



Department of Commerce

Washington State Coordinated Entry Guidelines

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TABLE OF CONTENTS

1	Introduction	5
1.1	Coordinated Entry Guidelines in Washington State	5
1.2	Purpose	6
1.3	Policies and Procedures	6
2	Governance	7
2.1	Composition	7
2.1.1	Victim Services	8
2.2	Participation	8
2.2.1	Exception for Emergency Shelter	9
2.3	Prioritization Policy	9
2.3.1	Subpopulation Prioritization	10
2.4	System Evaluation	11
3	Accessing the CE System	11
3.1	Accessibility	12
3.2	Marketing	13
3.3	Access Points	13
3.3.1	Subpopulation Dedicated Access Points	14
3.4	Emergency Services	14
3.5	Street Outreach	14
4	Assessment	15
4.1	Subpopulation Assessment Processes	16
4.2	Diversion	16
4.3	Assessment Training	16
5	Prioritization Process	17
5.1	Prioritization Tools	18
5.2	Dynamic Prioritization	19
6	Referral	21
7	Household Protections	22

7.1 Grievance and Appeal Process 22

7.2 Privacy 22

7.3 Non-Discrimination 23

8 Appendices..... 25

8.1 Allowances by Subpopulation 25

8.2 Requirements Specific to Washington State..... 26

8.3 Resources 28

8.4 Policy and Procedure Template 29

1 Introduction

1.1 Coordinated Entry Guidelines in Washington State

In January 2017, HUD released new requirements for coordinated entry (CE) systems ([CPD-17-01](#)).

The Washington State CE Guidelines incorporate the requirements of CPD-17-01 and requirements and clarifications specific to systems funded by the Washington State Department of Commerce (Commerce).

In the Washington State CE Guidelines, *crisis response system* refers to all of the services and housing available in the lead Consolidated Homeless Grant grantee's jurisdiction (i.e. county) for households who are experiencing homelessness or at-risk of homelessness. A county CE system incorporates all of the resources in their crisis response system.

In addition to this document, Commerce encourages review of the following published guidance:

[Notice CPD-17-01](#)

[CE Policy Brief](#)

[CE Core Elements](#)

[CE Management and Data Guide](#)

[Office of Homeless Youth Recommendations for Youth and Young Adults](#)

[Youth Specific FAQs for CE](#)

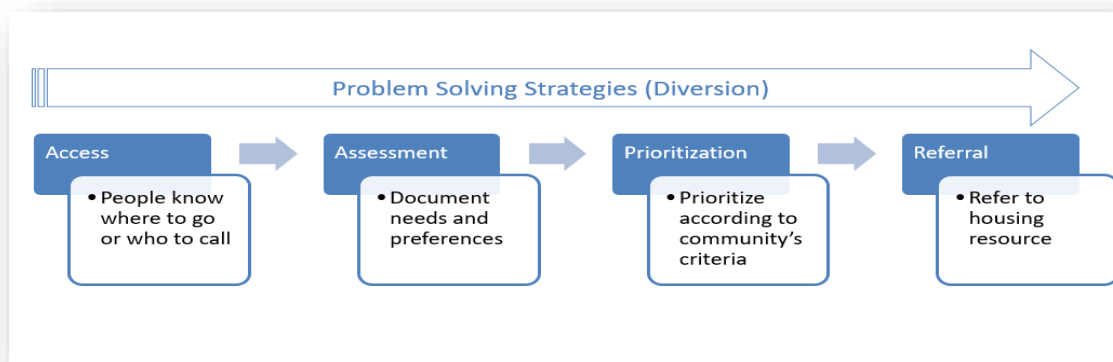
[Incorporating DV Providers](#)

1.2 Purpose

The purpose of a crisis response system is to ensure homelessness for all households is rare, brief, and one time.

CE promotes system-wide coordination for a more effective and strategic response to homelessness. CE helps a crisis response system transition from project-focused to person-focused. Through CE, systems can monitor an inventory of housing resources and ensure households are prioritized for available services based on need and vulnerability. Implementation of CE also provides crisis response systems with comprehensive data for planning and resource allocation.

In practice, CE aims to guide households experiencing a housing crisis through the crisis response system by providing immediate access to the most appropriate housing through a standardized assessment, prioritization, and referral process.



1.3 Policies and Procedures

Each section ends with a summary of required CE policies and procedures. A template policy and procedure is located in Appendix 8.4.

POLICY: Describes a management decision.

PROCEDURE: Lists the steps a team takes to complete an action.

All CE policies and procedures required in this document must be publicly available.

2 Governance

Each CE system must designate a governing body. The governing body is responsible for the general management of CE. It also facilitates coordination among all projects within the CE system, and ideally, all existing projects within the crisis response system.

The roles of the governing body include¹:

- Planning: facilitate system design process.
- Policy oversight: establish and review policies and procedures, including CE prioritization policies (Section 2.3).
- Management: oversight of day-to-day work-flow of the CE process.
- Evaluation: assess system performance to inform policies and procedures.
- Community engagement: establish and maintain buy-in from entire crisis response system, and continually gather feedback from the crisis response system to inform policies and procedures.

2.1 Composition

The governing body membership should reflect a balance of people with lived experience of homelessness and homeless crisis response system representatives. Additionally, the governing body must include relevant mainstream service providers².

By July 1, 2019 the governing body must include at least two people with lived experience of homelessness.

Governing body members must be offered compensation for their time, if they are not otherwise compensated by their employer to participate.

Recommended: the membership of the governing body is demographically representative of the homeless population; particularly in terms of race, ethnicity, gender identity, sexual orientation, and geographic location.

POLICY: CE Governing Body Structure and Participation Requirements

¹ The roles of the governing body may be executed by a single entity, or separately by different entities.

² Examples: behavioral, physical, and mental health organizations, public housing agencies, affordable housing operators, VA Centers, Department of Social and Health Services Community Services Offices, McKinney Vento Liaisons, early education and early childhood care providers, hospitals, correctional facilities, workforce investment programs.

2.1.1 Victim Services

Victim service providers³ are not required to participate in CE as an access point or by accepting referrals.

However, the CE governing body must consult and incorporate guidance from all relevant victim service providers when developing policies and procedures. This is to ensure accessibility, safety, and confidentiality for households who are fleeing, or attempting to flee, violence (domestic violence, dating violence, sexual assault, stalking, or trafficking).

At a minimum, the CE governing body must partner with all relevant victim service providers to develop and implement the policies and procedures listed below.

POLICY: CE System Victim Services Partnerships

PROCEDURE: Process for households fleeing violence and seeking services from non-victim specific providers

PROCEDURE: Process to ensure safe and confidential access to the CE system

PROCEDURE: Process to ensure immediate access to emergency services, such as domestic violence helplines and shelter

2.2 Participation

Homeless housing and homelessness prevention projects funded by, but not limited to, the fund sources listed below must participate in CE as an access point or by accepting referrals. Participating projects accepting referrals must fill openings exclusively through the CE system and eliminate all side doors.

- Consolidated Homeless Grant (CHG), includes Housing and Essential Needs (HEN)
- Federal Emergency Solutions Grant (ESG)
- Federal Continuum of Care (CoC) Program
- Federal HOME Tenant-Based Rental Assistance (TBRA)
- If the Commerce grantee is a county government, homeless housing projects funded by local homeless housing surcharge revenue (local document recording fees) must also participate in the CE system.

Recommended: All homeless housing and homelessness prevention projects within the crisis response system participate in the CE system.

Exception: Victim service providers and emergency shelters are not required to participate as an access point or by accepting referrals.

³ Victim Service providers are organizations 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. While Washington State CE Guidelines do not require victim service providers to participate in CE, it should be noted that projects funded by ESG and/or CoC must meet HUD CE requirements. 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>.

2.2.1 Exception for Emergency Shelter

Emergency shelters⁴ are not required to participate in the CE system as an access point or by accepting referrals.

Whether or not a shelter should participate in the CE system will depend on factors such as shelter capacity and the type of services offered at the shelter. For example, drop-in shelters⁵ may not participate in the CE system due to the immediacy and urgency of the services provided. On the other hand, continuous-stay shelters⁶ may participate in order to prioritize beds in accordance with the CE system process.

CE system policies must identify which shelters will participate in CE.

POLICY: CE System Emergency Shelter Participation

2.3 Prioritization Policy

The governing body is responsible for establishing and implementing a system-wide prioritization policy.

CE must have a prioritization policy⁷ that describes who is considered in priority status. Prioritization identifies which households have the greatest need and will receive accelerated assistance to available housing resources.

CE must include required factors identified below in the prioritization policy. CE may include additional optional factors.

Required: At a minimum, criteria used by the CE system to determine prioritization for homeless households must include:

- Chronic homelessness as defined by HUD⁸
- Length of time homeless
- Unsheltered homelessness⁹

Optional: Additional criteria used for prioritization may include:

- Vulnerability to illness or death
- Vulnerability to victimization, including physical assault, trafficking, or sex work

⁴ Emergency shelter provides short term temporary shelter (lodging) for those experiencing homelessness. Emergency shelters can be facility-based, or hotel/motel voucher.

⁵ Drop-in shelters offer night-by-night living arrangements that allow households to enter and exit on an irregular or daily basis.

⁶ Continuous-stay shelters offer living arrangements where households have a room or bed assigned to them throughout the duration of their stay.

⁷ 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.

⁸ Documentation of chronic homelessness is not required by Commerce for the purposes of CE intake or assessment.

⁹ Unsheltered means currently living in a place not meant for habitation or fleeing domestic violence.

- 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 housing¹⁰
- High utilization of crisis or emergency services to meet basic needs
- Other factors which may determine greatest need, including risk of continued homelessness due to barriers such as criminal and housing history

Sometimes optional criteria in the prioritization policy may only relate to single adults, or may only relate to households with children. For example, a criteria such as *involvement in child welfare issues* only relates to households with children. In this example, *households with children* will be prioritized by chronic homelessness, length of time homeless, unsheltered homelessness, and involvement in child welfare issues. *Single adults* will be prioritized by chronic homelessness, length of time homeless, and unsheltered homelessness only.

POLICY: Prioritization (includes specific prioritization criteria)

2.3.1 Subpopulation Prioritization

The following subpopulations are *not required* to be prioritized by the mandatory criteria identified in Section 2.3.

- Households fleeing violence (domestic violence, dating violence, sexual assault, stalking, trafficking, or other dangerous or life-threatening conditions)
- Youth under the age of 18 and young adults up to age 24
- Households at-risk of homelessness

While these subpopulations must be prioritized based on greatest need and vulnerability, it is recommended that these subpopulations have unique prioritization criteria, which considers each subpopulation's specific needs and vulnerabilities.

For more information on developing a youth specific prioritization policy see the Office of Homeless Youth's [Five Recommendations for Making Coordinated Entry Work for Homeless Youth and Young Adults](#).

Housing and Essential Needs (HEN) eligible households are *not* allowed to have unique prioritization criteria.

POLICY: Subpopulation Specific Prioritization (if applicable)

¹⁰ This factor focuses on the level of support needed, not the disability type.

2.4 System Evaluation

The CE governing body must complete an annual evaluation of the CE system. The evaluation process must be documented in CE system policies and procedures.

Evaluation must include:

- A review of the intake, assessment, and referral processes, in partnership with all projects participating in the CE system.
- Collection of information and feedback from participating projects and project participants (e.g. survey, focus groups, involvement in meetings, etc.).
- Documentation of adequate privacy protections of all household information collected throughout the evaluation process.
- Description of how project 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.
- Documentation of the evaluation results.

POLICY: Evaluation Method and Frequency

PROCEDURE: Collecting information from projects and participants

PROCEDURE: Selecting project participants to provide feedback

PROCEDURE: Using evaluation for improvement

3 Accessing the CE System

Access refers to how people connect with crisis response services. The first contact that most households experiencing a housing crisis will have with the crisis response system is through a CE access point.

CE must be available to all households regardless of actual or perceived race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity, marital status, and U.S. residency status.

The CE system policies and procedures must ensure all households have fair and equal access to the CE system, including people experiencing chronic homelessness, veterans, households with children, youth and young adults, survivors of domestic violence, and those least likely to access services.

The CE system must be low-barrier, and adhere to state, federal, and local 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

- Lacking proof of U.S. Residency Status¹¹
- Other behaviors that are perceived as indicating a lack of “housing readiness,” including perceived resistance to receiving services

POLICY: CE System Access Criteria

PROCEDURE: Ensuring accessibility for all households

3.1 Accessibility

CE must develop and implement the following accessibility components:

- Physical access points must be accessible for people who use wheelchairs or mobility devices, and must provide reasonable accommodations as needed (e.g. a different access point, telephone number, or online access). Policies and procedures must include steps taken to ensure physical accessibility.
- Physical access points must be located near public transportation and other mainstream services, or offer variation to the assessment process. For example, a person with a mobility impairment may request a reasonable accommodation in order to complete the CE system intake and assessment process at a different location.
- Access points must 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, and sign language interpreters). Policies and procedures must include steps taken to ensure effective communication with individuals with disabilities.
- CE system materials must be available in multiple languages in order to serve those who speak other languages, have limited English proficiency, and/or have limited literacy abilities, as is locally appropriate.
- The CE system must ensure accessibility throughout its geographic jurisdiction. Access points must be designated to avoid forcing households to travel or move long distances to be served. Options to ensure access throughout the geographic jurisdiction include offering phone or electronic assessments and utilizing mobile outreach providers to administer assessments.

POLICY: CE System Accessibility

PROCEDURE: Physical accessibility and reasonable accommodations

PROCEDURE: Effective communication with individuals with disabilities

¹¹ [Immigration Status and Housing Discrimination Frequently Asked Questions.](#)

3.2 Marketing

Marketing, or advertising, refers to how households learn the CE system exists. This may include, but is not limited to, written materials such as flyers and brochures, outreach to relevant partners, community education, and street outreach.

The CE system must develop and implement the following marketing components:

- A marketing strategy to ensure the CE system is available to all households regardless of actual or perceived race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity, marital status, or U.S. residency status. This marketing strategy must be included in policies and procedures.
- A strategy to market to households who are the least likely to apply for services in the absence of special outreach. This marketing strategy must be included in policies and procedures.
- Advertisement of access points to all eligible persons, mainstream systems of care, and other community partners within the entire CE system's jurisdiction.
- Marketing materials must be 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.

POLICY: Marketing Strategy

PROCEDURE: Marketing to all households

PROCEDURE: Marketing to households least likely to apply

3.3 Access Points

The number of access points the CE system designates will depend on the capacity and geography of the crisis response system. The purpose of designating multiple access points is to ensure all people in the CE system's jurisdiction have equal access to the crisis response system.

When multiple access points exist within the CE system, each access point must provide equal access to emergency services, use common assessment approaches and tools, and prioritize persons for available resources according to the CE system's prioritization policies and procedures. Each access point must be available to all people experiencing a housing crisis.

Exception: Separate and distinct access points may be designated for the subpopulations listed in 3.3.1.

3.3.1 Subpopulation Dedicated Access Points

The CE system is allowed to designate separate and distinct access points for the following subpopulations:

- Households with children
- Individual adults (households without children)
- Households fleeing violence (domestic violence, dating violence, sexual assault, stalking, trafficking, or other dangerous or life-threatening conditions)
- Youth under the age of 18 and young adults up to age 24
- Households at-risk of homelessness
- HEN eligible households

Access points that do not assess certain populations must immediately refer those households to an appropriate CE access point. Procedures must include steps taken to ensure immediate and complete referral¹² to the appropriate access point.

Households included in more than one population for which an access point is dedicated must be served at whichever access point they choose, so long as they qualify as a target population. For example, a youth who is HEN eligible may be served at the HEN or youth access point.

For more information on establishing youth specific access points see the Office of Homeless Youth's [Five Recommendations for Making Coordinated Entry Work for Homeless Youth and Young Adults](#).

PROCEDURE: Referrals to subpopulation designated access point

3.4 Emergency Services

The CE system must ensure people are able to obtain information about how to access emergency services¹³ outside of the CE operating hours. Procedures must describe how people obtain information about accessing emergency services outside of the CE operating hours.

PROCEDURE: Access to emergency services

3.5 Street Outreach

Street outreach efforts¹⁴ must be linked to CE. Examples of approaches to link street outreach efforts to CE include designating street outreach as a defined access point, or training outreach staff to provide referrals to CE. Policies and procedures must describe how street outreach efforts are linked to CE.

POLICY: Linking Street Outreach Efforts

PROCEDURE: Outreach staff CE role

¹² *Complete referral* means staff take steps beyond providing contact information to the household (e.g. follow-up with household, communication with provider receiving referral, or physically assisting household to the appropriate access point).

¹³ 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.

¹⁴ Street outreach efforts funded by CHG, ESG, CoC, and TBRA.

4 Assessment

The assessment process is how CE gathers information about a household experiencing a housing crisis. Information gathered includes household needs, housing preferences, barriers to housing stability, and factors that might indicate vulnerability while homeless.

The assessment tool is the standardized tool used to collect information about a household. Examples of the information assessments collect include household make up, housing history, income and benefits, employment history, legal history, health considerations, and housing goals and preferences.

This information is collected to determine a strategy to solve the housing crisis, and informs the uniform prioritization process.

Household information should be collected in phases, obtaining only what is absolutely necessary to connect households to appropriate interventions and make prioritization decisions. The approach CE chooses to use will depend on the system's structure, capacity, and inventory of resources.

CE must have the following assessment standards:

- The assessment process gathers all of the information necessary to make prioritization decisions, as defined by the CE prioritization policy.
 - For example, if the CE system prioritizes by chronic homelessness, length of time homeless, and unsheltered homelessness, the assessment process must collect the information necessary to determine chronic homelessness, length of time homeless, and where the household is staying.
- Assessment processes, including use of assessment tools, must be implemented consistently at each access point in order to achieve fair, equitable, and equal access to services. Procedures must include documentation of uniform assessment processes and tools across access points and staff.
 - Section 4.1 identifies variations allowed in the assessment process based on subpopulation.
- A CE system 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.
- If street outreach workers administer 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 CE system through other access points.

PROCEDURE: Household assessment

4.1 Subpopulation Assessment Processes

Given that the following subpopulations may have unique prioritization criteria, differences in the assessment process may also occur for these subpopulations:

- Households fleeing violence (domestic violence, dating violence, sexual assault, stalking, trafficking, or other dangerous or life-threatening conditions)
- Youth under the age of 18 and young adults ages up to age 24
- Households at-risk of homelessness

If a CE system implements a separate assessment processes for a subpopulation, the assessment process must be implemented consistently at each access point the subpopulation is served.

Other instances exist where variations in the assessment process may occur: CE may include criteria, in addition to the required criteria, in the prioritization policy which only relates to single adults, or only relates to households with children. For example, *involvement in child welfare issues*. In this example, the assessment tool used with *households with children* may include additional questions about involvement in the child welfare system, while the assessment tool used with *single adults* may skip questions related to child welfare system involvement.

For clarification on acceptable variations for subpopulations, see Appendix 8.1.

PROCEDURE: Household assessment for subpopulations (if applicable)

4.2 Diversion

In the context of these guidelines, diversion means a problem solving strategy that helps households preserve their current housing situation or make immediate alternative arrangements outside of the crisis response system.

Diversion problem solving conversations should take place as part of initial triage, and before households are fully assessed through the CE process. This approach helps ensure households only enroll in services through CE when no other options are available.

Diversion involves conversations that:

- Are client-driven
- Are strength-based
- Consider creative solutions
- Link to natural supports
- May or may not include light-touch financial assistance

4.3 Assessment Training

The CE governing body 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:

- Review of CE policies and procedures, including any adopted variations for specific subpopulations.

- How to use assessment information to determine prioritization.
- Criteria for uniform decision-making and referrals.
- CE staff funded by CHG must receive required trainings listed in the CHG Guidelines.¹⁵
- CE staff at youth and young adult specific access points must receive Office of Homeless Youth (OHY) required trainings.¹⁶
- **Recommended:** all CE staff should receive the CHG and OHY required and recommended trainings.

5 Prioritization Process

The prioritization process refers to determining a household's priority status for services.

Once a household has been assessed, the information collected is analyzed in the context of the CE prioritization policies. People with the highest priority are offered services first.

The following prioritization components must be implemented, and CE system policies and procedures must describe:

- Prioritization as a process separate from determination of eligibility, including:
 - Consideration of all projects available to each household in relation to each participating projects' unique eligibility criteria. If it is determined through initial assessment that a household does not meet any of the CE system's prioritization standards, it may still be appropriate to proceed with the CE process due to presumptive eligibility for population-specific projects. For example, a project serving only veterans may have capacity to serve homeless veterans in addition to veterans at-risk of homelessness, while other participating projects do not.
 - Consideration of each subpopulation's unique prioritization criteria. For example, youth and young adults who are couch surfing may be prioritized for projects serving youth and young adults, while unsheltered homelessness is prioritized for other subpopulations. For more information on using a broader definition of homelessness with youth and young adults see the Office of Homeless Youth's [Five Recommendations for Making Coordinated Entry Work for Homeless Youth and Young Adults](#).
 - These types of considerations ensure access to all services available through CE for all subpopulations.
- Process by which households seeking assistance and households' service providers are given an opportunity to provide additional information to be considered in prioritization decisions. Assessment tools alone may not capture all the information necessary to determine need and vulnerability. However, only information relevant to the CE system's prioritization policy may be used to make prioritization decisions.

PROCEDURE: Prioritization process

¹⁵ <https://www.commerce.wa.gov/serving-communities/homelessness/consolidated-homeless-grant/>

¹⁶ <https://www.commerce.wa.gov/serving-communities/homelessness/office-of-youth-homelessness/>

5.1 Prioritization Tools

Prioritization tools may be used during the assessment process, typically to generate a score, and are used by CE systems to help determine need and vulnerability while homeless.

- All tools used for prioritization must aim to determine which households have the greatest need and vulnerability while homeless, and all factors included in the tool must be based on the prioritization criteria identified in the CE system prioritization policy.
- Prioritization tools must be used consistently at all access points in order to achieve fair, equitable, and equal access to services.
- The variations allowed for subpopulations in the assessment process, as described in Section 4.1, are also allowed for the use of prioritization tools.

It is not required to use a prioritization tool that generates a score. Using the standardized assessment tool, it is possible that all necessary information needed to make prioritization decisions may be collected.

Commerce does not recommend any established prioritization tool.

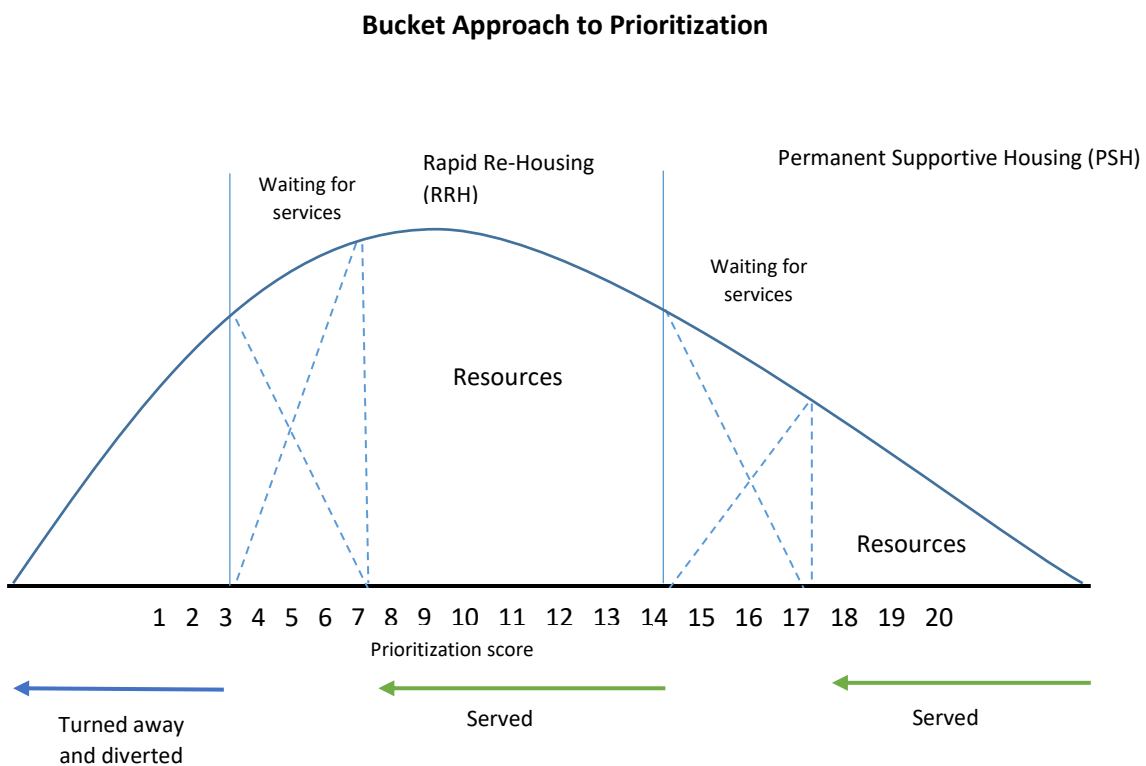
In all instances, the assessment process should only gather the information necessary to determine need and best match for housing services. For example, if a community has chosen to prioritize based only on the three required factors (chronic homelessness, length of time homeless, and unsheltered homelessness), a more complex prioritization tool, like the VI-SPDAT, is likely unnecessary and a “home grown” prioritization tool may be more appropriate. Elsewhere, a community may decide to gather this information through the assessment process without creating any additional tool that generates a score.

5.2 Dynamic Prioritization

CE should avoid using a “bucket” approach to prioritization.

In a bucket approach, households are placed on one waitlist based on the intervention determined through the assessment process to be the best fit.

While the assessment process may help determine the intervention type that may best assist households, prioritization decisions should also consider resource availability. When resource availability is not considered, and households are matched to only one intervention type, the result is often high need households waiting longer periods for housing services than necessary.

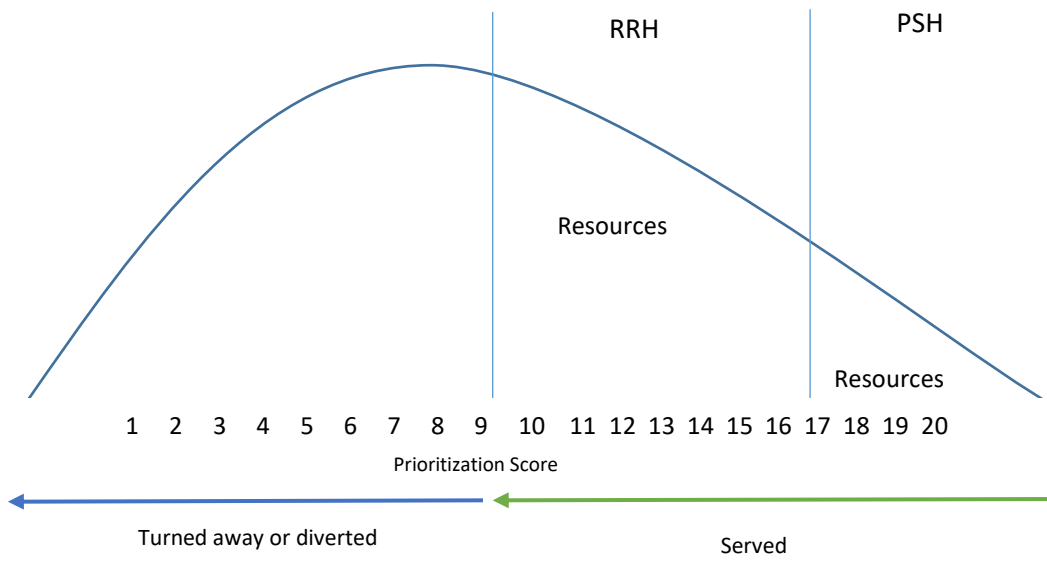


Instead, “dynamic” prioritization¹⁷ considers a household’s prioritization status and current resource availability. This approach requires CE to anticipate upcoming resource availability (e.g. next 60 days).

For example, the assessment process may determine that a household with a high level of need would be a good fit for PSH. However, PSH resources will not be available for 60+ days. In this case, the household should be referred to an available intervention, such as RRH, rather than waiting a long period for a PSH opening. This approach maximizes the resources available within the crisis response system and keeps wait time down for the highest need households.

¹⁷ Charts adapted from HUD presentation materials, 2018.

Dynamic Prioritization



6 Referral

The referral process matches households with available resources which will best help households quickly exit homelessness. CE must implement a uniform and coordinated referral process for all beds, units, and services available at participating projects.

CE must:

- Identify acceptable reasons for referral rejections by projects. In instances where households are rejected, households must be immediately referred to other appropriate services. Policies and procedures must specify the conditions for households to maintain their place on CE prioritization lists (i.e. By-Name lists) when a provider rejects a referral.
 - **For Systems with only one homeless housing service provider:** Identify acceptable reasons for rejections. In instances where households are rejected, households must be immediately connected to other appropriate services. Policies and procedures must include steps taken to ensure immediate connection to other services (e.g. follow-up with household, communication with provider receiving referral, or physically assisting household to the appropriate services).
- Specify the conditions for households to maintain their place on CE prioritization lists (i.e. By-Name lists) including 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.
- Ensure that when the assessment process determines the best type of intervention or project for a household, this information does not exclude the household from another type of intervention. For instance, if a household is identified as a match for permanent supportive housing, but there are no units available, that household should be offered the first available intervention for which the household is eligible. (See Dynamic Prioritization, Section 5.2)
- Maintain up-to-date information on project capacities, vacancies, and eligibility criteria. Procedures must describe how and by whom this information is maintained.
- Follow rent limit policies as required by funding sources.

POLICY: Referral Rejections by Projects

POLICY: Conditions to maintain list placement

PROCEDURE: Additional referral if rejected by project

PROCEDURE: Maintaining up-to-date information on project capacities, vacancies, and eligibility criteria

7 Household Protections

7.1 Grievance and Appeal Process

Households must be notified of their right to submit grievances, and how to submit grievances including nondiscrimination and equal access complaints. The CE grievance and appeal procedures must include processes by which:

- Households may appeal prioritization decisions.
- Households may appeal referral decisions.
- Households may present grievances and appeals to staff not involved in the grievance or decision.
- Grievances and appeals are reviewed by staff not involved in the grievance or decision.
- Households are notified of the outcome of the grievance or appeal.

All grievance and appeal processes must be made publicly available.

POLICY: Grievance and Appeal

PROCEDURE: Grievance and appeal submission

PROCEDURE: Grievance and appeal reviews

PROCEDURE: Communicating outcomes of grievance and appeal

7.2 Privacy

CE must develop and implement policies and procedures for obtaining household consent to share and store household information for purposes of assessing and referring households.

If CE maintains prioritization lists (i.e. By-Name lists) outside of HMIS, they must extend the same HMIS data privacy and security protections prescribed by HUD for HMIS practices in the HMIS Data and Technical Standards.

CE must adopt the following privacy protections:

- CE 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.
- CE 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 as a condition of program participation.
- Records containing personally identifying information must be kept secure and confidential.
- The address of any family violence project must 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.

PROCEDURE: Obtaining household consent

PROCEDURE: Secure and confidential storage of records

7.3 Non-Discrimination

Recipients of federal and state funds must comply with all applicable civil rights and fair housing laws and requirements. CE 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, U.S. residency status¹⁸, 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 because 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.

¹⁸ [Immigration Status and Housing Discrimination Frequently Asked Questions](#)

- A CE system 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.

8 Appendices

8.1 Allowances by Subpopulation

Subpopulation	ACCESS	PRIORITY CRITERIA	ASSESSMENT PROCESS
	<i>Can the subpopulation have a separate access point?</i>	<i>Can the subpopulation have priority criteria that differs from the standard priority criteria?</i>	<i>Can the subpopulation be assessed differently?</i>
Households with Children	Separate access point is allowable	Standard Priority Criteria	Variation in process is allowable
Single Adults	Separate access point is allowable	Standard Priority Criteria	Variation in process is allowable
Households Fleeing Violence: domestic violence, dating violence, sexual assault, stalking, trafficking, or other dangerous or life-threatening conditions	Separate access point is allowable	Different priority criteria is allowable	Different assessment process is allowable
Youth and Young Adults: youth under the age of 18 and young adults ages 18-24	Separate access point is allowable	Different priority criteria is allowable	Different assessment process is allowable
HEN: Housing and Essential Needs eligible households	Separate access point is allowable	Standard Priority Criteria	Must use assessment process for relevant subpopulation (i.e. single adults, youth and young adults, etc.)
Prevention: Households at-risk of homelessness	Separate access point is allowable	Different priority criteria is allowable	Different assessment process is allowable

Standard priority criteria means the prioritization criteria established in the CE system prioritization policies.

8.2 Requirements Specific to Washington State

The following table identifies items in the Washington State CE Guidelines which either differ from the requirements of HUD Notice CPD-17-01, or which include additional requirements or recommendations.

Washington State CE Guidelines Reference	Topic	Requirement/Recommendation
2.1	Governing body composition	<p>July 1, 2019: Must include at least two people with lived experience of homelessness.</p> <p>Recommendation for governing body to represent homeless population demographically in terms of race, ethnicity, gender identity, sexual orientation, and geographic location.</p>
2.1.1	Victim services provider participation	<p>Victim services providers are not required to participate in CE.</p> <p>CE governing body <u>must partner with all relevant victim service providers</u> to develop policies and procedures to ensure access, confidentiality, and safety for households who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or trafficking.</p>
2.2	Participation	Projects funded by sources listed must participate in CE.
2.3	Prioritization policy	Required and optional prioritization criteria are identified. (Required criteria are chronic homelessness, length of time homeless, and unsheltered homelessness).
2.3.1	Prioritization policy	Recommendation for subpopulations identified to have unique prioritization criteria.

		Specifies HEN eligible households are not allowed to have unique prioritization criteria.
2.4	System evaluation	Specifies required system evaluation components, policies, and procedures.
3	Low-barrier access	Adds lacking ID and proof of US residency status to reasons someone cannot be refused access to CE.
3.1	Accessibility	Adds accommodations for people with limited literacy abilities.
3.2	Marketing	Adds accommodations for people with limited literacy abilities.
3.3.1	Subpopulation access points	Includes HEN eligible households.
4.1	Subpopulation assessment processes	Distinguishes allowances for subpopulations, including HEN eligible households.
4.3	Assessment training	Includes CHG and OHY recommended and required trainings for CE staff.
5.1	Prioritization tools	Distinguishes allowances for subpopulations, including HEN eligible households.
6	Systems with one homeless housing service provider	Distinguishes referral process requirements for crisis response systems that include only one homeless housing service provider.
7.1	Grievance and appeal process	Specifies required grievance and appeal process components.

8.3 Resources

Chronic Homeless Definition. HUD, 2017.

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

Coordinated Entry Process Self-Assessment. HUD.

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

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>

Immigration Status and Housing Discrimination Frequently Asked Questions. HUD.

<http://www.equalhousing.org/wp-content/uploads/2014/09/2012-Immigration-Status-FAQ.pdf>

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>

8.4 Policy and Procedure Template

Policies describe management decisions. Procedures list the steps a team takes to complete an action. Below are sample policy and procedure templates.

Effective Date: November 16, 2018

Approved By: CE Governing Body

COUNTY COORDINATED ENTRY POLICY

9 Training and Developing Staff

SCOPE

This policy applies to all County CE staff (employees and volunteers).

POLICY

- A. All staff must remain current with all required trainings.
- B. Track staff training electronically in the Training Management Database.
- C. CE Organization pays for all required trainings.
- D. CE Organization may pay for professional development training up to a maximum of \$1000 per staff person, per calendar year.

COUNTY COORDINATED ENTRY PROCEDURE

10 Attending a Training

See Also: **Policy: Training and Developing Employees**
Applies to: CE STAFF

<u>Action By:</u>	<u>Action:</u>
CE Staff	<ol style="list-style-type: none"> 1. Notifies supervisor of training request with all training information available, including agenda.
CE Supervisor	<ol style="list-style-type: none"> 2. Coordinates with requesting staff to complete Training Request Form. 3. Routes for signature to appropriate person: <ol style="list-style-type: none"> 3a. <u>\$0 to \$500</u> - Approval required by supervisor. 3b. <u>\$500 to \$5000</u> - Approval required by supervisor and Director.
CE Supervisor/ Director	<ol style="list-style-type: none"> 4. Reviews Training Request Form for accuracy and completion. 5. Signs and routes to appropriate person: <ol style="list-style-type: none"> 5a. <u>\$0 to \$500</u> - Supervisor signs and routes to Administrative Assistant. 5b. <u>\$500 to \$5000</u> – Director signs and routes to Administrative Assistant.
CE Administrative Assistant	<ol style="list-style-type: none"> 6. Verifies signature(s) and amount for training. 7. Scans and saves final signed copies in personnel folder. 8. Sends requesting staff a copy of approved request. 9. Submits purchase request for training fees. 10. Routes approved Training Request Form with purchase. 11. Notifies attending staff to submit training request copy and certification of completion to HR Training Manager, when completed, if applicable.