



Department of Commerce

Washington State Coordinated Entry Guidelines

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1. Purpose and Overview

The purpose of a Coordinated Entry System (CES) is to provide the quickest access to the most appropriate housing to every household experiencing or at-risk of homelessness through a standardized assessment and referral process.

In January 2017, HUD released new requirements for CES ([CPD-17-01](#)). Homeless housing programs funded by the state Consolidated Homeless Grant (CHG), the federal Emergency Solutions Grant (ESG), and the Continuum of Care (CoC) grant must participate in coordinated entry (CE), either as an access point or by accepting referrals into housing programs.

Each CES must designate a lead agency or governing body. The CES must cover the same geographic region as the Commerce grantee's CHG. Participating programs must fill program openings exclusively through the CES and eliminate all side doors. If the Commerce grantee is a county government, homeless housing programs funded by local homeless housing surcharge revenue (local document recording fees) must also participate in the CES.

Commerce acknowledges in some counties, not all of the CES guidelines detailed will be relevant. Commerce grantees should consult with their grant manager for further clarification.

2. Marketing

The CES must develop and implement the following marketing components:

- ✓ Policies and procedures which include a marketing strategy (flyers, brochures, outreach to relevant partners) to ensure the CES is available to all eligible households regardless of actual or perceived race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity, or marital status, including those least likely to access homeless assistance.
- ✓ Advertisement of access points to all eligible persons, mainstream systems of care, and other community partners within the entire CES geographic region.
- ✓ Marketing materials and participant instruction available in multiple languages to meet the varying needs of those who speak other languages, have Limited English Proficiency (LEP), and/or have limited literacy abilities, as is locally appropriate.

3. Accessing the Coordinated Entry System

The CES policies and procedures must ensure all households in different populations have fair and equal access to the CES, including people experiencing chronic homelessness, veterans, households with children, youth, survivors of domestic violence, and those least likely to access homeless assistance.

The CES must be low-barrier, and adhere to state and federal anti-discrimination laws. Households cannot be screened out based on the following criteria:

- ✓ Having too little or no income
- ✓ Having poor credit or financial history
- ✓ Having poor or lack of rental history
- ✓ Having involvement with the criminal justice system
- ✓ Having active or history of alcohol and/or substance use
- ✓ Having a history of victimization
- ✓ The type or extent of disability-related services or supports that are needed

- ✓ Lacking ID or proof of U.S. Residency Status
- ✓ Other behaviors that are perceived as indicating a lack of “housing readiness,” including resistance to receiving services

The CES must develop and implement the following accessibility components:

- ✓ Appropriate accommodations to ensure the CES is available to all eligible households regardless of actual or perceived race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity, or marital status.
- ✓ Policies and procedures which include steps taken to ensure access points are fully accessible, including accessible physical locations for individuals who use wheelchairs, as well as a plan to offer reasonable accommodation as needed (e.g. a different access point, telephone number, or online access).
- ✓ Access points, if physical locations, are sited in proximity to public transportation and other mainstream services, or offer some variation to the assessment process. For example, a person with a mobility impairment may request a reasonable accommodation in order to complete the CES intake and assessment process at a different location.
- ✓ Policies and procedures that ensure effective communication with individuals with disabilities, including access to all appropriate auxiliary aids and services necessary (e.g. braille, large type, assistive listening devices, sign language interpreters).
- ✓ CES materials and participant instruction available in multiple languages to meet the varying needs of those who speak other languages, have LEP, and/or have limited literacy abilities, as is locally appropriate.
- ✓ CES can have different access points for different populations (see list of populations under ‘Assessment’ section). Access points that do not assess certain populations must immediately refer those households to an appropriate CES access point. Households included in more than one population for which an access point is dedicated (for example a youth who is fleeing domestic violence) must be served at whichever access point they choose, so long as they qualify as a target population.

3.1 Emergency Services¹

- ✓ Policies and procedures must outline the processes which ensure information about how to access emergency services is available independent of the operating hours of the CES, and describe how households will be connected to the CES from emergency services when the CES next opens.
- ✓ Emergency services are not required to be prioritized.
- ✓ Policies and procedures must state whether or not emergency services will be prioritized and how they will be accessed if the assessment and prioritization process will not be used.

3.2 Street Outreach

- ✓ Street outreach efforts funded with CHG, ESG and/or CoC must be linked to the CES process.
- ✓ If street outreach workers administer CES assessments, policies and procedures must describe how households encountered by street outreach workers are offered the same standardized assessment process as households who access the CES through site-based access points.

¹ Emergency services may include domestic violence and emergency services hotlines, drop-in service programs, and emergency shelters, including domestic violence shelters and other short-term crisis residential programs

3.3 Homeless Prevention

Prevention programs funded with CHG, ESG, and/or CoC must participate in CES. Policies and procedures must document the process for prioritizing households seeking access to homelessness prevention services. CES can have a separate access point for prevention.

3.4 Victim Services

Victim service providers² funded with CHG, ESG, and/or CoC must either:

- ✓ Serve as an access point or as a program accepting referrals in the CES, or
- ✓ Establish and adhere to a comparable assessment and prioritization process for households who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or trafficking which meets the requirements of this document.
 - Commerce acknowledges for victim service providers in some counties, not all of the CES guidelines detailed will be relevant. Commerce grantees should consult with their grant manager for further clarification.

Whether or not victim service providers are participating in the CES, the CES must consult and incorporate guidance from all relevant victim service providers when developing CES policies and procedures in order to ensure accessibility, safety, and confidentiality for households who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or trafficking. At a minimum, the CES must partner with all relevant victim service providers to develop and implement the following policies and procedures:

- ✓ A process to guide the operation of the CES to address the needs of households who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or trafficking, but who are seeking shelter or services from non-victim specific providers.
- ✓ A process to ensure this population has safe and confidential access to the CES.
- ✓ A process to ensure immediate access to emergency services such as domestic violence helplines and shelter.

Victim service providers must also meet the requirements established by [Washington Administrative Code Chapter 388-61A](#).

4. Assessment and Prioritization

4.1 Assessment

All households entering the CES must complete an initial assessment that is used to inform a uniform prioritization process. Households with the greatest need must be prioritized and matched with services

² Victim Service provider is an organization whose primary mission is to provide direct services (which may include shelter and/or housing services) to survivors of domestic violence, sexual assault, stalking, trafficking and/or other crimes. A list of Washington Domestic Violence programs can be found here: <https://wscadv.org/washington-domestic-violence-programs/>. A list of Washington Accredited Community Sexual Assault Programs can be found here: <http://www.wcsap.org/find-help>.

that will help them quickly exit homelessness. The CES must implement the following assessment standards³:

- ✓ All assessment tools must aim to determine which households have the greatest need and all factors included in the assessment must be based on the greatest need.
- ✓ Assessment tools used with homeless households, excluding households fleeing DV and homeless youth under the age of 18, must include the following factors:
 - Chronic homelessness as defined by HUD
 - Length of time homeless
 - Unsheltered
- ✓ Assessment tools may also include any combination of the following factors, including:
 - Vulnerability to illness or death.
 - Vulnerability to victimization, including physical assault, trafficking or sex work.
 - Significant challenges or functional impairments, including any physical, mental, developmental or behavioral health disabilities regardless of the type of disability, which require a significant level of support in order to maintain permanent housing. This factor focuses on the level of support needed, not the disability type.
 - High utilization of crisis or emergency services to meet basic needs.
 - Other factors which may determine greatest need.
- ✓ Policies and procedures must include assessment information, factors, and documentation of the criteria used for uniform decision-making across access points and staff.
- ✓ Different assessment processes may be used for the following populations:
 - Households with children
 - Single adults
 - Households fleeing domestic violence, dating violence, sexual assault, stalking, trafficking, or other dangerous or life-threatening conditions
- ✓ A different assessment process should be used for households at risk of homelessness.
- ✓ A different assessment process should be used for youth and young adults. For information, see the [Department of Commerce Office of Homeless Youth](#).
- ✓ Assessment tools must be used consistently at all access points in order to achieve fair, equitable and equal access to services within the community.
 - Each population must be assessed in the same way at each access point they are served.
- ✓ A CES is prohibited from denying assessment or services to a household if the household refuses to provide certain pieces of information, unless the information is necessary to establish or document program eligibility.
- ✓ Policies and procedures detailing assessment and prioritization processes must be publicly available.

4.2 Assessment Training

The CES lead must ensure all staff administering assessments receive training annually. Training may be in person, a live or recorded online session, or reading material.

The training curricula must include the following topics for staff conducting assessments:

³ CoC Program-funded PSH projects need to follow HUD Notice CPD-016-11, Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing, or any subsequent notices that update or replace CPD-016-11.

- ✓ Review of local CES policies and procedures, including any adopted variations for specific populations
- ✓ How to use assessment information to determine prioritization
- ✓ Criteria for uniform decision-making and referrals

4.3 Prioritization

All CES must develop and implement policies and procedures for the following prioritization components:

- ✓ Prioritization as a process separate from determination of eligibility, including:
 - Prioritizing eligible households for available housing resources, including transitional housing, permanent supportive housing, rapid rehousing, and prevention assistance. Policies and procedures must ensure that if a household is prioritized for one type of housing intervention, it does not exclude the household from another type of intervention. For instance, if a household is prioritized for permanent supportive housing, but there are no units available, that household should be served with the first available intervention for which the household is eligible.
- ✓ Process by which households seeking assistance and household’s service providers are given an opportunity to give additional information which should be considered in prioritization decisions. Assessment tools alone may not capture all the information necessary to determine vulnerability. However, only information relevant to prioritization factors established in CES policies and procedures may be used to make prioritization decisions.
- ✓ Process by which households may appeal referral and prioritization decisions.

5. Referral

The CES must develop and implement the following referral standards:

- ✓ Policies and procedures which ensure referral rejections by providers are justified, rejected households are immediately referred to appropriate services, and which specify the conditions for households to maintain their place on CES prioritization lists when a provider rejects a referral.
- ✓ Policies and procedures that specify the conditions for households to maintain their place in CES prioritization lists when households reject a referral. Households have the right to reject housing and service options without retribution or limiting their access to other forms of assistance.
- ✓ Up-to-date information on program capacities, vacancies, and eligibility criteria.
- ✓ Rent limit policies as required by funding sources are consistently followed.

6. Household Protections

6.1 Privacy

All CES must develop and implement policies and procedures for obtaining household consent to share and store household information for purposes of assessing and referring households through the CES. If the CES maintains a prioritization list outside of HMIS, the CES must extend the same HMIS data privacy and security protections prescribed by HUD for HMIS practices in the HMIS Data and Technical Standards. The policies and procedures must reflect the following privacy protections:

- ✓ A CES is prohibited from denying assessment or services to a household if the household refuses to provide certain pieces of information, unless the information is necessary to establish or document program eligibility per the applicable program regulation.
- ✓ A CES is prohibited from denying services to households if the household refuses to allow their data to be shared unless Federal statute requires collection, use, storage, and reporting of a household's personally identifiable information condition of program participation.
- ✓ Records containing personally identifying information must be kept secure and confidential and the address of any family violence project not be made public.
- ✓ The assessment and prioritization process cannot require disclosure of specific disabilities or diagnoses. Specific diagnosis or disability information may only be obtained for purposes of determining program eligibility to make appropriate referrals.

6.2 Non-Discrimination

Recipients of federal and state funds must comply with all applicable civil rights and fair housing laws and requirements. All CES must comply with the nondiscrimination and equal opportunity provisions of federal civil rights laws as specified at 24 CFR 5.15(a), including, but not limited to, the following:

- ✓ Fair Housing Act prohibits discriminatory housing practices (including but not limited to "steering" participants towards any particular housing facility or neighborhood) based on actual or perceived race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity, or marital status.
- ✓ Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving federal financial assistance.
- ✓ Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin under any program or activity receiving federal financial assistance.
- ✓ Title II of the Americans with Disabilities Act prohibits public entities, which includes state and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing-related services such as housing search and referral assistance.
- ✓ Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.
- ✓ HUD's Equal Access Rule at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status, including any projects funded by the CoC Program, ESG Program, and HOPWA Program. The CoC Program interim rule also contains a fair housing provision at 24 CFR 578.93. For ESG, see 24 CFR 576.407(a) and (b), and for HOPWA, see 24 CFR 574.603.
- ✓ A CES must not use data collected from the assessment process to discriminate or prioritize households for housing and services on a protected basis, such as actual or perceived race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity, or marital status, including those least likely to access homeless assistance.
- ✓ Households must not be denied access to the CE process on the basis that the household is or has been a victim of domestic violence, dating violence, sexual assault or stalking.

6.3 Grievance

Households must be notified of their right to submit grievances and in what manner they can submit grievances, including nondiscrimination and equal access complaints. The local CES policies and procedures must include the procedure for submitting and reviewing grievances.

7. Evaluation

The CES lead or governing body must complete an evaluation of the CES annually. Policies and procedures detailing the evaluation process must include:

- ✓ Frequency and method by which the CES evaluation will be conducted.
- ✓ A review of the intake, assessment, and referral processes, in partnership with all programs in the system.
- ✓ Collection of information and feedback from participating programs and program participants (e.g. survey, focus groups, involvement in meetings, etc.).
- ✓ Documentation of adequate privacy protections of all household information collected.
- ✓ Description of how program participants will be selected to provide feedback.
- ✓ Description of the process by which the evaluation is used to implement updates to existing policies and procedures.

Commerce grantees/CoC agency must maintain documentation of the evaluation process and evaluation results.

8. Resources

Chronic Homeless Definition. HUD, 2017.

<https://www.hudexchange.info/homelessness-assistance/resources-for-chronic-homelessness/>

Coordinated Entry Core Elements. HUD.

<https://www.hudexchange.info/resources/documents/Coordinated-Entry-Core-Elements.pdf>

Coordinated Entry Notice, CPD-17-01. HUD, January 2017.

<https://www.hudexchange.info/resources/documents/Notice-CPD-17-01-Establishing-Additional-Requirements-or-a-Continuum-of-Care-Centralized-or-Coordinated-Assessment-System.pdf>

Coordinated Entry Process Self-Assessment. HUD.

<https://www.hudexchange.info/resources/documents/coordinated-entry-self-assessment.pdf>

Coordinated Entry and Victim Service Providers. HUD, November 2015.

<https://www.hudexchange.info/resource/4831/coordinated-entry-and-victim-service-providers-faqs/>

Equal Access Rule. HUD, 2011.

<https://www.hud.gov/sites/documents/5359-F-02EQACCESSFINALRULE.PDF>

Fair Housing Act. Department of Justice, August 2015.

<https://www.justice.gov/crt/fair-housing-act-2>

Incorporating DV Providers into Coordinated Assessment. NAEH, September 2012.
<https://endhomelessness.org/resource/incorporating-dv-providers-into-coordinated-assessment/>

Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing, Notice CPD-16-11. HUD, July 2016.
<https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf>

Section 504 of the Rehabilitation Act. Government Publishing Office, 1973.
<https://www.gpo.gov/fdsys/pkg/STATUTE-87/pdf/STATUTE-87-Pg355.pdf>

Section 504 Frequently Asked Questions. HUD.
https://www.hud.gov/program_offices/fair_housing_equal_opp/disabilities/sect504faq

Title II and III of the Americans with Disabilities Act. Congress.Gov, 1990.
<https://www.congress.gov/bill/101st-congress/senate-bill/933/text?q=%7B%22search%22%3A%5B%22americans+with+disabilities+act%22%5D%7D&r=1>

Title VI of the Civil Rights Act. Department of Justice, January 2016.
<https://www.justice.gov/crt/fcs/TitleVI-Overview>

Youth Specific FAQs for Coordinated Entry. HUD, August 2016.
<https://www.hudexchange.info/resource/5135/coordinated-entry-and-youth-faqs/>