



Coordinated Entry Written Standards

for MA-507 Three County Continuum of Care

Written Standards for Providing Services to Homeless and At-Risk Households accessed by a Coordinated Entry System

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Introduction and Background

Regulatory Mandate

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 reauthorized the McKinney-Vento Homeless Assistance programs. Through the enactment of the HEARTH Act, the Department of Housing and Urban Development (HUD) published the new Continuum of Care (CoC) Program interim rule. The CoC Program Interim Rule requires that the CoC must establish and consistently follow written standards for providing CoC assistance, in consultation with recipients of the Emergency Solutions Grant (ESG) program. At a minimum, these written standards must include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance in the CoC Program
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive assistance (including the emergency transfer priority required under Emergency Transfer Plan requirement) for permanent supportive housing assistance, transitional housing assistance, and Rapid Rehousing assistance

Goals of the Written Standards

The CoC recognizes and supports HUD's goals for its local written standards and strives to meet its obligations under the HEARTH Act in a way that helps to enhance its systemic response to people. These standards hereby:

- Establish community-wide expectations on the operations of projects within the community
- Ensure that the system is transparent to users and operators
- Establish a minimum set of standards and expectations in terms of the quality expected of projects
- Make the local priorities transparent to recipients and subrecipients of funds and all community stakeholders
- Create consistency and coordination between recipients' and subrecipients' projects within the Three County CoC.

The Three County CoC agrees that these standards must be applied consistently across the entire Three County CoC's defined geographic area while also taking into consideration individual county-specific needs and resources. Additionally, Three County CoC recipient and subrecipients are to administer their assistance in compliance with the CoC's written standards. Recipients and subrecipients of CoC and local funds may develop additional standards for administering program assistance, but these additional standards cannot be in conflict with those established by the Three County CoC or the CoC Program Interim Rule. Other CoC providers and stakeholders are strongly encouraged to adopt the standards and practices discussed in this document.

Furthermore, these standards recognize the unique geography of the Three County CoC and accommodate the unique needs and service availability of each respective county as well as the policy of allowing individuals and families choices in where and how they receive services and housing resources.

Individual Single Adults vs. Families with Children

The Commonwealth of Massachusetts mandates providing state-funded Emergency Assistance (EA) to all eligible families, therefore any family presenting for services will be screened for EA along with other appropriate options. CoC providers will work to ensure that EA eligible families are able to access EA supported resources as part of the required assessment process. If the family is determined ineligible for state EA, then they should be assessed for vulnerability and be included in the CoC's By Names List to be prioritized for CoC resources.

Guiding Principles

The Three County CoC commits to the following Guiding Principles as part of its overall approach to ending and preventing homelessness throughout the CoC. These Guiding Principles shall inform all program and policy decisions of the CoC and its funded or affiliated housing and service providers.

Housing First

Housing First is a programmatic and systems approach that centers on providing people who are homeless with housing quickly and then providing services as needed. Three County CoC hereby implements a Housing First model that provides a range of housing services to persons experiencing or at-risk of homelessness, including outreach and engagement, emergency and transitional housing, rapid re- housing, homelessness prevention and permanent supportive housing. Through these standards, the Three County CoC formally incorporates the Housing First approach as well as non-discrimination policies into the coordinated entry system and its funding priorities.

- Housing is not contingent on compliance with services.
- Participants are expected to comply with a standard lease or occupancy agreement and are provided with services and supports to help maintain housing and prevent eviction.
- Services are provided in housing to promote housing stability and well-being.
- All programs are expected to ensure low barriers to program entry for program participants.

No Wrong Door in a Multi-site centralized access system

Staff of community organizations are able to connect individuals and/or families with the appropriate service(s) in a manner that is streamlined, effective and seamless from the individual's and/or family's perspective, even if that service(s) is not offered by their organization or within their sector. This means information and referral processes become consistently more family or individual-focused, collaborative and successful. Assessments are conducted at several locations in the community.

Anti-Discrimination

The Three County CoC commits to a policy of anti-discrimination for all CoC projects (recipients and subrecipients) and activities. We adhere to and comply with all non-discriminatory and equal opportunity provisions of Federal Civil Rights laws as specified in 24 CFR 5.105(a). Including, but not limited to, the following:

- Providers must have non-discrimination policies in place and adhere to the CoC's Anti-discrimination and Equal Access policy. Our partners must assertively outreach to people least likely to engage in the homeless system. Providers must post, onsite, information that supports participants in filing discrimination complaints.
- Providers must comply with all federal statutes including the Fair Housing Act, which prohibits discrimination on the bases of race, color, religion, sex, national origin, disability, or familial status; Section 504 of the Rehabilitation Act and the Americans with Disabilities Act, which prohibit public entities- including state and local governments and private entities that provide public accommodations- from discriminating against persons with disabilities in services, programs and activities, and housing practices.
- The Three County CoC is committed to Racial Equity. We recognize that there is racism and prejudicial practices in social services and housing programs. Our community witnesses an over-representation of BIPOC in our homeless population. We see racial identities as a possible area to affect vulnerability status for our homeless community members, low-income populations, and program participants. We will seek out and provide opportunities for training for local providers and will take discriminatory practices seriously. We will maintain a high level of expectation of agencies funded by the CoC, to adhere to standards set forth to understand and address the experience of all minority groups in our service area.
- The Three County CoC will not deny access to the coordinated entry process on the basis that a person is or has been a victim of domestic violence, dating violence, trafficking, assault, or stalking.
- Three County CoC is committed to abiding by the Equal Access Rule at 24 CFR 5.105(a)(2) which prohibits eligibility determinations in HUD Programs based on actual or perceived sexual orientation, gender identity, or marital status, including projects funded by CoC, ESG, or HOPWA.
- Three County CoC practices a person-centered model that strongly incorporates participant choice and inclusion of subpopulations present in Three County, including, but not limited to, homeless veterans, youth, families with children, and victims of domestic violence.
- Coordinated entry flyers, marketing materials and the assessment tool will affirmatively market services with nondiscrimination language and will be viewed by populations served to ensure adherence to this expectation.
 Discrimination complaints specific to the Coordinated Entry process will go to the Collaborative Applicant staff to be presented to the CoC Board. Complaints related to the provider agency and not the Coordinated Entry system should go through the agency's regular complaint process.

Participant Choice

Given the geography of the Three County CoC, the CoC strives to ensure that participants seeking assistance are provided with a choice in the types and duration of services they receive, dependent on available resources. To the degree possible based on resources and the prioritization mechanisms described in this document, and where safety is not compromised, participants are given choice in:

- The type of services they receive by whom and over what time period
- The location and type of housing they access
- The elements and goals of their housing stability plans

Affirmative Outreach and Marketing

Three County CoC providers must affirmatively market their Coordinated Entry efforts, Housing and Supportive Services projects to eligible persons who are least likely to apply in the absence of specific outreach and intentional efforts to reach marginalized communities and vulnerable populations. The Three County CoC commits to using Executive Office of Housing and Livable Communities Office of Program Monitoring Fair Housing and Equal Opportunity's Affirmative Housing Marketing Plan as a resource to conduct outreach to vulnerable populations and specifically engage marginalized communities. The CoC will provide materials that increase language and disability access.

HUD's Primary Goals of Effective Coordinated Entry

HUD's primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that it be easily accessible no matter where or how people present. Most communities lack the resources needed to meet all of the needs of people experiencing homelessness. This, combined with the lack of well-developed coordinated entry processes, can result in severe hardships for people experiencing homelessness. They often face long waiting times to receive assistance or are screened out of needed assistance. Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. Coordinated entry processes also provide information about service needs and gaps to help communities plan their assistance and identify needed resources. See 24 CFR 578.7(a)(8) for more information and current requirements.

The Following are adopted "best practices" of Effective Coordinated Entry

The Three County CoC will strive to achieve proficiency in these areas and will measure our success annually, based on these expectations.

- Prioritization. HUD has determined that an effective coordinated entry process ensures that people with the greatest needs receive priority for any type of housing and homeless assistance available in the CoC, including PSH, Rapid Rehousing (RRH), and other interventions.
- Low Barrier. The coordinated entry process does not screen people out for assistance because of perceived barriers to housing or services, including, but not limited to, lack of employment or income, drug or alcohol use, or having a criminal record. In addition, housing and homelessness programs lower their screening barriers in partnership with the coordinated entry process.
- Housing First orientation. The coordinated entry process is Housing First oriented, such that people are housed quickly without preconditions or service participation requirements.
- Person-Centered. The coordinated entry process incorporates participant choice, which may be facilitated by questions in the assessment tool or through other methods. Choice can include location and type of housing, level of services, and other options about which households can participate in decisions.
- Fair and Equal Access. 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. Marketing strategies may include direct outreach to people on the street and other service sites, informational flyers left at service sites and public locations, announcements during CoC or other coalition meetings, and educating mainstream service providers. If the entry point includes one or more physical locations, they are accessible to people with disabilities, and easily accessible by public transportation, or

there is another method, e.g., toll-free or 211 phone number, by which people can easily access them. The coordinated entry process is able to serve people who speak languages commonly spoken in the community.

- Emergency services. The coordinated entry process does not delay access to emergency services such as shelter. The process includes a manner for people to access emergency services at all hours independent of the operating hours of the coordinated entry intake and assessment processes. For example, people who need emergency shelter at night are able to access shelter, to the extent that shelter is available, and then receive an assessment in the days that follow, even if the shelter is the access point to the coordinated entry process.
- Standardized Access and Assessment. All coordinated entry locations and methods (phone, in-person, online, etc.) offer the same assessment approach and referrals using uniform decision-making processes. A person presenting at a particular coordinated entry location is not steered towards any particular program or provider simply because they presented at that location.
- Inclusive. A coordinated entry process includes all subpopulations, including people experiencing chronic homelessness, Veterans, families, youth, and survivors of domestic violence. However, CoCs may have different processes for accessing coordinated entry, including different access points and assessment tools for the following different populations: (1) adults without children, (2) adults accompanied by children, (3) unaccompanied youth, or (4) households fleeing domestic violence. These are the only groups for which different access points are used. For example, there is not a separate coordinated entry process for people with mental illness or addictions, although the systems addressing those disabilities may serve as referral sources into the process. The CoC continuously evaluates and improves the process ensuring that all subpopulations are well served.
- Referral to projects. The coordinated entry process makes referrals to all projects receiving Emergency Solutions Grants (ESG) and CoC Program funds, including emergency shelter, RRH, PSH, and transitional housing (TH), as well as other housing and homelessness projects. Projects in the community 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.
- Referral protocols. Programs that participate in the CoC's coordinated entry process accept all eligible referrals unless the CoC has a documented protocol for rejecting referrals that ensures that such rejections are justified and rare and that participants are able to identify and access another suitable project.
- Outreach. The coordinated entry process is linked to street outreach efforts so that people sleeping on the streets are prioritized for assistance in the same manner as any other person assessed through the coordinated entry process.
- Ongoing planning and stakeholder consultation. The CoC engages in ongoing planning with all stakeholders
 participating in the coordinated entry process. This planning includes evaluating and updating the coordinated
 entry process at least annually. Feedback from individuals and families experiencing homelessness or recently
 connected to housing through the coordinated entry process is regularly gathered through surveys, focus groups,
 and other means and is used to improve the process.
- Informing local planning. Information gathered through the coordinated entry process is used to guide homeless assistance planning and system change efforts in the community.
- Leverage local attributes and capacity. The physical and political geography, including the capacity of partners in a community, and the opportunities unique to the community's context, inform local coordinated entry implementation.
- Safety planning. The coordinated entry process has protocols in place to ensure the safety of the individuals seeking assistance. These protocols ensure that people fleeing domestic violence have safe and confidential

access to the coordinated entry process and domestic violence services, and that any data collection adheres to the Violence Against Women Act (VAWA).

- Using HMIS and other systems for coordinated entry. The CoC may use HMIS to collect and manage data associated with assessments and referrals or they may use another data system or process, particularly in instances where there is an existing system in place into which the coordinated entry process can be easily incorporated. For example, a coordinated entry process that serves households with children may use a system from a state or local department of family services to collect and analyze coordinated entry data. Communities may use CoC Program or ESG program funding for HMIS to pay for costs associated with coordinated entry to the extent that coordinated entry is integrated into the CoCs HMIS.
- Full coverage. A coordinated entry process covers the CoC's entire geographic area. In CoCs covering large geographic areas (including statewide, Balance of State, or large regional CoCs) the CoC might use several separate coordinated entry processes that each cover a portion of the CoC but in total cover the entire CoC. This might be helpful in CoCs where it is impractical for a person who is assessed in one part of the CoC to access assistance in other parts of the CoC.

Three County CoC Coordinated Entry System

HUD requires that CoC Program and ESG Program funding within the CoC area must establish, operate and use a coordinated

entry (CE) process. The requirement was established in the 2012 CoC Program interim rule (24 CFR 578) and the 2011 ESG interim rule (24 CFR 576). Details of the requirement, as well as additional policy considerations, are provided there and in several documents issued by HUD since:

- <u>HUD required new DATA Elements</u> Announcement and information on HUD's new data elements focusing on Coordinated Entry (2020)
- <u>HUD Coordinated Entry Notice CPD-17-01</u> Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System (2017)
- <u>HUD Prioritization Notice CPD-16-11</u> Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing (2016)
- HUD Coordinated Entry Policy Brief (2015)
- <u>CoC CoC Program interim rule</u>: 24 CFR 578.7(a)(8)
- ESG interim rule: 24 CFR 576.400(d)
- <u>HUD Equal Access rule</u>: <u>24 CFR 5.105(a)(2)</u> and <u>5.106(b)</u>
- HUD Changes to Coordinated Entry Prioritization to Support and Respond to COVID-19
- HUD COVID-19 Equity-Driven Changes to Coordinated Entry Prioritization

Coordinated Entry Procedure:

- 1) An Individual or Family experiencing homelessness is identified by phone or in person at a shelter or service provider or is encountered by an outreach team outside.
- 2) With the multi-site centralized access system, the person will be connected to the same procedure and services no matter where they present or who first encounters them because we work to increase the number of people trained to assess and the number of locations this is possible. However, there are several scenarios:
 - a. Service Provider has the staff and capability of entering participant into the Coordinated Entry system. This staff person becomes the advocate for that participant until the housing offer is made.
 - b. Service Provider does not have enough staff or appropriately trained staff to enter the participant into the Coordinated Entry system, the service provider contacts CoC another trained assessor who becomes the advocate for that participant and enters them into the Coordinated Entry System.
- Staff at each entry point are trained to address the participant's needs for immediate shelter and safety first, do a basic HMIS intake and then within one to ten days, complete the Coordinated Entry Assessment for Vulnerability, if this person

seems to fit basic criteria, and enter it into the HMIS system if they have access. If they do not have access to HMIS, the assessment is sent to Three County CoC Staff to be entered.

- 4) Some participants may self-resolve or be connected to prevention services through housing problem solving, or other support services not requiring housing and will be removed from the By Names List by their advocate by communicating with the Three County CoC Staff. The HMIS data system requires that these events be recorded and this person be exited from the Coordinated Entry Program within HMIS.
- 5) The CoC Data and Evaluation Manager will ensure regular data pulls from the HMIS in the creation of a By Names List (BNL), at least weekly to be used at case conferencing.
- 6) The CoC Coordinated Entry Coordinator or the CoC Data Evaluation Manager will run a report prior to case conferencing meetings to create a By Names List of all participants who are active in the Coordinated Entry system and therefore have completed an assessment and are seeking permanent housing. When identifying referrals for housing openings, the list will be sorted according to their vulnerability score determined by a Coordinated Entry Vulnerability Assessment and length of time experiencing homelessness. The list will include other necessary data fields such as county preferences, advocate contact, veteran status, disability status, etc. A single By Names List will be generated containing everyone currently active in coordinated entry which is then filtered by population for case conferencing meetings when appropriate:
 - a. Youth
 - b. Survivors of Domestic Violence
 - c. Veterans
 - d. Geographic Location
- 7) To protect participant confidentiality in cases where someone is fleeing domestic violence the following protections will be in place:
 - a. the participant is given a randomly generated unique identifier
 - b. the participants identifiable information may be masked with a numeric code known to the referring assessor
 - c. the participants age will be shown, not the participants date of birth
- 8) All CoC service providers will have access to viewing information from the list as needed
 - a. The Collaborative Applicant will maintain a list of current or upcoming vacancies of all PH units on the Housing Inventory Chart, for our CoC. Housing providers should notify Three County CoC Staff regularly by email as units come online or near vacancy.
 - b. Providers with a vacancy may make a housing offer to the participant highest on the By Names List who meets their basic entry criteria after discussing appropriate referrals during case conferencing.
 - c. The offer will be made through the participant's advocate as their point of contact.
 - d. The provider with the available housing unit can only decline the participant referred through case conferencing if their unit has eligibility criteria which makes that participant ineligible and those criteria must be consistent with a Housing First approach.
 - e. A participant stating a geographic preference may still be contacted about housing openings in other geographic areas and be given the option to decline.
 - f. If two eligible participants are equally scored numerically, the participant with the longest time experiencing homelessness should be offered the unit first.
 - g. Participants must NOT be passed over for available housing opportunities for any reason other than the CoC Project or other housing unit's basic entry eligibility, chronic status, or significant safety issues. Advocates should do their best to make housing referrals that will result in sustainable housing for the participant.
 - h. The housing offer must be documented in the data system.
 - i. While the initial assessing advocate may not have control over the housing placement outcome, it is still their responsibility to keep the HMIS updated on housing offers, decline or acceptance, and successful or unsuccessful lease-up, until the participant is inactive. It may be necessary to coordinate with other providers to keep the participant's information up to date and track referrals and their outcomes.

- j. Any questions or concerns which arise during this housing offer step must be brought to the case conferencing meeting or the CoC staff.
- 9) Vacancies and prioritized By Names List will be on the agenda of bi-weekly and monthly case conferencing meetings. The agenda will include reviewing referrals and placements which have changed the make-up of the By Names List, addressing any concerns or questions which have arisen and case conferencing on new participants added to the list. CoC staff will ensure an updated By Names List is available at each meeting.
- 10) Significant issues or disagreements on placements or the use of the list will be sent to the Collaborative Applicant staff to be placed on the agenda for the CE Committee to track and analyze the program and the CoC Board meetings for guidance and/or resolution.

ACCESS

The Three County CoC is committed to ensuring that the coordinated entry process is available to all eligible persons regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identify, or marital status. The Three County CoC will provide access to all eligible individuals and families in the geographic coverage area (Berkshire, Hampshire, and Franklin Counties). For the Youth Homelessness Demonstration Program (YHDP), we will serve Youth and Young Adults with connections in Franklin County, first, and then those who present in Hampshire or Berkshire Counties.

The Three County CoC follows a 'no wrong door' approach that ensures that regardless of where a participant appears requesting assistance, they will have fair and equal access to the coordinated entry process. If a participant presents at a program that does not have trained CE assessors, the program staff can find a list of CE assessors on the Three County CoC website (<u>Connecting to the CE System | 3 County CoC (communityaction.us)</u> or can contact CoC program staff to ensure the participant is assessed. Regular trainings are conducted to educate new and existing CE assessors on the policies and procedures of the Coordinated Entry process to ensure that all people in different populations and subpopulations in the CoC's geographic area - people experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence - have fair and equal access to the coordinated entry process. Assessor Training will include:

- Progressive and phased assessment gathering information as trust is built
- Conducting assessments within the Data Systems (HMIS) as well as paper format and submission guidelines
- Using trauma-informed protocols
- Safety-planning if the assessment uncovers safety issues (domestic violence concerns, assault, abuse or neglect of a child, stalking trafficking, mental or physical health concerns)
- Importance of cultural competency and language of origin support for participants
- Addressing the needs of persons with disabilities

Regardless of access point to coordinated entry assessment, all service providers and stakeholders will attempt to address immediate housing and safety needs of participants first. Access to emergency services, including domestic violence shelters, short-term crisis residential programs, emergency shelters and hotlines for those services must have as few barriers to entry as possible. While recognizing the importance of coordinated entry assessment, the Three County CoC prioritizes participant safety first before the coordinated entry assessment can or should be begun by a service provider.

Most access points to Coordinated Entry are accessible for the mobility impaired.

In person or by phone, materials are available to communicate with participants with disabilities – large type, recorded sign language interpretation, and language translation services are available within the CoC system.

Individuals and families who are fleeing domestic violence, dating violence, sexual assault or stalking have safe and confidential access to services via referrals through Domestic Violence providers. Spanish speaking staff are available. Physical access points will make every effort to provide a safe and confidential location to discuss the common assessment form with participants. Unique participant identifiers will be used for case conferencing for participants with safety and confidentiality issues pertaining to domestic violence. Domestic violence situations are identified on the common assessment form as an available data point for referrals and as part of eligibility criteria for specific programs.

All trained Assessors are required to initiate the assessment process with a newly encountered participant, if identified that the Coordinated Entry process will be conducive to housing the participant. An appointment to complete the assessment should be made as part of the participant's routine, for example agreeing to meet at a meal site to complete the assessment. Or initiating the appointment could mean making a referral to a trained CE Assessor and explaining the benefits to the participant of the coordinated assessment process.

CE Assessors

Agency representatives that would like to become Coordinated Entry assessors can request information and training from our Coordinated Entry Specialist.

Agency representatives can become CE Assessors by completing required training and privacy agreements. An agency representative does not need to have access to HMIS to be trained and approved as a CE Assessor.

Community ambassadors are individual volunteers that are not employed by an agency. Community ambassadors can become CE Assessors, if they can meet the following requirements:

- Complete the same training required for all assessors
- Complete any applicable privacy agreements required for all assessors
- Complete a CORI
- Participate in additional supervision outside of case conferencing with the Three County CoC Coordinated Entry Specialist

Suspension or Termination of CE Assessors

All CE Assessors, including both agency representatives and community ambassadors, will be held to privacy and confidentiality standards outlined in our Case Conferencing Privacy Agreement and any other requirements outlined in these Written Standards.

Failure to follow expectations will result in the following actions taken:

- First and second occurrences: CE Assessor will receive a warning in writing by email about the disclosure, and reminders about applicable terms from privacy and confidentiality agreements
- Third occurrence: Coordinated Entry Specialist will require the CE Assessor to complete additional training on privacy and confidentiality expectations and practices.
- Fourth occurrence: CE Assessor may be suspended from Case Conferencing and Coordinated Assessment until steps have been put in place to prevent disclosure of private or confidential information.

Failure to address concerns about privacy and confidentiality of CE Assessors may result in termination of access to the CE System, case conferencing, and submission of assessment.

Any corrective actions as described above will be applied on an individual basis – meaning that other compliant agency representatives will not be asked to complete corrective action due to another person's actions.

COMMON ASSESSMENT

All assessments will be conducted using the Three County CoC Coordinated Entry Assessment Tool. Participants must be told by staff performing the assessment that they have the right to refuse to provide information and still receive emergency services, that they have the right to decline housing services based on their preference and still remain eligible for future offers and services, and staff must have the participant complete the appropriate Data Agreement and Provider Release which can be done through verbal consent if written consent is not possible or would further endanger the participant.

The Three County CoC Assessment tool is designed to prioritize participants for housing services based on need. Need is based on vulnerability of the participant in the absence of resources to move them into secure and stable housing. Detailed prioritization by subpopulation is provided below.

The assessment must NOT be used to screen participants out of services. Barriers to housing or services identified in the assessment will be used ONLY for the purposes of referral to the program or service which best matches the participant's need. A

portion of each case conferencing meeting will be devoted to problem solving for those who remain on the list due to housing barriers. This will include both coordinating suggested solutions for that particular participant and identifying systemic gaps in services in the three counties based on the barriers the assessment reveals.

The assessment tool will include information to determine risk factors and to prioritize participants. Prioritization criteria are based on the following, consistent with HUD Notice CDP:-16-11:

- **Chronic homeless status:** This criterion considers whether an individual qualifies as "chronically homeless." Chronic homelessness typically involves long-term homelessness, often defined as being homeless for a year or more or having experienced multiple episodes of homelessness over a specified period, along with a disability status. Those who meet these criteria are often prioritized for housing assistance because they are among the most vulnerable and have the greatest need for stable housing.
- **Inclusion in a vulnerable or marginalized group:** This criterion recognizes that certain groups within the homeless population are particularly vulnerable and may require special attention. These groups include:
 - Young adults: Homeless young adults (ages 18-24) may face unique challenges and risks
 - Older adults (60+): older adults experiencing homelessness often have specific needs related to aging and health, making them a priority for housing assistance
 - LGBTQ+ individuals: LGBTQ+ individuals may face discrimination and a lack of culturally competent services when homeless, so they are prioritized for assistance
 - Fleeing domestic violence: People who are fleeing domestic violence situations require immediate housing and support to ensure their safety
 - Living outside/unsheltered: Individuals living in unsheltered conditions are typically at higher risk and in greater need of housing assistance
 - **Disproportionately impacted due to being a person of color:** Recognizing racial disparities in homelessness, prioritizing individuals of color is intended to address systemic inequalities
- Assessment score: this is a numeric system used to objectively assess individuals' needs and prioritize them based on their level of need. The assessment score may take into account various factors, including the ones mentioned above, as well as factors like vulnerability, health, and service utilization.

The assessment tool will also seek to identify barriers to housing. These barriers are meant to assist matching participants to eligible programs but are not factors in the prioritization score and should NOT be used to screen out otherwise eligible participants. There is an exception for site-based projects in cases where one of these barriers may prevent an eligible individual or family from residing in a site (for example, some participants who are registered sex offenders may not be able to live in a site where children are housed):

- Significant CORI issues
- History of evictions
- Sex Offender registration
- Non-service animals/pets
- Housing preference within our CoC region

CE Assessment Tool Companion Guide

The Coordinated Entry Assessment Tool Companion Guide serves to support trained CE Assessors in Administering the CE Assessment Tool and in fulfilling the responsibilities and expectations of CE Assessors. CE Assessors must sign and return The CE Signature page at the end of the Companion Guide to certify that they have reviewed and understood the Companion Guide in its entirety. The CE Tool Companion Guide reviews in detail the following aspects:

- Principles of Coordinated Entry
- Expectations and Responsibilities of CE Assessors
- Three County CE Assessment Tool Stages
- CE Assessor Core Competencies and Training

• CE Assessment Tool Clarification and Guidance

Changes to the CE Assessment and Prioritization to Respond to Emergencies

The Three County CoC may implement use of temporary assessment and prioritization procedures, as encouraged by HUD, in the event of pandemics or similar mass crises.

PRIVACY & INFORMATION PROTECTION

Assessment questions on medical, disability and substance abuse issues are meant to assess risk factors; specific health diagnoses are not requested nor gathered. Specific diagnosis or disability information may only be obtained for purposes of determining program eligibility to make appropriate referrals. Every participant in the Coordinated Entry System is offered a Data Agreement & Provider Release which allows them to agree to have their personal information discussed during case conferencing meetings. This release gives participants the option to participate in Coordinated Entry in an identified manner or a de-identified manner and also gives them the option of choosing to disclose HIV/AIDS status or drug/alcohol use treatment status. Participants also have the option of contacting the local HIV/AIDS Care Organization, A Positive Place, to disclose HIV/AIDS status directly without having it discussed during case conferencing.

All information and data collected in coordinated entry will be treated as confidential and subject to the same rules governing the privacy and protection of HMIS data. Prioritized By Names Lists will protect participant identity by using only first name and last initial. By Names Lists will be kept in password protected computers and private offices. No printed copies will be left in public areas or meeting rooms and will be shredded rather than discarded in the trash or recycling. The HMIS used to enroll participants in Coordinated Entry and enter their Coordinated Entry Vulnerability assessments is the CAPV Clarity HMIS, a data system administered by Community Action Pioneer Valley and the vendor, Bitfocus, Inc. The CAPV Clarity HMIS is password protected with user accounts and data is transmitted with 128-bit encryption. User accounts are managed by the CoC Data & Evaluation Manager to ensure that access is granted at the lowest level required and only for applicable programs. Participants may at times be discussed outside of case conferencing if it is to share information between providers for the purpose of housing a participant and the information goes into more detail than other case conferencing providers need to know.

In the event that Coordinated Entry Case Conferencing meetings are held virtually for any reason, only those who have signed a Case Conferencing Privacy Agreement not to disclose any information unnecessarily are able to attend the case conferencing portion of the meetings. Other partners may attend to give updates or share information as long as they depart prior to the start of actual case conferencing. The By Names List will be screen shared by a member of the CoC staff and will not be distributed under any circumstances.

DOCUMENTATION FOLLOWS ENTRY

Eligibility documentation specified by certain programs needs to be gathered prior to a housing placement but should not be a barrier to entering the Coordinated Entry system or housing programs, see this <u>link</u> for more information on timelines for required documentation. The Coordinated Entry system is primarily based on self- reporting with some staff input and is meant to be followed up in the following weeks with documentation to meet the requirements of specific programs and services. After an appropriate referral has been identified, the Coordinated Entry Coordinator will connect the referring advocate with the housing program through the CE Referral Follow up email that includes the Homelessness and Disability Verification document. This document is required to be filled out and returned to the housing program, and outlines the necessary documentation required to enter.

REFERRAL PROVIDER DECLINE POLICY

Rapid Rehousing, and permanent supportive housing providers may only decline households found eligible for their programs under limited circumstances—such as when:

- There is no actual vacancy available.
- The household presents with more people or different information than referred by the coordinated entry system.
- The provider has determined, based on their individual program policies and procedures, that the household cannot be safely accommodated with the supports provided by the program.

All denials must be reviewed during case conferencing.

Rapid Rehousing providers may decline a participant locating outside their service area unless another agency is able and willing to provide support services to that participant.

Repeated denials by a given provider or project may result in de-prioritization during future funding rounds. Providers must record CE referral denials in the Clarity HMIS, including the date and reason for denial.

An intake denial notification will include, at a minimum, the following details, if applicable:

- The reason the participant cannot enter the program, including the reason for rejection by the participant or program
- Instructions for appealing the decision, including the contact information for the person to whom and under what time frame the appeal should be submitted.

PARTICIPANT DECLINE POLICY

Participant choice is an important theme of the coordinated entry system in the Three County CoC. Therefore, households should only be referred to housing projects or interventions they are eligible for and have an interest in living/participating in.

Case conferencing will be used to review and resolve rejection decisions by participants. The purpose of the case conference will be to resolve barriers to the participant receiving the indicated and desired level of service. In addition, case conferencing on barriers will reveal any systemic gaps in services or procedures which are impeding successful housing placements.

Providers must record CE referral denials in the CAPV Clarity HMIS, including the date and reason for denial.

PRIORITIZATION

Permanent Supportive Housing Eligibility and Prioritization

PSH Eligibility

For permanent supportive housing programs, households must meet both the HUD definition of chronic homelessness (578.3), which includes meeting the definition of homelessness under Category 1 and having a disabling condition.

See page 25 for the full definition of Chronic Homelessness

Once meeting eligibility requirements, households are then prioritized by Three County's target populations. Programs may not establish additional eligibility requirements beyond those specified in Category 1 and those required by funders. Some projects may be required to serve only chronically homeless households, per the NOFO under which that project was funded.

Households qualify as Category 1 if they are:

- Sleeping in a place not designed for or used as a regular sleeping accommodation, including the street, a car, park, abandoned building, bus or train station, airport, camping ground etc.
- Living in a shelter designed to provide temporary living arrangements (including emergency shelter, congregate shelters, transitional housing, hotels and motels paid for by charitable organizations or by government programs)
- Exiting an institution where they resided for ≤ 90 days, and were residing in an emergency shelter or place not meant or human habitation immediately prior to entering the institution

PSH Prioritization

Of those eligible households, the populations must be prioritized in accordance with:

- The U.S. Interagency Council on Homelessness (USICH) 2022 plan, <u>All In: The Federal Strategic Plan to Prevent and End</u> <u>Homelessness</u>
- HUD's guidance on prioritization of chronically homeless households and policy brief on coordinated entry systems

The Three County CoC has established the following priority populations for permanent supportive housing for individuals and families. These priorities have been established because solving homelessness for Three County CoC's most vulnerable people and highest users of resources will enhance the CoC's goal of quickly transitioning people who are homeless to permanent supportive housing, and ultimately eradicating homelessness throughout the entire

geographic area. This prioritization encompasses Three County CoC's coordinated entry system (please note this list is **not** organized in terms of highest priority to least):

- 1. Chronically homeless individuals and families with the most severe service needs
- 2. Chronically homeless individuals and families with the longest history of homelessness
- 3. All other chronically homeless individuals and families
- 4. Youth, meeting Category 1 (literal homelessness), 2 (Imminent Risk of Homelessness), and 4 (Fleeing Domestic Violence) documented homelessness
- 5. Individual or family meeting Category 4 (Fleeing Domestic Violence) documented homelessness
- 6. Homeless individuals and families with a disability with the most severe service needs
- 7. Homeless individuals and families with long period of continuous or episodic homelessness
- 8. Homeless individuals and families coming from places not meant for human habitation (such as emergency shelters, streets, safe havens, etc.)

Anticipated vacancies must be reported to the CoC via the Collaborative Applicant staff as soon as possible, but no later than 3 business days after the participant leaves the unit or program. Vacant units must be open to all providers participating in the CoC Coordinated Entry system via the bi-weekly/monthly case conferencing. The provider with the vacant unit or housing opportunity must make every effort to move the highest scoring participants off the prioritization list into the housing unit. If, however, the unit has remained vacant for more than 31 days/rental month period, the provider with the unit may make the housing offer to a participant in the next category on the list (i.e. from Chronic Homeless to Homeless). While we recognize the importance of housing those with highest needs first, a vacant unit is a wasted resource. In general, the CoC will prioritize any veteran households who are not eligible for VA housing or services by targeting those Veterans to the most appropriate CoC-funded projects.

PSH Emergency Transfers Prioritization under VAWA

When PSH assisted program participants qualify for an emergency transfer under VAWA protections, and a safe unit is not immediately available for an internal emergency transfer, the individual or family shall have priority over all other Coordinated Entry participant for permanent supportive housing projects, provided that the individual or family meets all eligibility criteria required by Federal law or regulation or HUD NOFO; and the individual or family meets any additional criteria or preferences established by a project that houses specific populations.

The individual or family shall not be required to meet any other eligibility criteria or preferences for the project. The individual or family shall retain their original homeless or chronically homeless status for the purposes of the transfer.

PSH Minimum Standards

All referrals to permanent supportive housing will be made through the coordinated entry system. The following minimum standards will be applied to all permanent housing programs

- Support services must be available throughout the duration of stay in housing. However, participation in supportive services will not be a requirement of receiving CoC PSH assistance.
- Program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.
- There is no designated length of stay for program participants.
- All PSH projects will use a Housing First approach and only terminate participants from the project in the most extreme cases.
- PSH projects will not administer drugs tests, impose income requirements, require employment, or require services (case management, mental health, behavioral health) as a condition of housing. Providers are encouraged to practice Trauma Informed Practices, Motivational Interviewing, and Participant-Centered Housing Stability Planning. This standard may be flexible in cases of immediate safety concerns or other extreme circumstances.

Rapid Rehousing Eligibility, Rent Policies and Prioritization

Rapid Rehousing Eligibility

For Rapid Rehousing programs, households must meet the HUD's definition of homelessness under Category 1, any subsequent CoC Program Notice of Funding Opportunity (NOFO) eligibility requirements, and any additional funder eligibility requirements. Rapid Rehousing projects must commit to a Housing First, participant-centered approach whereby any eligible household can be served regardless of severity of service needs or length of time homeless, particularly if a more intensive housing intervention is not available in the CoC or the county in which the household chooses to reside.

Rapid Rehousing programs will specifically target households experiencing literal homelessness (Category 1), households actively fleeing domestic violence (Category 4), and households where the head of household is an unaccompanied or parenting youth or single guardian with dependents. Currently, the CoC's RRH inventory is only available for those between the ages of 18 – 24.

Rapid Rehousing Prioritization

Eligible participants are referred to Rapid Rehousing resources based on the following prioritization:

- 1. Households eligible and prioritized for Permanent Supportive or Transitional Housing where either a) that housing type is not immediately available with the participant's preferred geography, or b) the participant chooses RRH over PSH
- 2. Any individual or family currently fleeing domestic violence or experiencing Category 4 homelessness
- 3. Families and individuals whose score on the Coordinated Entry Assessment Tool indicates a moderate to high vulnerability.
- 4. Households with the longest history of homelessness
- 5. Households expected to sustain housing once they have addressed housing barriers through case management

RRH Emergency Transfers Prioritization under VAWA

When RRH assisted program participants qualify for an emergency transfer under VAWA protections, and a safe unit is not immediately available for an internal emergency transfer, the individual or family shall have priority over all other Coordinated Entry participant for rapid rehousing housing projects, provided that the individual or family meets all eligibility criteria required by Federal law or regulation or HUD NOFA; and the individual or family meets any additional criteria or preferences established by a project that houses specific populations.

The individual or family shall not be required to meet any other eligibility criteria or preferences for the project. The individual or family shall retain their original homeless or chronically homeless status for the purposes of the transfer.

Rapid Rehousing Minimum Service Standards

All referrals to Rapid Rehousing will be made through the coordinated entry system. The following minimum standards will be applied to all Rapid Rehousing programs

Maximum participation in a Rapid Rehousing program cannot exceed 24 months

- Support services must be provided throughout the duration of stay in housing. Supportive services must be provided at least monthly.
- Program participants must enter into a lease agreement with the landlord/owner for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.
- RRH projects will not administer drugs tests, impose income requirements or require services (case management, mental health, and behavioral health) as a condition of housing, except where required by funders. Providers are encouraged to practice Trauma Informed Practices, Motivational Interviewing, and Participant-Centered Housing Stability Planning. This standard may be flexible in cases of immediate safety concerns or other extreme circumstances.

Rapid Rehousing Rent Guidelines

Rental assistance will be tailored to the individual needs of each household and delivered in a progressive manner, beginning with the least assistance necessary to house the household and continuing thereafter on an as needed basis. Each RRH provider will submit its rent guidelines and justification for these guidelines to the CoC Board for review, and if necessary, the Board will respond with recommended changes. Providers are encouraged NOT to

impose "one size fits all" assistance packages and instead work within the flexibility allowed by the funder to deliver effective, individualized rental assistance and supportive services to meet unique participant needs. Providers are also strongly encouraged to ensure participants fully understand the limitations of RRH funding and ensure responsible, transparent participant rent sharing as part of their service delivery. The CoC recognizes that some households may only need a single financial assistance payment and short-term services, while other households (particularly those with the highest barriers who cannot otherwise immediately access PSH) may need the full range of rental assistance and services allowed under the funder's program requirements.

Transitional Housing Eligibility and Prioritization

Transitional Housing Eligibility

For transitional housing programs in the Three County CoC, households must meet the HUD definition of homelessness, under Categories 1 or 4. Once meeting the following eligibility requirements, households are then prioritized by Three County's target populations based on the unique criteria for the CoC's transitional housing programs. Transitional Housing programs will specifically target households experiencing literal homelessness (Category 1), households actively fleeing domestic violence (Category 4), and households where the head of household is an unaccompanied youth or single guardian with dependents.

Households qualify as Category 1 if they are:

- Sleeping in a place not designed for or used as a regular sleeping accommodation, including the street, a car, park, abandoned building, bus or train station, airport, camping ground etc.
- living in a shelter designed to provide temporary living arrangements (including emergency shelter, congregate shelters, transitional housing, hotels and motels paid for by charitable organizations or by government programs)
- Exiting an institution where they resided for ≤ 90 days, and were residing in an emergency shelter or place not meant or human habitation immediately prior to entering the institution

Households qualify as Category 4 if they are:

- Experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing.

Prioritization for Transitional Housing

The process for prioritizing households for transitional housing first includes eligible households based on HUD's homeless definition, and then secondly based on the below prioritization. Transitional Housing facilitates the movement of homeless households to permanent housing within 24 months of entering transitional housing.

In the Three County CoC, each transitional housing program has its own eligibility criteria. At entry, this may be based on the subpopulation served—such as age, gender, family composition, severity of behavioral health issues, etc. If multiple households meet the transitional housing programs individualized eligibility criteria, then prioritization will take place in the following order:

Households with the highest service needs will be prioritized first.

- 1. Eligible households who, after being presented with any permanent housing options available to them, choose to instead pursue a Transitional Housing environment.
- 2. Length of time homeless
- 3. Falling under one of the target populations for transitional housing:
 - a. Single guardian with dependents
 - b. Family with head of household between the ages of 18-24 years old
 - c. Households fleeing domestic violence
 - d. Households with severe service needs that threaten their immediate health or safety and who cannot safely live in an independent living environment but for whom institutional recovery or treatment services are not desired or available.

TH Emergency Transfers Prioritization under VAWA

When TH assisted program participants qualify for an emergency transfer under VAWA protections, and a safe unit is not immediately available for an internal emergency transfer, the individual or family shall have priority over all other Coordinated Entry participants for transitional housing projects, provided that the individual or family meets all eligibility criteria required by Federal law or regulation or HUD NOFA; and the individual or family meets any additional criteria or preferences established by a project that houses specific populations.

The individual or family shall not be required to meet any other eligibility criteria or preferences for the project. The individual or family shall retain their original homeless or chronically homeless status for the purposes of the transfer.

Transitional Housing Minimum Service Standards

The following minimum standards will be applied to all transitional housing programs:

- Maximum length of stay cannot exceed 24 months (except for YHDP programs serving youth and young adults).
- Assistance in transitioning to permanent housing must be provided. Permanent housing plans are established immediately upon intake to the Transitional Housing program, even if those plans anticipate a prolonged length of stay in TH prior to moving to PH.
- Support services must be provided throughout the duration of stay in transitional housing.
- Program participants in transitional housing must enter into a lease, sublease or occupancy agreement for a term of at least one month. The lease, sublease or occupancy agreement must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months (or 36 months for YHDP TH programs).

Ineligible Participants

A project that is following a housing first approach may request information related to a potential program participant's sex offender status, criminal history, or other information which was either informed during Coordinated Entry Assessment, or as general practice for that program's intake process. Information obtained at any point during assessment or identified during intake screenings should be used to determine the most appropriate housing placement and not to screen out an otherwise eligible individual or family.

The only exception to this policy is for site-based projects. In these instances, it is possible that an individual or family may be screened out of the site-based project based on a background check (e.g., if an individual is a registered sex offender and cannot live near children and the site has a household with children residing in it); however, HUD encourages the recipient or subrecipient of that project to work with the individual or family presenting for assistance and the coordinated entry system, to identify another appropriate housing placement.

Individual Projects may have specific eligibility criteria based on expectations from funding sources, but COC funded projects should make every effort to house through the Coordinated Entry process.

*Individuals and families should never be removed from the CE By Names List due to histories that are thought to increase difficulty to house.

Homelessness Prevention, Eligibility and Prioritization

Individuals and families who are currently housed, but at risk of losing that housing, should be referred to regional or subregional providers (agencies) for homelessness prevention programming, which may include ESG supported services. These households should be provided with referrals to agencies that are the most geographically accessible. Upon referral, households will be screened and assessed by appropriate regional and sub-regional agencies to determine the following: what programming and resources a household is eligible to receive, which may include a screening for ESG supported interventions and resources; what resources are currently available; and what are the most appropriate interventions for a household. Because most of these at-risk households currently have housing – even if it is insecure in the near term – they would not score highly in terms of vulnerability, and the 'right-size' resource for them will typically include one or a combination of the following: financial support, legal counseling, housing counseling, case management, housing search, and/or community based or court connected mediation to keep them in their current home or divert them from homelessness. The Coordinated Entry Assessment Tool does not need to be completed for these at-risk households until they have become literally homeless, at which time the referral to an agency providing more than prevention will be their entry point in the system. The policy will continue to be developed to ensure consistency with EOHLC's anticipated prescribed policy regarding homeless prevention and coordinated entry.

Youth and Young Adult Eligibility Specifications

Youth and Young Adults Referred through the CoC to YHDP or CoC funded projects must meet HUD definition of Homelessness of Category 1, 2, or 4. Category 1 should be prioritized for PSH. Young people in the Three County CoC will be referred to YHDP-funded projects if, when presenting for assistance, they report that their current, primary nighttime residence (or homelessness) is within the Franklin County limits. Primary nighttime residence may refer to an unsheltered sleeping place, Emergency Shelter, Transitional Housing, a housing situation in which they are at risk of becoming homeless, or a housing situation from which they are fleeing or attempting to flee DV etc.

Program Evaluation

The Coordinated Entry program will be evaluated annually using a participatory evaluation model and a mixed methods approach.

The evaluation will be overseen by an outside consultant and will occur each spring, starting in 2020, reporting to the CoC Staff by the agreed upon date each year on the quality and effectiveness of the coordinated entry experience of both the participating projects and participants via surveys, focus groups, CE data, and key informant interviews. The evaluation will also measure the Coordinated Entry process's adherence to HUD's expectations and guidance for effectiveness. Those participating in the evaluation process will be representative of the diversity of participating households and individuals in the CoC region. The results of the CE evaluation will be reviewed by the CoC's Equity & Inclusion Committee.

Participant surveys may be incorporated into Exit Interviews from Shelter or TH into PH and will also include a survey link for responses from current project participants. The survey will reflect a representative sample of participants as noted above, is voluntary, and intended only for the purposes of improving the CE system.

Improvements to the process will be made after the conclusion of the annual evaluation period, based on the strengths and limitations of the process emerging from the evaluation.

HUD, CE, and Housing Definitions

Advocate: one who assists in the planning, coordination, monitoring, and evaluation of services for a participant with emphasis on quality of care, continuity of services, and proper administration of their goals and programming.

Affordable Housing: In general, housing for which the occupant(s) is/are paying no more than 30 percent of his or her income for housing costs, including utilities. Some jurisdictions may define affordable housing based on other, locally determined criteria.

Case Conference: A meeting held between Coordinated Entry providers to discuss participant details for the purpose of coordinating care. In the Three County CoC these meetings are held weekly in each of the three counties.

Chronic Homelessness (CH): The definition of "chronically homeless", as stated in Definition of Chronically Homeless final rule is:

(a) A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

i. lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

ii. Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i).

Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;

- (b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering the facility;
- A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless

Homeless in this definition means that the individual is living either in a place not meant for human habitation (in their car, in a tent in winter, in an abandoned building, etc.), a safe haven (program for people who have severe mental illness and are homeless), or in an emergency shelter, or in an institutional care facility (in a hospital, substance program, etc.) but they were homeless prior to entering the facility.

Collaborative Applicant: the eligible applicant designated by the CoC to collect and submit the CoC Registration, CoC Consolidated Application (which includes the CoC Application and CoC Priority Listing), and apply for CoC planning funds on behalf of the CoC during the CoC Program Competition.

Consolidated Application: The CoC **Consolidated Application** is made up of two parts: the CoC Application and the CoC Priority Listing, with all of the CoC's project applications either approved and ranked, or rejected. The Collaborative Applicant is responsible for submitting both the CoC Application and the CoC Priority Listing in order for the CoC Consolidated Application to be considered complete.

Continuum of Care (CoC): A collaborative funding and planning approach that helps communities plan for and provide, as necessary, a full range of emergency, transitional, and permanent housing and other service resources to address the various needs of homeless persons. HUD also refers to the group of service providers involved in the decision-making processes as the "Continuum of Care." The Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for

efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency.

Coordinated Entry (CE): a standardized access, assessment, and referral process for housing and other services across agencies within a CoC to assist individuals and families seeking housing and services.

CE Partner: Coordinated Entry Partners are organizations/agencies which participate in the Three County Continuum of Care Coordinated Entry System in any way. This could refer to local emergency services, libraries, or other public services which assess visitors interested in participating in CE, CoC Funded and Unfunded Projects, emergency housing programs and case workers.

Emergency Shelter (ES): is any facility whose primary purpose is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless. In Massachusetts we have a large ES program run by the State specifically for families.

Emergency Solutions Grant Program (ESG): A federal program that provides homelessness and homelessness prevention programing to designated states and local governments. ESG programming includes Street Outreach to unsheltered persons experiencing homelessness, Emergency Shelter, Rapid Rehousing, and Homelessness Prevention. ESG Rapid Rehousing, when available in communities, must participate and take referrals from Coordinated Entry.

Executive Office of Housing and Livable Communities (EOHLC): EOHLC (previously known as DHCD, Department of Housing and Community Development) is the Massachusetts housing and community development agency, providing programs and service to households throughout the commonwealth. EOHLC distributes funding to municipalities, oversees the state-aided public housing portfolio, and operates the state's Emergency Family Shelter (EA) program.

Geographic Preference: The area, within the Continuum, that an Individual or family wants to reside and therefore may choose housing opportunities only available in that area.

HEARTH Act: The Homeless Emergency Assistance and Rapid Transition to Housing (**HEARTH**) Act of 2009 amends and reauthorizes the McKinney-Vento Homeless Assistance Act with substantial changes, including:

- A consolidation of HUD's competitive grant programs
- The creation of a Rural Housing Stability Assistance Program
- A change in HUD's definition of homelessness and chronic homelessness
- A simplified match requirement
- An increase in prevention resources
- An increase in emphasis on performance

Homelessness Management Information System (HMIS): is a computerized data collection system designed to capture participant-level information over time on the characteristics and service needs of men, women, and children experiencing homelessness, while also protecting participant confidentiality. It is designed to aggregate participant-level data to generate an unduplicated count of participants served within a community's system of homeless services. An HMIS may also cover a statewide or regional area, and include several CoCs. The HMIS can provide data on participant characteristics and service utilization.

U.S. Department of Housing and Urban Development (HUD): Established in 1965, HUD is a cabinet-level agency that oversees federal programs designed to help Americans with their housing needs. HUD's mission is to increase homeownership, support community development, and increase access to affordable housing free from discrimination. The agency enforces federal housing laws, operates mortgage-supportive initiatives and distributes millions of dollars in federal grants.

Housing First (HF): is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements.

Housing Opportunities for Persons with AIDS (HOPWA): Provides housing assistance and supportive services to lowincome people with HIV/AIDS and their families. HOPWA funds may also be used for health care and mental health services, chemical dependency treatment, nutritional services, case management, assistance with daily living, and other supportive services.

No Wrong Door: a model of integrated and coordinated service delivery based on the premise that every door in the service system should be the right door. It represents a philosophy whereby service providers are committed to actively engaging people to ensure they receive appropriate and adequate support for their needs regardless of their initial entry point.

NOFO: The **Notice of Funding Opportunity** is a notice published each year on Grants.gov for HUD's Discretionary Funding Programs. This notice describes the type of funding available on a competitive basis. The deadline for submission is typically 60 to 90 days from the date of NOFO publication.

Participant-centered: Participant-centered (also referred to as person-centered) models are characterized by:

- inclusion of subpopulations present in Three County, including, but not limited to, homeless veterans, youth, families with children, and victims of domestic violence
- strongly incorporating participant choice, focusing on strengths and needs of participants

Examples of participant-centered models include Housing First victim-centered approaches,

Participatory Evaluation Model: Participatory evaluation is an approach that involves the stakeholders of a program or policy in the evaluation process. This involvement can occur at any stage of the evaluation process, from the evaluation design to the data collection and analysis and the reporting of the study.

Point of Contact: The specific staff person at an organization or agency responsible for all contact with a particular participant. In most scenarios in this CoC the **Point of Contact** will be the participant's advocate.

Project (CoC): A Program that is funded as the subrecipient for HUD funds, that has applied for and been approved by the Continuum, to provide Housing and Supportive Services to a priority population.

Permanent Supportive Housing (PSH): is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability.

Recipient: The Agency or Organization Awarded the CoC HUD funds. In this Continuum, that is the Collaborative Applicant.

Rapid Rehousing (RRH): RRH rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services.

Subsidized Housing: housing for low or very low-income households where the rent is capped at a percent of the occupant's income (often 30-40%). Public housing is a type of subsidized housing, as is a Housing Choice Voucher (Section 8).

Subrecipient: The "Project" within an Agency or Organization that enters into a contract with the Recipient or Collaborative Applicant for funding and resources which follow the programs expectations within the guidelines and Interim Rule.

Supportive Services Only (SSO): This program provides services to homeless individuals and families living in the community. SSO recipients may use the funds to conduct outreach to sheltered and unsheltered homeless persons and families, link participants with housing or other necessary services, and provide ongoing support.

Trauma Informed: Approaches delivered with an understanding of the vulnerabilities and experiences of trauma survivors, including the prevalence and, physical, social, and emotional impact of trauma. This approach recognizes signs of trauma in staff, participants, and others and addresses this by integrating knowledge about trauma into policies or procedures and practices. Trauma

informed practices place priority on restoring survivor's feelings of safety, choice and control. Programs, services, organizations & communities can be trauma-informed.

Transitional housing (TH): provides temporary housing for the certain segments of the homeless population, including working homeless making insufficient wages or homeless individuals with mental or physical disabilities who have trouble affording long-term housing, and is set up to transition their residents into permanent, affordable housing within a reasonable amount of time (usually 24 months).