



**Memphis/Shelby County  
Coordinated Entry System (CES)  
Policy & Procedure Manual**

## Memphis/Shelby County CES Policy & Procedure Manual Index

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## 1.1 HUD, COC & CES

### **PURPOSE**

The purpose of this policy is to outline the role of the Coordinated Entry System (CES) as mandated by the U.S. Department of Housing and Urban Development (HUD) to ensure an equitable, streamlined, and efficient approach to assessing, prioritizing, and referring individuals and families experiencing homelessness to appropriate housing and resources. This policy aims to enhance the accessibility and fairness of resource allocation while improving service outcomes through data-driven strategies across the entire Continuum of Care (CoC) serving the entire Memphis/Shelby County geographic area.

### **FORMS**

Appendix B HUD Homelessness Definitions

### **POLICY**

The U.S. Department of Housing and Urban Development (HUD) mandates that every Continuum of Care (CoC) establish and operate a centralized or Coordinated Entry System (CES). This system is designed to increase the efficiency of local crisis response networks and ensure fair access to housing and supportive services. Projects participating in CES must follow a standardized process for intake, assessment, and prioritization, ensuring that resources are allocated according to the needs and vulnerabilities of the individuals or families seeking assistance. The main goals of CES are to ensure that resources are easily accessible to those in need, no matter where they seek help, and that those with the greatest need receive timely assistance.

Through data collection, CES also provides valuable insights into the gaps in services and emerging needs, allowing communities to strategically allocate resources. These data are captured in the local Homeless Management Information System (HMIS), which helps to track and evaluate CES outcomes and informs continuous improvement of the system.

In the Memphis/Shelby County geographic area, CES manages matches and assessments for CoC Program- and Emergency Solutions Grant (ESG)-funded projects. The system uses a standardized housing needs assessment to identify and prioritize households experiencing literal homelessness. Once prioritized, households are matched with housing programs or other community resources based on their specific needs and vulnerabilities.

The CES operates through designated access points where individuals and families who are either homeless or at risk of homelessness can complete the standardized housing needs assessment. These access points play a key role in connecting people to appropriate housing and services, ensuring that assistance is distributed fairly. The overarching aim of CES is to provide rapid, fair, and equitable access to housing resources, ensuring that episodes of homelessness in Memphis/Shelby County are rare, brief, and nonrecurring.

### KEY TAKE AWAYS

- **Centralized Process:** HUD mandates each CoC to establish a Coordinated Entry System (CES) to standardize intake, assessment, and matchmaking processes across all participating projects.
- **Fair Access and Prioritization:** CES prioritizes assistance based on vulnerability and service needs to ensure that resources reach those most in need, regardless of where they seek help.
- **Data-Driven Resource Allocation:** The CES uses data collected through HMIS to identify service gaps and improve the efficiency and effectiveness of the homelessness response system.
- **Geographic Coverage:** The CES covers the entire Memphis/Shelby County area, ensuring that individuals and families experiencing homelessness in this region can access the system.
- **Service Coordination:** CES creates access points throughout the community, enabling households to complete a standardized housing needs assessment and be matched to housing programs or supportive services.
- **Continuous Improvement:** By evaluating outcomes through HMIS data, CES helps refine its processes, ensuring a fair, quick, and data-informed approach to addressing homelessness.

This policy supports HUD's goal of making homelessness rare, brief, and nonrecurring by ensuring equitable access to housing opportunities and improving collaboration among service providers.

## I.2 CAFTH CES Team

### **PURPOSE**

The purpose of this policy is to define the roles and responsibilities of key personnel within the Coordinated Entry System (CES) at the Community Alliance for the Homeless (CAFTH). This policy ensures the effective operation, continuous improvement, and alignment of CES processes with both local and national Continuum of Care (CoC) standards that supports the overarching goal of addressing housing insecurities and ending homelessness in Memphis/Shelby County.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

#### **CES Director**

The CES Director oversees all operations of the CES, including its continuous evolution and quality improvement. The director provides community support through technical assistance and works to identify gaps and barriers experienced by those in the CES, addressing them to ensure the specific needs of the Memphis/Shelby County community regarding housing insecurities are met. They support the community of service providers and housing providers through technical assistance and ensure CES policies and procedures align with local and national CoC intentions. The director stays current on best practices and changes made locally and nationally as CAFTH strives to end homelessness in Memphis/Shelby County.

#### **CES Administrator**

The CES Administrator is responsible for operating and facilitating Family and Youth Coordinated Entry System processes. The administrator continually works on expanding the CES by engaging with various service providers to include a wide range of services and resources for those who interact with the CES. The CES Administrator acts as a point of contact and oversees YHDP Navigators and the navigation program processes.

### **CES Coordinator**

The CES Coordinator oversees the operation and facilitation of the Individual CES. This role involves continuous data analysis through the HMIS system to ensure CES meets HMIS standards. The coordinator is responsible for monitoring and executing all CES annual and supportive training(s). Additionally, the administrator serves as the point of contact for all service providers and housing providers in relation to the CES.

### **CES Special Populations Coordinator**

The CES Special Population Coordinator is responsible for the implementation and facilitation of the Special Populations CES. They operate exclusively in the Comparable Database (CDB) to ensure a safe and protected avenue for all protected populations to be housed fairly within the CES. Additionally, they are responsible for establishing and maintaining collaborative relationships with victim service providers.

### **Senior Housing Navigator**

The Senior Housing Navigator continuously identifies property owners and property management companies that provide affordable housing in Memphis and Shelby County. This role involves seeking affordable housing opportunities and establishing new partnerships with builders interested in developing affordable homes and communities. The Senior Housing Navigator supports partnered housing providers with all aspects of affordable housing, including helping them find resources for their clients to sustain their housing. The objective is to advocate for the specific affordable housing needs presented by partner agencies.

Additionally, this role serves as the liaison between the Memphis Housing Authority and partner agencies, assisting with the promotion and distribution of housing choice vouchers and helping partner agencies refer their clients to these vouchers.

### **Housing Navigator**

As a Housing Navigator at CAFTH, this role is primarily responsible for landlord engagement. The Housing Navigator dedicates their days to finding affordable housing options for the homeless and those at risk of homelessness in Shelby County, TN.

Additionally, they manage and update the affordable housing resource document, giving consideration to the unique vulnerabilities of those engaging the homeless service system.

The Housing Navigator supports both the CoC and CES teams by facilitating housing case manager meetings and attending relevant CAFTH committee meetings. Working within the CES team, they meticulously search for properties that meet HUD's Fair Market Rate, a challenging task given the high rental rates in the area.

### KEY TAKE AWAYS

- **Leadership and Oversight:** The CES Director is responsible for overseeing all CES operations, providing technical assistance, and ensuring alignment with CoC intentions. The Director plays a crucial role in identifying and addressing gaps and barriers in the CES, ensuring that the system evolves to meet the community's needs.
- **Specialized Administration:** The CES Administrator focuses on the Family and Youth Coordinated Entry, expanding CES participation by engaging with a variety of service providers. This role serves as the primary point of contact for all CES-related inquiries from service and housing providers.
- **Focused Coordination:** The CES Coordinator manages the Individual CES, ensuring compliance with HMIS standards and overseeing all CES-related training programs. This role is vital for maintaining data integrity and operational effectiveness within the CES.
- **Special Populations Support:** The CES Special Populations Coordinator ensures the safe and equitable housing of protected populations through the use of a Comparable Database (CDB), addressing the unique needs of these groups within the CES.
- **Housing Advocacy and Partnerships:** The Senior Housing Navigator identifies and develops affordable housing opportunities, supports housing providers, and facilitates partnerships with property owners and developers. This role is instrumental in expanding access to affordable housing in the Memphis/Shelby County area.
- **Landlord Engagement and Resource Management:** The Housing Navigator is dedicated to engaging landlords and securing affordable housing options for homeless individuals or those at risk of homelessness. This role also involves managing housing resources and supporting housing providers in accessing additional services like employment and transportation for their clients.

These roles collectively ensure that the CES operates efficiently, supports the housing needs of vulnerable populations, and aligns with the broader goals of ending homelessness in the Memphis/Shelby County region.

### I.3 CES Participant Roles & Responsibilities

#### **PURPOSE**

The purpose of this policy is to outline the mandatory participation requirements for all CoC, YHDP, and ESG funded programs in the Coordinated Entry System (CES). This policy emphasizes the role of the Community Alliance for the Homeless (CAFTH) in overseeing the CES operations within Memphis/Shelby County and the importance of collaboration among various community partners, including both HMIS-equipped and non-HMIS CES partners, to effectively serve individuals experiencing homelessness.

#### **FORMS**

APPENDIX C            CES Contributor Confidentiality Agreement

#### **POLICY**

Participation in the CoC's CES is a requirement for all CoC, YHDP, and ESG funded programs. All Permanent Supportive Housing, Rapid Re-housing, and Supportive Services for Veteran Families (SSVF) agencies must adhere to the CoC: CES protocols for their tenant assignments. Additional community and local partners, outlined below, also utilize CES and share resources to ensure that consumers are housed quickly and appropriately.

All CES Contributors are required to have an up to date signed CES confidentiality agreement, updated annually, to ensure the safety of our neighbors information shared and discussed through CES meetings and to ensure all CES contributors are aware of the responsibilities that come with being a CES contributor.

The CoC still aims to have all homelessness assistance projects participating in its CES processes, and work with all local projects and funders in its geographic area to facilitate their new participation in the CES.

#### ***Community Alliance for the Homeless (CAFTH)***

Operates as the lead Continuum of Care (CoC) and lead Homeless Management Information System (HMIS) agency in Memphis/Shelby County. CAFTH is the operating agency for CES Individuals, Veterans, Families, Youth and IPV/DV populations; coordinating



routine population specific CES meetings, HMIS electronic housing matches, monitor CoC housing availability vacancies and housing availability matchmaking for CES participants.

### **Accessors**

Access refers to the way individuals experiencing a housing crisis become aware of CES and how they connect with crisis response services. For many, the first point of contact with the crisis response system is through a CES access point. These access points play a crucial role in engaging individuals to address their immediate needs by referring them to emergency services.

There are several community social and service providers who are trained in the CES and offer direct services to the community. Access points are specific agencies or contacts that are equipped with HMIS and CES training. As a result, they have the capability to enter all who report homelessness, as defined by HUD, into the CES through the HMIS system.

### **Non-HMIS CES Community Partners**

These providers are often referred to as ‘informal’ CES partners. They are service providers or social agencies within the community that are trained in the CES but do not have access to HMIS, so they cannot directly enter individuals into CES. However, these partnerships play a vital role by advocating for individuals, assisting with resource connections, and helping to fill gaps related to documentation and service linkage.

### **CoC Housing Providers and Case Managers**

CoC Housing Providers are responsible for actively participating in the CES. This includes accepting matches from the CES matchmaker, reporting all unit vacancies, move-in statuses, and consumer progress. Housing Providers must regularly update on consumer housing successes and challenges, allowing the community to troubleshoot and ensure consumers successfully maintain their housing.

## **KEY TAKE AWAYS**

- **Mandatory CES Participation:** All CoC, YHDP, and ESG funded programs, including Permanent Supportive Housing, Rapid Re-Housing, and SSVF agencies, are required to

participate in the CoC's Coordinated Entry System (CES) and follow established protocols for tenant assignments.

- **Role of CAFTH:** Community Alliance for the Homeless (CAFTH) serves as the lead agency for the CoC and HMIS, coordinating CES operations, managing housing matches, and monitoring housing vacancies in Memphis/Shelby County.
- **CES Access Points:** Designated access points equipped with HMIS and CES training play a crucial role in connecting individuals experiencing a housing crisis with necessary services and entering them into CES as defined by HUD.
- **Informal CES Partners:** Non-HMIS community partners, although unable to directly enter individuals into CES, contribute significantly by advocating for individuals, connecting them to resources, and filling service gaps.
- **CoC Housing Provider Responsibilities:** CoC Housing Providers must actively participate in CES, accept matches, report unit statuses, and maintain ongoing communication with CES facilitators to ensure successful housing outcomes and adherence to the Housing First Protocol.

## 2.1 CES By-Name List Meetings

### **PURPOSE**

The purpose of this policy is to establish the structure and objectives of population-specific By-Name-List meetings within the Coordinated Entry System (CES); to review and discuss participants of the CES, ensuring that each population receives tailored support and resources. By addressing the unique needs of different populations, these meetings aim to enhance the effectiveness of housing solutions and service provision.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

By-Name list specific meetings are used to review the By-Name list of all those who are entered into the CES. HUD identifies the below categories as the separate populations:

- Youth (18-24) *Including pregnant and parenting youth*
- Veterans
- Families
- Individuals
- Domestic Violence

The COC has HUD funded programs all the above populations, therefore the populations are reviewed and discussed separately as the resources and housing solutions vary per population.

At each meeting, service providers who specifically or otherwise interact with that population are invited and encouraged to attend routine CES meetings to provide client updates, advocate CES participants and help ‘paint a picture’ of the circumstances that are considered when CES facilitators make matches through prioritization practices.

## KEY TAKE AWAYS

- **Population-Specific Focus:** The CES organizes separate meetings for different populations identified by HUD, including youth (18-24), veterans, families, individuals, and those experiencing domestic violence. This segmentation ensures that each group receives appropriate attention and resources.
- **Tailored Resources and Solutions:** Each population has distinct needs, and the CES meetings allow for the review and discussion of these needs. The CoC offers HUD-funded programs that cater to these specific populations, ensuring that the solutions provided are relevant and effective.
- **Service Provider Involvement:** Service providers who work with specific populations are encouraged to participate in these routine CES meetings. Their involvement is crucial in providing updates, advocating for participants, and offering insights that help CES facilitators make informed decisions during the prioritization and matching process.
- **Enhanced Collaboration:** These meetings foster collaboration among service providers, ensuring that all relevant parties are involved in the decision-making process. This collaborative approach helps to create a comprehensive understanding of each participant's circumstances, leading to better outcomes in housing placements and support services.

## 2.2 CES Housing Team Meetings

### **PURPOSE**

The purpose of this policy is to outline the roles and initiatives of the Coordinated Entry System (CES) Housing Team at the Community Alliance for the Homeless (CAFTH) in Memphis and Shelby County. The CES Housing Team is dedicated to securing and maintaining affordable housing by collaborating with property owners, landlords, housing providers, and other community partners. This policy establishes the structure and objectives of various meetings and events organized by the CES Housing Team to support housing providers, address housing barriers, and foster partnerships that enhance affordable housing opportunities.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

The CES Housing Team at the CAFTH plays a crucial role in securing and sustaining affordable housing for individuals and families in Memphis/ Shelby County. This team engages with property owners, landlords, and community partners to identify and expand affordable housing opportunities. The CES Housing team holds regular meetings and events to facilitate collaboration and share insights among housing providers.

#### Population Specific CES Housing Case Manager Meeting(s)

The housing navigator facilitates population specific meetings to case conferences and provide support to CoC Housing case managers who have clients matched to their programs. All matches are reviewed and discussed, identifying any barriers and sustaining housing inside the CoC program. The intention of these meetings is to provide support and technical assistance to housing case managers to meet the needs of CES participants to pursue housing sustainability within the CES.

#### Housing Huddle

CAFTH Housing Huddle is held quarterly. The goal of the huddle is to bring together all of our partnered housing providers to discuss different aspects of affordable housing. Topics can include areas of need, best practices, new opportunities, challenges faced, and collaborative solutions. This forum aims to foster open communication, share valuable

insights, and strengthen partnerships, ultimately enhancing our collective efforts to provide affordable housing.

### Property Partners & Housing Support Social

The Property Partners & Housing Support Social Events will be held on a less-than-quarterly basis. The purpose of this event is to facilitate networking and collaboration between our partnered providers, partnered landlords and property owners. In addition to networking, the event will provide opportunities for providers to engage with landlords and property owners through a structured Q&A session. Additionally, there will be opportunities for special guests with expertise in affordable housing to appear, offering valuable insights that could benefit both partnered providers and landlords/property owners.

### **KEY TAKE AWAYS**

- **CES Housing Team Role:** The CES Housing Team at CAFTH is pivotal in identifying and expanding affordable housing options by engaging with landlords, property owners, and community partners. Their efforts are focused on securing sustainable housing for individuals and families in need.
- **Population-Specific CES Housing Case Managers Meetings:** These meetings are designed to support CoC housing case managers by addressing barriers to housing and providing technical assistance. The goal is to ensure housing sustainability for CES participants by reviewing matches and discussing challenges.
- **Housing Provider Huddle:** Held quarterly, this huddle brings together all partnered housing providers to discuss affordable housing challenges, best practices, and new opportunities. The forum encourages open communication and strengthens partnerships to enhance collective efforts in providing affordable housing.
- **Property Partners & Housing Support Social:** This less-than-quarterly event facilitates networking and collaboration between housing providers and landlords/property owners. It includes structured Q&A sessions and opportunities for learning from experts in affordable housing, aiming to build stronger relationships and improve housing outcomes.

## 2.3 CES Meeting Attendance

### **PURPOSE**

The purpose of this policy is to outline the roles and meeting requirements for Coordinated Entry System (CES) contributors, including CoC and ESG housing providers, outreach providers, and informal CES partners. These meetings ensure that all participants receive the necessary support and technical assistance to fulfill their responsibilities in serving the homeless population effectively.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

CES contributors are expected to participate in specific routine CES meetings based on their role within the system. These meetings facilitate collaboration, case conferencing, resource sharing, and advocacy for individuals experiencing homelessness.

Meeting Requirements:

CoC Housing Providers are required to attend CES Housing specific meetings, which are designed to offer technical support, address housing-specific challenges, and provide solutions to maintain housing stability for clients.

ESG Providers are required to attend CES meetings depending on their program's focus:

ESG RRH housing providers must participate in CES Housing Case Manager staffing, ensuring coordination with other housing providers.

ESG outreach providers are required to attend CES By-Name List meetings to help with client tracking and resource allocation.

Informal CES Contributors, including non-HMIS agencies and service providers, are encouraged to attend CES meetings related to the services they provide to the homeless population:

Housing providers should attend CES Housing case managers staffing

Shelter, outreach, and other service providers should participate in CES By-Name List meetings.

Outreach Committee Meetings are open to all CES contributors and focus on connecting housing providers and outreach workers. These meetings aim to share resources, discuss cases, and advocate for necessary services for individuals experiencing homelessness.

### KEY TAKE AWAYS

- **CES meetings are critical for housing providers and outreach workers** to receive support, collaborate on cases, and address challenges in serving the homeless population.
- **Different CES meetings are offered based on the provider's role**, ensuring the right participants attend meetings that are relevant to their work.
- **CoC and ESG housing providers are required to participate** in CES meetings to ensure effective housing services and outreach efforts.
- **Informal CES contributors are encouraged to attend meetings** that align with their services to stay informed and advocate for their clients.
- **Outreach Committee Meetings foster collaboration and resource sharing** among CES contributors to enhance the support for individuals and families experiencing homelessness.



### 3.1 Fair Access

#### **PURPOSE**

The purpose of this policy is to ensure that all individuals, regardless of their actual or perceived membership in federally protected classes or specific subpopulations, have fair and equal access to the Coordinated Entry System (CES) services and resources. This policy is designed to promote inclusivity and equity within the CES process for all participants.

#### **FORMS**

There are no forms related or required for this Policy

#### **POLICY**

All persons participating in any aspect of CES such as access, assessment, prioritization, or match shall be afforded equal access to CES services and resources without regard to a person's actual or perceived membership in a federally protected class such as race, color, national origin, religion, sex, age, familial status, or disability. Additionally, all people in different populations and subpopulations in the CoC's geographic area, including people experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence, shall have fair and equal access to the CES process. If a client is in need of an accessible format such as Braille, large type, or sign language, agencies can request materials or assistance from CES facilitator(s).

#### **KEY TAKE AWAYS**

- **Equal Access:** All participants in CES, regardless of race, color, national origin, religion, sex, age, familial status, disability, or any other federally protected class, are entitled to equal access to CES services and resources.
- **Inclusive Service:** The policy ensures that all subpopulations within the CoC's geographic area, including those experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence, have fair and equal access to the CES process.

- **Accessible Formats:** If a client requires materials in an accessible format (e.g., Braille, large type, or sign language), agencies can request these materials or assistance from CES facilitators to ensure effective communication and access for all participants.

## 3.2 Housing First

### PURPOSE

The purpose of this policy is to outline and promote the Housing First approach as defined by the United States Interagency Council on Homelessness. This approach aims to rapidly connect individuals experiencing homelessness to permanent housing with minimal barriers, ensuring that housing stability is prioritized. The policy emphasizes the importance of leveraging supportive services to maintain housing and improve the quality of life for those who are housed.

### FORMS

There are no forms related or required for this Policy

### POLICY

Housing First, as defined by the United States Interagency Council of Homelessness,

*“is a proven approach, applicable across all elements of systems for ending homelessness, in which people experiencing homelessness are connected to permanent housing swiftly and with few to no treatment preconditions, behavioral contingencies, or other barriers.”*

Housing First is an evidence-based practice designed to maximize housing stability for people experiencing homelessness. Housing First providers operate under the principle that homelessness is a housing crisis and must be addressed through the provision of safe and affordable housing.

Housing First is most successful when supportive services are leveraged to prevent returns to homelessness. Therefore, utilizing a person-centered housing model to move households experiencing homelessness quickly and efficiently into housing under the assumption that every eligible person is “housing ready.” “Housing ready” means that a person’s eligibility for housing is not based on sobriety, treatment compliance, or criminal histories. Rather, people experiencing homelessness can control their own outcomes and improve their quality of life after they have attained housing.

The core components of Housing First include:

- Low barrier admission policies – Housing program policies should place a minimum number of expectations on participants. They should be designed to “screen-in” rather

than “screen-out” applicants with the greatest barriers to housing, such as having little to no income, poor rental history or past evictions, or criminal history.

- Few to no programmatic prerequisites to housing – Program participants are offered permanent housing with no programmatic preconditions such as demonstration of sobriety; completion of drug, alcohol or mental health treatment; or agreeing to comply with a treatment regimen upon program entry.
- Voluntary but engaged services – Supportive services are proactively offered to help clients achieve and maintain permanent housing, but participants are not required to participate in services as a condition of housing

### KEY TAKE AWAYS

- **Housing First Approach:** Housing First is an evidence-based practice that focuses on swiftly providing permanent housing to people experiencing homelessness without requiring treatment or meeting behavioral conditions beforehand.
- **Low Barrier Admission Policies:** Housing programs should have minimal expectations for participants, aiming to "screen-in" rather than "screen-out" those with significant barriers such as low income, poor rental history, or criminal records.
- **No Prerequisites for Housing:** Participants are offered permanent housing without preconditions such as sobriety, treatment completion, or compliance with treatment regimens.
- **Voluntary Supportive Services:** While supportive services are proactively offered to help clients achieve and maintain housing, participation in these services is not a requirement for accessing or maintaining housing.
- **Client-Centered Model:** The policy operates under the assumption that every eligible person is "housing ready," meaning eligibility is not based on factors like sobriety or criminal history. Instead, individuals can improve their outcomes and quality of life once they are housed.

### 3.3 Low Barrier

#### **PURPOSE**

The purpose of this policy is to ensure that access to the Coordinated Entry System (CES) is low barrier and non-discriminatory. It aims to guarantee that individuals experiencing homelessness can seek CES services without being denied based on perceived barriers such as substance use, criminal history, disabilities, or health conditions.

#### **FORMS**

There are no forms related or required for this Policy

#### **POLICY**

Access to the CES is low barrier, meaning that people experiencing homelessness seeking CoC CES are not discriminated against based on perceived barriers to housing. Barriers that are not considered or discriminated against when offering CoC CES services include, but are not limited to:

- Prior or ongoing substance use
- Domestic violence history
- Criminal justice involvement
- Physical, intellectual, and/or developmental disabilities
- Acute, long-term, and/or behavioral health conditions, including Serious Mental Illness(es)
- History of evictions, poor credit history, and/or housing lease violations

#### **KEY TAKE AWAYS**

- **Low Barrier Access:** The CES is designed to provide access to services without discrimination or exclusion based on common barriers to housing.
- **Non-Discriminatory Practices:** Barriers such as prior or ongoing substance use, history of domestic violence, criminal justice involvement, disabilities, or health

conditions (including Serious Mental Illness) will not be considered when offering CES services.

- **Inclusive Service Provision:** Individuals with a history of evictions, poor credit history, or housing lease violations are also entitled to access CES services without discrimination.
- **Focus on Housing Support:** The policy reinforces that all individuals, regardless of their past or current circumstances, have the right to receive support in obtaining stable housing through the CES.

### 3.4 Racial Equity

#### **PURPOSE**

The purpose of this policy is to acknowledge and address the historical and systemic racial disadvantages faced by minority populations in accessing housing. The Coordinated Entry System (CES) commits to using data analysis and regular policy reviews to identify and eliminate inequities within the system. This policy is grounded in the guidance from HUD's Racial Equity Homeless System Response, which mandates taking meaningful actions to overcome segregation, promote housing choice, and create inclusive communities free from discrimination.

#### **FORMS**

There are no forms related or required for this Policy

#### **POLICY**

The CES recognizes the historic and systematic racial disadvantages minority populations have faced in seeking housing in the United States. HMIS is used to track these inequities through dashboards and data analysis and the CES P&P are reviewed annually in order to address these disadvantages. The CES supports and follows the following guidance from HUD's Racial Equity Homeless System Response:

*“No protected class (race, color, religion, national origin, sex, age, familial status, and disability) can be used as the sole basis for decisions on housing, but communities must take meaningful actions to overcome historic patterns of segregation, promote housing choice, and foster inclusive communities that are free from discrimination.”*

An ongoing goal of the CES is to identify, address, and eliminate inequities and disparities that may present within the system in order to ensure that access to housing is as equitable as possible.

## KEY TAKE AWAYS

- **Recognition of Racial Disadvantages:** The CES acknowledges the historical and systemic barriers that minority populations have faced in accessing housing in the United States.
- **Data-Driven Approach:** HMIS is utilized to track and analyze racial inequities through dashboards and data analysis, allowing for informed decision-making and targeted interventions.
- **Annual Policy Review:** The CES Policies and Procedures (P&P) are reviewed annually to address and mitigate racial disparities within the housing system.
- **HUD Racial Equity Guidance:** The policy aligns with HUD’s guidance, emphasizing that while protected classes cannot be used as the sole basis for housing decisions, communities must actively work to overcome segregation and foster inclusive, discrimination-free environments.
- **Commitment to Equity:** An ongoing goal of the CES is to identify, address, and eliminate inequities within the system, ensuring that access to housing is equitable for all individuals, regardless of race or other protected characteristics.



### 3.5 Affirmative Marketing

#### **PURPOSE**

The purpose of this policy is to ensure that all people participating in any aspect of the Coordinated Entry System (CES), including access, assessment, prioritization, or matchmaking, receive equal access to CES services and resources. This policy guarantees that no person is discriminated against based on their actual or perceived membership in any federally protected class. It also ensures that all populations and subpopulations within the Continuum of Care's (CoC) geographic area, including vulnerable groups like veterans, families with children, youth, and survivors of domestic violence, have fair and equal access to the coordinated entry process.

#### **FORMS**

There are no forms related or required for this Policy

#### **POLICY**

All persons participating in any aspect of CES such as access, assessment, prioritization, or referral shall be afforded equal access to CES services and resources without regard to a person's actual or perceived membership in a federally protected class such as race, color, national origin, religion, sex, age, familial status, or disability. Additionally, all people in different populations and subpopulations in the CoC's geographic area, including people experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence, shall have fair and equal access to the coordinated entry process.

#### **KEY TAKE AWAYS**

- **Commitment to Equal Access:** The policy ensures that all participants in the CES process are afforded equal access to services and resources, without discrimination based on race, color, national origin, religion, sex, age, familial status, disability, or perceived membership in any protected class.
- **Inclusivity Across Populations:** The policy specifically includes all populations and subpopulations within the CoC's geographic area, such as individuals experiencing

chronic homelessness, veterans, families with children, youth, and survivors of domestic violence, ensuring they have fair and equal access to CES services.

- **Non-Discriminatory Practices:** CES services and resources are to be provided without any form of discrimination, promoting an inclusive and equitable environment for all participants.
- **Holistic Access:** The policy emphasizes that equal access applies to all aspects of CES, including access, assessment, prioritization, and referral, ensuring a comprehensive and fair process for all individuals involved.

### 3.6 Non-Discrimination

#### **PURPOSE**

The purpose of this policy is to ensure that the Coordinated Entry System (CES) provides fair, equal, and non-discriminatory access to housing and services for all participants, regardless of their membership in any Civil Rights protected class. The policy outlines that while the CES may collect information about participants' membership in protected classes for documentation purposes, such information will not be used to restrict, limit, or direct participants to specific referral options. It also emphasizes compliance with federal laws that govern non-discrimination in housing and related services.

#### **FORMS**

There are no forms related or required for this Policy

#### **POLICY**

The CES may collect and document participants' membership in Civil Rights protected classes but will not consider membership in a protected class as justification for restricting, limiting, or steering participants to particular referral options.

CES has been designed to offer a fair, equal access and low barrier Housing First approach. All participants within the CES will have equal access to all programs regardless of race, color, age, religion, gender, sexual orientation, gender identity, gender expression, national origin, marital status, familial status, pregnancy, parenthood, creed, veteran's status, veteran's disability, or physical or mental disability. The following laws govern non-discrimination policies within the CoC and CES:

- The Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status.
- Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance.
- Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin under any program or activity receiving Federal financial assistance.

- 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 match 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 services establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

Eligibility for CES will not be determined or affected by:

- Too little or no income
- History or active substance abuse
- Domestic violence history
- Resistance to receiving services
- The type or extent of disability-related services or support needed
- History of evictions or poor credit
- Lease violations or leaseholder history
- Criminal record

Data from the assessment process will not be collected to discriminate or prioritize households for housing and services on a protected basis, such as race, color, religion, national origin, sex, age, familial status, disability, actual or perceived sexual orientation, gender, identity, or marital status.

If an individual or household feels they are being discriminated against based upon any of the previously mentioned factors, they may file a complaint utilizing the grievance policy. Any complaint filed will not affect the individual's place within CES

### KEY TAKE AWAYS

- **Non-Discrimination Principle:** Membership in a Civil Rights protected class, such as race, color, religion, sex, national origin, disability, or familial status, will not be used to

justify restrictions or limitations in CES referral options, ensuring that all participants have equal access to available housing and services.

- **Inclusive Access:** The CES is designed to operate under a Housing First approach, offering fair, equal, and low-barrier access to all participants, regardless of factors like income, substance use history, disability, or criminal record.
- **Compliance with Federal Laws:** The policy adheres to multiple federal laws, including the Fair Housing Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act, which collectively prohibit discrimination in housing and related services based on various protected characteristics.
- **Equal Treatment in Eligibility:** Eligibility for CES will not be determined or influenced by participants' income, substance use, domestic violence history, disability needs, eviction history, or criminal record, ensuring that all participants are treated fairly and equitably.
- **Grievance Process:** Participants who believe they have been discriminated against based on any protected characteristic may file a complaint using the established grievance policy, without fear of it affecting their status within the CES. This provides a safeguard for participants' rights within the system.

### 3.7 Grievance

#### **PURPOSE**

The purpose of this policy is to establish a clear and structured grievance process for individuals, families, programs, and partners involved in the Memphis and Shelby County Coordinated Entry System (CES). This process ensures that concerns related to CES policies, procedures, identification, and placement are addressed fairly, transparently, and promptly, providing multiple levels of resolution to uphold the integrity and effectiveness of the CES.

#### **FORMS**

Appendix K CES Grievance Form

#### **POLICY**

All participants in the CES, as well as the programs and partners involved, have the right to file a grievance regarding the Memphis/ Shelby County CES as it pertains to its policies and procedures, including the identification and placement process.

A grievance form must be delivered to the CES facilitator for an official grievance to be filed. Upon receipt, the CES facilitator will exhaust every effort to satisfy the matter within ten (10) days. The complainant or their representative will be notified using the matched method of communication noted on the grievance form.

If the matter is still not resolved, the concern should be addressed in writing to the Executive Director of CAFTH who will work to resolve the matter within ten days of receipt. The complainant or their representative will be notified using the matched method of communication.

If no resolution has been reached using the assistance of the Executive Director, the matter shall be submitted in writing to the Governing Council of the Memphis/Shelby County Homeless Consortium. The Governing Council will determine the best course of action and respond accordingly within 45 days of receipt. The complainant or their representative will be notified using the matched method of communication. All decisions by the Governing Council shall be considered final.

## KEY TAKE AWAYS

- **Right to File a Grievance:** All participants, programs, and partners in the CES have the right to file a grievance concerning any aspect of the CES, including policies, procedures, and the identification and placement process.
- **Structured Grievance Process:** Grievances must be formally submitted using a grievance form delivered to the CES facilitator. The CES facilitator is responsible for attempting to resolve the grievance within ten days and will notify the complainant using the communication method indicated on the grievance form.
- **Escalation Procedure:** If the grievance is not resolved by the CES facilitator, it can be escalated in writing to the Executive Director of CAFTH, who will work to resolve the issue within ten days. If still unresolved, the grievance may be further escalated to the Governing Council of the Memphis/Shelby County Homeless Consortium, which will respond within 45 days, with its decision considered final.
- **Communication and Timeliness:** Throughout the grievance process, the complainant or their representative will be kept informed of progress and outcomes using their preferred method of communication. Each stage of the grievance process has a defined timeframe to ensure timely resolution, emphasizing the importance of addressing concerns swiftly and effectively.
- **Final Authority:** The Governing Council of the Memphis/Shelby County Homeless Consortium serves as the final authority in the grievance process, ensuring that all concerns are handled with the highest level of oversight and fairness.

This policy ensures that all grievances related to the CES are managed in a fair, transparent, and timely manner, providing multiple levels of recourse for participants and partners to address their concerns.

### 3.8 CES Evaluation

#### **PURPOSE**

The purpose of this policy is to ensure that the Memphis and Shelby County Coordinated Entry System (CES) is continuously monitored and evaluated to maintain its mission: to end homelessness, prevent new episodes of homelessness, and ensure that any future episodes are rare, brief, and nonrecurring. The CES will undergo regular assessments to evaluate compliance with HUD requirements, the effectiveness of the system in connecting individuals to appropriate housing, and the fidelity of its processes to the established policies and procedures.

#### **FORMS**

There are no forms related or required for this Policy

#### **POLICY**

The Memphis and Shelby County Coordinated Entry System (CES) will be evaluated and monitored through a variety of methods on an ongoing basis to ensure the mission of the CES remains the same: to end homelessness, prevent new episodes of homelessness, and make future episodes rare, brief, and nonrecurring. The CES will be assessed for:

- Compliance: evaluates whether the CES process meets HUD’s requirements and the CoC’s design.
- Effectiveness: evaluates how effective the CES process is in connecting people experiencing homelessness to appropriate matches.
- Process: evaluates how the CES process has been implemented and whether it is currently operating in accordance with the CoC’s established policies and procedures.

#### *Compliance*

In order to assess compliance with current HUD requirements, CoC Lead Agency staff are responsible for monitoring HUD requirements and updates to CES guidelines on a quarterly basis, at minimum. When HUD requirements or guidelines change and require



updates to CES policies, the CoC will follow the policies and procedures for updating the CES Manual.

### *Effectiveness & Process*

In conjunction with ongoing monitoring of the CES's effectiveness, there will be an annual CE Evaluation which will incorporate client and CoC program feedback, data collection and analysis, and additional feedback collected from CES stakeholders. This evaluation will gather information on the effectiveness and success of the CES through analysis of performance measures, HMIS data, client and CoC program surveys, system goals, assessment tool data, and additional data collected from CES key stakeholders. This evaluation will also look at common tracking indicators for persons moving through the CES including:

- Intake, assessment and match protocol
- Outcomes for all demographics – exits to permanent housing and recidivism
- Newly identified homeless numbers
- Length of time homeless
- Rate of returns to homelessness
- Gaps in services
- Number of declines, cancellations, and client refusals within the match process

The Memphis and Shelby County CES will be designed to produce specific outcomes expected by HUD, which may include:

- Length of time individuals and families remain homeless
- Repeated homelessness and returns to Coordinated Entry
- Extent of Outreach efforts
- Decrease in unit vacancy rate and increase in long term occupancy rates
- Reduction in homeless numbers within Memphis and Shelby County
- Job and income growth
- Client-centered programs and services
- Linkages to mainstream benefits and community support
- Prevention Services
- Decrease in homeless episodes, sustainability in housing and retention
- Length of time between entry into Coordinated Entry and housing placement

The primary method of determining the effectiveness of our system will be through analyzing performance measures to evaluate the quality and outcome of CES services. These performance measures are determined by HUD and assessed by the Memphis/Shelby County CES to ensure alignment with HUD goals. Data collected should be able to indicate:

- Length of stay in shelters
- Newly identified homeless episodes
- Re-entry into the Coordinated Entry System
- Rate of matched and mismatched matches
- Time from identification to move in – and the progress tracked in between
- Rate of vacancies and occupancy among CoC and ESG funded housing
- Time on the By Name List – wait time and placement
- Number of interactions with clients on the By Name List
- Prioritization of vulnerability

In addition to data analysis, the input collected from clients and CoC programs through surveys is also a key component of the CES evaluation. Rather than rely solely on HMIS and collected data, using responses to surveys and questionnaires from clients and CoC providers allows the evaluation to gain a more in-depth look into successes and challenges that the system faces that may not show up on a data level. Suggested survey questions relating to the Memphis/Shelby County CES will not only address implementation, but also the accessibility of the system and match process, services, and gaps.

### KEY TAKE AWAYS

- **Ongoing Evaluation and Monitoring:** The CES will be continuously evaluated through various methods, including compliance checks, effectiveness assessments, and process evaluations, to ensure it meets HUD's requirements and the CoC's design.
- **Compliance Monitoring:** The CoC Lead Agency staff are responsible for quarterly monitoring of HUD requirements and updates to ensure that the CES remains in compliance with current HUD guidelines. Any necessary updates to CES policies will follow established procedures.
- **Annual CE Evaluation:** An annual evaluation will be conducted to assess the CES's effectiveness, incorporating feedback from clients, CoC programs, and key stakeholders. This evaluation will analyze performance measures, HMIS data, and

common tracking indicators such as length of time homeless, rate of returns to homelessness, and gaps in services.

- **Performance Measures and Data Analysis:** The primary method for determining CES effectiveness will involve analyzing HUD-determined performance measures, including metrics such as length of stay in shelters, newly identified homeless episodes, and time from identification to housing placement. This data will ensure alignment with HUD goals and guide system improvements.
- **Client and Program Feedback:** In addition to data analysis, the CES evaluation will include input from clients and CoC programs through surveys and questionnaires. This qualitative feedback will provide insights into the system's successes and challenges that may not be evident through data alone, helping to identify areas for improvement.
- **Outcome-Oriented Design:** The CES is designed to produce specific outcomes expected by HUD, including reducing the length of time individuals remain homeless, decreasing rates of repeated homelessness, improving long-term occupancy rates, and increasing access to mainstream benefits and community support.

By implementing this policy, the Memphis/Shelby County CES will ensure that its operations are continuously refined to better serve the community and achieve its mission of ending homelessness.

### 3.9 Release of Information

#### **PURPOSE**

The purpose of this policy is to ensure that all Coordinated Entry System (CES) participating agencies follow standardized procedures for obtaining participant consent for the collection, use, and disclosure of personally identifiable information (PII). This policy upholds participant privacy rights while facilitating effective service delivery through informed consent.

#### **FORMS**

Appendix A HMIS Release of information (ROI)

#### **POLICY**

CES participating agencies are required to notify and obtain participant consent for the collection, use, and disclosure of participants' personally identifiable information (PII) through the use of a Release of Information (ROI).

##### *Notification and Consent Requirement:*

All CES participating agencies are required to notify participants and obtain their consent for the collection, use, and disclosure of personally identifiable information (PII) through a standardized Release of Information (ROI) form.

##### *Inferred Consent for Initial Communication:*

When a participant initiates a request for housing crisis response assistance via phone or email, this action will be considered notification of intent and will infer the participant's consent for the collection, use, and disclosure of any PII provided during that communication.

##### *Written Consent for In-Person Assessments:*

CE participating agencies must obtain written consent from participants during in-person assessments when additional PII is collected. The written ROI form should be presented

and explained to the participant, ensuring they fully understand the scope of data collection and its intended use before providing their consent.

### KEY TAKE AWAYS

- **Standardized Consent Process:** CES agencies must notify participants and obtain consent for collecting and sharing PII, ensuring compliance with privacy standards and respecting participant rights.
- **Inferred Consent for Remote Communication:** Initial requests for assistance made through phone or email imply the participant's consent for collecting PII during that interaction, facilitating timely responses to housing crises.
- **Mandatory Written Consent for In-Person Data Collection:** Written consent is required for any additional PII collected during in-person assessments, ensuring participants are fully informed and agree to how their information will be used and shared.
- **Respecting Participant Privacy:** This policy emphasizes the importance of protecting participant privacy by ensuring that all data collection and sharing practices are conducted with the participant's informed consent.

This policy ensures that all data collection, use, and disclosure practices within CE are conducted transparently, with participant consent, and in alignment with privacy regulations.

## 4.1 Homeless Management Information System (HMIS)

### **PURPOSE**

The purpose of this policy is to ensure that all program and assessment data related to homelessness and housing services within the Memphis Continuum of Care (CoC) is accurately collected, managed, and stored in compliance with federal requirements. The Homeless Management Information System (HMIS) serves as the central database for this information, supporting the CoC's mission to effectively coordinate services, monitor outcomes, and secure permanent housing for individuals and families experiencing homelessness.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

HMIS is a locally-administered database used to collect person and program-level data as it relates to homeless housing and services in a CoC. As a requirement of participating in the CoC, all program and assessment data collected for the CoC and CES must be stored in HMIS.

The vendor used by the Memphis CoC is Bitfocus, whose product is called Clarity Human Services. CoC and ESG-funded projects are required to be entered and managed within Clarity to be compliant with HUD's HMIS Requirement Rule.

The CoC HMIS is required to collect all data as it relates to the CES in managing project enrollment and exit information, assessments, including the housing needs assessment, HUD-required reporting elements, prioritization, and any necessary case management services that support the goal of households' move into permanent housing.

Participating Agencies that enter household information into Clarity must obtain each household members' permission to collect and share their Personally Identifiable Information (PII) within HMIS.

## KEY TAKE AWAYS

- **HMIS Requirement:** All program and assessment data collected for the CoC and CES must be entered and managed in the locally administered HMIS, specifically using Bitfocus's Clarity Human Services platform. This is a mandatory requirement for compliance with HUD's HMIS Requirement Rule.
- **Data Management:** The CoC HMIS is responsible for tracking project enrollment, exit information, assessments (including housing needs), HUD-required reporting elements, prioritization processes, and case management services. This data is crucial for evaluating program effectiveness and ensuring that households are successfully transitioned into permanent housing.
- **Vendor and Compliance:** The Memphis/Shelby County CoC utilizes Bitfocus as its HMIS vendor, and all CoC and ESG-funded projects must be managed within the Clarity system to meet federal compliance standards.
- **Informed Consent:** Participating agencies are required to obtain consent from each household member before collecting and sharing their Personally Identifiable Information (PII) within the HMIS. This ensures that data handling is done ethically and in accordance with privacy regulations.

This policy underscores the importance of proper data management within the HMIS to support the CoC's goals of ending homelessness and maintaining compliance with federal regulations.

## 4.2 Comparable Database (CDB)

### **PURPOSE**

This policy outlines the privacy and confidentiality standards required for agencies working with individuals fleeing domestic violence, particularly those receiving Violence Against Women Act (VAWA) funding or participating in the Coordinated Entry System (CES). The policy ensures that the sensitive information of domestic violence survivors is protected in accordance with federal guidelines utilizing the Comparable Database (CDB).

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

The Domestic Violence population comes with its own set of privacy and confidentiality standards. Recipients of Violence Against Women Act (VAWA) funding and all agencies that participate in CES are prohibited from disclosing personally identifiable information without the participant's written consent.

Client's fleeing domestic violence can have their information entered into a VAWA-compliant comparable database but will not be entered into the HMIS. Comparable Databases collect aggregate data with no identifying information being stored or reported, which makes client information entered unidentifiable to others.

VSPs are prohibited from entering data into HMIS and will be required to use a CDB to participate in CES. A CDB is a relational database that meets all HMIS Data Standards and does so in a method that protects the safety and privacy of survivors.

CES will rely on VSP to utilize the CDB to safely integrate homeless victims access housing available through the CoC CES.

### **KEY TAKE AWAYS**

- **Confidentiality and Consent:** Agencies that receive VAWA funding and all other agencies involved in CES are strictly prohibited from disclosing personally identifiable information (PII) of domestic violence survivors without the participant's explicit, written



consent. This is to ensure the safety and privacy of individuals who are fleeing domestic violence.

- **Use of Comparable Databases:** Survivors of domestic violence may have their information entered into a VAWA-compliant comparable database instead of the HMIS. These databases collect and store aggregate data without any identifying details, making the information untraceable to ensure the privacy of the clients.
- **Victim Service Providers (VSPs):** VSPs are prohibited from entering any client data into the HMIS. Instead, they must use a comparable database that meets all HMIS Data Standards while ensuring the safety and privacy of the survivors. This alternative database allows VSPs to participate in CES without compromising client confidentiality.
- **Coordinated Entry System (CES) Integration:** The CES will depend on VSPs to use the CDB to safely facilitate access to housing for homeless victims through the CoC CES. This approach ensures that survivors can access the services they need without exposing their personal information to potential risks.

This policy is designed to protect the privacy and safety of domestic violence survivors while ensuring their access to necessary housing and support services within the CES.

### 4.3 Data Privacy

#### **PURPOSE**

This policy ensures that all data collected during the Coordinated Entry System (CES) process is handled with the utmost security and confidentiality. It mandates that participants' data, whether collected on paper or electronically, is protected across all systems and locations. Furthermore, it guarantees that participants are fully informed about how their data will be collected, stored, managed, and shared. This policy is vital to maintaining trust, protecting participant privacy, and ensuring compliance with federal regulations.

#### **FORMS**

There are no forms related or required for this Policy

#### **POLICY**

CES process contributors and all participating agencies contributing data to CES must ensure participants' data are secured regardless of the systems or locations where participant data are collected, stored, or shared, whether on paper or electronically. Additionally, participants must be informed about how their data is being collected, stored, managed, and potentially shared, with whom, and for what purpose.

#### *Client Information and Confidentiality Process*

Before an assessment is completed, anyone administering the standardized housing assessment must review the release of information form with clients. This form identifies what data will be collected, where data will be stored/managed, how data will be used for the purposes of helping the participant obtain housing and assistance and for other administrative purposes, and what data will be shared with others (if the participant consents to such data sharing).

All data, files, records, and documentation are confidential information and are only shared with written permission from the client. All client data collected during the CES process will only be shared among CES Community Organizations who have signed a confidentiality agreement with CAFTH. The confidentiality agreement states all recorded

data will only be shared with designated staff for the purposes of CES management, participant care coordination, CES evaluation, and other administrative purposes. Upon review of the release of information and the purpose of the assessment, clients must then sign the consent form or verbally notify them that they understand and agree to participate in the assessment.

Additionally, protected data such as that of a specific disability or diagnosis will not be used to prioritize specific households over others.

### *HMIS and Client Data Security*

If clients consent to having their data shared, their information will be stored within HMIS. CES staff should thoroughly explain the process of storing client data in HMIS, and the data security standards in place to protect client data. Assessors should also ensure that clients understand their choice regarding their information being stored in HMIS will not affect their access to housing resources.

At any time, a client can request to view their information or request to have their information removed from HMIS. To get their information removed from the HMIS system, they need to directly reach out to the HMIS facilitator requesting their information be removed and the HMIS Lead Agency will remove their information. If a client desires or requires assistance to complete this request, service providers are encouraged to assist clients with completing their request. The same HMIS data privacy and security protections will be applied to the By-Name List as prescribed by HUD for HMIS practices in the HMIS Data and Technical Standards.

In line with HUD regulations, the CoC complies with mandatory disclosures of any oversight with compliance of HMIS privacy and security standards.

### *Client's Right to Refuse Questions*

Before completing any assessment, it is the responsibility of the service provider to inform the client of their right to refuse any individual questions during the assessment and ensure clients understand that doing so does not affect their ability to access housing programs. Under no circumstance does refusal of information or request to have information removed make any participant ineligible for services unless the information is necessary to establish or document program eligibility per applicable program regulation.

## KEY TAKE AWAYS

- **Data Security:** All participating agencies and CES process partners must secure participant data regardless of the medium or location where it is collected, stored, or shared. This applies to both paper and electronic formats.
- **Informed Consent:** Participants must be informed about how their data will be collected, stored, managed, and potentially shared, including details about with whom and for what purposes their data may be shared. This information must be reviewed with the participant before an assessment is completed.
- **Confidentiality Agreements:** All data, files, and documentation are confidential and are only shared among CES Community Organizations that have signed a confidentiality agreement with CAFTH. Data is shared strictly for CES management, participant care coordination, evaluation, and other administrative purposes.
- **Client Rights:** Participants have the right to review the release of information, understand the purpose of data collection, and must consent to participate in the assessment. Clients can also refuse to answer any questions during the assessment without affecting their eligibility for housing programs.
- **Data Sharing and HMIS:** If participants consent to share their data, it will be stored within HMIS. The process and security measures of storing data in HMIS must be thoroughly explained to participants. Clients' refusal to have their data stored in HMIS does not affect their access to housing resources.
- **Client Requests:** Clients can request to view or remove their information from HMIS at any time. The HMIS Lead Agency is responsible for fulfilling such requests. Service providers are encouraged to assist clients with these requests if needed.
- **Non-Discrimination:** Protected data, such as specific disabilities or diagnoses, will not be used to prioritize households over others. All participants are treated equitably, and their privacy is respected.
- **Compliance with HUD Regulations:** The CoC complies with HUD regulations, including mandatory disclosures of any oversights in HMIS privacy and security standards. The By-Name List is subject to the same privacy and security protections as prescribed by HUD.

This policy is designed to protect participant data, uphold confidentiality, and ensure that all individuals are fully informed and consent to the processes involved in the CES.

## 4.4 Inactive CES Participants

### PURPOSE

The purpose of this policy is to maintain the accuracy and relevance of the CES By-Name List and HMIS records, ensuring that resources are allocated to clients who are actively engaged in the CES process. It also provides a clear process for re-engaging and reactivating clients who have become inactive, thereby supporting continuous efforts to connect individuals with the services they need.

### FORMS

There are no forms related or required for this Policy

### POLICY

Clients who have not been located, engaged, or served within 60 days of their entry into the Coordinated Entry System (CES) will be moved to a "Pending Inactive" status for a two-week period. If no further contact is made within these two weeks, the client will be transitioned to "Inactive" status on both the By-Name List and in the Homeless Management Information System (HMIS). The date of inactivity will be recorded as the last day of known contact with the client.

Should a client be re-engaged after being marked inactive, they may be reactivated in the system following verification and, if necessary, a reassessment. All relevant dates and notes regarding the client's status changes will be documented. There is no limit to how many times a client may be re-entered into CES.

### KEY TAKE AWAYS

- **Inactivity Monitoring:** Clients who have not been engaged for 60 days will be placed on a Pending Inactive list, with further action taken if no contact is made within two weeks.
- **Reactivation Process:** Clients can be reactivated upon re-engagement, verification, and reassessment, with all status changes documented.
- **No Re-Entry Limit:** Clients may be re-entered into the CES as many times as necessary to ensure they receive needed support.

#### 4.5 Non-CDB users identifying Special Populations person(s)

### PURPOSE

The purpose of this policy is to ensure that service providers using the Homeless Management Information System (HMIS) take appropriate actions to protect the safety and confidentiality of clients who are experiencing domestic violence. By establishing clear procedures for managing client information, particularly when transferring sensitive data to the Comparable Database (CDB), this policy aims to align with HUD's guidelines and ensure that survivors of domestic violence are supported through secure and informed processes.

### FORMS

There are no forms related or required for this Policy

### POLICY

*NOTE: Our community currently only has COC DV RH/TTH for Individuals. For families, they will be de-identified in HMIS and prioritized for CoC openings.*

#### Individuals

If a service provider using HMIS identifies that their client is experiencing domestic violence, as defined by HUD (fleeing or attempting to flee domestic violence, with no other residence and lacking the resources or support networks to obtain permanent housing), the following steps should be followed:

- **If the client has already completed the HMIS Release of Information (ROI)**, the provider should complete the client's HMIS profile and CES program enrollment. The provider must then contact the Special Populations Coordinated Entry facilitator to notify them of the client's situation, ensuring their information is securely transferred to the Comparable Database (CDB). This can be done verbally in person, over the phone, or through direct message in HMIS to the CES Director, who will communicate them to the Special Populations CES Facilitator. NO EMAILS with any client information, to ensure safety.
- **If the client has not yet completed the HMIS ROI nor has a HMIS profile**, the provider should explain the CES process and the option to enter their information into the CDB for protection. If the client does not want to be in HMIS but does want to be in CDB, they ROI is still required. The provider should contact the Special Populations Coordinated

Entry facilitator to securely enter the client's information into the CDB. NO EMAILS about clients to ensure safety.

- **If the client does not wish to be entered into the CDB**, they may be entered into HMIS (only with a signed ROI), or the provider can direct them to local Victim Service Providers for further assistance.
- **If the client does not want to sign a ROI**, their information cannot be placed in either system for legal or safety reasons.

### Families

- ALL person being entered into the CES must sign the ROI. When a family reports actively fleeing DV/IPV/HT and creating their HMIS profile. Even with the signed ROI, complete the ROI as 'refused' in HMIS to protect their immediate identifiable information from being searchable.
- Complete CES program enrollment and CES assessment(s)
- NOTE: Their HMIS ID will be the only way to search for the family's profile in HMIS after 'refusing' consent on their profile for safety.
- These families will still populate on the By-Name List and are routinely discussed in Family By-Name List meetings.

### **KEY TAKE AWAYS**

- Service providers must promptly and securely manage the client's information in HMIS when domestic violence is identified, ensuring compliance with HUD's definition.
- If a client has completed the HMIS Release of Information (ROI), their data should be entered into the HMIS and CES program, and their situation must be communicated to the Special Populations Coordinated Entry facilitator for secure transfer to the Comparable Database (CDB).
- If the client has not completed an ROI, providers must explain the CES and CDB processes, allowing clients to choose whether to enter the CDB or be directed to Victim Service Providers.
- The policy ensures that client information is securely handled and that service providers facilitate safe, trauma-informed choices for clients.

## 5.1 CES Participant Training

### **PURPOSE**

The purpose of this policy is to ensure that all staff involved in Coordinated Entry System (CES) operations are adequately trained to implement the CES effectively, in alignment with its vision, framework, and established policies and procedures.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

#### Initial Training for New CES Participants:

All new participants in the CES must complete a series of recorded webinar trainings. These trainings provide foundational knowledge necessary for conducting VI assessments and participating in CES-related activities.

#### Completion and Certification:

After completing the required training video, participants must successfully pass the CES Onboarding Trainings quiz with a score of 100% before engaging in any CES activities.

Upon achieving 100% on the quiz, participants must notify the CES facilitator by emailing [coordinatedentry@cafth.org](mailto:coordinatedentry@cafth.org) to confirm their readiness.

#### Annual Training Requirement:

The CES conducts an annual mandatory training for all CES participants, held in November each year. Attendance is required to ensure ongoing compliance with CES policies and the latest procedural updates.

Failure to attend the annual training may result in the removal of CES access within HMIS until the participant completes the necessary training.



### KEY TAKE AWAYS

- **Comprehensive Training for All Participants:** All new CES participants must undergo a thorough training process, including completing a recorded webinar series and passing a quiz with 100% accuracy.
- **Certification Before Participation:** Participants must pass the CES Onboarding Trainings quiz and notify the CES facilitator before conducting assessments or participating in CES activities.
- **Mandatory Annual Training:** An annual training session is required for all CES participants, ensuring they stay informed about any updates to the system and maintain compliance with CES protocols.
- **Enforcement of Training Compliance:** Participants who fail to attend the required annual training risk losing their access to CES within HMIS until they fulfill the training requirement.

This policy ensures that all staff involved in CES operations are equipped with the necessary training to implement the system effectively and in accordance with established guidelines.

## 5.2 Routine CES Training(s)

### **PURPOSE**

The purpose of this policy is to outline the training and confidentiality requirements for all participants in the Coordinated Entry System (CES). The policy ensures that CES contributors are equipped with the necessary knowledge, skills, and ethical standards to collaborate effectively in efforts to end homelessness, while safeguarding the privacy and dignity of those served.

### **FORMS**

APPENDIX C CES Contributor Confidentiality Agreement

### **POLICY**

CES participants will be provided with annual training to assist providers with best practices, procedures and ensure a collaborative community effort to end homelessness. Trainings are provided in-person or in recorded webinar form and cover:

- Overview: HUD, CoC & CES
- Guiding Principles
- Contributors Roles & Responsibilities
- Database
- Core Elements
- Housing Providers
- Documentation
- Meetings
- CES Resources

CAFTH CES team acknowledges these needs are continuing to change and grow, so changes to training and additional trainings will be added as the CES team feels necessary to best assist the consortium and homeless population.

All CES Contributors are required to attend annual CES training and complete a confidentiality form to maintain their ability to access CES in HMIS.

### *New CES Contributor Training*

Outside of annual required refresher trainings, new CES contributors must complete CES training through the recorded CES Training Video, completion of a follow-up with 100% accuracy to demonstrate thorough understanding of the processes of the CES.

Upon the completion of the CES recorded training and 100 % accuracy CES Quiz. The contributor will have to complete and return a confidentiality agreement. Once the confidentiality agreement is completed and returned, the CES contributor is added to the email invitations to all CES meetings.

### *Confidentiality Agreement*

The confidentiality agreement is required by all CES contributors, to maintain the safety of all of our neighbors as the meetings involve the display and discussion of many clients and their private information.

The CES confidentiality agreement outlines the persons understanding of all CES processes and procedures, the acknowledgement to operate within the CES as it is outlined by HUD and CAFTH and lastly, to not share or obtain pictures/screen shots of meeting content with client information on person devices without prior protections to ensure HIPPA.

## **KEY TAKE AWAYS**

- **Annual CES Training:** All CES participants are required to undergo annual training. This training covers essential topics such as HUD, CoC, and CES overviews, guiding principles, core elements, documentation, and procedures. The goal is to keep all participants informed of best practices and ensure a unified community effort to address homelessness.
- **Ongoing Adaptation:** The CES team recognizes the evolving needs of the homeless population and the service community and commits to updating and adding training modules as necessary to best support CES contributors.
- **New Contributor Training:** New CES contributors must complete an initial training through a recorded CES Training Video, followed by a quiz that must be completed with 100% accuracy. This ensures a comprehensive understanding of CES operations before the contributor is granted access to the system.

- **Confidentiality Agreement:** All CES contributors must sign a confidentiality agreement to maintain the security and privacy of client information. This agreement reinforces the commitment to safeguarding sensitive data, prohibiting the sharing or unauthorized recording of client information, and ensuring compliance with HUD and HIPAA standards.
- **Access Requirements:** Completion of the annual training and signing the confidentiality agreement are mandatory for maintaining access to CES in the Homeless Management Information System (HMIS). Failure to comply with these requirements may result in the loss of access privileges.

## 6.1 Access

### **PURPOSE**

The purpose of this policy is to ensure that all people experiencing a housing crisis can easily access the Coordinated Entry System (CES) in Memphis/Shelby County through a decentralized, "No Wrong Door" approach. This policy aims to simplify the process of connecting people to crisis response services and housing interventions, ensuring that they receive immediate and appropriate assistance regardless of where they first seek help.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

Access refers to how people experiencing a housing crisis learn that CES exists and access crisis response services. The first contact that most people experiencing a housing crisis will have with the crisis response system is through a CES access point. Access points play a critical role in engaging people in order to address their most immediate needs. Access points also play a critical role in beginning to determine which intervention might be most appropriate to rapidly connect those people to housing.

#### No Wrong Door Approach

The Memphis/Shelby County Coordinated Entry System (CES) is decentralized and operates with a "no wrong door" approach. This system enables clients to access CES and be assessed for housing eligibility, regardless of which agency they initially contact. Partnered agencies within the CES are equipped to enter individuals, youth, and families into the system. All access points utilize a community-adopted vulnerability assessment tool to ensure compliance with HUD regulations, focusing on serving the most vulnerable populations.

All subpopulations identified by HUD can access CES through this "No Wrong Door" approach, allowing any CES assessor to enter individuals, youth, families, and veterans into CES when they present as homeless.

The No Wrong Door approach eliminates the need for multiple providers to repeatedly collect the same information from an individual, as the system allows different providers to securely share data within HMIS.

### KEY TAKE AWAYS

- **First Point of Contact:** The initial interaction individuals experiencing a housing crisis have with the crisis response system is typically through a CES access point. These access points are crucial for addressing immediate needs and beginning the process of connecting individuals to suitable housing interventions.
- **"No Wrong Door" Approach:** The CES operates on a decentralized basis, allowing clients to access CES and be assessed for housing eligibility through any participating agency. Regardless of where a person first seeks help, they will receive the same level of service and be entered into the CES.
- **Unified Assessment Process:** All access points within the CES utilize a community-adopted vulnerability assessment tool to ensure compliance with HUD regulations. These tools focus on identifying and serving the most vulnerable populations, including individuals, youth, families, and veterans.
- **Data Sharing and Efficiency:** The "No Wrong Door" approach eliminates the redundancy of multiple providers collecting the same information from a client. It allows for secure data sharing within HMIS, streamlining the process and ensuring that clients do not have to repeatedly provide the same information.
- **Inclusivity for All Subpopulations:** The policy ensures that all subpopulations identified by HUD, including veterans, youth, families, and others, can access CES through any CoC CES assessor when they present as homeless.

This policy is designed to create a more accessible, efficient, and client-centered approach to housing crisis response, ensuring that all individuals receive the assistance they need without unnecessary barriers.

## 6.2 Assessment

### **PURPOSE**

The purpose of this policy is to ensure a standardized and phased assessment process within the Coordinated Entry System (CES) in Memphis/Shelby County. This process aims to accurately identify the needs and preferences of those experiencing a housing crisis, ensuring they are connected to the most appropriate interventions while minimizing the need for them to repeat their stories.

### **FORMS**

APPENDIX B HUD Homelessness Definitions

### **POLICY**

The CoC's CES will provide a standardized assessment process to all CES participants, ensuring uniform decision-making and coordination of care for persons experiencing a housing crisis.

Memphis/Shelby County's Coordinated Entry System (CES) utilizes a phased assessment process. It is strongly suggested by HUD to collect information in phases, initially only collecting the information essential to ascertaining the person's immediate needs and connecting them with appropriate interventions; and to capture information as needed and limit how frequently the person being assessed must repeat their story. The goal is to build an accurate and concise picture of that person's needs and preferences in order to connect them to an appropriate intervention.

#### 1<sup>st</sup> Phase CES assessment(s):

##### Youth (YHDP) Assessment (18-24)

The YHDP assessment was specifically developed to gather initial information of youth (18-24) experiencing homelessness. As a special population, determined by HUD, this screening has youth specific questions to assist with their CES navigation.

CES Pre-Questionnaire (everyone else, other than youth)

CES Pre-Questionnaire is about 10 questions that are data driven. The questions are a cumulation of necessary information to conduct basic case conferencing at routine CES meetings to further decide the most appropriate housing and resource needs and eligibility.

### 2nd Phase CES assessment(s):

#### Memphis Vulnerability Assessment (MVA)

The CoC's CES process for clients (who are not fleeing domestic violence) provides a standardized assessment process to all CE participants, ensuring uniform decision-making and coordination of care for persons experiencing a housing crisis. The standardized assessment tool used for Coordinated Entry, outlined below, follows the guidelines for establishing a Coordinated Entry System outlined by HUD.

#### *Who Qualifies for a CES enrollment and CES assessment(s)*

The Memphis/Shelby County CES has adopted the practice that a person or household must be at minimum literally homeless to receive a CES enrollment and assessment(s). The definition of literally homeless is determined by HUD and varies by population. HUD's HEARTH Act Final Rule on Homelessness defines literal homelessness as:

1. Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who resided in an emergency shelter or a place not meant for human habitation and who is exiting an institution where he or she temporarily resided;
2. Individuals and families who will imminently lose their primary nighttime residence; and
3. Individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member.
4. *Who Can Administer the Memphis Vulnerability Assessment (MVA)?*
5. Assessors who administer the Memphis Vulnerability Assessment (MVA) to clients who are not fleeing domestic violence are generally housing provider staff, outreach



workers, or those who are key players within the CES. Anyone can administer the assessments once they are trained on CES processes and procedures. Assessors are also trained in how to quickly and safely refer a client fleeing domestic violence who may present at a CES access point.

6. All staff administering assessments are expected to use culturally and linguistically competent practices. The CoC will incorporate cultural competency and linguistic competency training into the required annual training protocols for participating projects and staff members using standards of practice from models provided by organizations and associations like the American Speech and Hearing Association (ASHA). Assessments will include questions for all persons that reduce cultural and linguistic barriers to housing and services for special populations, including immigrants, refugees, youth, individuals with disabilities, and LGBTQ+ persons.

#### *When to administer the MVA after the completion of the CES Questionnaire*

When completing the CES Questionnaire, you immediately do the 2nd phase assessment if they:

can meet their Activities for Daily Living (ADLs)

**AND**

are a Veteran

are pregnant

Single parent with 3+ dependents under 6 years old

have dependents with a documented disability

they are fleeing DV/IPV/Trafficking

If the participant answers NO to the Daily Activities question on the CES Questionnaire, no matter their circumstances, they do not receive a MVA.

If they answer YES to the Daily Activities question and is a veteran, pregnant, family with 3 or more dependents, families who have 2 or more dependents under the age of 10 or any of the dependents have disabilities.

All CES Questionnaire and MVA clients will be reviewed at routine CES meetings.

### *Privacy and Assessments*

An HMIS consent form is attached to each assessment. The client's consent is required for the release and sharing of information, and for entering the client into the HMIS CES. If a participant completes the assessment, but does not want their data in HMIS, the CE Lead Agency will need to be given the data by the assessor so that a unique identifier can be used on the By Name List for connection to supportive housing.

### *Client's Right to Decline Answers*

CoC CES clients are free to decide what information they provide during the assessment process, to refuse to answer assessment questions, and to refuse housing and service options without retribution or limiting their access to other forms of assistance.

During the assessment, clients are not required to disclose information, including a specific disability or diagnosis. The disclosure of a specific disability or diagnosis (or the refusal to disclose such) will not impact an individual or household's placement into the CES, nor will it affect the individual's place on the priority list. Assessment score, length of time homeless, chronic status, and supportive documentation forms will all be used to determine eligibility and match appropriateness. Information regarding a specific diagnosis or disability may only be obtained for the purposes of determining program eligibility to make appropriate matches from XES, e.g. accessible units, physical limitations, first floor vs. upper floor vacancies, and congregate vs. scattered-site settings.

### Special Populations Risk Assessment

The CES will include a local domestic violence hotline, which is staffed 24 hours a day, seven days a week, to ensure that all persons who are fleeing or attempting to flee domestic violence or sexual assault have immediate access to crisis response services. All persons will have access to this hotline regardless of which access point they initially contact for services and assistance through the CoC's CES.

All CoC providers shall incorporate a safety risk assessment as part of initial CES triage and intake procedures, evaluating, to the greatest extent possible, the physical safety and well-being of participants and prospective participants.

### *Assessments for Domestic Violence Survivors*

It is HUD's position that any level of domestic violence, dating violence, sexual assault, or stalking is inherently dangerous and life-threatening. Therefore, HUD did not intend the phrase "dangerous or life-threatening" outlined above in the definition of literal homelessness to be interpreted as a level of violence that must occur before an individual or family can qualify as homeless. HUD interprets the intent behind section 103(a)(6) of the McKinney Vento Act as including all individual and families fleeing, or attempting to flee domestic violence, dating violence, sexual assault and stalking. These domestic violence subpopulations are to be assessed separately from those who are entering CE and are not fleeing domestic violence or assault. Clients within this population are to receive a brief risk assessment to best assess their needs while protecting their privacy.

### **KEY TAKE AWAYS**

- **Phased Assessment Approach:** The CES utilizes a phased assessment process to collect only the most essential information at each stage. This approach helps address immediate needs and limits the frequency with which participants must repeat their information.
- **Standardized Assessments:** The policy mandates the use of standardized assessment tools, such as the Youth (YHDP) Assessment for youth and the CES Questionnaire for other populations, to ensure uniform decision-making and care coordination across the CES.
- **Cultural and Linguistic Competency:** All assessors are trained to use culturally and linguistically competent practices during assessments, ensuring inclusivity for special populations such as immigrants, refugees, individuals with disabilities, and LGBTQ+ persons.
- **Eligibility for Vulnerability Assessment:** Only individuals or households that meet the HUD definition of literally homeless are eligible for CES enrollment and assessments. This ensures that resources are prioritized for those in the most urgent need.
- **Privacy and Consent:** Participants must provide consent for their information to be entered into HMIS, with specific provisions in place for protecting the data of domestic

violence survivors. Clients have the right to decline answering specific questions without affecting their access to housing resources.

- **Client Rights:** Clients are informed of their right to refuse to answer questions or to reject housing and service options without retribution. Their eligibility and prioritization within the CES will not be impacted by their decision to withhold certain information.
- **Risk Assessment for Domestic Violence Survivors:** A dedicated risk assessment process is in place for survivors of domestic violence, ensuring their safety and privacy are protected while assessing their needs for housing and support services.

This policy is designed to provide a consistent, respectful, and effective approach to assessing and addressing the needs of individuals in housing crises, ensuring they receive the most appropriate support and housing interventions.

## 6.3 Prioritization

### **PURPOSE**

The purpose of this policy is to establish a clear and consistent process for prioritizing participants within the Coordinated Entry System (CES) in Memphis/Shelby County based on their level of vulnerability and need. The policy ensures that those who are most in need receive appropriate housing and supportive services in a timely manner, according to the Continuum of Care's (CoC) established prioritization standards.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

After a person experiencing a housing crisis has been assessed, the CES determines their priority for housing and supportive services. This prioritization is based on the person's level of vulnerability or need, which is evaluated by comparing the information from their assessment against the CoCs prioritization standards.

The CES encompasses individuals and families of all ages and compositions. Different populations hold meetings or follow specific program procedures to allocate available housing units within CoC Housing Projects.

#### CES By-Name List Meetings:

All CES by-name list meetings involve the following activities:

- **Client Case Updates:** Recording all updates in the Homeless Management Information System (HMIS).
- **Identifying Barriers:** Recognizing challenges that prevent clients from accessing housing and services.
- **Spotting Emerging Trends:** Observing new patterns, such as an increase in single fathers experiencing homelessness.
- **Process Questions:** Addressing any questions related to CES processes.
- **Provider Collaboration:** Facilitating cooperation among homeless service providers.

- Resource Sharing: Sharing available resources among providers.
- Client-Related Topics: Discussing any other matters related to clients.
- Health and Behavioral Challenges: Addressing significant health or behavioral challenges that require substantial support for clients to maintain permanent housing.
- High Use of Emergency Services: Noting high use of crisis services such as emergency rooms, jails, and psychiatric facilities.
- Unsheltered Status: Understanding the extent to which individuals, particularly youth and children, are unsheltered.
- Vulnerability to Illness or Death: Considering the risk of illness or death.
- Risk of Continued Homelessness: Assessing the risk that clients may remain homeless.
- Vulnerability to Victimization: Evaluating the risk of clients being victimized, including risks of physical assault, trafficking, or sex work.
- Community-Determined Factors: Considering other factors identified by the community based on the severity of needs.

#### Permanent Supportive Housing (PSH) Prioritization:

The prioritization for PSH aligns with HUD's guidelines. Available units are allocated based on the following order:

1. 1st Priority: Chronically homeless individuals and families with the longest history of homelessness and the most severe service needs.
2. 2nd Priority: Chronically homeless individuals and families with the longest history of homelessness but without severe service needs.
3. 3rd Priority: Chronically homeless individuals and families with the most severe service needs.
4. 4th Priority: All other chronically homeless individuals and families not included in priorities 1 through 3.
5. 5th Priority: Homeless individuals and families who are not chronically homeless but have a disability and severe service needs.
6. 6th Priority: Homeless individuals and families who are not chronically homeless but have a disability and a long period of continuous or episodic homelessness.
7. 7th Priority: Homeless individuals and families who are not chronically homeless but have a disability and are coming from places not meant for human habitation, Safe Havens, or emergency shelters.

8. 8th Priority: Homeless individuals and families who are not chronically homeless but have a disability and are coming from transitional housing.

*Tie-Breaker:* When two households in the same priority category have equal scores on the Prioritized List, the following tie-breakers are used in this order:

- Longest length of homelessness
- Lowest household income
- MVA's score(s)

#### Rapid Re-Housing (RRH) Prioritization for Youth (18-24):

Prioritization for RRH follows the CoC's scoring criteria for need and vulnerability related to RRH youth projects. Additionally, the CoC prioritizes the following youth for RRH:

1. Experiencing or at risk of domestic violence/violence
2. Vulnerability to illness or death
3. High utilization of crisis or emergency services, including emergency rooms, jails, and psychiatric facilities to meet basic needs
4. Risk of continued homelessness

#### Rapid Re-Housing (RRH) Prioritization for Families:

Prioritization for RRH follows the CoC's scoring criteria for need and vulnerability related to RRH family projects. Additionally, the CoC prioritizes the following families for RRH:

1. Households are experiencing domestic violence.
2. Pregnant member of the family
3. Single parent and three or more dependent children under the age of six.
4. Length of time homeless

#### Rapid Re-Housing (RRH) Prioritization for Individuals:

Prioritization for RRH follows the CoC's scoring criteria for need and vulnerability related to RRH projects. Additionally, the CoC prioritizes the following Individuals for RRH:

1. Experiencing domestic violence & other safety concerns
2. Deteriorating/potentially deteriorating health
3. Length of time homeless

### Transitional Housing (TH) Prioritization: (youth only)

The prioritization for TH is consistent with the CoC's scoring criteria for need and vulnerability related to TH projects. The CoC prioritizes the following individuals for TH:

1. Households fleeing or experiencing domestic violence as the primary cause of their current housing crisis.
2. Households consisting of unaccompanied youth.
3. Participants seeking treatment services for behavioral health conditions such as mental illness and/or substance use disorders.

### **KEY TAKE AWAYS**

- **Prioritization Based on Vulnerability:** The policy emphasizes that individuals and families are prioritized for housing and services based on their level of vulnerability, as determined through CES assessments. Factors such as severity of service needs, length of homelessness, and risk of victimization are considered to ensure those in the greatest need are prioritized.
- **Population-Specific Prioritization:** The CES captures data across all ages and family compositions. Prioritization processes and meetings are tailored to the needs of different populations, including youth, families, veterans, and those with severe health or behavioral challenges.
- **Permanent Supportive Housing (PSH) Prioritization:** PSH prioritization aligns with HUD's guidelines, focusing first on chronically homeless individuals and families with the longest histories of homelessness and most severe service needs. Subsequent priorities consider the duration of homelessness and the presence of disabilities.
- **Transitional Housing (TH) Prioritization:** TH prioritization is targeted at households fleeing domestic violence, unaccompanied youth, and individuals seeking treatment for behavioral health conditions. The prioritization process is consistent with the CoC's scoring range for TH projects.
- **Rapid Re-Housing (RRH) Prioritization:** RRH prioritization is directed towards vulnerable households, including single-parent families with young children, those experiencing domestic violence, unaccompanied youth, and households with recent episodes of homelessness. The policy ensures these groups are given priority for RRH resources.
- **Collaborative CES Meetings:** CES prioritization meetings involve collaboration among homeless service providers, focusing on client case updates, identifying barriers to



housing and services, sharing resources, and addressing emerging trends in homelessness.

- **Tie-Breaking Criteria:** In cases where two households have the same prioritization score, tie-breakers such as veteran status, longest length of homelessness, and lowest household income are used to determine who receives priority.

This policy ensures a transparent, equitable, and needs-based approach to allocating housing and supportive services within the CES, helping to efficiently and effectively serve those experiencing homelessness in Memphis/Shelby County.

## 6.4 Matchmaking

### **PURPOSE**

The purpose of this policy is to ensure that all individuals and families eligible for Coordinated Entry System (CES) housing are properly matched with available housing units in a timely manner. This policy outlines the responsibilities of outreach and agency staff in collecting and validating HUD-required documentation, as well as the procedures for matchmaking clients to housing program openings through CES prioritization practices.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

To be eligible for any CES housing opening, all HUD required CES Eligibility documents must be collected and uploaded into HMIS. Outreach or agency staff who are working directly and indirectly with a client are responsible for collecting all required verification and ensuring that the documentation is valid. Or it must be confirmed the documentation will be acquired within 30 days of the match. Upon the reported open unit, utilizing prioritization practices, the CES team will matchmake an individual or family to unit openings.

Matchmaking will happen within 3 business days of the reported opening.

CES facilitators match housing openings to clients outside of CES meetings. Clients are discussed thoroughly at routine CES By-Name list meetings to understand and clarify the low barrier eligibility requirements for COC funded housing programs.

CES facilitators utilize Housing First principles when discussing clients in By-Name list meetings and in matchmaking as all those who meet the bare minimum eligibility requirements for RRH or PSH can be matchmade to any of the RRH and PSH programs, as they all offer the same components per HUD.

HUD funded COC Housing Programs utilize the CES processes to house those who are most vulnerable without disqualifying them for factors that would go against Housing First principles. CES participants are the most vulnerable, including those who are traditionally more difficult to house. That population is the targeted population per HUD.

Matchmaking is conducted through the application of CES prioritization practices, which are heavily dependent on active participation in CES meetings. Upon receiving a CES match, it is a collaborative effort to schedule a warm hand-off between the housing provider and the individual or family. This process helps to ensure that clients are connected and helps to build trust and communication during the match process.

Matches are made with a physical match in the housing program in HMIS and an email including the housing provider and the outreach worker/service provider who is actively working with the client(s) who are matched to foster a warm hand off.

### KEY TAKE AWAYS

- **Eligibility Requirements:** To qualify for CES housing, all HUD-required verification documents must be collected and uploaded into the Homeless Management Information System (HMIS). Outreach and agency staff are responsible for ensuring that all necessary documentation is valid and complete, or that it will be obtained within 30 days of the client being matched to a housing unit.
- **Timely Matchmaking:** The Coordinated Entry System (CES) team will match eligible clients to available CoC housing program openings within three business days of the reported vacancy. This process utilizes CES prioritization practices to ensure that the most vulnerable individuals and families are matched with available units as quickly as possible.
- **Collaborative Process:** After a CES match is made, a collaborative effort is required to schedule a warm hand-off between the housing provider and the matched individual or family. This approach fosters trust and communication, ensuring that clients are connected to their housing providers and supported throughout the transition into housing.
- **Responsibility of Outreach and Agency Staff:** Staff working directly or indirectly with clients must take an active role in collecting and validating the required documentation to facilitate smooth and efficient housing placements. This responsibility is critical to the success of the CES process and the timely housing of eligible clients.



## 6.5 CES Eligibility Documentation

### **PURPOSE**

This policy ensures that all participants in Continuum of Care (CoC)-funded housing programs provide the necessary documentation to verify their eligibility, homelessness status, and any required conditions such as disability. The policy outlines the types of documentation required by HUD, the process for collecting and validating these documents, and the specific record-keeping requirements for chronic homelessness and clients fleeing domestic violence.

### **FORMS**

|          |   |  |
|----------|---|--|
| APPENDIX | H | Verification of Homelessness (VOH) Form – Self Certification           |
| APPENDIX | F | Verification of Homelessness (VOH) Form – Program/Facility Third Party |
| APPENDIX | G | Verification of Homelessness (VOH) Form – Unsheltered Third Party      |
| APPENDIX | E | Verification of Disability (VOD) Form                                  |

### **POLICY**

Participants in the CES must provide specific documentation to verify their eligibility, per HUD. The two main documents required are the Verification of Homelessness (VOH) and Verification of Disability (VOD). The policy also includes guidelines for documenting chronic homelessness and for clients fleeing domestic violence.

#### *Verification of Homelessness (VOH)*

- An HMIS record or a record from a comparable database.
- A written observation by an outreach worker of the client's living conditions.
- A written statement from another housing or service provider.
- A client certification, accompanied by the intake worker's documentation, if the above evidence cannot be obtained.

### *Verification of Disability (VOD)*

- Written verification from a licensed professional.
- Written verification from the Social Security Administration.
- Receipt of a disability check.
- Intake staff-recorded observation of the disability, confirmed within 45 days by a professional.

For any documentation other than third-party verification, the case file must include evidence of due diligence to obtain third-party verification. All documents must be retained for at least five years.

### *Chronic Homeless Verification*

- History of residing in a place not meant for human habitation, an emergency shelter, or a safe haven.
- Stays in institutions and breaks in homelessness of seven nights or more.
- Documentation should prioritize third-party evidence, with intake worker observation and client certification as secondary options.
- Accumulation of 12 months over the last 3 years.

### *Documentation for Clients Fleeing Domestic Violence*

For Victim Service Providers (VSPs):

An oral statement from the client certifying they are fleeing domestic violence, have no subsequent residence, and lack resources, documented by self-certification or intake worker certification.

For non-VSPs:

An oral statement from the client, documented by self-certification or caseworker verification, with additional certification that no subsequent residence has been identified and the client lacks financial resources and support networks to obtain other housing.

This policy ensures that all required documentation is properly collected, validated, and maintained to support eligibility for CoC-funded housing programs and to comply with HUD guidelines.

## KEY TAKE AWAYS

- **Required Documentation:** CoC-funded housing programs require two primary documents for participants: Verification of Homelessness (VOH) and Verification of Disability (VOD). VOH is used to assess a client’s homelessness status and duration, while VOD is required for Permanent Supportive Housing (PSH) programs to verify that the client or a household member has a qualifying disability.
- **Acceptable Forms of Documentation:** The policy details acceptable forms of documentation for both VOH and VOD, as well as the priority order for obtaining these documents as set by HUD. Third-party verification is preferred, but other forms of documentation may be used if necessary, provided that due diligence is demonstrated.
- **Chronic Homelessness Documentation:** For clients who meet the definition of chronically homeless, the policy outlines specific record-keeping requirements, including the documentation of homelessness history, institutional stays, and any breaks in homelessness. Third-party documentation is required for at least 9 of the 12 months of homelessness, with the remainder documented by client certification.
- **Domestic Violence Documentation:** The policy provides guidance on documenting homelessness for clients fleeing domestic violence, differentiating between requirements for Victim Service Providers (VSPs) and non-VSPs. In both cases, an oral statement by the client is required, with additional certification and documentation depending on the circumstances.
- **Record-Keeping Requirements:** All documentation must be kept for a minimum of five years, as per HUD guidance. The policy emphasizes the importance of maintaining accurate and complete records to ensure compliance with HUD requirements and to support the eligibility of participants for CoC-funded housing programs.

## 6.6 Supportive Documentation

### **PURPOSE**

The purpose of this policy is to clarify the documentation requirements for participants in Rapid Re-Housing (RRH) and Permanent Supportive Housing (PSH) programs, particularly concerning identification, family custody, and income verification. These requirements are essential for ensuring that participants can secure housing, access mainstream resources, and comply with program guidelines.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

#### *Head of Households ID, Birth Certificates and/or Social Security Card*

In the context of securing housing through the CES, specific documentation is recommended or required to facilitate the enrollment and leasing processes for participants in Rapid Re-Housing (RRH) and Permanent Supportive Housing (PSH) programs.

For RRH participants, possessing a valid ID is mandatory, as it is essential for obtaining a lease in the participant's name. This requirement ensures that participants can smoothly navigate the process of identifying landlords and applying for housing. Additionally, while not mandatory, it is strongly advised that RRH participants also obtain a Social Security Card (SSC) and/or a Birth Certificate (BC). Landlords commonly request these secondary forms of identification as part of the leasing process.

In contrast, PSH participants are not required to have an ID, SSC, or BC at the time of their enrollment in the program. However, recognizing the importance of these documents in accessing mainstream resources, securing employment, and generating income, all participants in the CES are encouraged to obtain an ID. This proactive measure supports participants in achieving long-term housing stability and self-sufficiency.



### *Family Custody Documentation*

Regarding family custody, the CoC Program interim rule stipulates that no custodial relationship or proof of custody is necessary for entry into a CoC-funded project. According to the Equal Access Rule, a family is defined as any group of individuals presenting together and identifying themselves as a family. Consequently, families seeking assistance through CES are not required to provide proof of custody, ensuring that all family units are served without additional barriers.

### *Verification of Income/Pay Stubs*

Income verification, including proof of income or pay stubs, is not a requirement for enrollment in either RRH or PSH programs. However, participants are encouraged to obtain and provide this documentation. For RRH participants, income verification can facilitate the leasing process, while for PSH participants, it is necessary to meet the program's requirement that tenants contribute 30% of their income toward rent. Providing income documentation supports the overall goal of helping participants secure and maintain stable housing.

## **KEY TAKE AWAYS**

- **Identification Requirements:** RRH participants must have a valid ID to secure a lease, and it is highly recommended that they also obtain a Social Security Card (SSC) and/or Birth Certificate (BC) as secondary forms of identification. These documents are often required by landlords during the leasing process. PSH participants are not required to have an ID, SSC, or BC at the time of enrollment. However, obtaining an ID is strongly encouraged to facilitate access to mainstream resources, employment, and income opportunities.
- **Family Custody Documentation:** The CoC Program does not require proof of custody for families seeking entry into a CoC-funded project. The Equal Access Rule defines a family as any group of people who present together and identify themselves as a family. Consequently, no custodial documentation is necessary.
- **Income Verification:** While verification of income is not a prerequisite for enrollment in RRH or PSH programs, participants are encouraged to provide proof of income or pay stubs. This documentation aids in the leasing process for RRH participants and assists PSH providers in calculating the required 30% income contribution for housing.

## 6.7 COC Housing Types & Components

### **PURPOSE**

This policy outlines the framework for providing various housing interventions within the Continuum of Care (CoC), specifically focusing on Permanent Supportive Housing (PSH), Rapid Re-Housing (RRH), Transitional Housing (TH), and Supportive Services (SS). The goal is to ensure that each housing program meets the specific needs of individuals and families experiencing homelessness, providing them with the necessary support to achieve and maintain housing stability.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

#### Permanent Supportive Housing (PSH)

PSH is the most intensive housing model, targeted to individuals and families with the most severe housing and service needs.

PSH that includes supportive services is designed for households where at least one member (either an adult or a child) has a disability. There is no set length of stay in this type of housing; participants can remain as long as they choose, or until they are terminated from the program. Supportive services tailored to meet the participant's needs must be provided for the entire duration of their stay in PSH.

- The rental assistance and support are permanent, so long as the household continues to be eligible for the program
- Tenants pay 30% of their monthly adjusted income as their share of the rent, we pay the rest
- Annual activities for PSH programs include:
  - Recertification of the household
  - Re-inspection of the unit
  - Lease renewal – Housing Program facilitates this process between the tenant and landlord, providing an opportunity for rent changes

## Rapid Rehousing (RRH)

*RRH is a time-limited housing intervention, targeted to individuals and families with moderate needs.*

Rapid Re-Housing (RRH) provides short-term (up to 3 months) and medium-term (4-24 months) tenant-based rental assistance along with supportive services to households experiencing homelessness. The aim is to help these households achieve housing stability as quickly as possible. Importantly, there is no requirement for any household member to have a disability. Supportive services can continue for up to six months after the rental assistance ends, and participants are allowed to remain in their housing once the RRH assistance has concluded.

Participants are required to meet with a case manager at least once a month, with flexibility in how and where these services are delivered—whether at the participant’s home, an office, another location, or even by phone. Additionally, recipients or subrecipients must re-evaluate participants at least once a year to ensure that continued RRH assistance is necessary, specifically to verify that participants still lack the resources and support networks needed to maintain housing without the assistance.

- The housing assistance and support is time-limited, tailored to each household to re-stabilize them in housing
  - On average, RRH assistance lasts between 6 and 9 months
- Tenants pay a share of the monthly rent that gradually increases as their income increases
- At the end of the RRH assistance, the tenancy continues according to the term of the initial lease and the household is responsible for the monthly rent to the landlord

*PSH and RRH programs both have many of the same features and requirements, including:*

- Rent Reasonableness determination
- Housing Quality Standards (HQS) inspections
- Contract with the housing provider for the rental assistance
- The housing provider generally pays the application fees, security and other deposits at move-in
- Reimbursement available to landlords for unpaid rent, damages and move-out charges

Transitional Housing (TH) *(youth & special populations only)*

Transitional housing programs with supportive services are designed to help households transition successfully to permanent housing within a 24-month period. Participants are required to have a signed lease, sublease, or occupancy agreement that meets the following conditions:

- The maximum term allowed is 24 months.

If suitable permanent housing has not been identified, or if the household requires additional time to achieve independence, participants may remain in the program beyond 24 months. However, HUD may discontinue funding for the program if more than half of the households exceed this 24-month limit.

Consumers are expected to follow the TH programs community guidelines.

Recipients and subrecipients are required to adhere to the CoC's written policies and procedures, which must include standards for prioritizing referrals to transitional housing.

Supportive Services (SS)

All COC housing providers are required by HUD to provide voluntary Supportive Services. The supportive services must be necessary to assist participants in obtaining and maintaining housing.

Recipients and subrecipients must conduct an annual assessment of participant service needs and should adjust services accordingly. The recipient or subrecipient must also document the types of supportive services provided under the recipient's program and the amount spent on those services.

There are 17 eligible supportive service categories:

|                              |                                      |                                    |
|------------------------------|--------------------------------------|------------------------------------|
| Assistance With Moving Costs | Housing Search & Counseling Services | Substance Abuse Treatment Services |
| Case Management              | Legal Services                       | Transportation                     |
| Child Care                   | Life Skills Training                 | Utility Deposits                   |
| Education Services           | Mental Health Services               | Direct Provision of Services       |
| Employment Assistance        | Outpatient Health Services           |                                    |
| Job Training                 |                                      |                                    |
| Food                         | Outreach Services                    |                                    |

## KEY TAKE AWAYS

- **Permanent Supportive Housing (PSH):** Designed for households with at least one member having a disability. Tenants contribute 30% of their monthly adjusted income toward rent.
- **Rapid Re-Housing (RRH):** Provides short to medium-term rental assistance (3-24 months) to households without requiring a disability. Tenants gradually take on more of the rent as their income increases.
- **Transitional Housing (TH):** Aimed at helping households transition to permanent housing within 24 months. Participants must have a lease or occupancy agreement with a minimum term of one month, renewable automatically.
- **Supportive Services (SS):** All CoC housing providers are required to offer voluntary supportive services necessary to help participants obtain and maintain housing. An annual assessment of participant service needs is mandatory, with services adjusted accordingly.

## 7.1 CES Housing Program Vacancies

### **PURPOSE**

The purpose of this policy is to ensure that all Continuum of Care (CoC), Emergency Solutions Grant (ESG), and Youth Homelessness Demonstration Program (YHDP) housing providers follow a standardized process for filling vacancies, improving efficiency and minimizing vacancy rates. It outlines clear steps for timely communication of available housing units through the Coordinated Entry System (CES) to ensure that placements are made efficiently and in alignment with CES prioritization protocols.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

All CoC, ESG, and YHDP housing providers are required to enroll new participants exclusively through the CoC's Coordinated Entry (CE) referral process. Providers must notify the CE facilitator of any current or anticipated housing vacancies within 14 business days of becoming aware of them. The notification must include essential details such as project name, unit size, location, and any funder-defined eligibility requirements.

Communication about housing vacancies is crucial for the efficiency of the CE process. Providers are required to submit an Open Units Report in the Homeless Management Information System (HMIS) at least one month before the unit becomes available or as soon as possible. The CE Coordinator will work to match the vacancy with a prioritized household from the By-Name List within four business days of receiving the vacancy notification.

If no chronically homeless clients are eligible or available, the CE process will identify the next qualified participant. No unit will be held vacant if a suitable household is not immediately available.

## KEY TAKE AWAYS

- **Mandatory Use of CE Referrals:** All CoC, ESG, and YHDP housing providers must fill vacancies exclusively through the Coordinated Entry referral process.
- **Timely Vacancy Reporting:** Providers must report anticipated or current vacancies to the CE facilitator within 14 business days of awareness. Ideally, reports should be submitted one month in advance through the HMIS Open Units Report.
- **Efficient Matching Process:** The CE Coordinator will prioritize households and match them to the reported vacancies within four business days, based on the latest data recorded in HMIS.
- **Prioritization and Flexibility:** If no eligible chronically homeless clients are available, the vacancy will be matched to the next qualifying participant based on CES prioritization.

## 7.2 Client Choice in Matches

### **PURPOSE**

The purpose of this policy is to ensure that all participants in the Coordinated Entry System (CES) retain their right to make informed choices regarding housing placements, without facing negative consequences. This policy supports CES's commitment to person-centered care, encouraging client engagement and participation while respecting individual preferences in the housing process.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

All CES participants have the right to refuse any housing placement offered to them. A refusal of a housing match by a client will not negatively affect their position on the CES prioritization list. When a match is refused, the rejected unit will be offered to the next eligible individual on the Coordinated Queue (CQ). The client who declined the placement will remain eligible for future housing options as they become available.

CES encourages active client participation, ensuring clients have the freedom to make informed decisions regarding the services they receive, the level of support they accept, and, when applicable, the location of their housing unit.

### **KEY TAKE AWAYS**

- **Right to Refuse:** Clients have the right to refuse any housing placement without losing their place on the CES prioritization list.
- **Eligibility for Future Placements:** Refusing a housing offer does not disqualify a client from being matched with future housing opportunities.
- **Client Choice:** Clients are empowered to make decisions about the services they receive, the level of support they want, and, if applicable, the location of their housing.
- **Person-Centered Approach:** This policy reflects CES's commitment to client autonomy and ensuring that housing and services align with individual preferences.



### 7.3 Client Population Change Following Match making

#### **PURPOSE**

The purpose of this policy is to provide clear guidelines for CoC Coordinated Entry System (CES) housing providers when they receive a match that may not align with their targeted population. The policy ensures that all matches are carefully evaluated for appropriateness, maintaining the integrity of the matching process while addressing the specific needs of both the housing provider and the client. It also aims to facilitate prompt and effective communication between housing providers and the CES facilitator, preventing unnecessary delays or denials in housing placements.

#### **FORMS**

There are no forms related or required for this Policy

#### **POLICY**

When a CoC CES Housing provider receives a match and the housing providers targeted population does not match or is no longer a match to the population primarily served by the housing provider, these are the steps to be followed:

1. Immediately contact the CES facilitator to discuss the population change or population appropriateness
2. The CES Facilitator will then seek clarification through direct contact and HMIS history to clarify and ensure the match is appropriate to the population of the housing program and client(s) being matched

No housing program can deny a match when the population does not match their targeted housing program without the direct contact and communication with the CES Facilitator to ensure the timeliness and appropriateness of the client(s) needs.

#### **KEY TAKE AWAYS**

- **Prompt Communication:** Housing providers must immediately communicate with the CES facilitator if a match does not align with their targeted population.

- **Thorough Review:** The CES facilitator will conduct a detailed review to ensure the match is appropriate, considering both the client's needs and the housing program's criteria.
- **No Unilateral Denials:** Housing providers cannot deny a match without consulting the CES facilitator, ensuring that decisions are made collaboratively and based on accurate information.
- **Documentation:** All steps, decisions, and communications must be documented in HMIS, promoting transparency and accountability.
- **Timely Resolution:** The policy emphasizes the importance of timely resolution to ensure that clients are housed as quickly and appropriately as possible.

## 7.4 Declining or Canceling Matches

### **PURPOSE**

The purpose of this policy is to establish clear guidelines for agencies within the Coordinated Entry System (CES) when deciding to decline or cancel a match for a prioritized household. The policy ensures that any refusal or cancellation is handled transparently and that all decisions are properly documented and communicated. This process is crucial for maintaining the integrity of the CES and ensuring that eligible individuals receive the appropriate and timely support they need.

### **FORMS**

There are no forms related to or required for this Policy

### **POLICY**

Below are the only allowable reasons a CES match to a COC Housing Program can be denied or canceled. In such cases, the agency must promptly notify the CES Facilitator of the denial and provide a detailed reason for the decision.

#### Guidelines for Declining or Canceling Matches:

##### Eligibility Issues:

Agencies may cancel a match if the individual is not eligible for the program's services, has been incorrectly matched, or is banned from the program. This includes communications with the CES Facilitator and the housing program must document the reason for canceling or declining the match in the Homeless Management Information System (HMIS) with a note explaining the decision.

##### Client Refusal:

If an eligible individual refuses the assigned placement, the agency may decline the match in HMIS, marking the reason as "client refused services."

#### Inability to Locate Client:

If the referred individual cannot be located within five business days of the initial match, and only if there are other eligible clients ready for placement, the CE facilitator may cancel the match.

Housing Providers are required to do their due diligence when locating clients who are matched to their program. Including but not limited to: calling the client, calling any/all service providers connected to their HMIS profile, enlisting assistance from outreach workers to go to their known locations to make contact and going to shelters to locate the matched client(s). All due diligence must be documented in HMIS and/or communicated in routine Housing Case managers Staffing meetings.

#### Safety and Capacity Concerns:

Refusals are acceptable if:

- The individual does not meet the project's eligibility criteria.
- The individual poses a danger to themselves or others if placed in the project.
- The services offered by the project are insufficient to meet the participants' needs.
- The project is at capacity and cannot accept matches at the time.

#### Canceling & Denial Communication and Documentation:

- The agency must notify the CES Facilitator of the refusal before any actions are taken in HMIS as it relates to the denial or refusal of the match.
- The agency must also inform the CES Facilitator about how the participant was notified of the refusal, what alternative resources were offered, and whether similar refusals are expected to occur in the future.
- Documentation in HMIS and communication in routine Housing Case Managers Staffing meetings are required to determine the next appropriate steps for both the project and the participant.

This policy ensures that all match cancellations or refusals are handled transparently and that eligible individuals receive appropriate and timely support through the CES.

## KEY TAKE AWAYS

- **Notification and Documentation:** Agencies must promptly notify the CES Facilitator of any match refusal or cancellation and provide a detailed reason for the decision. This must be documented in the Homeless Management Information System (HMIS).
- **Eligibility Issues:** Matches may be declined if the individual is ineligible, incorrectly matched, or banned from the program. These reasons must be recorded in HMIS.
- **Client Refusal:** If a client refuses the offered placement, the agency may decline the match, with the refusal documented in HMIS as "client refused services."
- **Inability to Locate Client:** If a client cannot be located within five business days, and other eligible clients are ready for placement, the CES Facilitator may cancel the match, after the housing program has demonstrated an communicated dule diligence of the match. The client will remain in the By-Name List for future matching.
- **Safety and Capacity Concerns:** Refusals are allowed if the client is ineligible, poses a danger, the project's services are insufficient, or the project is at capacity.
- **Other Justifications:** Any other reasons for declining a match must be explained in HMIS and communicated to the CES Facilitator.

This policy ensures transparency, proper documentation, and effective communication, all of which are vital for the smooth operation of the CES and the fair treatment of those in need.

## 7.5 CoC CES Housing Transfer

### **PURPOSE**

The purpose of this policy is to ensure a structured and efficient process for managing internal transfers within Continuum of Care (CoC) housing programs. It aims to facilitate seamless transitions for participants who require a transfer to a different unit or program, ensuring their housing needs are met promptly while maintaining clear communication and coordination between housing providers and the Coordinated Entry System (CES) facilitator.

### **FORMS**

Appendix D CoC Housing Program Internal CES Transfer Form

### **POLICY**

When a CoC housing program participant requests/requires an internal transfer the Internal Transfer Application must be completed on their behalf by the current housing provider. The Housing Provider will case conference with the CES facilitator.

When a participant in a CoC housing program requests or requires an internal transfer, the following steps must be followed:

**Completion of Internal Transfer Application:** The current housing provider must complete the Internal Transfer Application on behalf of the participant.

**Case Conferencing:** The housing provider will engage in a case conference with the CES facilitator to discuss the participant's transfer needs.

**Alternative CoC Housing Program Transfer:** If a transfer to a different CoC housing program is necessary, the housing provider will fill out the CoC Housing Program Internal Transfer Form.

**Review and Documentation:** The CES facilitator will review the completed form and upload it into the HMIS system.

**Assignment to Available Unit:** The CES facilitator will match the participant to the next appropriate available unit that meets the participant's requests and needs.

Ongoing Case Conferencing: If the internal transfer cannot be resolved immediately, the case will be discussed in weekly case conferencing sessions during the Outreach Committee meeting to address any housing crisis related to the transfer request.

### KEY TAKE AWAYS

- **Structured Process:** The policy outlines a clear process for handling internal transfer requests, ensuring that all necessary steps are followed.
- **Collaboration and Communication:** It emphasizes the importance of collaboration and communication between housing providers and the CES facilitator to address participants' needs effectively.
- **Timely Resolution:** The policy aims for timely resolution of transfer requests, with weekly case conferencing as a mechanism to address any delays or issues.
- **Documentation:** Proper documentation and review of transfer requests are critical, ensuring that all actions are recorded and tracked within the HMIS system.

## 7.6 Rehousing CES clients

### **PURPOSE**

The purpose of this policy is to outline the conditions and procedures for rehousing individuals within the Coordinated Entry System (CES). It provides clear guidelines on how to handle immediate and non-immediate rehousing situations, ensuring that clients receive appropriate support and placement in housing programs. This policy aims to facilitate a transparent and effective rehousing process that prioritizes client safety, needs, and successful outcomes in housing stability.

### **FORMS**

APPENDIX K RRH/PSH Transfer Request Form

### **POLICY**

General Rehousing Policy:

Rehousing within the Same Program: CoC housing provider participants may be rehoused within the same program multiple times as long as the program is willing to accommodate them. Additionally, a client can be rehoused in up to three separate housing programs before they must exit and restart the Coordinated Entry (CE) Process. This decision will take into consideration any other resources needed to help the client succeed and is contingent upon the program's acceptance of the match.

Immediate Rehousing Situations:

Criteria for Immediate Rehousing: Certain situations may necessitate an immediate move from one housing unit or program to another. Immediate rehousing may be required if:

- A client is fleeing domestic violence, making their current housing unit unsafe. Clients experiencing domestic violence while in CoC-funded housing are protected by VAWA regulations and cannot be terminated due to the violence.
- A client requires more intensive support or case management services, such as programs with more intensive mental/behavioral health services.



**Priority Placement:** In these situations, clients will be moved back to the top of the By-Name List and prioritized for the next available appropriate housing opening. Programs must communicate with the CES facilitator to ensure that clients in immediate rehousing situations are efficiently prioritized and relocated as quickly as possible.

#### Non-Immediate Rehousing Situations:

**Client Requests:** Clients may express a desire to move to a different housing unit or program, or they may violate their lease agreements. Lease violations do not automatically disqualify clients from being rehoused, nor do they necessitate eviction from the program.

- **Rehousing Due to Client Preference:** If a client wishes to leave their unit of their own accord and there are no significant issues with their current housing, they are not eligible for expedited rehousing. The client has the right to exit and be placed back on the By-Name List using the documentation provided during the original CE match. This information will guide future placements.
- **Rehousing Due to Lease Violations:** If a client frequently or severely violates their lease, including non-payment of rent, they may be evicted from the program. In such cases, the client may be rehoused through CE but will not be prioritized. Clients may be rehoused within the same program if the program agrees or be offered alternative housing or community resources. The client will be placed back on the By-Name List for future placement using the original CE documentation.

**Rehousing Due to Violence:** If a client is evicted due to violent behavior, they are not eligible for expedited priority rehousing. The client will be placed back on the By-Name List, using the original CE documentation, unless a new assessment is warranted due to changes in the client's vulnerability or homeless status. This information will be used in future placements.

#### Rehousing Clients from Rapid Rehousing (RRH) to Permanent Supportive Housing (PSH):

**Retention of Homeless Status:** Clients placed in RRH programs retain their homeless status until they exit the program. A client who has verified chronic homelessness and a disability, and who is not succeeding in RRH, can be moved into a PSH unit. The chronic homeless status is retained for the duration of their RRH rental assistance.

**Youth Rehousing:** Youth aged 18-24 with a disability verification can be moved into a PSH program if they are not succeeding in RRH. Under YHDP regulations, youth are not required to have chronic status for PSH placement.

## KEY TAKE AWAYS

- **Rehousing Flexibility:** Clients may be rehoused multiple times within the same program, and up to three different housing programs, before needing to restart the CE process. This is contingent on the program's willingness to accommodate the client and consideration of necessary resources for success.
- **Immediate Rehousing:** Clients in urgent situations, such as fleeing domestic violence or needing more intensive support, will be prioritized for immediate rehousing. These clients are placed at the top of the By-Name List for the next available appropriate housing unit.
- **Client Preference:** Clients who wish to move voluntarily or without major issues in their current housing will not receive expedited priority for rehousing. They may exit and be placed back on the By-Name List for future placement.
- **Lease Violations:** Clients who frequently or severely violate lease agreements may be rehoused but are not prioritized. They may be placed back on the By-Name List for future placement, with their original CE documentation guiding the process.
- **Rehousing Due to Violence:** Clients evicted due to violence are not eligible for expedited priority rehousing but can be placed back on the By-Name List for future consideration based on their original CE match.
- **Transition from RRH to PSH:** Clients in RRH programs who are not succeeding, and have verified chronic homelessness and a disability, may be transitioned to PSH. Youth aged 18-24 with a disability can also be moved to PSH under YHDP regulations without needing chronic status.

## 7.7 Eviction

### **PURPOSE**

The purpose of this policy is to establish guidelines for eviction prevention and protocols within Continuum of Care (CoC) Housing Programs participating in the Coordinated Entry System (CES). The policy ensures that eviction is treated as a last resort, in alignment with the Housing First model set forth by HUD, and provides clear procedures for addressing potential eviction situations. The goal is to support clients in maintaining stable housing through proactive communication, case conferencing, and the use of appropriate intervention strategies.

### **FORMS**

There are no forms related or required for this Policy

### **POLICY**

All CoC Housing Programs have agreed to participate in CES and follow the Housing First model set forth by HUD. Anytime an eviction is being considered, it is recommended that the program communicate any issues with the CE facilitator case conference in weekly meeting to tackle barriers and find solutions. The goal of this process is to help programs best assist their clients in maintaining their housing. Eviction should always be the last resort abiding by Housing First Principles. These eviction protocols discuss eviction prevention, eviction due to non-payment of rent, behavioral issues, criminal activity, abandonment, hospitalization, or incarceration and a suggested plan of action programs should take before any client is evicted.

#### *Eviction Prevention Strategies*

CoC Housing Program staff should make every effort to prevent clients from being evicted unless extreme situations such as violence or criminal activities prevent mediation from being conducted safely. Program staff should use techniques such as motivational interviewing, trauma-informed care approaches, and establishing strong client-staff communication practices to work with clients who are violating their lease or having behavioral issues within the program. It is important to note that just because a client has

a lease violation, that does not automatically mean that a client must be evicted. Programs should uphold every strategy possible to work with a client to understand why violations may be occurring and create a plan to help link clients with additional resources or services that can help address any unmet needs. Before an eviction outside of extreme violence or criminal activities occurs, programs should contact the CES facilitator for additional resources or support. Case conferencing during the routine CES meetings is also used to help program staff collaborate on strategies and techniques for preventing lease violations and evictions.

#### *Eviction Due to Non-Payment of Rent*

Participants with income have the option to pay on their own or have a payee. If they fail to pay for more than one month after the designated due date, they should agree to have a payee assigned. Failure to cooperate with the payee application process, thereby not paying rent per the lease agreement and housing contract is considered a lease violation, and the program has the right to provide warnings and eviction protocol.

Programs should use an internal protocol to address nonpayment, including verbal warnings; a housing retention agreement and contract signed by the client; case notes and supportive documentation of scheduled client meetings regarding the issue and who was in attendance; and any progress surrounding income, budgeting, payee set up, etc.

#### *Eviction Due to Abandonment, Hospitalization, or Incarceration*

If a client willingly walks away from their unit, lets the housing program know they aren't coming back, or hasn't been seen or heard from for more than 30 days, they are eligible for program eviction as a matter of abandonment. When a program knows that a client has not been heard from before the 30 days mark the program should contact the CE facilitator so that CE partners and outreach workers can attempt to make contact with the client to prevent abandonment evictions.

If a client has been hospitalized for more than 90 days, they are required to be terminated from the program per HUD regulations. If the program knows that their client is hospitalized or incarcerated, it is not considered abandonment. In this instance, 90 days must pass before the client is eligible to be evicted versus the 30-day abandonment rule mentioned above.

### *Eviction Due to Criminal Activity*

If a client commits a criminal offense on the property in which they reside, or the crime has an immediate connection to the property or other residents on the property, they may be eligible for immediate eviction without case management attempts at mediation.

If a client commits a criminal offense away from the individual's residence and property, it is not an immediate eviction due to criminal activity. These activities are not considered direct program violations or documentable behavioral issues. Unless the individual is convicted of a crime and incarcerated, their right to remain housed within the program remains.

### *Eviction Due to Violence*

If a client is violent with a program staff member or another tenant, the safety of all involved should be the highest priority. The client should meet with directors and case managers to discuss behavioral improvement plans and action steps to prevent an occurrence from happening again. An internal incident report, supportive documentation, and policies around behavior expectations should be included.

Depending on the program's policies, its staff, and the extent of the violence, programs have a right to decide if eviction is the best course of action.

## **KEY TAKE AWAYS**

- **Eviction as a Last Resort:** CoC Housing Programs must treat eviction as a final measure, only after all other strategies have been exhausted. Programs are encouraged to work closely with the CES facilitator and use weekly case conferences to address and resolve issues before considering eviction.
- **Eviction Prevention Strategies:** Programs should utilize motivational interviewing, trauma-informed care, and strong communication practices to prevent lease violations from escalating to eviction. Programs must explore all possible solutions, including linking clients to additional resources and services, before initiating eviction procedures.
- **Eviction Due to Non-Payment of Rent:** Clients who fail to pay rent for more than one month should be offered the option of a payee. Non-cooperation with the payee process can lead to eviction, but only after internal protocols, such as verbal warnings and housing retention agreements, have been followed.

- **Eviction Due to Abandonment, Hospitalization, or Incarceration:** Clients who abandon their units or who are hospitalized for more than 90 days may be subject to eviction. Programs should notify the CES facilitator if they are unable to contact a client to prevent abandonment. For clients incarcerated or hospitalized for extended periods, the 90-day rule applies before eviction can be considered.
- **Eviction Due to Criminal Activity:** Immediate eviction is permissible if a client commits a criminal offense on the property or in direct connection with it. Criminal activities off-property do not automatically lead to eviction unless the client is convicted and incarcerated.
- **Eviction Due to Violence:** If a client engages in violent behavior towards staff or other tenants, safety is the top priority. Programs must document incidents and consider behavioral improvement plans. Depending on the severity and program policies, eviction may be considered, but only after assessing all factors involved.

This policy reinforces the commitment to maintaining housing stability for clients, ensuring that eviction is approached thoughtfully and in compliance with Housing First principles.

## 7.8 CoC Housing Program Termination

### **PURPOSE**

The purpose of this policy is to establish clear guidelines for the termination of Coordinated Entry System (CES) participants, in alignment with the Housing First model set forth by HUD. The policy emphasizes the importance of communication, case conferencing, and the use of good judgment when considering program termination. It ensures that all efforts are made to resolve issues before termination and outlines the necessary steps and documentation required when termination is unavoidable.

### **FORMS**

Appendix J CoC Housing Program Termination Form

### **POLICY**

All programs have agreed to participate in CES and follow the Housing First model set forth by HUD. Anytime a PSH program termination is being considered, it is required that the housing program to communicate any issues with the CES facilitator, and case conference in routine meetings, in order to tackle barriers and find solutions. It is the responsibility of the program to exercise good judgment and examine all extenuating circumstances in determining when program violations are serious enough to result in termination from the program.

Rental assistance payments can only be made for units that pass the Department of Housing and Urban Development Housing Quality Standards within 30 days of an initial and annual inspection. Failure to comply with the federal regulations of the program will result in termination from the program. Per the federal regulations, clients must:

- Receive an annual assessment of needs; and
- Provide all required documentation to verify program eligibility initially and as changes occur.

Termination will also occur if the qualified member of the household:

- Is institutionalized or incarcerated for 90 days or more;
- Moves out of the service area;
- Voluntarily exits the program; or
- Dies.

Clients must be provided a written copy of the program rules and the termination process upon entry into the program. Clients who repeatedly and/or seriously violate program rules or their lease may be terminated from the program. In the spirit of the supportive aspects of the program, the participating agency will document reasonable efforts and interventions that demonstrate attempts to encourage clients' compliance with program rules and expectations. In some severe cases, (e.g. violence, or serious threats of violence, toward program staff, volunteers, or other clients), termination from the program may be immediate.

Clients participating in ESG or CoC funded RRH programs may also be terminated from the program if they do not meet program requirements, but that does not mean that their lease is terminated. ESG RRH programs require clients to have income below 30% AMI and must participate in monthly home, and if clients do not meet these requirements they may be terminated from the program but continue to hold their lease with the landlord.

When termination is necessary, the client will be provided notice that clearly states the reason for termination. The agency will also provide the CE facilitator with a "Termination of Program Client" form, outlining specifics of why the client is being terminated to determine their rehouse eligibility and/or prioritization. The program must deliver all termination-related notices in writing. A client is able to file a grievance with Coordinated Entry if a client feels they have been wrongly terminated from a program. Notice of the final decision will be provided to the client in a timely manner. The termination process must be consistent with federal regulations and agency policy.

### KEY TAKE AWAYS

- **Communication and Collaboration:** Before terminating a client from a Permanent Supportive Housing (PSH) program, it is mandatory for the program to communicate with the Coordinated Entry System (CES) facilitator and participate in weekly case conferences to address and resolve any issues that may lead to termination.



- **Adherence to Federal Regulations:** Clients must comply with federal regulations, including passing Housing Quality Standards inspections and providing required documentation to maintain program eligibility. Failure to comply with these standards will result in termination. Specific conditions, such as incarceration, institutionalization

for 90 days or more, moving out of the service area, voluntary exit, or death, also necessitate program termination.

- **Termination Criteria and Process:** Clients who seriously or repeatedly violate program rules or their lease may be terminated from the program. However, programs must demonstrate that they have made reasonable efforts to help clients comply with program expectations. In cases of severe violations, such as violence or serious threats, immediate termination may be warranted.
- **Notification and Documentation:** Clients must be provided with a written copy of program rules and the termination process upon entry into the program. When termination is necessary, the program must deliver written notice to the client and provide a “Termination of Program Client” form to the CE facilitator, outlining the reasons for termination.
- **Supportive Approach:** The policy reinforces the importance of a supportive approach, with programs expected to document interventions and efforts to encourage client compliance before resorting to termination.

This policy ensures that all program terminations are handled with care, fairness, and in compliance with the Housing First principles, prioritizing client support and stability whenever possible.

## **Coordinated Entry System (CES) Contributor Confidentiality Agreement**

### **Purpose**

The purpose of this confidentiality agreement is to ensure that all contributors to the Coordinated Entry System (CES) operated by the Community Alliance for the Homeless (CAFTH) understand and agree to abide by the confidentiality and data privacy requirements mandated by HUD and CES protocols. This agreement ensures that sensitive client data is protected and handled appropriately, in alignment with the Housing First principles and other HUD guidelines.

### **Key Responsibilities of CES Contributors**

As a CES contributor, you are responsible for the following:

#### **1. Confidentiality of Client Data**

All client data shared within the CES, including information recorded in HMIS or the Comparable Database (CDB), must be kept confidential. Contributors must not disclose any Personally Identifiable Information (PII) about participants without explicit written consent from the participant, as outlined in the Release of Information (ROI) policy.

#### **2. Compliance with HUD CES Requirements:**

All contributors must comply with the following federal laws and regulations:

- a) **Fair Housing Act:** Protects against discrimination based on race, color, religion, sex, national origin, disability, or familial status.
- b) **Section 504 of the Rehabilitation Act:** Prohibits discrimination based on disability in programs receiving federal financial assistance.
- c) **Title VI of the Civil Rights Act:** Prohibits discrimination based on race, color, or national origin in programs receiving federal assistance.
- d) **Americans with Disabilities Act (ADA):** Prohibits discrimination based on disability in public and private housing-related services.

#### **3. Data Security**

Data collected and stored within HMIS or the CDB must be protected. CES contributors must adhere to all HUD and CAFTH security protocols to safeguard client information from unauthorized access or disclosure. No data is to be shared via screenshots, pictures, or any other non-secure methods.

#### **4. Informed Consent & Client Rights**

Before conducting assessments or entering client data into the CES, contributors must:

- a) Ensure the client has been informed of how their data will be collected, used, and stored.
- b) Obtain and document the client's written consent
- c) Inform clients of their right to refuse to answer specific questions without affecting their access to housing services.

#### **5. Prohibition on Retaliation and Discrimination**

Contributors are prohibited from retaliating against or discriminating against any client based on their



answers, protected class status, or engagement in CES services. Clients are to be treated equally, regardless of substance use history, criminal background, or other barriers to housing.

### **CES Contributor Training Requirements**

All CES contributors must:

- a) Complete initial CES training, including understanding HUD, CES policies, procedures, and confidentiality protocols.
- b) Attend annual CES trainings to stay updated on system changes and enhancements.
- c) Complete refresher courses as required, especially when significant changes are made to CES operations.

### **Obligations in Case of Breach**

In the event of a confidentiality breach, CES contributors must:

- a) Immediately notify the CES facilitator.
- b) Participate in any investigations or reviews conducted by CAFTH.
- c) Take corrective actions as recommended by the CES team and comply with any follow-up training or sanctions imposed.

### **Signatures**

By signing below, I affirm that I have reviewed and understand the policies and procedures outlined in the Coordinated Entry System (CES) Policy and Procedure Manual. I acknowledge that I am responsible for adhering to these policies and procedures in all CES-related work and processes. I further confirm that I know how and where to access the most up-to-date version of the CES Policy and Procedure Manual and agree to refer to it as needed to ensure compliance with CES standards and requirements. I acknowledge that I have read, understood, and agree to comply with the terms of this confidentiality agreement. I understand that failure to adhere to these confidentiality guidelines may result in disciplinary action, including the potential loss of access to CES resources.

**Name of CES Contributor:** \_\_\_\_\_

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

**Signature:** \_\_\_\_\_

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