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## I. OVERVIEW, SCOPE, HUD DEFINITIONS AND DOCUMENTATION OF HOMELESS STATUS

The U.S. Department of Housing and Urban Development (HUD) requires Continuums of Care (CoCs) to establish and operate a “centralized or coordinated assessment system” (referred to as “coordinated entry” or “coordinated entry process”) with the goal of increasing the efficiency of local crisis response systems and improving fairness and ease of access to resources, including mainstream resources. Both the CoC and Emergency Solutions Grants (ESG) Program interim rules, 24 CFR § 578 and 24 CFR §§ 91 and 576 respectively, require the use of a CoC’s coordinated entry process, provided that it meets HUD requirements.

The CoC Program interim rule at 24 CFR § 578.3 defines centralized or coordinated assessment as a “centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services (“participants” or “clients”), is well advertised, and includes a comprehensive and standardized assessment tool.” The CoC Program interim rule set the basic parameters for coordinated entry and left further requirements to be set by HUD notice. Under the authority of 24 CFR § 578.7(a)(8) and through Notice CPD-17-01, HUD established additional requirements that CoC and recipients of CoC Program and ESG Program funding must meet related to the development and use of a centralized or coordinated assessment system. Other federal and state funding sources also mandate recipient participation in the coordinated entry system. **All projects mandated to participate in coordinated entry by their funding source (“mandated projects”) must follow these policies and procedures.** All other providers participating in the coordinated entry process should also be following these policies and procedures.

Coordinated entry processes are intended to help communities prioritize people who are most in need of assistance. They also provide information to CoCs and other stakeholders about service needs and gaps to help communities strategically allocate their current resources and identify the need for additional resources. The development of a comprehensive crisis response system in each community, including new and innovative types of system coordination, is central to the key objectives and strategies outlined in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*, the approach used by HUD and its Federal partners to address homelessness.<sup>1</sup>

***CES Processes and Procedures:*** The ensuing set of Coordinated Entry Policies and Procedures documents the Housing First Solano Continuum of Care’s (“Housing First Solano” or “the CoC”) operation of its Coordinated Entry System (“CES”), **named Resource Connect Solano (RCS)**, and acts as a guide to its continuing operation in compliance with the CoC and ESG Interim Rules and CPD 17-01. All projects funded through the Community Action Partnership of Solano Joint Powers Authority (CAP Solano

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<sup>1</sup> Amended in 2012 and 2015.

JPA) must utilize Resource Connect Solano for referrals to their projects (unless otherwise specified in the JPA-agency Memorandum of Understanding (MOU)).

These Policies and Procedures shall be made publicly available and must be applied consistently throughout the CoC geographic areas for all populations.

Consistent, standardized application of Core CES Elements:

These Policies and Procedures establish the same assessment approach at all access points and all access points, not designated for survivors of domestic violence, must be usable by all people who may be experiencing homelessness or at risk of homelessness. Households who present at any entry point (except those designated specifically for survivors of domestic violence survivors) shall be afforded easy access to an appropriate assessment process that provides the CoC with enough information to make prioritization decisions about that household. Housing First Solano’s prioritization policies, herein documented, shall be applied consistently throughout the CoC areas for all populations.

The HFS CoC funds the following program types: Permanent Supportive Housing, Transitional Housing, Joint Transitional Housing-Rapid Rehousing (Joint TH-RRH), Planning, Rapid Rehousing and Coordinated Entry. As set forth in the HEARTH Act, there are four categories of eligibility:

1. Literally Homeless
2. Imminent Risk of Homelessness
3. Homeless Under Other Federal Statutes, and
4. Fleeing/Attempting to Flee Domestic Violence

HFS elects to serve categories 1, 2, and 4 due to the shortage of resources for those priority populations. As defined in the HEARTH Act, **eligibility for Permanent Supportive Housing** is limited to categories 1 and 4. Participants must also:

- Enter from the street or shelter, or a transitional housing program to which they originally entered from the street or shelter (NOTE: if the project is designated for chronically homeless, they may only enter from the street or shelter. Individuals may lose their chronically homeless designation after they enter a transitional housing program); and
- At least one member of the household must have a disability of long duration, verified either by Social Security or a licensed professional that meets the state criteria for diagnosing and treating that condition.

Definition of “Survivor of Domestic Violence”:

In these Policies and Procedures, the shorthand term “survivor of domestic violence” or “survivor” includes all individuals and families who qualify under paragraph (4) of HUD’s definition of homeless. That definition includes any individual or family who:

- (1) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence\*; and



- (2) Has no other residence; and
- (3) Lacks the resources or support networks to obtain other permanent housing.

\* This includes victims of human trafficking.

The CoC Program Interim Rule clarifies that the imminent threat of harm must be from further domestic violence, dating violence, sexual assault, or stalking, which would include threats from a third party, such as a friend or family member of the perpetrator of the violence. For additional information on the documentation of eligibility for survivors, see the [Written Standards](#).

## II. SYSTEM EVALUATION, ADMINISTRATION AND OVERSIGHT

### A. PARTICIPANT EVALUATION

Providers and clients participating in Coordinated Entry shall be consulted at least annually to evaluate Resource Connect Solano’s intake, assessment, and referral processes. Information collected will solicit feedback on the quality and effectiveness of the entire coordinated entry experience for participating providers and clients.

Housing First Solano’s Coordinated Entry System Standing Committee shall meet quarterly to discuss the evaluation of the performance of Resource Connect Solano, including how project participants will be selected to provide feedback; and to make a recommendation to the Continuum of Care General Membership as to how any feedback collected should be used to implement updates to these Coordinated Entry Policies and Procedures.

All participant information collected in the course of the annual coordinated entry evaluation shall be protected by the privacy protections described herein.

### B. SYSTEM EVALUATION AND ADMINISTRATION

The Housing First Solano CoC shall follow the policy and management structure to facilitate intensive coordination and communication among all the projects and agencies in the CoC, as well as others throughout the CoC’s geography, that serve individuals and families experiencing homelessness. In addition to the provisions below, the CoC shall follow the guidelines established in HUD’s “Coordinated Entry Management and Data Guide.”

**Management and Administration:** The Coordinated Entry System Operator shall be responsible for the implementation of the day-to-day workflow of the Coordinated Entry process.

In this management capacity, **the Coordinated Entry System Operator’s responsibilities shall include, at a minimum:**

- Establishing day-to-day management structures
- Establishing clear, accessible communications plans

- Promoting standardized screening and assessment processes
- Developing and delivering training
- Monitoring the Coordinated Entry System

**System Evaluation:** The Community Action Partnership of Solano, Joint Powers Authority shall oversee an open, transparent, and competitive process to appoint an entity to deliver annual performance assessments of the Coordinated Entry System no later than 90 days after the end of the system’s operating year. The selected entity shall be responsible for, at a minimum:

- Collecting performance data through the CoC’s Homelessness Management Information System
- Evaluating the Coordinated Entry System’s implementation process for effectiveness and efficiency
- Identifying policy and process improvements for the CoC’s consideration
- Including homeless participant feedback in its evaluation

The entity selected to perform this annual evaluation may not be the General Membership of the Housing First Solano CoC.

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## C. POLICY OVERSIGHT

The General Membership of the Housing First Solano CoC shall be responsible for establishing policies and procedures governing Resource Connect Solano.

Policy and procedure proposals shall first be vetted by the CoC’s Coordinated Entry System Standing Committee, whose membership shall be open to the General Membership but must include Fixed Members, as defined by the CoC Governance Charter.

Standing Committee recommendations shall be considered and approved by a majority of the General Membership for enactment.

**Data security and privacy policies:** The General Membership of the Housing First Solano CoC shall be responsible for establishing policies and procedures governing data privacy and security as it relates to the CoC’s Coordinated Entry process. It shall receive recommendations on these matters from the Community Action Partnership of Solano, Joint Powers Authority, via the Coordinated Entry Work Group.

In particular, the CoC General Membership shall:

- Establish the universe of coordinated entry–related uses and disclosures included in the standard authorization form for use in obtaining consent for uses and disclosures not covered in the CoC’s Universal Privacy Notice (Attachment VI to these Policies and Procedures);
- Before revising the Universal Privacy Notice or changing the privacy policy in any material way, discuss the privacy policies and practices with appropriate stakeholders;

- Have a legal advisor review privacy practices and determine how other local, state, and federal laws affect the CoC’s privacy and security requirements; and
- Determine how to implement a safe and confidential CE process for survivors of domestic violence, using guidance from the National Network to End Domestic Violence.

### III. ACCESS

Access with CES is the initial engagement point (virtual or site-based, including multiple access sites) for persons experiencing a housing crisis.

These processes and procedures ensure all people in the CoC’s geographic area have fair and equal access to the coordinated entry process, regardless of where or how they present for services. Fair and equal access means that people can easily access the coordinated entry process, whether in person, by phone, or some other method, and that the process for accessing help is well known. Housing First Solano’s CES serves people who speak languages commonly spoken in the community.

#### A. FULL COVERAGE

Housing First Solano’s CES covers the CoC’s entire geographic area. Except as otherwise specified, these Coordinated Entry Policies and Procedures apply to all geographic areas and all subpopulations in the CoC, including individuals, families, and unaccompanied youth. These Coordinated Entry Policies and Procedures apply to all housing and homeless services in the CoC. The CoC covers the entire geographic scope of Solano County, California.

#### B. LOW BARRIER ACCESS

Housing First Solano’s CES is Housing First oriented, such that people are housed quickly without preconditions or service participation requirements. The CoC’s Coordinated Entry System, including emergency services, does not screen people out for assistance due to perceived barriers to housing or services, including, but not limited to, little or no income, active or a history of substance use, domestic violence history, resistance to receiving services, the type or extent of 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—with exceptions for state or local restrictions that prevent projects from serving people with certain convictions.

#### C. EMERGENCY SERVICES ACCESS

***Not subject to prioritization:*** Access to emergency services, such as entry to emergency shelter, shall not be prioritized based on severity of service need or vulnerability, and referrals will be made as quickly as possible. However, select CES-mandated shelter beds are referred to based on acuity and report their openings to the Coordinated Entry System using the Vacancy Tracker described on pages 17-18.



***Twenty-four-hour connection to emergency system:*** Persons will be able to access emergency services independent of the operating hours of the coordinated entry’s intake and assessment processes.

- Emergency service providers will notify a Coordinated Entry Specialist regarding new homeless clients who have been served, so that those clients can be integrated into the Coordinated Entry system quickly.
- Emergency service providers, including all domestic violence hotlines, emergency service hotlines, drop-in service programs, emergency shelters, domestic violence shelters, and other short-term crisis residential programs, will receive and care for clients including during hours when Coordinated Entry hubs may be closed for business.

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## D. ENTRY POINTS

Entry points are the places—either virtual or physical—where an individual or family in need of assistance accesses the coordinated entry process. All assessment services in the CoC will be concentrated at a handful of entry points, known as “entry points” or “access points”.

***There are three forms of entry points:***

***1) Fixed Physical Locations: CES Operators have physical entry points throughout Solano County***

***2) Mobile Access Through Outreach:***

- ***Affirmative Marketing and Street Outreach:*** Housing First Solano’s Coordinated Entry System also shall be linked to street outreach efforts so that people sleeping on the streets are able to access the CES and are prioritized for assistance in the same manner as any other person assessed through the coordinated entry process.
- Housing First Solano shall affirmatively market its housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach and maintains records of those marketing activities. Housing assisted by HUD and made available through the CoC also are made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status in accordance with 24 CFR 5.105 (a)(2). Nondiscrimination and affirmative outreach requirements for the ESG program are located at 24 CFR § 576.407(a) and (b).

***3) Virtual Access. CES Operators are accessible by phone and email and RCS has a website. 211 is also used as a digital entry point to direct CES queries.***



***Specialized access point for survivors of domestic violence:*** The CoC has chosen to create a separate access point for survivors of domestic violence. If survivors choose to access CES using a survivor-specific physical or virtual access point, they can receive their

intake and assessment from a Victim Service Provider (VSP). VSPs will ensure that survivors entering through this separate access point have equal access to the full range of housing and mainstream services for which they are eligible.

- **Referral to VSP:** if a survivor calls RCS and wants to be transferred to the DV-CES VSP for assessment, RCS will facilitate the transfer by conference calling the VSP and waiting on the line until the survivor is connected to the VSP.
- **Referral from VSP to RCS:** if a participant presents at the DV-CES VSP that is not a survivor, or if a survivor wants to be transferred to RCS for assessment, the DV-CES VSP will facilitate the transfer by conference calling RCS and waiting on the line until connected to RCS.

### ***Safety Planning:***

Housing First Solano's CES shall ensure that individuals fleeing domestic violence have safe and confidential access to the CoC's coordinated entry process and domestic violence services, and that the CoC's coordinated entry process addresses the physical and emotional safety and privacy and confidentiality needs of participants.

The CoC shall continue to work with VSPs within the CoC's geographic area to establish client driven, trauma-informed and culturally-relevant assessment and screening tools, as well as referral policies and procedures.

### ***Veterans***

The CES operator shall maintain a working relationship with veteran agencies and veterans' funded providers. If a client reports that they have served in the military, the CES Operator will complete a full intake and assessment but then take the additional step of referring the client to the appropriate veterans' funded services through a formal referral process. Veterans will be reviewed at the Veteran By Name List Case Conferencing meetings and the CES Operator Case Conferencing meetings. The CES Operator will participate in the monthly Veteran By Name List Case Conferencing meetings and update the client's status based on services received. Veterans' agencies and veteran funded providers will make referrals to the CES Operator where appropriate and are encouraged to attend the CES Operator Case Conferencing Meetings.

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## **E. ENTRY POINTS – OPERATIONAL AND PROGRAMMATIC PRACTICES**

The CES Operator shall maintain and update information at all entry points that detail all operational and programmatic practices. The protocols and federal notices and forms included at entry points shall be incorporated by reference into these Coordinated Entry Policies and Procedures and are included below as Attachments II-VI, VIII. They include:

1. Housing First Solano Right to File Discriminations Complaints Notice and Form;
2. Housing First Solano Right to File a Grievance Notice and Form
3. Personally Identifiable Information Use or Disclosure Complaint Form
4. Fair Housing Amendments Act of 1988 Notice;

5. Housing First Solano Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking; and
6. Emergency Transfer Request Form and Notice of Occupancy Rights and Certification forms for Victims of Domestic Violence, Sexual Assault, or Stalking

## IV. ASSESSMENT

In the context of the coordinated entry process, HUD uses the term “Assessment” to refer to the use of one or more standardized assessment tool(s) to determine a household’s current housing situation, housing and service needs, risk of harm, risk of future or continued homelessness, and other adverse outcomes. HUD does not intend that the term be confused with assessments often used in clinical settings to determine psychological or physical health, or for other purposes not related to preventing and ending the homelessness of persons who present to coordinated entry for housing-related assistance.

All assessments are conducted using trauma-informed, client-centered methods. Assessment areas shall be continually assessed by Coordinated Entry staff for their safety and privacy to allow individuals to identify sensitive information or safety issues in a private and secure setting.

### A. COLLECTION OF INFORMATION

All participants in the coordinated entry process will be freely allowed to decide what information they provide during the assessment process and to refuse to answer assessment questions. Assessment staff shall engage participants in an appropriate and respectful manner to collect only necessary assessment information. Should a participant choose not to provide a piece of requested information, coordinated entry staff shall communicate to those participants the impact of incomplete assessment responses. Assessment staff shall make every effort to assess and resolve the person’s housing needs based on a participant’s responses to assessment questions no matter how limited those responses. Participants may refuse to answer assessment questions and to reject housing and service options offered without their suffering retribution or limiting their access to assistance.

Although participants may become ineligible for some programs based on a lack of information, a participant’s refusal to answer questions will not be used as a reason to terminate the participant’s assessment, nor will it be used as a reason to refuse to refer the participant to programs for which the participant appears to be eligible. However, some information may be required by the project, or by public or private funders to determine eligibility for housing or services, or to assess needed services, so it must be collected. In cases where a client does not consent to having their information shared, the information must still be collected by the service providers to determine whether the individual or family is eligible, but it must not be shared via the HMIS if the program participant objects or is fleeing domestic violence. See Section VII below for additional information on data entry requirements.



The assessment process will not require disclosure of any specific disabilities or diagnoses. The assessment process may attempt to collect specific information about a person's diagnoses or disabilities, but only in so far as is necessary to determine program eligibility to make appropriate referrals, or in so far as is necessary to provide a reasonable accommodation for the person being served.

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## B. ASSESSMENT IN PHASES

The assessment component of the coordinated entry process may be implemented in phases in order to capture information on an as-needed basis as participants navigate the process, recognizing that trauma-informed approaches are necessary throughout these phases. The assessment process, including information gathered from assessment tools, case workers, and others working with households, shall provide sufficient information to make prioritization decisions.

Assessment phases may include:

1. Determining veteran status
2. Screening for survivors of domestic violence
3. Assessing shelter and other emergency needs;
4. Screening for diversion or prevention;
5. Identifying housing resources and barriers; and
6. Evaluating vulnerability to prioritize for assistance.

Assessments conducted in different phases shall build on each other and limit the frequency with which a participant must repeat a personal story so as to reduce trauma and improve system efficiency. Information collection related to prioritization ranking and program eligibility may also occur concurrently with these different phases, even though assessment generally occurs before referral.

Once connected to housing and services, project staff may conduct more sophisticated assessments to evaluate a participant's need for specialized services or resources.

The phased assessment process used during coordinated entry is not intended to replace those more specialized assessments but rather to connect participants to the appropriate housing solution as quickly as possible. Similarly, the assessment process does not preclude the use of complementary assessments designed to support access to mainstream services that are made available during assessment or otherwise conveniently accessed.

All CES Entry Points utilize the **pre-screening triage tool** included as Attachment VII.

- **Veterans:** If the pre-screening tool indicates that the person has served in the military, then a referral should be made to the appropriate veteran's funded provider for further assessment (subject to client choice).
- **DV Survivors: Immediate access to emergency services such as domestic violence hotlines and shelters:** If the pre-screening tool indicates that the person is fleeing domestic violence, the Entry Point shall, without transmitting any



personally identifiable information, notify the local CoC-funded VSP CES Entry Point of the pre-screening interview and transfer the person to the VSP (subject to client choice) for further assessment within 24-hours of the exchange with the household.

- ***Emergency Services:*** If pre-screen questions suggest that the household wishes to be connected to other emergency services, the Entry Point shall provide the household immediate access to the contact information for an appropriate emergency services provider, as well as arrange transportation for the household to the emergency services provider, as possible.
- ***Prevention and Diversion:*** The CoC is committed to further integrating prevention, diversion, and mainstream services into the coordinated entry system. Individuals and families who are homeless or at risk of homelessness may access prevention and diversion services through the coordinated entry process. If the pre-screening tool indicates that the person is not literally homeless, but is at risk of becoming homeless, then a referral should be made to a participating Prevention and Diversion provider for further assessment and support. For additional information on Prevention and Diversion eligibility see the [Written Standards](#).

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### C. ASSESSMENT TOOL

The CES Operators' staff will consistently assess all persons using the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) and its various versions related to sub-populations (i.e. youth and families). This tool was selected based on the community's satisfaction that it met the following characteristics:

- Tested, valid, and appropriate
- Reliable (provide consistent results)
- Comprehensive (provide access to all housing and supportive services within the CoC)
- Person-centered (focused on resolving the person's needs, instead of filling project vacancies)
- User-friendly for both the person being assessed and the assessor
- Strengths-based (focused on the person's barriers to and strengths for obtaining sustainable housing)
- Housing First-oriented (focused on rapidly housing participants without preconditions)
- Sensitive to lived experiences (culturally and situationally sensitive, focused on reducing trauma and harm)
- Transparent in the relationship between the questions being asked and the potential options for housing and supportive services

Application of the VI-SPDAT may not produce the entire body of information necessary to determine a household's prioritization, either because of the nature of self-reporting, withheld information, or circumstances outside the scope of assessment questions. Therefore, case workers and others who work with households may provide additional

information, through case conferencing or otherwise, that appear relevant to the CoC's written prioritization policies.

All persons participating in Coordinated Entry will be given the same assessment tool. Specific assessments will be administered based on how a participant answers the questions during the initial intake and whether they identify with one of the following populations:

- Adults without children
- Adults accompanied by children
- Unaccompanied youth
- Households fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions (including human trafficking)
- Persons at imminent risk of literal homelessness for purposes of administering homelessness prevention assistance

Clients should be reviewed for potential re-assessment annually, or earlier if the client has a significant life change that would impact their score.

***Cultural and linguistic competency:*** All staff administering assessments shall use culturally and linguistically competent practices. Assessments shall include trauma-informed culturally and linguistically competent questions for special subpopulations, including immigrants, refugees, and other first-generation subpopulations; youth; persons fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking; and LGBTQ persons.

***Person-Centered Assessments and sensitivity to lived experience:*** Sensitivity to participants' lived experiences shall be incorporated into every aspect of this coordinated entry system, including the ongoing assessment of assessment tools and delivery protocols that are trauma informed, minimize risk and harm, and address potential psychological impacts. Assessments are based in part on participant's strengths, goals, risks, and protective factors.

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#### D. ASSESSMENT TRAINING

Training opportunities for persons authorized by the CoC to serve as Coordinated Entry Points or to administer VI-SPDATs (including the ones for subpopulations) shall be available at least once annually. Training curricula and protocols shall be updated and distributed annually, and include the following topics:

- Review of Housing First Solano's Coordinated Entry Policies and Procedures, including any adopted variations for specific subpopulations;
- Requirements for use of assessment information to determine prioritization;
- Criteria for uniform decision-making and referrals;
- Cultural and linguistic competency;
- How to conduct trauma-informed assessments, including for special populations;
- Safety planning and how to identify safety issues during the assessment process; and



- Personal and data privacy considerations, and procedures to protect confidential information.

Housing First Solano shall strive to offer training to participating projects that receive referrals in culturally and linguistically competent practices so that appropriate resources available to participants are as comprehensive as possible. Training on VAWA and working with survivors will be given to the CoC on an annual basis.

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## E. CONTACT INFORMATION

Staff authorized to conduct assessments shall collect contact information from all interviewees and inform those participants that it is their duty as a participant to keep Coordinated Entry staff apprised of any updates to that contact information.

## V. PRIORITIZATION

In the context of the coordinated entry process, these Policies and Procedures use the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority, in accordance with written standards established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.

Individuals and families are prioritized for a full continuum of housing and service interventions according to Housing First Solano’s CoC and ESG Written Standards, which prioritize those who are most vulnerable and with the most immediate needs for referral and placement into appropriate housing interventions. Those with the highest VI-SPDAT scores are prioritized highest for longer-term housing solutions. The CoC shall use the coordinated entry process to prioritize homeless persons within the CoC’s geographic area for access to housing and supportive services.

The coordinated entry prioritization process combines the individual person’s assessment results with the CoC’s prioritization policies and procedures to determine that person’s level of vulnerability. The person’s assessed vulnerability will establish his or her level of priority for resources in the homeless system and lead to identification of vacancies at housing and supportive services projects that the person can be referred to.

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## A. PRIORITIZATION SCHEME

**Scoring:** In the context of the coordinated entry process, HUD uses the term “Scoring” to refer to the process of deriving an indicator of risk, vulnerability, or need based on responses to assessment questions. The output of most assessment tools is often an “Assessment Score” for potential project participants, which provides a standardized analysis of risk and other objective assessment factors. While assessment scores generally reflect the factors included in the prioritization process, the assessment score alone does not necessarily determine the

relative order of potential participants for resources. Additional consideration, including use of case conferencing, is often necessary to ensure that the outcomes of the assessment more closely align with the community's prioritization process by accounting for unique population-based vulnerabilities and risk factors.

**The CoC shall make decisions of prioritization based on the following:**

- **Level of vulnerability and need (VI-SPDAT score, highest to lowest) and**
- **Chronically homeless status and length of time homeless (longest to shortest).**

Dynamic Prioritization:

Permanent Supportive Housing (PSH) are the most service intensive housing interventions and are generally intended for the highest vulnerability households. The shorter-term interventions, RRH and TH, are generally intended for households with more moderate vulnerability.

Dynamic prioritization is a process wherein all available housing resources for persons experiencing homelessness are flexibly and immediately offered to the individuals who need them the most acutely in that moment, regardless of whether the individuals might be better-served in the future by a more intensive program not presently available to them. The Housing First Solano CoC will initially adopt modified dynamic prioritization processes that allow flexibility across housing interventions instead of strictly defined vulnerability parameters for each intervention type.

When a household is recommended for Permanent Supportive Housing but no PSH beds are currently available, the household may be referred to "bridge housing" in other program types, and/or for any other available CoC resource that would be of use to the household. In referring households to bridge housing, case conference participants shall attempt to balance the need to provide immediate care for the community's most vulnerable households against the need to match tenants with safe, adequately supported housing situations that will promote the community's long-term ability to increase its supply of available and affordable housing. Transfers between RRH and PSH are allowable by HUD CoC and ESG funding so long as the household meets the eligibility criteria under the specific program and the requirements for the receiving project under the Notice of Funding Availability (NOFA) for the year the project was awarded. Program participants maintain their chronically homeless status during the time period that they are receiving the rapid rehousing assistance (for the purpose of eligibility for other permanent housing programs dedicated to serving the chronically homeless).

**PSH Priority: VI-SPDAT 10+, Chronically Homeless, Dedicated Plus**

Chronically homeless households scoring over 10 on the VI-SPDAT will be prioritized for PSH. Since all available housing interventions for which the household is eligible will be considered prior to referral, chronically homeless status and VI-SPDAT of 10+ will not automatically result in a match to PSH. If a PSH-eligible household is placed in housing other than PSH, the client's case manager should document chronicity prior to placement to preserve the household's PSH eligibility if a PSH placement is required later.



When a household is recommended for Permanent Supportive Housing but no PSH beds are currently available, the household may be referred to “bridge housing” in other program types, and/or for any other available CoC resource that would be of use to the household. Resource Connect Solano has the discretion to prioritize clients in “Bridge Housing” for the next available Permanent Supportive Housing beds, regardless of VI-SPDAT score, as the community recognizes that a client housed in Bridge Housing in the interim may show a decrease temporarily in their VI-SPDAT score. The client does not need to be re-assessed once they enter Rapid Rehousing “Bridge Housing”, as their chronically homeless and PSH-eligible status is retained while the client is in Rapid Rehousing “Bridge Housing.”

Individuals and families will be prioritized for PSH according to HUD Notice CPD-16-11 and the CoC’s Written Standards. People who are at risk of chronic homelessness but who are not literally homeless may be considered for PSH funded by No Place Like Home (NPLH) after all priority groups in HUD Notice CPD-16-11 have been exhausted (based on their ordinary priority (e.g., based on VI-SPDAT scores) in the Written Standards).

**RRH Priority: 6+ VI-SPDAT, Chronically Homeless, Dedicated Plus, and non-CH households**

RRH as a housing intervention is generally intended for households with more moderate vulnerability. Dynamic Prioritization encourages RRH placement for households that score in PSH range instead of extending waiting time for PSH that may never become available. The Housing First Solano CoC will work to balance RRH placement across moderate and slightly higher vulnerability households as the CoC builds system-wide capacity for RRH to work with higher vulnerability households.

Individuals and families will be prioritized for RRH according to the CoC’s Written Standards. Written Standards for Rapid Rehousing will reflect prioritization and placement using the VI-SPDAT and F-SPDAT. People who are at risk of chronic homelessness but who are not literally homeless may be considered for RRH funded by No Place Like Home (NPLH) based on their ordinary priority (e.g. based on VI-SPDAT scores) in the Written Standards.



***Emergency Transfer Prioritization for Survivors:***

All participants in the Resource Connect Solano Coordinated Entry System shall be informed of their right to file for an Emergency Transfer, per the U.S. Department of Housing and Urban Development Final Rule 2016-2888, Violence Against Women Act Reauthorization of 2013: Implementation in HUD Housing Programs. The Housing First Solano Continuum of Care Policies and Procedures contain the CoC’s Emergency Transfer Plan. Please see the Housing First Solano Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking; and Emergency Transfer Request Form for Certain Victims of Domestic Violence, Sexual Assault, or Stalking– included in these Coordinated Entry Policies and Procedures as Attachments IV and V respectively.

A participant may request an Emergency Transfer out of a current mandated-project housing placement. A participant’s eligibility to request an Emergency Transfer and the Emergency Transfer process is outlined in Attachment IV. Participants in CoC-funded

projects who are eligible to request an external Emergency Transfer through the Emergency Transfer Process have priority over all other applicants for CoC housing assistance for which the household is eligible. Requests for internal emergency transfers should receive at least the same priority as the program provides to other types of transfer requests. The difference between internal and external transfers is discussed in Attachment IV- the Emergency Transfer Plan Process.

***Not subject to prioritization:*** Access to emergency services, such as entry to emergency shelter, shall not be prioritized based on severity of service need or vulnerability.

***Eligibility:*** In the context of the coordinated entry process, determining eligibility is a project-level process governed by written standards as established in 24 CFR § 576.400(e) and 24 CFR § 578.7(a)(9). Eligibility information may not be used as part of prioritization and ranking, e.g. using documentation of a specific diagnosis or disability to rank a person. Projects or units may be legally permitted to limit eligibility, e.g., to persons with disabilities, through a Federal statute which requires that assistance be utilized for a specific population, e.g., the HOPWA program, through State or local permissions in instances where Federal funding is not used and Federal civil rights laws are not violated.

Additionally, the Coordinated Entry System has the discretion to prioritize for PSH programs, eligible clients who are currently residing in a PSH program that has been defunded or is otherwise ending or closing. Prior to this prioritization occurring, PSH programs that have been defunded, are ending, or closing should assess each client in the PSH program to determine whether each client is still in need of PSH, or whether they now need a different housing intervention (such as a Housing Authority voucher (without intensive case management), self-sufficiency, a skilled nursing facility, or some other intervention). After the assessment, the program will send a list of clients that still require a PSH intervention to the Coordinated Entry System, who will prioritize the eligible clients to other PSH programs if they become available. While the defunded/closing PSH program still has funding and staff, that program is responsible for assisting the client with locating a new housing unit, should the client need to move from their current residence to a new unit (with a PSH program, housing voucher, self-sufficiency, or other intervention). Additionally, while the program still has funding/staff, the program should provide up to six months of case management as needed to assist the client with the transition, especially if the transition is to a housing intervention that is not PSH or otherwise does not come with case management. Additionally, for client notification and other requirements, the provider should follow the Defunded Projects section of the CoC's Written Standards.

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## B. MANAGING THE PRIORITY LIST

To manage prioritization for referral and placement into CoC resources, Coordinated Entry staff shall use HMIS or applicable confidential database to prepare and maintain a single priority list. The priority list shall include persons by name and/or identification code, their assigned VI-SPDAT scores, and their placement ranking level according to the aforementioned prioritization scheme.



Victims fleeing domestic violence shall be prioritized according to the aforementioned prioritization protocols described for all other subpopulations. Case managers who conducted the assessment of a victim shall be informed by Coordinated Entry System

Operator staff at case conferencing when one of these anonymous victim’s records rises to the top ten spots in a prioritization queue.

Survivors of domestic violence should be added to the priority list in a way that protects all personally identifiable information. VSPs should aggregate data and VI-SPDAT scores for prioritization. The following information is the only information that should be sent to RCS by a VSP to add a survivor to the by-name list for case conferencing:

<b>Data Field</b>	<b>Description</b>
Referral date (not program entry date)	Date the survivor’s unidentified information was sent to coordinated entry. A program entry date could potentially be personally identifiable if coupled with other demographic information.
Location (where the survivor seeks placement)	The geographic area(s) in which the domestic violence survivor is seeking housing
Coordinated Entry Assessment Tool Result	The result the survivor received from the coordinated entry screening conducted by the VSP.
Household Type	The number of bedrooms the domestic violence survivor will need given their family size. This data field is very important, as number of bedrooms is not a personally identifying piece of information about a survivor. Do not capture number of children in this category, because it is personally identifying information and would not be in compliance with VAWA/ Family Violence Prevention and Services Act (FVPSA)
Chronically Homeless Status	Is the domestic violence survivor chronically homeless by HUD’s definition? Yes/No
Point of Contact at VSP agency	The point of contact at the VSP. They should provide their email and phone number so that RCS can contact them when a unit becomes available.
Unique Client ID#	This number is created and assigned by the VSP and given to RCS. It should not in any way be identifying and should not be decoded by RCS.

These data entry points are in compliance with VAWA and FVPSA requirements.

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**C. DOCUMENT READY**

Coordinated Entry staff shall assist in getting the top ten clients on the priority list document ready for enrollment into a housing program. This includes, at a minimum, acquiring identification documents (identification and social security card), completing housing applications, and completing supportive and subsidized housing paperwork. As needed, clients will also be connected to the CES Housing Locator. Coordinated Entry staff shall maintain any such collected records until participant enrollment. These services should also be provided by outreach teams, emergency shelter providers, and/or other provider agencies as appropriate.

## VI. MATCHING & REFERRAL

### A. IN GENERAL

As stated in the Memorandum of Understanding Between Community Action Partnership of Solano, Joint Powers Authority and Participating Agencies, incorporated into these Coordinated Entry Policies and Procedures as Attachment I, **all mandated project recipients must use the coordinated entry process established by the CoC as the only referral source from which to consider filling vacancies in their housing and/or services.** Coordinated Entry staff shall maintain and annually update a list of all resources that may be accessed through referrals from the coordinated entry process.

**Reporting Vacancies:** all housing and shelter providers participating in the CES are required to alert the CES of any new or pending vacancies (e.g., due to turnover or a new program coming online) **as soon as possible, but no later than seven days following a vacancy** (a bed, unit, or voucher). To report these vacancies the [CES Vacancy Tracker](#) must be used and should be updated at least biweekly, even if the vacancy number is “0” for a project.

- CES Operator must be informed of every opening and how and when they were filled.

**Newly Funded CES-Mandated Projects:** when new CES-mandated projects are awarded funding, agencies must add these projects to the CES Vacancy Tracker **within two weeks of the MOU becoming fully executed with the JPA.** The information added to the Tracker should include relevant information for CES Operator referrals, including:

- Agency/project name, program type, funding source, and whether the project is CES and Housing First-mandated by its funding source;
- Detailed written eligibility guidance and enrollment determinations (eligibility criteria should be limited to that required by the funder);
- Contact information for referrals/referral process;
- Total number of households that can be served by the project or the total number of beds/units/vouchers the project will provide; and
- Link(s) to grant applications, marketing materials, funder MOU/contract, or project descriptions that provide additional information regarding the project and services it will provide.

The more information a project provides in the Tracker, the better the CES Operator can match clients to the program.

**Referral to projects:** Housing First Solano’s Coordinated Entry System makes referrals to all projects receiving funding that requires participating, including emergency shelter, RRH, PSH, and transitional housing (TH), as well as other housing and homelessness projects. Projects in the CoC that are dedicated to serving people experiencing homelessness fill all vacancies through referrals, while other housing and services projects determine the extent to which they rely on referrals from the coordinated entry process.

- **Voucher Referrals:** the CES Operator can also refer eligible clients to the Vacaville and Solano County Mainstream Voucher program. If clients are already enrolled in a permanent housing project (PSH, RRH) then the housing provider, not the CES Operator, should work with the Housing Authority to complete the Mainstream Voucher program referral directly, along with any other voucher or long-term subsidy or senior housing programs.

Mandated providers must use the CES to fill homeless housing/program openings. Providers are responsible for ensuring that referred households meet any eligibility requirements and for communicating those requirements to the CES Operator through the vacancy tracker. Upon receiving a referral from the CES Operator, **providers must contact or attempt to contact the referred household within two (2) business days**. The provider should note all contact attempts in the “notes” section of the client’s record in HMIS. If the client is non-responsive, RCS should be informed as soon as possible so they can contact the client or send a different referral. **RCS will respond to each reported open housing vacancy from a housing provider within three (3) business days of the date the vacancy is reported to RCS.**

Additionally, Outcomes Reports are due to RCS within 7 days of receiving referrals.



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## B. MATCHING AND REFERRAL FOR SURVIVORS

Should a survivor household be matched with a non-CoC funded VSP housing opportunity through the below process, the VSP case manager who conducted the assessment of the victim shall safely refer the household to the identified VSP, preferably with a warm hand-off including a phone call, transportation, or other transition determined to be a best practice by the VSP.

**Placement Outside the CoC: Tenant Based Rental Assistance:** Per CoC program interim rule section 578.51(c), a survivor of domestic violence may be referred to a different CoC geographic area to protect their health and safety and retain their Housing First Solano-funded rental assistance if the victim reasonably believe they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking. Please see 24 CFR 578.103(a)(5).

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## C. DETERMINING PROGRAM ELIGIBILITY

Each mandated project must establish specific eligibility criteria that the project will use to make enrollment determinations, and these criteria must be made available to the public. Agencies that serve a specific target subpopulation may receive referrals of that target population. To target a specific population, agencies must provide documentation of receipt of funding that supports the unit and maintains funder-defined targeting criteria (unless the requirement is from the CoC's Written Standards). Examples of targeting criteria include:

- Area Median Income
- Household Composition
- Gender
- Youth/Seniors
- HIV/Aids
- Veteran Status
- Domestic Violence Provider

Requires a specific disabling condition (i.e., mental health) Housing First Solano's CES is Housing First oriented, such that people are housed quickly without preconditions or service participation requirements. Coordinated Entry System operators may not use the coordinated entry process to screen people out due to perceived barriers related to housing or services, including, but not limited to, too little or no income, active or past substance abuse, domestic violence history, resistance to receiving services, the type or extent of a disability, the services or supports that are needed because of a disability, a history of evictions or of poor credit, a history of lease violations, a history of not being a leaseholder, a criminal record, as well as sexual orientation or gender identity and expression. Exceptions are state or local restrictions that prohibit projects from serving people with certain criminal convictions or other specified attributes.

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#### D. CASE CONFERENCING

Coordinated Entry staff shall convene a monthly case conferencing meeting with Coordinated Entry System operators to discuss potential matching options for participants at the top of the CoC's priority list. Case conferences shall be held even when there are no housing vacancies. Referrals and matching are also done outside of case conferencing whenever open beds are reported.

Coordinated Entry staff shall strive to include at each case conference the participation of at least one representative from each mandated agency, as well as representatives involved in street outreach, the veterans' funded providers, emergency shelters, victim service providers and hospitals. The Memorandum of Agreement in Attachment I between agencies shall be continuously disseminated such that only agencies that participate in case conferencing shall be able to recommend and accept referrals through the Coordinated Entry System. For such case conferencing meetings, the aforementioned priority list shall be used for referencing clients. No other client data shall be transmitted for these meetings.





Because survivor information cannot be entered into HMIS, VSP case managers who conducted the assessment of a survivor shall participate in case conferencing meetings to be able to represent the survivor in those discussions.

Participation in case conferences may be done in person, over the phone or other participatory technology, or some combination thereof.

Coordinated Entry staff shall create and maintain minutes for each case conference for a period of five years.

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## G. EXITING CLIENTS FROM THE PRIORITY LIST

The following events will result in a household's removal or exit from the CoC's Priority List:

- A documented exit to permanent housing per the HMIS "Move In Date" input (unless the clients were eligible for PSH but referred to RRH because no PSH beds were available and RCS and the RRH case manager have determined that the client needs PSH after RRH, then clients will stay on the list for a PSH bed);
  - o The client's case manager should document chronicity prior to placement in RRH to preserve the household's PSH eligibility.
- If case conference participants believe that a client no longer resides in the CoC's geographic area, and the CoC has no effective means of contacting that client;
- A documented move to an institutional setting where they will be residing for more than 90 days;
- They are deceased;
- They have had no contact for 90 days with the Coordinated Entry System, it has been documented in HMIS that they could not be located, and within the past 90 days have had no contacts with, and received no services from, any partner agency who utilizes HMIS.

**Client choice should be respected when housing is offered. However, if clients refuse housing multiple times, they may be exited from the Priority List** with the expectation that they will be added back to the list if they make contact again with the Coordinated Entry System or an HMIS partner agency. The type of housing refused and/or reason for refusal should be noted in HMIS.

When a client is referred for housing, Coordinated Entry staff should see to it that a diligent attempt is made to locate that client and persuade the client to enter the housing program. However, some homeless households may require significant engagement and contacts prior to entering housing. Accordingly, programs are not required to allow units to remain vacant indefinitely while waiting for an identified homeless person to accept an offer of housing. Instead, if a referral remains unfilled after five business days of attempts to engage the intended tenant(s), the housing placement may be considered open again, and returned to the coordinated entry system for additional referral attempts with new

client(s). Coordinated Entry staff shall complete case notes in HMIS recording when and how attempts were made to contact the client during the five-business day period. Such records shall be kept for five years following the end of the five-business day contact attempt period.

The mere fact that a client could not be located or persuaded to enter housing should not generally be used to remove or cancel the client's priority for receiving housing or services. **However, if a client cannot be found for, or refuses a housing opportunity matched for him or her by case conference participants or RCS staff, three times, then and the client will be reclassified in the Coordinated Entry System as "exited."** Exiting the client from the on the Priority List does not remove them permanently from the list, nor does it render them ineligible for future referrals or services. If a household who has previously been exited makes contact again, they retain their assessment score prior to becoming inactive unless an update is warranted.

Only RCS staff can exit clients from the Priority List in HMIS. Provider staff may contact RCS directly with requests to exit clients from the Priority List, which will be completed at RCS's discretion.

Some prospective tenants may explicitly reject a housing placement. When this happens, street outreach workers should attempt to determine the reason for the clients' refusal to accept the offered housing and to communicate this reason to the coordinated entry system. Whenever possible, client's choice is used to determine placement. Participants who reject referral options will still maintain their place in the coordinated entry prioritization list. Clients should directly refuse or accept project referrals to the referred project, rather than through case managers, outreach workers, shelter staff, or other community members who are not part of the new project's staffing.

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## G. WHEN PROGRAMS REJECT A CLIENT

Providers should rarely reject a referral from coordinated entry. Mandated projects may reject a client referred by the Coordinated Entry System only if:

- That client is ineligible to participate in the program because of restrictions imposed by government regulations or outside funding sources; or
- The program lacks the capacity to safely accommodate that client.

It is considered a rejection of a client if a Tenant Based Rapid Rehousing program does not enroll a client in the program because the client rejects a housing unit pre-identified by the Housing Provider. These clients have tenant unit choice and the provider may not limit eligibility to their program to only those who will live in certain units.

Whenever a program rejects a referral, the program must document the time of the rejection and the reason for the rejection, and communicate that information immediately to both the client and to Coordinated Entry staff.

All mandated providers are expected to adopt a Housing First approach that continually lowers the barriers to entry for prospective clients, and that avoids screening out clients



based on real or perceived barriers to success. A provider that repeatedly rejects referrals of high-needs clients based on an inability to safely accommodate those clients must attempt to improve its capacity to serve high-needs clients. The CoC will provide training and technical assistance on this topic upon request. The CoC's Rank and Review Committee is encouraged to reallocate the funding of low-capacity providers that cannot or will not make diligent efforts to improve their capacity to serve high-needs clients.

When a client has been rejected from a program, Coordinated Entry staff shall investigate the reasons provided (if any), attempt to determine whether the client can be safely and lawfully placed in that program, and, if not, raise the client's case again at the next case conference to locate alternative housing for the client.

A household shall not lose its priority or be returned to a general waiting list simply because it was rejected by a provider.

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## H. INCORPORATING MAINSTREAM SERVICES

The CoC should include relevant mainstream service providers in the following activities: identifying people experiencing or at risk of experiencing homelessness; facilitating referrals to and from the coordinated entry process; aligning prioritization criteria where applicable; coordinating services and assistance; and conducting activities related to continual process improvement. Written policies and procedures should describe how each participating mainstream housing and service provider will participate, including, at a minimum, the process by which referrals will be made and received. Examples of mainstream housing and service providers include Public Housing Agencies; affordable housing operators; VA Medical Centers; public child welfare agencies; providers of mental, physical or behavioral health services; schools; early childhood care and education providers; out of school time providers; hospitals; correctional facilities; and workforce investment programs.

## VII. HMIS AND DATA ENTRY

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### A. HMIS DATA ENTRY

Housing First Solano uses Homeless Management Information System (HMIS) to collect and manage data associated with assessments and referrals. All mandated projects are required to use HMIS. All providers working with client-level data shall abide by the privacy protocols prescribed by the Violence Against Women Act (VAWA) and the Housing First Solano HMIS Policies and Procedures Manual.

After assessment, Coordinated Entry scores shall be transmitted to Coordinated Entry staff within 24 hours. Coordinated Entry staff shall enter those scores into Housing First Solano's HMIS 48 hours within having received such scores unless the information is being put in a separate, confidential database for those fleeing domestic violence.

***PII Data Privacy and Privacy Notice in Attachment VI:*** The Privacy Notice included as attachment VI should be read or shared with participants coming in to contact with the Coordinated Entry System. This Notice details the reasons that the Coordinated Entry

System requires the collection of information and states that RCS shall only collect information that its management entity considers to be appropriate and consistent with the policies and procedures created by the Housing First Solano Continuum of Care General Membership.



## B. VAWA AND HMIS DATA ENTRY, COMPARABLE DATABASES FOR SURVIVORS

Under VAWA, VSPs are prohibited from entering client-level data into HMIS. VSPs must use a comparable database that complies with the current HUD HMIS Data and Technical standards and has the ability to create unduplicated aggregate reports in the HUD-required Sage reporting format about the participants served with HUD funds. The comparable database must also meet all confidentiality requirements related to Personally Identifiable Information (PII) under VAWA, the Victims of Crime Act (VOCA), and the Family Violence Prevention and Services Act (FVPSA).

**Consent to HMIS data entry:** If a survivor chooses to be enrolled in a mandated non-victim services provider program, that victim must be asked to sign a Release of Information (ROI) form to consent to having PII entered into the CoC's HMIS.

**Entry of anonymous VI-SPDAT score for prioritization:** Regardless of the extent to which a survivor consents to having his or her information entered into HMIS, Coordinated Entry System Operator staff shall ensure that a survivor's VI-SPDAT score is entered into HMIS under an anonymous record so that the survivor can be placed.

**Personally Identifiable Information:** The CoC Program Interim Rule Section 578.103(b) requires that records containing PII are kept secure and confidential and the address of any domestic violence project not be made public.

## VIII. DOCUMENTATION

Housing Providers are responsible for literally homeless, [chronically homeless](#), and disability documentation for their projects, as required and described in the [Written Standards](#). As needed, RCS, outreach staff, and emergency shelters will work with housing providers to document literal homeless status, length of homelessness and disabling conditions.

### **Housing Provider Note re: [Chronic Homeless Verifications](#):**

- 100% of households served can use self-certification for three of their 12 months;
- 75% of households served need to use third party documentation for 9 months of their 12 months;
- 25% of households served can use self-certification as documentation for any and all months.
- Homeless documentation should be obtained within 180 days of the household moving into their unit (per HUD regulations) and does not need to delay housing the client. However, the CoC recommends that homeless verifications are obtained

within 45 days of housing the client. Disability documentation must be collected within 45 days of moving into a unit.

- Due diligence is required when attempting to access any third party verification that can be documented.

## VIII. NON-DISCRIMINATION POLICY

The Housing First Solano Continuum of Care does not tolerate discrimination based on actual or perceived membership in any protected class. The entirety of Housing First Solano's Coordinated Entry process shall be conducted in compliance with the nondiscrimination provisions of federal and state civil rights laws, including the Fair Housing Act, CA Fair Employment and Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II and III of the Americans with Disabilities Act, as well as HUD's Equal Access and Gender Identity Rules. Under these laws and rules, the following classes are protected from discrimination:

- Race
- Color
- Religion
- National origin
- Ancestry
- Sex, gender
- Actual or perceived sexual orientation
- Actual or perceived gender identity or gender expression
- Disability, mental or physical
- Age
- Familial status (including families with children under age 18, pregnant women, and people securing custody of children under 18)
- Marital status
- Source of income
- Immigration status
- Primary language
- Citizenship
- Veteran / Military status, or
- Genetic information (such as likelihood of a gene mutation or chronic disorder)<sup>2</sup>

Some programs may be forced to limit enrollment based on requirements imposed by their funding sources and/or state or federal law. For example, a HOPWA-funded project might be required to serve only participants who have HIV/AIDS. All such programs will avoid discrimination to the maximum extent allowed by their funding sources and their authorizing legislation.

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<sup>2</sup> CA Department of Fair Employment and Housing: <https://www.dfeh.ca.gov/resources-2/posters-and-brochures-and-fact-sheets/poster-and-brochure-tab-list/?target=housing>;  
Fair Housing Advocates of Northern California: <http://www.fairhousingnorcal.org/california-and-local-fair-housing-rights.html>

All aspects of the Housing First Solano Coordinated Entry process will comply with all Federal, State, and local Fair Housing laws and regulations. Participants will not be “steered” toward any housing facility or neighborhood because of any protected status.

Locations where persons are likely to access or attempt to access the CoC’s Coordinated Entry System include signs or brochures displayed in prominent locations informing participants of their right to file a non-discrimination complaint and containing the contact information needed to file a non-discrimination complaint. Requirements associated with filing a non-discrimination complaint, if any, will be included on the signs or brochures. Please see Fair Housing Amendments Act of 1988 Notice, incorporated into these Coordinated Entry Policies and Procedures as Attachment II.

The RCS CES shall ensure effective communication with individuals with disabilities by making available appropriate auxiliary aids and services necessary to ensure effective communication (e.g. Braille, audio, large type, assistive listening devices, and sign language interpreters). Coordinated Entry process materials shall be offered in multiple languages according to demonstrated local need to meet the needs of minority, ethnic, and groups with Limited English Proficiency (LEP).

Access points will be chosen to optimize accessibility for as many clients as possible with respect to geography, language, culture, and subpopulation-specific needs. Physical access points shall be accessible to individuals with disabilities, including for individuals who use wheelchairs, as well as for people in the CoC who are least likely to access homeless assistance.

Data collected from the assessment process shall not be used to discriminate or prioritize households for housing and services on a protected basis.

Prioritized Subpopulations and Fair Housing Implications: Service providers shall comply with all applicable civil rights laws, including the Fair Housing Act. Within this framework, these standards establish subpopulations to be prioritized for housing and services that align with the identified needs of the local community and the goals of the Federal Strategic Plan to End Homelessness.

1. Subpopulations may be prioritized if doing so does not discriminate against any protected class under federal nondiscrimination laws in 24 CFR § 5.105; subpopulations may also be prioritized according to who needs the specialized supportive services that are offered by the project. 24 CFR § 578.93(b)(2) and (7).
2. The local standards establish priority subpopulations by project type (i.e. permanent supportive housing); service providers may not set more restrictive priorities unless a federal statute or executive order specifically authorizes this limitation, or unless expressly authorized by 24 CFR § 578.93(b)(1) to (7).
  - a. For instance, while a Permanent Supportive Housing project may prioritize chronically homeless persons or households with a qualifying disability per the Local Standards, beds may not be reserved to persons with a specific disability (i.e. physical disability).
3. If an individual or household who is otherwise qualified but who does not have a physical disability seeks admission and would benefit from the services offered, this individual or household may not be excluded from the project. Alternatively, for example, service providers may reserve beds for persons with HIV/AIDS if the

housing also receives funding from the Housing Opportunities for People with AIDS program (HOPWA).

#### Transgender and Gender Nonconforming Best Practices for CES:

As the Housing First Solano CoC works to develop common intake procedures and single-points-of-entry it is critical that all eligible people know they are welcome. In addition to the policies outlined in the CoC's Written Standards, the CES will strive to:

- During pre-assessment/intake, staff will:
  - Avoid gendered greetings such as “sir” or “ma’am”;
  - Ensure all forms allow for transgender and gender non-conforming selections by clients;
  - Create space during intake and on forms for all clients to indicate their preferred name and pronouns.
- During referrals, staff will:
  - Support transgenders clients’ enrollment and placement based on their gender identity in single-sex options to ensure correct procedures are followed;
  - Only share necessary information about clients when making a referral;
  - Listen to clients and respect their choices to access any options for which they are eligible without requiring “proof.”

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### A. PROCESS FOR FILING A DISCRIMINATION COMPLAINT

All participants in Resource Connect Solano shall be notified of their right to file a discrimination complaint. Please see the Housing First Solano Right to File Discriminations Complaints Notice and Form incorporated into these Coordinated Entry Policies and Procedures as Attachment III.

## IX. FILING A GRIEVANCE

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### A. PROCESS FOR FILING GENERAL GRIEVANCES

Attachment VIII contains the Housing First Solano Continuum of Care’s process for handling grievances and complaints made by clients, provider agencies, or other parties expressing dissatisfaction with the homeless system of care in Solano County (“Complainant(s)"). Any person participating in the coordinated entry process or interacting with programs in the Solano County homeless system of care has the right to file a grievance. All participants in the Coordinated Entry System should be informed of their right to file a grievance. Resolution of grievances related to a particular service agency should be attempted first through that agency’s grievance procedure.

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## B. DISCRIMINATION COMPLAINTS

There is a specific, separate process for discrimination complaints summarized above in Section VIII.A. and included as Attachment III

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## C. PII COMPLAINTS

There is also a specific, separate process for incidents involving the improper use and/or disclosure of Personally Identifiable Information. For information on this process, please see the Universal Privacy Notice included as Attachment VI.

ATTACHMENT I:  
MEMORANDUM OF UNDERSTANDING BETWEEN COMMUNITY ACTION  
PARTNERSHIP OF SOLANO, JOINT POWERS AUTHORITY AND PARTICIPATING  
AGENCIES

MEMORANDUM OF UNDERSTANDING  
BETWEEN COMMUNITY ACTION PARTNERSHIP SOLANO, JOINT POWERS AUTHORITY  
AND PARTICIPATING AGENCIES

This Memorandum of Understanding (hereafter “MOU”) is entered into as of \_\_\_\_\_, between Community Action Partnership Solano Joint Powers Authority (hereafter “CAP Solano JPA”), on behalf of the Housing First Solano Continuum of Care, and \_\_\_\_\_.

***I. Background***

Provisions in the U.S. Department of Housing and Urban Development’s (HUD) Continuum of Care (CoC) Program and Emergency Solutions Grant (ESG) Program interim rules require that all CoCs establish a coordinated entry system (CES). The CES represents a CoC-wide process for facilitating access to all homeless designated resources, identifying and assessing the needs of persons experiencing a housing crisis, and referring clients to the most appropriate service strategy or housing intervention.

Coordinated Entry is the community process by which the Housing First Solano Continuum of Care supports the development of a comprehensive and efficient crisis response system that improves fairness and ease of access to resources in Solano. Housing First Solano’s CES also provides information to Continuums of Care and other stakeholders about service needs and gaps, to help the CoC strategically allocate its current resources and identify the need for additional resources.

***II. Purpose***

To ensure the consistent implementation of the Housing First Solano CES policies and procedures, this MOU shall identify the obligations of CAP Solano JPA, as the Collaborative Applicant for the CoC, and the designated agencies that will act as participant agencies in the Resource Connect Solano Coordinated Entry System.

***III. Responsibilities of CAP Solano JPA:***

CAP Solano JPA agrees to the following duties:

- Supervise the Coordinated Entry Systems Operator;
- Provide lead staff to guide the Resource Connect Solano Work Group and any relevant subgroups;
- Coordinate, integrate, and leverage resources to maximize impact of Coordinated Entry services for individuals who are experiencing homelessness;
- Develop and implement policies and procedures on how the Resource Connect Solano Coordinated Entry System will be operated;

- Provide training to all staff dedicated to the Resource Connect Solano Coordinated Entry System;
- Provide guidance and supervision to Resource Connect Solano Coordinated Entry System Operator staff as it relates specifically to the operation of Resource Connect Solano;
- Evaluate performance and progress of Resource Connect Solano and make adjustments as necessary; and
- Approve any press releases and communication with the media with regards to Resource Connect Solano.

**IV. Responsibilities of Participating Agencies:**

\_\_\_\_\_, as a Resource Connect Solano participating agency, agrees to the following duties:

- Serve as a member of the Resource Connect Solano Work Group for the purpose of engaging in a joint venture to develop and implement an array of integrated services designed to stabilize housing for people who are literally homeless or imminently at-risk of homelessness;
- Agree to assess and refer clients for services through the Resource Connect Solano only for the following programs: \_\_\_\_\_;
- Enter and maintain timely client data in HMIS;
- Name a designated staff contact for Resource Connect Solano.
- Coordinate and receive approval for and press releases and communication with the media with regards to Resource Connect Solano.
- Send a representative to all case conferencing meetings scheduled by the Coordinated Entry System Operator.

**V. Terms of Agreement:**

This MOU shall be in effect from the date marked herein and will renew automatically on an annual basis, unless terminated by mutual agreement in writing prior to the project end date.

**Modification.** This MOU can be expanded, modified, or amended, as needed, at any time by the written consent of all parties. This MOU shall be reviewed and revised as needed to further implementation of any strategic and long-term goals of the project.

**Liability.** CAP Solano JPA and the participating agency each agree to defend, indemnify, and hold each other harmless from any claims or liability arising from the acts or omissions of the other, including any third-party claims arising from the acts or omissions of any officers, employees, agents, representatives, licensees, or clients of the other. CAP Solano JPA shall not be liable for any injuries or other claims that arise from events that occur at the designated entry points.

**Severability.** The invalidity or unenforceability of any particular provision of this MOU shall not affect the remaining provisions hereof, and the MOU shall be construed in all respects as if such invalid or enforceable provision were omitted.



**Participating Agency**

Agency: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

**CAP Solano JPA**

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

ATTACHMENT II:  
FAIR HOUSING AMENDMENTS ACT OF 1988 NOTICE

U. S. Department of Housing and Urban Development



**EQUAL HOUSING  
OPPORTUNITY**

**We Do Business in Accordance With the Federal Fair  
Housing Law**

(The Fair Housing Amendments Act of 1988)

**It is illegal to Discriminate Against Any Person  
Because of Race, Color, Religion, Sex,  
Handicap, Familial Status, or National Origin**

- In the sale or rental of housing or residential lots
- In the provision of real estate brokerage services
- In advertising the sale or rental of housing
- In the appraisal of housing
- In the financing of housing
- Blockbusting is also illegal

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Anyone who feels he or she has been discriminated against may file a complaint of housing discrimination:

1-800-669-9777 (Toll Free)

1-800-927-9275 (TTY)

[www.hud.gov/fairhousing](http://www.hud.gov/fairhousing)

**U.S. Department of Housing and  
Urban Development  
Assistant Secretary for Fair Housing and  
Equal Opportunity  
Washington, D.C. 20410**

Previous editions are obsolete

form HUD-928.1 (6/2011)

## ATTACHMENT III: HOUSING FIRST SOLANO RIGHT TO FILE DISCRIMINATION COMPLAINTS NOTICE AND FORM

The Housing First Solano Continuum of Care does not tolerate discrimination based on actual or perceived membership in any protected class. The entirety of Housing First Solano's Coordinated Entry process shall be conducted in compliance with the nondiscrimination provisions of federal and state civil rights laws, including the Fair Housing Act, CA Fair Employment and Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II and III of the Americans with Disabilities Act, as well as HUD's Equal Access and Gender Identity Rules. Under these laws and rules, the following classes are protected from discrimination:

- Race
- Color
- Religion
- National origin
- Ancestry
- Sex, gender
- Actual or perceived sexual orientation
- Actual or perceived gender identity or gender expression
- Disability, mental or physical
- Age
- Familial status (including families with children under age 18, pregnant women, and people securing custody of children under 18)
- Marital status
- Source of income
- Immigration status
- Primary language
- Citizenship
- Veteran / Military status, or
- Genetic information (such as likelihood of a gene mutation or chronic disorder)<sup>3</sup>

Some programs may be forced to limit enrollment based on requirements imposed by their funding sources and/or state or federal law. For example, a HOPWA-funded project might be required to serve only participants who have HIV/AIDS. All such programs will avoid discrimination to the maximum extent allowed by their funding sources and their authorizing legislation.

All aspects of the Housing First Solano Coordinated Entry process will comply with all Federal, State, and local Fair Housing laws and regulations. Participants will not be "steered" toward any housing facility or neighborhood because of any protected status.

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<sup>3</sup> CA Department of Fair Employment and Housing: <https://www.dfeh.ca.gov/resources-2/posters-and-brochures-and-fact-sheets/poster-and-brochure-tab-list/?target=housing>;  
Fair Housing Advocates of Northern California: <http://www.fairhousingnorcal.org/california-and-local-fair-housing-rights.html>

Locations where persons are likely to access or attempt to access the CoC's Coordinated Entry System include signs or brochures displayed in prominent locations informing participants of their right to file a non-discrimination complaint and containing the contact information needed to file a non-discrimination complaint. Requirements associated with filing a non-discrimination complaint, if any, will be included on the signs or brochures.

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## PROCESS FOR FILING A COMPLAINT

Written complaints of discrimination may be sent to the staff of the Housing First Solano Continuum of Care at the following address:

Housing First Solano Continuum of Care  
c/o the Community Action Partnership of Solano, Joint Powers Authority  
Attn: Kathy Lawton-Caesar, Chair  
701 Civic Center Boulevard  
Suisun City, CA 94585  
solano@homebaseccc.org

When a complaint of discrimination is received, the CoC Board will complete an investigation of the complaint within 60 days by attempting to contact and interview a reasonable number of persons who are likely to have relevant knowledge, and by attempting to collect any documents that are likely to be relevant to the investigation. Within 30 days after completing the investigation, the CoC Board will write an adequate report of the investigation's findings, including the investigator's opinion about whether inappropriate discrimination occurred and the action(s) recommended by the investigator to prevent discrimination from occurring in the future. If appropriate, the investigator may recommend that the complainant be re-assessed or re-prioritized for housing or services.

The report will be kept on file for two years.

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## DISCRIMINATION COMPLAINT FORM

**Confidentiality:** All information provided to the Housing First Solano Continuum of Care concerning the incident(s) of discrimination shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny relief as provided by the nondiscrimination provisions of federal civil rights laws, including the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II and III of the Americans with Disabilities Act, as well as HUD's Equal Access and Gender Identity Rules. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

### **TO BE COMPLETED BY OR ON BEHALF OF THE PERSON FILING A COMPLAINT**

- 1. Name of complainant:**
- 2. Your name (if different from complainant):**
- 3. Address or phone number for contacting the complainant:**

**4. Name of the person or entity against whom this complaint is being filed (if known and can be safely disclosed):**

**5. Date(s), Time(s) and location(s) of incidents:**

**6. Description of perceived discrimination suffered:**

**7. If voluntarily provided, list any third-party documentation you are providing along with this notice:**

This is to certify that the information provided on this form is true and correct to the best of my knowledge. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of relief.

Signature \_\_\_\_\_

Signed on (Date) \_\_\_\_\_

Please return this form to:

Housing First Solano Continuum of Care  
c/o the Community Action Partnership of Solano, Joint Powers Authority  
Attn: Kathy Lawton-Caesar, Chair  
701 Civic Center Boulevard  
Suisun City, CA 94585  
[solano@homebaseccc.org](mailto:solano@homebaseccc.org)

ATTACHMENT IV:  
HOUSING FIRST SOLANO EMERGENCY TRANSFER PLAN FOR VICTIMS OF  
DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

See the [Written Standards](#).

ATTACHMENT V:  
EMERGENCY TRANSFER REQUEST FORM AND NOTICE OF OCCUPANCY  
RIGHTS AND CERTIFICATION FORM FOR VICTIMS OF DOMESTIC VIOLENCE,  
DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING FORM

See the [Written Standards](#).

## ATTACHMENT VI: UNIVERSAL PRIVACY NOTICE

The following statement should be read or shared with participants coming in to contact with the Coordinated Entry System: The Resource Connect Solano Coordinated Entry System collects personal information directly from you for reasons that are discussed below. It may be required to collect some personal information by law or by organizations that provide funding to operate the program. The personal information RCS collects is important to run its programs, to improve services for persons experiencing homelessness, and to better understand the needs of persons experiencing homelessness. RCS shall only collect information that its management entity considers to be appropriate and consistent with the policies and procedures created by the Housing First Solano Continuum of Care General Membership.

The following provisions, as well as relevant policies and procedures created by the Housing First Solano Continuum of Care General Membership, may be amended at any time. Such amendments will affect information obtained before the date of the amendment.

### PERSONALLY IDENTIFIABLE INFORMATION DEFINITION

Personally Identifiable Information (PII). Defined in OMB M-07-16 as “...information which can be used to distinguish or trace an individual’s identity, such as their name, social security number, biometric records, etc., alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother’s maiden name, etc.”

Non-personally identifiable information (non-PII) is data that cannot be used on its own to trace, or identify a person.

### RESPONSIBILITY TO PROTECT PERSONALLY IDENTIFIABLE INFORMATION

Resource Connect Solano shall be responsible for protecting participant’s Personally Identifiable Information in accordance with existing laws and regulation. When other federal or state data privacy or security laws apply, Resource Connect Solano shall comply with the requirements that ensure the greatest protection for the participant’s Personally Identifying Information. Relevant protections may include:

- 24 CFR 578.7(a)(8) and Section II.A
- HUD’s HMIS Privacy and Security Notice
- HUD’s 2004 HMIS Data and Technical Standards
- Health Insurance Portability and Accountability Act (HIPAA)
- Section 407 of The McKinney-Vento Homeless Assistance Act, as amended by S. 896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009
- The Violence Against Women’s Act (VAWA)

### USES AND DISCLOSURES OF PARTICIPANT INFORMATION



Per the 2004 HMIS Data and Technical Standards, Resource Connect Solano must disclose Personally Identifiable Information when required to by the U.S. Department of Housing and Urban Development for oversight of compliance with HMIS data privacy and security standards.

Resource Connect Solano *may* use and disclose Personally Identifiable Information without participant consent for the following purposes:

- **As** required by law
- **To** avert a serious threat to health or safety
- To provide or coordinate services to an individual
- For functions related to payment or reimbursement for services
- To carry out administrative functions, including but not limited to legal, audit, personnel, oversight, and management functions
- For creating de-identified data from Personally Identifiable Information

Any other uses and disclosures not allowed by the 2004 HMIS Data and Technical Standards shall require participant consent.

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## PARTICIPANT RIGHTS AND OPTIONS

All participants shall receive a copy of this Privacy Notice before going through the VI-SPDAT assessment process.

Resource Connect Solano must disclose Personally Identifiable Information about a participant when that participant asks for access to his or her own information.

All Resource Connect Solano participants shall be notified of their right to file a use or disclosure complaint using the form below.

When a use or disclosure complaint is received, the CoC Board will complete an investigation of the complaint within 60 days by attempting to contact and interview a reasonable number of persons who are likely to have relevant knowledge, and by attempting to collect any documents that are likely to be relevant to the investigation. Within 30 days after completing the investigation, the CoC Board will write an adequate report of the investigation's findings, including the investigator's opinion about whether inappropriate discrimination occurred, and the action(s) recommended by the investigator to prevent inappropriate use or disclosure from occurring in the future. If appropriate, the investigator may recommend that the complainant be re-assessed or re-prioritized for housing or services. The report will be kept on file for five years.

## PERSONALLY IDENTIFIABLE INFORMATION USE OR DISCLOSURE COMPLAINT FORM

**The Confidentiality rules are as follows:** All information provided to the Housing First Solano Continuum of Care concerning incident(s) of improper use and/or disclosure of Personally Identifiable Information shall be kept confidential. Such details shall be stricken from any shared database until a pending complaint of improper use or disclosure is resolved. Housing provider employees are not to have access to these details unless to grant or deny relief as provided by federal or state law. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

### **TO BE COMPLETED BY OR ON BEHALF OF THE PERSON FILING A COMPLAINT**

- 1. Name of complainant:**
  
- 2. Your name (if different from complainant):**
  
- 3. Address or phone number for contacting the complainant:**
  
- 4. Name of the person or entity against whom this complaint is being filed (if known and can be safely disclosed):**
  
- 5. Date(s), Time(s) and location(s) of incidents:**
  
- 6. Description of perceived inappropriate use or disclosure suffered:**
  
- 7. If voluntarily provided, list any third-party documentation you are providing along with this notice:**

This is to certify that the information provided on this form is true and correct to the best of my knowledge. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of relief.

Signature \_\_\_\_\_

Signed on (Date) \_\_\_\_\_

Please return this form to:

Housing First Solano Continuum of Care  
c/o the Community Action Partnership of Solano, Joint Powers Authority  
Attn: Kathy Lawton-Caesar, Chair  
701 Civic Center Boulevard  
Suisun City, CA 94585  
[solano@homebaseccc.org](mailto:solano@homebaseccc.org)

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## PARTICIPATING PROVIDER OBLIGATIONS

Each provider participating in Resource Connect Solano shall require all individuals and participant organizations with access to PII, not limited to their staff members, to sign a confidentiality agreement that acknowledges receipt of a copy of the Privacy Notice and that pledges compliance with it. The participating providers shall be responsible for keeping these signed statements on file for a minimum of five years after the departure of each relevant staff member.

Each participating provider shall place a sign at data collection points with a statement explaining why information is being collected and how to obtain this Privacy Notice.

In instances where data is collected by phone, operators shall read the opening statement to all callers and inform them how they can receive a full copy of the Privacy Notice.

The following statement should be read or shared with participants: The Resource Connect Solano Coordinated Entry System collects personal information directly from you for reasons that are discussed below. It may be required to collect some personal information by law or by organizations that provide funding to operate the program. The personal information RCS collects is important to run its programs, to improve services for persons experiencing homelessness, and to better understand the needs of persons experiencing homelessness. RCS shall only collect information that its management entity considers to be appropriate and consistent with the policies and procedures created by the Housing First Solano Continuum of Care General Membership.

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## PROVIDER TRAINING

Resource Connect Solano shall train coordinated entry, intake staff and participating organizations on the CoC's privacy practices to maximize consistency and clarity for participants.

ATTACHMENT VII:  
PRE-SCREENING QUESTIONS AND ASSESSMENT SCRIPT GUIDEBOOK

[Pre-Screening Questions and Assessment Script](#)

ATTACHMENT VIII:  
GENERAL GRIEVANCE POLICY AND REQUEST FORM

See the [Grievance Policy and Forms](#).