 5/25/2016
Related Documents: Not Applicable.	

Coordinated Entry (CE) values household choice in the housing process. CE also strives to maintain low vacancy rates for the variety of housing programs available. In an effort to balance these values, the Refusal Policy, while flexible, has specific constraints to maintain the CE system.

# Policy

Eligible households are not limited in the number of resources they can refuse.

CE will document refusals in order to better understand why eligible households refuse resources and identify changes that would support the needs of our community.

- 1. If the household has already received a referral to the housing program and determines that they do not want to proceed with the referral at any point in the process, they can notify the program and/or the Housing Navigator/case manager supporting the household.
- 2. Upon refusal, the Housing Navigator should thoroughly explain types of programs the household is eligible for to affirm that the household is interested in the resources they may be offered in the future. The household may change their decision at any time, though a referral to the resource may or may not still be available at that time. The household will be returned to prioritization.

Mobility Transfer	Date Approved: 3/30/22
Related Documents: Mobility Request Form	

Coordinated Entry promotes housing stability and recognizes that circumstances arise which may require a change in a current housing placement.

# Policy

Households eligible for a Mobility Transfer are prioritized for referral to another housing program. Households are potentially eligible for Mobility Transfer regardless of how they were referred to their current placement: eligibility is not limited to those who were referred via Coordinated Entry prioritization. Current and former residents of housing programs that accept referrals from CE are eligible for mobility transfer.

\*If a household experiences a new episode of homelessness after a Mobility Request has been approved but before a placement has been facilitated, the Mobility Request is still able to be processed. In absence of an existing service connection, a connection will be made by the System Performance team to ensure adequate navigation support through a transfer.

\*If a household was housed through Rapid Rehousing but has since exited the RRH program (while remaining housed) and are facing imminent risk of homelessness they are eligible for MR with the support of a provider/navigator.

# Process

- The housing provider must securely send the completed Mobility Request form to Coordinated Entry staff, documenting the reason for Mobility Transfer in detail. Mobility Requests must indicate steps taken by housing staff to support the household and seek options that would keep the household housed within their program if possible.
- CE staff will follow up regarding approval or denial of Mobility Requests within one business day if there is a safety issue, and within three business days otherwise.
- Households who have been approved for mobility for safety reasons will be prioritized within mobility requests, followed by households in danger of losing their housing first.
- If denied for mobility through CEA, the housing situation will be determined between the housing provider and the household.

# Categories

*Imminent Safety Risk:* when a household is at risk of violence and needs to be moved to a different location. Mobility Requests under this category will be prioritized. Note that disagreements between neighbors are expected to be mediated by the property first.

*Geographic Change:* is often used in situations of joint custody, if parents need to be closer to each other in order to be in compliance with their custody agreement.

**Change in Service Need:** when a program and a household agree that a household is in need of either a decrease or increase in services related to circumstances that have changed since enrollment in original program. Examples could include a medical event or permanent disability, or a desire for more intensive on-site case management support.

*Exiting due to Age Restrictions:* when a young adult is aging out of their current program with no other housing options.

*Change in Family Size/Household Type:* when a household is anticipating a change in family size resulting in the household being over or under occupancy for their unit. This also applies if a household is moving from one population to another (i.e. from being a single adult household to a family household with minors.)

*Office of the Ombuds Pathway:* Referral from KCRHA Office of the Ombuds when significant concerns about the current housing placement are raised.
Reasonable Accommodations	Date Approved: 10/21/2016
Related Documents: Not Applicable	

The Fair Housing Act prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, familial status, and disability. One type of disability discrimination prohibited by the Act is the refusal to make reasonable accommodations in rules, policies, practices, or services when such accommodations may be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling.

A reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service that allows a person with a disability to use and enjoy housing, including public and common use areas. Examples of reasonable accommodations provided by rental management include:

- providing rental forms in large print
- providing a reserved accessible parking space near a dwelling
- allowing a service animal in a "no pets" building
- granting a move to the ground floor when someone can no longer climb stairs
- offer to move a resident to a different (more accessible) unit instead of allowing a modification in the person's current unit (but cannot insist that the person moves)
  - If a housing provider can accommodate someone's needs by moving them to another housing unit, the housing provider has permission to move the resident within their own housing portfolio. The housing provider is expected to post the housing unit the resident moves out of as an open unit for the CE system to fill.

# Policy

A reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service that allows a person with a disability to use and enjoy housing, including public and common use areas.

- An applicant or resident with a disability that needs either a reasonable accommodation or a reasonable modification, or both, in order to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces should submit requests to the housing program / agency where they currently live.
- 2. Any reasonable accommodation requests received by CE will be redirected back to the housing program to follow policies and procedures of that organization.
- 3. If the housing program / agency is unable to meet the reasonable accommodation request the program may submit a mobility request to CE. See mobility request policy.

Fair Housing Grievance – Grievances about a participating program's efforts to act in response to a reasonable accommodation request or discriminatory impact:

- a. Contact the Seattle office of Civil Rights ; more information is available at <a href="http://www.seattle.gov/civilrights/">http://www.seattle.gov/civilrights/</a>
- b. Contact the King County office of Civil Rights; more information is available at <a href="http://www.kingcounty.gov/exec/CivilRights.aspx">http://www.kingcounty.gov/exec/CivilRights.aspx</a>
- c. Washington State Human Rights Commission, more information is available at <a href="http://www.kingcounty.gov/exec/CivilRights.aspx">http://www.kingcounty.gov/exec/CivilRights.aspx</a>

External Fill	Date Approved: 06/08/17
Related Documents: External Fill Verification	

The External Fill Policy allows a housing provider to fill available housing units' external of a CE referral when CE is unable to identify an eligible household. This policy is intended to be the last effort to ensure CE is making the best use of available housing resources. Communication during an external fill request allows CE and housing providers to work together to understand challenges of the CE referral process and support continuous system improvement.

#### Policy

External fills are used as an emergency tool after CE staff and housing providers have made every attempt to prioritize and house the eligible households through CE. CE will offer a unit for external fill when an eligible household cannot be identified from the Priority Pool for referral after 2 weeks.

#### Procedures

- 3. CE makes referrals according to established referral and prioritization policies. When CE is unable to identify a household for an available unit, CE will release the unit to the housing provider to fill externally of CE.
- 4. The unit may not be filled until CE confirms the unit for an external fill.
  - a. Housing providers are encouraged to post the unit broadly, including with partner agencies, to obtain appropriate and immediate referrals.
- 5. The open unit should remain posted in HMIS. The System Performance Team will update the existing posting to designate that the unit was confirmed for an external fill.
- 6. When a household has been identified to move into the available unit, the housing provider will email the UI of the household identified to the appropriate member of the System Performance team.
- 7. That team member will refer the identified household to the available unit in HMIS. This will allow the housing history to be captured in the household's profile and will remove the available unit posting from HMIS.
- 8. The housing provider will enroll the household into their program.

Disengaged Households	Date Approved: 5/25/2016
Related Documents: Not Applicable.	

To ensure the Priority Pool reflects the most current information regarding eligible households who are in need of housing, prioritized households may be considered "disengaged" if they cannot be reached by navigators.

#### Policy

Prioritized households are considered "disengaged" after contact has been attempted at least three (3) unique times with no response from the household. If a household later re-establishes contact still eligible for CE, they will be considered for housing resources with no impact on their prioritization status.

Mandatory Reporting Policy	Date Approved:10/12/2017
Related Documents: Not Applicable	

Staff associated with Coordinated Entry and specifically Regional Access Points (RAP) are required to be mandatory reporters. Mandatory reporting ensures that the proper entities are notified when individuals or family members are at risk of neglect or abuse as outlined by the Washington Administrative Codes (WAC) <u>http://app.leg.wa.gov/wac/default.aspx?cite=246-16</u> Individual or family member can include a dependent child, dependent adult, the elderly, or any member of society.

#### Policy

Staff associated with CE RAP locations including mobile assessment staff will respond to suspected abuse or neglect that may require mandatory reporting **based upon the internal policies and procedures unique to each agency**. All agencies that operate a RAP are required to have a mandatory reporting policy.

• The criteria for reporting vary significantly based on jurisdiction. Typically, mandatory reporting applies to people who have reason to suspect the abuse or neglect of a child, but it can also apply to people who suspect abuse or neglect of a dependent adult or the elderly, or to any members of society. For more information on mandatory reporting in Washington State go to <a href="http://app.leg.wa.gov/wac/default.aspx?cite=246-16">http://app.leg.wa.gov/wac/default.aspx?cite=246-16</a>

#### Procedures

The Housing Assessor will notify their direct supervisor when there is suspected neglect or abuse that may require the agency to report. The agency will then follow their internal mandatory reporting policy to ensure the proper agencies are notified.

CE Assessor Training	Date Approved: 2/23/2018	
Related Documents: CE Housing Assessor Manual Ap	ppendix VIII, Train the Trainer (T-3) Manual	

To ensure uniform application of the Housing Triage Tool throughout the CoC Coordinated Entry System through established and standardized training practices.

Policy

Housing Assessors are to be trained in the standardized application of the Coordinated Entry Housing Triage Tool. Agencies that perform triage and employ assessors are responsible for ensuring that triage staff are proficient in all aspects of triage application including privacy, when to de-identify participants, flagging, transparency regarding housing resources, reporting household information accurately, and data accuracy. See Bitfocus training manual for additional information.

Framework for Community Based Housing Assessors	Date Approved: 3/9/2017	
Related Documents: CE Assessor Manual, CE Operations Manual		

To ensure proper Assessor coverage throughout the service area and to identify and fill any potential gaps in connections to triage while not duplicating or overleveraging existing coverage.

#### Policy

Assessors are a critical front door to triaging homeless individuals, families, and youth / young adults for potential referral to a CE resource. The number and proficiency of assessors impact the CE system including data quality, household and community expectations, and connections to resources that are available through CE. Assessors are required to be trauma-informed, knowledgeable about CE, fill a specific need to reach under-served or hard to reach populations, and to be transparent about the limitations of housing resources through the Coordinated Entry System.

- Community Based Housing Assessors are existing staff associated with a program or agency within the CoC that serves or provides outreach to at risk homeless Individuals, families, and youth / young adults and have been trained to perform housing triage under the training guidelines established by the County.
- 2. Community Based Housing Assessors are selected by their home program or agency to perform triage / assessments to the specific population they serve and / or the homeless population at large.
- 3. Community Based Housing Assessors must undergo and successfully complete a training program designed and approved by KCRHA and complete a minimum of two County hosted Assessor Refresher trainings within a 12-month period (See Policy CE Assessor Training).
- 4. Community Based Housing Assessors must fill a specific need that is not otherwise captured within the CoC or by a Regional Access Point, such as culturally tailored programs, rural areas or after-hours programs where other assessors are not available, or other gaps where there is a lack of assessment capability.

5. Community Based Housing Assessors must be forthright about the limitations of CE and provide alternatives when it is clear that a housing resource through CE is unlikely.

 Community Based Housing Assessors must thoroughly and accurately input all triage data into HMIS as reported by the household. If a flag of the assessment is required, or if the household is deidentified, the assessor is required to follow the CE polices for flagging an assessment and / or f or de-identifying households, or risk losing assessor privileges (see CE Assessor Manual).

7. Community Based Housing Assessors must perform a minimum of at least one assessment per month or risk losing assessor privileges.

- 8. Community Based Assessors must follow the policies and procedures of assessing as outlined in the CE Operations Manual and the CE Assessor Manual or risk losing Assessor privileges.
- 9. Agencies can request new assessor access from CE as they experience staff turnover. Any additions to the assessor inventory must be approved by CE and only under specific circumstances such as coverage of a new program or population, or closing gaps in assessment accessibility.
- 10. CE holds sole authority to approve access to the assessments tab in HMIS. Access is granted based upon the process established by CE and outlined in the CE Assessor Manual and the CE Operations Manual.
- 11. CE maintains the Master List of Assessors for the CoC and holds singular authority to manage the number of assessors in the community, approve new assessors, and remove assessor access.

Accessing Emergency Services	Date Approved: 2/23/2018
Related Documents: None	

To ensure access to emergency services when households experiencing a housing crisis are triaged throughout the King County CES including from outreach teams, mobile assessors, community based assessors, and Regional Access Points.

#### Policy

Households must have equal and low barrier access to emergency services at any time of day that will meet their current needs. Staff providing triage throughout the CoC are required to provide assistance and/or information to households on how to access the emergency services that will assist the household in staying safe and providing for basic needs.

#### Procedures

#### **Accessing Emergency Services**

1. Operating hours for CE are M-F 8:00 AM- 5:00 PM with some Regional Access Point hours extending later into the evening. There are also designated walk-in times and mobile locations. A list of Regional Access Points, ancillary locations, and walk-in hours can be found on the <u>KCRHA website</u>.

2. Outreach teams and community based assessors are located throughout the CoC and provide triage at numerous locations including culturally tailored programs, shelters, and places where homeless households gather.

- A. Work with the household to help identify and prioritize the emergency services that are currently needed for the household to stay safe and that will meet their current basic needs.
- B. During operating hours, assist the household with making connections to the identified services by directly contacting the household with the provider, or provide written information on how to connect to those services.
- C. Provide the household with your contact information so you can be reached if other services are identified and help connect to other services is needed.
- D. Provide information on how to access emergency services after normal operating hours (see Accessing Emergency Services After Hours policy).

E. If the households believes that they are experiencing a life threatening emergency direct them to call 911.

Accessing Emergency Services After Operating Hours	Date Approved: 2/23/2018
Related Documents: None	

To outline the processes which ensures people have access to emergency services independent of the operating hours of CE Regional Access Points.

#### Policy

Households that need access to emergency services outside the operating hours of the CE Regional Access Points must have equal and low barrier access to meet their emergent needs. Staff providing triage throughout the CoC are required to provide information to households on how to access after hour services as listed below:

#### Procedures

#### Accessing Emergency Services Outside of the CE Regional Access Point Operating Hours

1. Operating hours for CE are M-F 8:00 AM- 5:00 PM with some Regional Access Point hours extending later into the evening. There are also designated walk-in times and mobile locations. A list of Regional Access Points, ancillary locations, and walk-in hours can be found on the <u>KCRHA website</u>.

2. When connections to services are needed outside of the regular operating hours of the CE system including Regional Access Points.

- A. Call 211 M-F up to 6:00 PM
- B. If it is past 6:00 PM, call the 24-hour crisis line at 866.4.CRISIS (866.427.4747).
- C. For 24/7 help with mental health, substance use and problem gambling call **866.789.1511**.
- D. If you are a teenager seeking teen specific help, call **866.833.4564 evenings (6-10 PM)** if after 10 PM, call the 24-hour crisis line at **866.4.CRISIS (866.427.4747).**
- E. If you are experiencing domestic violence and are in immediate danger, call 911. If you need connections to resources, call **800.799.7233.**
- F. When CE Regional Access Points and 211 reopen for operations at 8:00 AM on the next business day, households can contact either 211, or the Regional Access Point directly to receive help connecting to emergency services. Twenty-four-hour numbers listed above are also still available.
- G. If there is a life-threatening emergency households should always be directed to call 911.

Outreach and Community Assessors	
Related Documents: None	

To ensure that street outreach teams and community based assessors are applying the same standardized assessment process as assessors that provide triage at a Regional Access Point.

#### Policy

Street outreach staff and community based assessors will follow the standardized CE guidelines for providing triage in a way that is consistent throughout the CoC and in compliance with CE Housing Assessor guidelines as outlined in the Housing Assessor Manual.

#### Procedures

1. Street outreach staff and assessors not associated with a Regional Access Point will:

- A. Administer the Housing Triage Tool in the standardized manner as outlined in the CE Housing Assessor Manual and in compliance with all training requirements established by CE.
- B. Discuss options outside of the homeless housing system such as diversion and provide information on how to connect to such services including services offered at CE Regional Access Points.
- C. Assess for other service needs and make connections to services such as food, shelter, and other identified emergent needs.

Coordinated Entry Active Calculation	Date Approved: 3/8/22
Related Documents: None	

To ensure accuracy and dynamic maintenance of a Coordinated Entry Priority Pool that prioritizes the most vulnerable households that are literally homeless or fleeing domestic violence without a safe housing option for available CE resources, and to ensure an efficient and equitable referral process when a housing resource becomes available.

#### Policy

Households are considered "active" for the purposes of Coordinated Entry if they meet any of the below Active Criteria and do NOT meet any of the Inactive Criteria. If a household meets any of the Inactive Criteria, they are not considered "active" for the purposes of Coordinated Entry and will not be considered for potential prioritization.

#### **Active Criteria**

- 1. The household has an HTT and is currently enrolled in day shelter, safe haven, street outreach, diversion, or emergency shelter.
  - a. If a street outreach enrollment, the following conditions apply:
    - i. The enrollment started within the last year (365 days); or
    - ii. There have been services or CLS recorded in the project within the last year (365 days)
- 2. The household has an HTT and is currently enrolled in homeless prevention, other, or services only and if they were a family or single adult households, indicated that they were literally homeless at project entry and either:
  - a. The enrollment started within the last year (365 days); or
  - b. There have been services or CLS recorded in the project within the last year (365 days)
- 3. The household has an HTT and had a Current Living Situation or service entered in the Coordinated Entry System Project within the last 90 days.
- The household has an HTT, is not currently enrolled in any HMIS program, and exited from <u>any</u> HMIS program (excluding Coordinated Entry System Project and Coordinated Entry Priority Pool) within the past 90 days to a non-permanent housing destination.
- 5. The household has an HTT and meet this additional criteria:
  - a. the household has an HTT, VOLT form, Case conferencing form, Flag review form, Referral Refusal form, Housing Needs Form, or Unsuccessful Referral form that was created or updated within the past 90 days
    - i. Excluded are VOLT forms which were updated to indicated that the client is inactive
- 6. The household has an HTT, is a veteran and is enrolled in TH.
- 7. Household has an HTT and is in any of these RRH programs<sup>2</sup>:
  - a. 3647 Navigation & Diversion THS
  - b. 1956 HEN Housing Grant RRH

<sup>&</sup>lt;sup>2</sup> Despite being designated with the "PH - Rapid Re-Housing" project type in HMIS, these programs do not operate in the same way a traditional rapid re-housing program, and for the purposes of Coordinated Entry they are not considered to be a permanent housing program.

- c. 3648 Navigation & Diversion YMCA
- d. 3645 Friends of Youth Youth Engagement Team FOY
- e. 3644 YMCA of Greater Seattle Youth Engagement Team YMCA
- f. 3649 YHDP Agency Youth Engagement Team LCYC
- g. 1775 YWCA KC YWCA Shelter To Housing Seattle [14.185]
- h. 1799 YWCA KC YWCA South County Shelter To Housing [30.186]
- i. 1856 Attain Housing Welcome Home
- j. 1938 Multi-Service Center Shelter to Housing Families
- k. 1984 Solid Ground Solid Ground Shelter to Housing
- I. 2008 Lifewire Lifewire Shelter to Housing

#### Ineligible Criteria

- 1. The household has exited from the CE Priority Pool project to the following destinations and has not had any subsequent HTT updates or new HTTs completed:
  - a. Deceased
  - b. Foster care home or foster care group home
  - c. Hotel or motel paid for without emergency shelter voucher
  - d. Long-term care facility or nursing home
  - e. Moved from one HOPWA funded project to HOPWA PH
  - f. Moved from one HOPWA funded project to HOPWA TH
  - g. Owned by client, no ongoing housing subsidy
  - h. Owned by client, with ongoing housing subsidy
  - i. Permanent housing (other than RRH) for formerly homeless persons
  - j. Rental by client, no ongoing housing subsidy
  - k. Rental by client, with RRH or equivalent subsidy
  - I. Rental by client, with VASH housing subsidy
  - m. Rental by client, with GPD TIP housing subsidy
  - n. Rental by client, with other ongoing housing subsidy
  - o. Residential project or halfway house with no homeless criteria
  - p. Staying or living with family, permanent tenure
  - q. Staying or living with family, temporary tenure
  - r. Staying or living with friends, permanent tenure
  - s. Staying or living with friends, temporary tenure
  - t. Transitional housing for homeless persons
- 2. The household is currently enrolled in TH and is NOT a veteran.
- 3. The household is currently enrolled in a permanent housing program that is not listed in the Active Category number six.
- 4. The household is currently enrolled in the CE Priority Pool program.

CE Eligibility	Date Updated: 3/22/2022
Related Documents: None	

To ensure consistent eligibility criteria for households experiencing homelessness throughout the CoC for CE purposes.

#### Policy

Households are eligible for Coordinated Entry if they are primarily:

- Living and sleeping outside
- Sleeping in a place not meant for human habitation
- Staying in a shelter
- Fleeing/attempting to flee domestic violence
  - Households fleeing/attempting to flee are eligible for Coordinated Entry and can also access DV-specific resources
- Exiting an institution where they resided for up to 90 days and were in shelter or a place not meant for human habitation immediately prior to entering that institution.
- A young adult (18-24) who is imminently at risk of homelessness within 14 days, including those who are pregnant or parenting
  - Youth who are experiencing homelessness (including those who are pregnant or parenting) who are within 60 days of their 18th birthday are able to complete a Housing Triage Tool, but will not be able to be referred to housing resources until they turn 18, with the exception of emancipated minors.

Resources accessed through Coordinated Entry may have additional eligibility requirements.

#### Exceptions:

• The eligibility criteria for households residing in transitional housing does not apply to Veteran households living in Grant and Per Diem (GPD) programs, or Veteran households residing in other transitional housing if the Veteran household is eligible for VA funded housing programs or opportunities (HUD-VASH, SSVF, etc.). Veteran households that are in GPD funded programs/beds remain eligible for a CE assessment and potential referral to a housing resource. Veterans in other types of transitional housing remain eligible for permanent housing under any VA funded program.

Case Conferencing	Date Approved: 01/2017

Related Documents: Coordinated Entry – Case Conferencing Data Use Agreement

## Rationale

To ensure equitable access to available housing resources for each unique population served through the Coordinated Entity.

## Policy

Case Conferencing ensures that the housing needs of households experiencing homelessness closely align with the community's prioritization process for accessing available CE specific units by accounting for unique population-based vulnerabilities and risk factors. In addition, it provides an opportunity for ongoing communication and partnering with agency staff that have direct daily contact with people experiencing homelessness.

- 1. Each week a list of "prioritized" households will be identified from the Homeless Management Information System (HMIS) based on current prioritization methodology.
- 2. The Priority Pool will be distributed to designated Housing Navigation staff by by secured method.
- 3. Lists are compiled unique to each population served, including:
  - Single Adults (SA)
  - Youth and Young Adults (YYA)
  - Families (Fam)
  - Veterans (Vets)
- 3. Case conferencing meetings are facilitated by CE staff and unique to each population.
- 4. Housing Navigators representing agencies serving each unique population shall participate in case conferencing meetings.
- 5. Vulnerable households not yet assigned to housing navigation shall be assigned to a Housing Navigator from an agency that serves the population being referred.
- 6. After being assigned the household, the Housing Navigator will follow-up and facilitate meetings with the household members in order to be document ready for the identified unit.
- 7. All associated staff participating in case conferencing are required to complete and sign a CE Case Conferencing Data Use Agreement.
- 8. Staff that have not signed a CE Case Conferencing Data Use Agreement are not eligible to participate in case conferencing until the form is signed and dated.

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Coordinated Entry promotes housing stability and recognizes that prioritized individuals may move between household types. The availability of Permanent Supportive Housing specifically for Young Adults is limited. In order to ensure housing stability for Young Adults in need of Permanent Supportive Housing, Coordinated Entry will operationalize a pathway to Permanent Supportive Housing for individual adults of any age.

#### Policy

Prioritized households are able to be moved from their original Priority Pool to the Priority Pool for another household type, as appropriate and guided by the below:

Families: Adult(s) with at least one member under the age of 18, or pregnancy in household

Young Adult: individuals age 18 up to 24. Young Adults age out of YA resources upon turning 25.

Single Adult: age 18+ with no minors in household, including couples

Young Adult to Single Adult: Prioritized Young Adults may move to the Single Adult Priority Pool regardless of age if they are an appropriate service match for Permanent Supportive Housing. Prioritized Young Adults who are not an appropriate service match for PSH are able to move to the Single Adult Priority Pool within 90 days of their 25<sup>th</sup> birthday.

#### Process

If you are working with a prioritized household whose household type has changed, please contact a member of the System Performance Team.

CE Privacy Statement	Date Approved: 12/05/2018
Related Documents: Coordinated Entry Privacy State	ement

To ensure households are informed of their right to privacy regarding Personally Identifying Information (PII) and that in order to make a referral to a homeless housing resources, PII must be shared with a potential housing provider.

#### Policy

Staff conducting CE assessments are required to share the Coordinated Entry Privacy Statement with each households that is assessed for a homeless housing resource.

#### Procedures

- 9. Before conducting the assessment, the staff member will read aloud the Coordinated Entry Privacy Statement that is located at the top of the assessment tool for each unique population.
- 10. Agencies that perform assessments will have the Coordinated Entry Privacy Statement posted where assessments are conducted and it will be clearly visible.
- 11. If a household requests a copy of the Coordinated Entry Privacy Statement, a paper copy will be provided by the assessor.
- 12. If the assessment is conducted by a mobile assessor, the assessor will provide a paper copy at the time the assessment is conducted.

# Appendices

Denial Reason	Category	When to Use This Reason	Example
household did not show up or call	No Contact	Provider is unable to contact household after two unique attempts, OR Provider made initial contact with household but household did not show to appointment or call to <i>cancel/reschedule</i>	"12/3 contacted household and scheduled intake for 12/6. 12/6 household did not show and did not call to inform staff. Staff attempted to call household but their phone is not in service. 12/16 called again and phone is still not in service." "Made two separate contact attempts via all contact options over the last week but have not heard back."
household out of jurisdiction	Other	household informed provider that they are no longer in King County and no longer need or are eligible for housing	"household reported that they had moved to St. Louis" "household is not in King County and won't return to King County until June of next year"
household previously received service	Denial	Provider verifies that this household has previously been served by this program and <b>per program policy</b> , is no longer eligible to receive services at this time. If household's level of care exceeds what program is able to provide, or household presents an imminent health and safety risk, select "Needs could not be met by program"	"Per our policy, families are only eligible for housing at [agency's] owned and operated sites once."
Denied by landlord/property manager	Denial	Only applicable when housing provider does NOT own the building. Provider confirms that household is eligible to enroll in housing program but landlord or property manager of unit denies the household's application.	<i>"Property manager at [Apartment Name] denied household because they have an eviction on their record."</i>
Self Resolved – household Housed	Self- Resolved (Housed Outside of CE)	Provider is able to contact the household and finds that the household is housed.	"household moving back home to live with family" "household was housed through [program] and has a move in date of 5/18/17"

Denial Reason	Category	When to Use This Reason	Example
household refused service	Refusal	Provider is able to contact household and household informs provider that they are no longer interested in enrolling in the housing program for reasons such as: they want to live in a different geographic location, they don't want to share a room, or they prefer a different type of housing resource at this time. If household refuses the resource because they do not agree with the housing rules then select "Disagreement with rules."	"household declined location at intake" "household decided the commute to work would be too difficult from this location" "household decided it is best if they were placed at their preferred location." "household doesn't feel like this is a good fit for their family"
Denied by landlord/property manager	Denial	Only applicable when housing provider does NOT own the building. Provider confirms that household is eligible to enroll in housing program but landlord or property manager of unit denies the household's application.	"Property manager at [Apartment Name] denied household because they have an eviction on their record."
Disagreement with rules	Refusal	Provider is able to contact household and household informs provider that they are no longer interested in enrolling in the housing program because they do not want to adhere to housing rules or policies, including: guest policies, curfew.	<i>"household refused to engage in employment search, which is a policy for all households in this program."</i>
Falsification of documents	Other	Provider verifies that the documents they initially received have been falsified. If household is unable or unwilling to provide documents, select "Lack of eligibility"	<i>"Family was not truthful in their intake documents"</i>
Full capacity/no availability	Denial	Provider no longer has housing unit available due to reasons such as: - The unit was posted in error - The unit needs repair	<i>"Referred to unit that is occupied. This unit needs to be removed from Clarity."</i>
Referral time expired	Other	DO NOT USE	N/A

Denial Reason	Category	When to Use This Reason	Example		
Lack of eligibility	Denial	Provider verifies that the household does not meet the housing program's eligibility criteria. This may be due to: referral sent in error by the referral specialist,	"household is not literally homeless" "household is not disabled" "household is 10K over income eligibility" "Could not obtain Social Security		
		incorrect eligibility criteria was posted, household did not disclose accurate information at the time of the assessment, household is unable to provide documents necessary for the intake or application process, or household's circumstances changed making them ineligible for the program. If household is ineligible for housing because they are no longer in King County, select "household out of jurisdiction"	cards for the children" "household does not have children. Husband and child are separated from this household."		
Needs could not be met by program	Denial	Provider determines that the housing program is unable to meet the health or safety needs of the household. If household refuses the resource due to reasons such as geographic preference, discomfort with shared living spaces, or preference for a different resource select "household refused service." If household refuses the resource because they disagree with housing rules then select "Disagreement with rules."	"household says that they need an ADA unit. This is not an ADA unit."		
Other	Other	Provider completes text field with details regarding circumstances leading to the unsuccessful referral.			

# Civil rights and fair housing laws and requirements

Recipients and sub recipients of CoC Program and ESG Program funded projects must comply with applicable civil rights and fair housing laws and requirements, including the nondiscrimination and equal opportunity provisions of Federal civil rights laws as specified at 24 C.F.R. 5.105(a), including, but not limited to the following:

- 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; and
- 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 housing-related services such as housing search and referral assistance. 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.

In addition, HUD's Equal Access Rule at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status, including any projects funded by the CoC Program, ESG Program, and HOPWA Program.

The CoC Program interim rule also contains a fair housing provision at 24 CFR 578.93. For ESG, see 24 CFR 576.407(a) and (b), and for HOPWA, see 24 CFR 574.603.

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).

# **Coordinated Entry Privacy Statement**

An individual household has a right to adequate notice of a CE Partner Agency's use and release of Personally Identifying Information (PII) and of the individual's rights in regards to data about them, as well as the Partner Agency's legal duties with respect to PII.

Whether a households consents to having their information in HMIS or not, their PII will be shared in order to make a referral for housing and services

The CE Privacy Statement is read by the CE Housing Assessors before a CE Housing Triage Tool is completed and should be prominently displayed or distributed in the program offices where the CE Housing Triage Tool is completed.

The CE Coordinating Entity will promptly revise and redistribute the CE Privacy Statement whenever there is a material substantive change to the permitted uses or releases of information, the individual's rights, the Partner Agency's legal duties, or other privacy practices.

A household has the right to obtain a paper copy of the Privacy Statement from the Partner Agency upon request. Partner Agencies should maintain documentation of compliance with the Privacy Statement requirements by retaining copies of the Privacy Statements issued by them.

At any time a household may withdraw or revoke consent for household identified information collection in HMIS by signing the <u>household Revocation of Consent form</u>. Agency will follow KCRHA's policies for creating de-identified households and all non-identifying information for the household shall be entered into the HMIS. If a household revokes their consent, Agency is responsible for immediately providing the written revocation of consent to Bitfocus at the following address:

Bitfocus,						Inc.
ATTN:		King		County		HMIS
5940	S	Rainbow	Blvd	Ste	400	#60866
Las Vegas, N	evada 89118-2	2507				

Consent may be revoked verbally for records pertaining to drug/alcohol treatment and for records where household is actively fleeing domestic violence. If consent is revoked verbally to the Agency, the Agency will inform Bitfocus of such revocation immediately.

# Partner Agencies are prohibited for removing identified information from HMIS without household consent.

Partner Agencies understand that they are prohibited from penalizing or threatening to penalize households for either revoking their previously provided written consent or requesting that their information be held in the strictest confidence. The following statement must be prominently displayed:

# **Content of Privacy Statement:**

Completing the CE Housing Triage Tool allows Coordinated Entry (CE) to make referrals on your behalf to Partner Agencies for housing and services. The only information shared with Partner Agencies will be for the purpose of coordinating a housing or service referral. Partner Agencies receiving a housing or service referral from CE will be provided your name and contact information. A complete list of Partner Agencies can be found in the CE Operations Manual found on the CE website.