

HOUSING FIRST SOLANO COORDINATED ENTRY POLICIES AND PROCEDURES

I. OVERVIEW AND SCOPE

The U.S. Department of Housing and Urban Development (HUD) requires Continuums of Care (CoCs) to establish and operate a “centralized or coordinated assessment system” (referred to as “coordinated entry” or “coordinated entry process”) with the goal of increasing the efficiency of local crisis response systems and improving fairness and ease of access to resources, including mainstream resources. Coordinated entry processes are intended to help communities prioritize people who are most in need of assistance. They also provide information to CoCs and other stakeholders about service needs and gaps to help communities strategically allocate their current resources and identify the need for additional resources. The development of a comprehensive crisis response system in each community, including new and innovative types of system coordination, is central to the key objectives and strategies outlined in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*, the approach used by HUD and its Federal partners to address homelessness.¹

Both the CoC and Emergency Solutions Grants (ESG) Program interim rules, 24 CFR § 578 and 24 CFR §§ 91 and 576 respectively, require the use of a CoC’s coordinated entry process, provided that it meets HUD requirements. The CoC Program interim rule set the basic parameters for coordinated entry and left further requirements to be set by HUD notice. Under the authority of 24 CFR § 578.7(a)(8) and through Notice CPD-17-01, HUD established additional requirements that CoC and recipients of CoC Program and ESG Program funding must meet related to the development and use of a centralized or coordinated assessment system.

The ensuing set of Coordinated Entry Policies and Procedures documents the Housing First Solano Continuum of Care’s (“Housing First Solano” or “the CoC”) operation of its CES and acts as a guide to its continuing operation in compliance with the CoC and ESG Interim Rules and CPD 17-01.

Except as otherwise specified, these Coordinated Entry Policies and Procedures apply to all geographic areas and all subpopulations in the Housing First Solano Continuum of Care, including individuals, families, and unaccompanied youth.

These Coordinated Entry Policies and Procedures apply to all housing and homeless services in the Housing First Solano Continuum of Care, including Emergency Solutions Grant-funded programs and emergency services, as well as the use of Housing First

¹ Amended in 2012 and 2015. <https://www.usich.gov/opening-doors>.

Solano's HMIS to operate the CES. The Housing First Solano Continuum of Care covers the entire geographic scope of Solano County, California.

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

II. KEY TERMS

Affirmative Marketing and Outreach. The CoC Program interim rule at 24 CFR 578.93(c) requires recipients of CoC Program funds to affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities. Housing assisted by HUD and made available through the CoC must also be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status in accordance with 24 CFR 5.105 (a)(2).

Nondiscrimination and affirmative outreach requirements for the ESG program are located at 24 CFR § 576.407(a) and (b).

Coordinated Entry, Coordinated Entry Process, or Coordinated Entry System. The CoC and ESG Program interim rules, 24 CFR § 578 and 24 CFR §§ 91 and 576, respectively, use the terms “centralized or coordinated assessment” and “centralized or coordinated assessment system;” however, HUD and its Federal partners have begun to use the terms “coordinated entry” and “coordinated entry process.” “Centralized or coordinated assessment system” remains the legal term but, for purposes of consistency with phrasing used in other Federal guidance and in HUD’s other written materials, these Policies and Procedures uses the terms “Coordinated Entry” or “Coordinated Entry System” (“CES”).

The CoC Program interim rule at 24 CFR § 578.3 defines centralized or coordinated assessment as a “centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.”

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

Entry Point or Hub. Entry points are the places—either virtual or physical—where an individual or family in need of assistance accesses the coordinated entry process.

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

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

Suitability. Suitability gauges the appropriateness of a match between a consumer and a program based on that match being right for a particular person given the case at hand and resource limitations. Suitability will be considered in the matching process, but may not conflict with any other system characteristics, including the System’s low barriers, Housing First orientation, or client choice, as described below.

Scoring. In the context of the coordinated entry process, HUD uses the term “Scoring” to refer to the process of deriving an indicator of risk, vulnerability, or need based on responses to assessment questions. The output of most assessment tools is often an “Assessment Score” for potential project participants, which provides a standardized analysis of risk and other objective assessment factors. While assessment scores generally reflect the factors included in the prioritization process, the assessment score alone does not necessarily determine the relative order of potential participants for resources. Additional consideration, including use of case conferencing, is often necessary to ensure that the outcomes of the assessment more closely align with the community’s prioritization process by accounting for unique population-based vulnerabilities and risk factors.

III. SYSTEM CHARACTERISTICS

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

Housing First Solano shall strive to offer training to participating projects that receive referrals in culturally and linguistically competent practices so that appropriate resources available to participants are as comprehensive as possible.

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

HMIS. Housing First Solano uses HMIS to collect and manage data associated with assessments and referrals.

Inclusive. Housing First Solano’s Coordinated Entry System includes all subpopulations, including people experiencing chronic homelessness, Veterans, families, youth, and survivors of domestic violence. The Housing First Solano Continuum of Care Board of Directors (“CoC Board”) will continuously evaluate and improve the process ensuring that all subpopulations are well served.

Informing local planning. Information gathered through the Coordinated Entry process is used to guide homeless assistance planning and system change efforts across the CoC.

Leverage local attributes and capacity. Housing First Solano’s physical and political geography, including local agency capacity, and the opportunities unique to the CoC’s context, shall inform local coordinated entry implementation.

Low barrier. Housing First Solano’s Coordinated Entry System is Housing First oriented, such that people are housed quickly without preconditions or service participation requirements. The CoC’s Coordinated Entry System does not screen people out for assistance due to perceived barriers to housing or services, including, but not limited to, little or no income, active or a history of substance use, domestic violence history, resistance to receiving services, the type or extent of disability-related services or supports that are needed, history of evictions or poor credit, lease violations or history of not being a leaseholder, or criminal record—with exceptions for state or local restrictions that prevent projects from serving people with certain convictions.

Participant autonomy. Housing First Solano’s coordinated entry process allows participants autonomy to freely refuse to answer assessment questions and to refuse housing and service options without retribution or limiting their access to assistance.

Person-centered approach. Housing First Solano uses a person-centered approach, and incorporates the following principles:

1. ***Person-centered assessments.*** Assessments shall be based in part on participants’ strengths, goals, risks, and protective factors.

2. *Accessible tools and processes.* The policies and procedures below strive to ensure that participants being assessed and referred, in addition to using required accessible formats for persons with disabilities and the requirement in II.B.5(c) of CPD 17-01.
3. *Sensitivity to lived experiences.* Sensitivity to participants' lived experiences shall be incorporated into every aspect of this coordinated entry system, including the ongoing assessment of assessment tools and delivery protocols that are trauma informed, minimize risk and harm, and address potential psychological impacts. Assessments are based in part on participant's strengths, goals, risks, and protective factors.
4. *Participant choice.* Participants' choices in coordinated entry process decisions, such as location and type of housing, level and type of services, and other program characteristics, shall be accommodated to the fullest extent possible given overriding health and safety concerns and compliance with outstanding legal requirements. The ongoing development of assessment processes that provide options and recommendations similarly shall be guided and informed by participant choice, as opposed to rigid decisions about what individuals or families need.
5. *Clear referral expectations.* These policies and procedures shall continue to be modified to ensure that participants will be able to easily understand to which program they are being referred, what the program expects of them, what they can expect of the program, and evidence of the program's rate of success.
6. *Commitment to referral success.* The participants in Housing First Solano's Coordinated Entry System commit to successfully completing the referral process once a referral decision has been made through coordinated entry, including supporting the safe transition of participants from an access point or emergency shelter to housing, and supporting participants in identifying and accessing an alternate suitable project in the rare instance of an eligible participant being rejected by a participating project.

Referral protocols. As stated in the Memorandum of Understanding Between Community Action Partnership of Solano, Joint Powers Authority and Participating Agencies, incorporated into these Coordinated Entry Policies and Procedures as Attachment I, all Housing First Solano programs funded by either the CoC or ESG Programs shall use this coordinated entry process as the only referral source from which to consider filling vacancies in housing and/or services. Programs that participate in the CoC's Coordinated Entry process accept all eligible referrals unless the CoC has a documented protocol for rejecting referrals that ensures that such rejections are justified and rare and that participants are able to identify and access another suitable project.

Referral to projects. Housing First Solano's Coordinated Entry System makes referrals to all projects receiving Emergency Solutions Grants (ESG) and CoC Program funds, including emergency shelter, RRH, PSH, and transitional housing (TH), as well as other housing and homelessness projects. Projects in the CoC that are dedicated to serving people experiencing homelessness fill all vacancies through referrals, while other housing and

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services projects determine the extent to which they rely on referrals from the coordinated entry process.

Ongoing planning and stakeholder consultation. Housing First Solano engages in ongoing planning with all stakeholders participating in the coordinated entry process. This planning includes evaluating and updating the Coordinated Entry process at least annually. Feedback from individuals and families experiencing homelessness or recently connected to housing through the Coordinated Entry process is regularly gathered and used to improve the process.

IV. ACCESS

A. FULL COVERAGE

Housing First Solano's Coordinated Entry System covers the CoC's entire geographic area.

B. NON-DISCRIMINATORY ACCESS

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

- Race
- Color
- Religion
- National origin
- Sex
- Actual or perceived sexual orientation or gender identity
- Disability
- Familial status
- Marital status

Some programs may be forced to limit enrollment based on requirements imposed by their funding sources and/or state or federal law. For example, a HOPWA-funded project might be required to serve only participants who have HIV/AIDS. All such programs will avoid discrimination to the maximum extent allowed by their funding sources and their authorizing legislation. Otherwise, data collected from the assessment process shall not be used 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 identify or marital status.

All aspects of the Housing First Solano Coordinated Entry process will comply with all Federal, State, and local Fair Housing laws and regulations. Participants will not be “steered” toward any housing facility or neighborhood because of race, color, national origin, religion, sex, disability, or the presence of children.

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

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

Process for filing a discrimination complaint

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

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

C. AFFIRMATIVE MARKETING AND OUTREACH

Housing First Solano shall affirmatively market its housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach, and maintains records of those marketing activities. Housing assisted by HUD and made available through the CoC also are made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status in accordance with

24 CFR 5.105 (a)(2). Nondiscrimination and affirmative outreach requirements for the ESG program are located at 24 CFR § 576.407(a) and (b).

Housing First Solano's Coordinated Entry System also shall be linked to street outreach efforts so that people sleeping on the streets are prioritized for assistance in the same manner as any other person assessed through the coordinated entry process.

D. EMERGENCY SERVICES

Low barrier. Emergency services, including all domestic violence and emergency services hotlines, drop-in service programs, and emergency shelters, including domestic violence shelters and other short-term crisis residential programs, shall operate with as few barriers to entry as possible.

Not subject to prioritization. Access to emergency services, such as entry to emergency shelter, shall not be prioritized based on severity of service need or vulnerability. Emergency services funded through the ESG Program shall promulgate written standards required under 576.400(e)(3)(iv).

Twenty-four-hour connection to emergency system. Persons will be able to access emergency services independent of the operating hours of the coordinated entry's intake and assessment processes. The Coordinated Entry System will be tied to Housing First Solano's emergency care system through a Memorandum of Understanding between the CoC and emergency service providers that includes the following duties:

- Emergency service providers must notify a Coordinated Entry Specialist regarding new homeless consumers who have been served at night within 48 hours, so that those consumers can be integrated into the Coordinated Entry system as soon as the access point opens for business.
- Emergency service providers, including all domestic violence hotlines, emergency service hotlines, drop-in service programs, emergency shelters, domestic violence shelters, and other short-term crisis residential programs, will receive and care for consumers including during hours when Coordinated Entry hubs may be closed for business.
- The CoC Board will host a meeting between homeless services providers and emergency services providers at least twice per year to discuss strategies for reducing barriers to communication and collaboration.

E. STANDARDIZED ACCESS AND ASSESSMENT

Standardized access and assessment. These Policies and Procedures establish the same assessment approach at all access points and all access points must be usable by all people who may be experiencing homelessness or at risk of homelessness. Households who present at any entry point, regardless of whether it is an entry point dedicated to the population to which the household belongs, shall be afforded easy access to an appropriate

assessment process that provides the CoC with enough information to make prioritization decisions about that household.

Standardized Prioritization in the Referral Process. Housing First Solano’s prioritization policies, herein documented, shall be applied consistently throughout the CoC areas for all populations.

F. PRIVACY

All providers working with client-level data shall abide by the privacy protocols prescribed by the Housing First Solano HMIS Policies and Procedures Manual.

G. ENTRY POINTS

Access to Housing First Solano’s Coordinated Entry System will be channeled through the following disparate access (also known as “multisite centralized access”) model.

Prevention, diversion, and digital access. 211 will be used to direct prevention and diversion queries. It also will provide a digital entry point for consumers physically unable to access the Coordinated Entry System.

Hub System. All assessment services in the CoC will be concentrated at a handful of entry points, known as “hubs.”

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

H. ENTRY POINTS – OPERATIONAL AND PROGRAMMATIC PRACTICES

The Coordinated Entry System Operator shall maintain and update binders for all entry points that detail all operational and programmatic practices every entry point should be following. The protocols and federal notices and forms included in these binders shall be incorporated by reference into these Coordinated Entry Policies and Procedures. They include:

1. Housing First Solano Right to File Discriminations Complaints Notice and Form;
2. Fair Housing Amendments Act of 1988 Notice;
3. Housing First Solano Continuum of Care Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking; and
4. Emergency Transfer Request Form for Certain Victims of Domestic Violence, Sexual Assault, or Stalking.

Pre-screening questions. Upon first contact, entry point staff should ask consumers the following four questions to determine homelessness status and identify any urgent safety concerns:

1. Can you please tell me where you slept last night?
2. Do you have a place to sleep tonight?
3. Are you currently in danger?
4. What is your biggest need today?

Prevention / diversion. If pre-screening questions determine that a consumer is not literally homeless, entry point staff shall connect the consumer with prevention or diversion resources as detailed in an Entry Point Binder produced and maintained by Coordinated Entry System Operator staff. If pre-screening questions indicate that a consumer may be at risk of chronic homelessness, the client may be considered for housing that is funded by No Place Like Home (NPLH), even if the client is not literally homeless. For purposes of NPLH, those at risk of homelessness are: persons exiting institutionalized settings, such as jail or prison, hospitals, institutes of mental disease, nursing facilities, or long-term residential substance use disorder treatment, who were Homeless prior to admission to the institutional setting; Transition-Age Youth experiencing homelessness or with significant barriers to housing stability, including, but not limited to, one or more evictions or episodes of homelessness, and a history of foster care or involvement with the juvenile justice system; and/or Persons, including Transition-Age Youth, who prior to entering into one of the facilities or types of institutional care listed herein had a history of being Homeless as defined under this subsection (f)(3): a state hospital, hospital behavioral health unit, hospital emergency room, institute for mental disease, psychiatric health facility, mental health rehabilitation center, skilled nursing facility, developmental center, residential treatment program, residential care facility, community crisis center, board and care facility, prison, parole, jail or juvenile detention facility, or foster care. Having a history of being Homeless means, at a minimum, one or more episodes of homelessness in the 12 months prior to entering one of the facilities or types of institutional care listed herein.

Category Four. If pre-screening questions determine that a consumer is fleeing or attempting to flee domestic violence, entry point staff shall connect the consumer with a victim service provider by the process outlined later in these Coordinated Entry Policies and Procedures.

Other consumers experiencing homelessness. If pre-screening questions determine that a consumer is literally homeless, entry point staff shall walk the consumer through the following process:

1. Offer the consumer an overview of Coordinated Entry and the assessment, prioritization, and matching process.
2. If the consumer agrees to proceed, entry point staff shall have the consumer fill out an HMIS Release of Information Form. The completed form shall be scanned into HMIS and any original paper copies shall be destroyed.

3. Entry point staff shall then collect Universal Data Elements intake questions and enter the consumer's answers into HMIS.
4. Once the Universal Data Elements information is collected, entry point staff shall begin a VI-SPDAT, FVI-SPDAT or TAYVI-SPDAT interview, as detailed below. The VI-SPDAT shall be rendered in a private room/space if possible. All available contact information shall be collected from the consumer.
5. At the end of the VI-SPDAT, FVI-SPDAT or TAYVI-SPDAT entry point staff shall remind the consumer that completion of the VI-SDPAT, FVI-SPDAT or TAYVI-SPDAT is not a guarantee of housing.
6. Upon the completion of the VI-SPDAT, FVI-SPDAT or TAYVI-SPDAT, entry point staff may begin to address any immediate wrap around needs.
7. All consumers shall be given Coordinated Entry System contact information before they leave.

I. SEPARATE ENTRY POINTS

As of the publication of this version of these Policies and Procedures, Housing First Solano has elected not to create access points that are separate and distinct from general entry points for the following five subpopulations:

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

The CoC also may choose to establish designated entry points for homeless veterans if those access points are operated by VA or VA partners and the methods for providing access are documented in a future version of these Policies and Procedures.

Should the CoC designate separate entry points for any of the five subpopulations above or for homeless veterans, all entry points shall still be required to follow a uniform decision-making process, including equal access to emergency services, use common assessment approaches and tools, and prioritize persons for available resources using the standardized approach as determined and documented in these Policies and Procedures.

V. ASSESSMENT

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

A. COLLECTION OF INFORMATION

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11

All participants in the coordinated entry process will be freely allowed to decide what information they provide during the assessment process and to refuse to answer assessment questions. Although participants may become ineligible for some programs based on a lack of information, a participant's refusal to answer questions will not be used as a reason to terminate the participant's assessment, nor will it be used as a reason to refuse to refer the participant to programs for which the participant appears to be eligible. Participants may refuse to answer assessment questions and to reject housing and service options offered without their suffering retribution or limiting their access to assistance.

Assessment staff shall engage participants in an appropriate and respectful manner to collect only necessary assessment information. Should a consumer choose not to provide a piece of requested information, coordinated entry staff shall communicate to those participants the impact of incomplete assessment responses. Assessment staff shall make every effort to assess and resolve the person's housing needs based on a participant's responses to assessment questions no matter how limited those responses.

Data collected from the assessment process shall not be used 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 identify or marital status.

B. ASSESSMENT IN PHASES

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

Assessment phases may include:

1. Screening for diversion or prevention;
2. Assessing shelter and other emergency needs;
3. Identifying housing resources and barriers; and
4. Evaluating vulnerability to prioritize for assistance.

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

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

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

C. PREVENTION AND DIVERSION

Individuals and families who are homeless or at risk of homelessness may access ESG- and CoC-funded prevention and diversion services through the coordinated entry process. In addition, people at risk of chronic homelessness may be able to access housing funded through No Place Like Home (NPLH). For purposes of NPLH, those at risk of homelessness are: persons exiting institutionalized settings, such as jail or prison, hospitals, institutes of mental disease, nursing facilities, or long-term residential substance use disorder treatment, who were Homeless prior to admission to the institutional setting; Transition-Age Youth experiencing homelessness or with significant barriers to housing stability, including, but not limited to, one or more evictions or episodes of homelessness, and a history of foster care or involvement with the juvenile justice system; and/or Persons, including Transition-Age Youth, who prior to entering into one of the facilities or types of institutional care listed herein had a history of being Homeless as defined under this subsection (f)(3): a state hospital, hospital behavioral health unit, hospital emergency room, institute for mental disease, psychiatric health facility, mental health rehabilitation center, skilled nursing facility, developmental center, residential treatment program, residential care facility, community crisis center, board and care facility, prison, parole, jail or juvenile detention facility, or foster care. Having a history of being Homeless means, at a minimum, one or more episodes of homelessness in the 12 months prior to entering one of the facilities or types of institutional care listed herein. Street outreach, access and assessment points will prioritize referrals to those and other prevention services based on need and availability of appropriate interventions.

If, during the pre-screening interview of a consumer by an Entry Point, it is determined that the consumer is not literally homeless, Entry Point staff may refer the consumer to other providers listed in an Entry Point Binder continually maintained by Coordinated Entry System Operator staff.

All prevention and diversion conversations shall proceed with Entry Point staff using the following script:

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Diversion questions.

1. Are you safe in your current living situation?

☐Yes

☐No

If no, but household is otherwise eligible for diversion, divert them to a location other than where they are currently staying and make sure that it is somewhere where the household feels safe.

2. Is there anyone else you and your family could stay with for at least the next three to seven days if you were able to receive limited services such as (list services available in community such as case management services/transportation assistance/food pantry/limited financial support/ other referrals)?

☐ Yes ☐ No

Help family think through potential places – with family, friends, co-workers. Have them identify what barriers they think exist to staying in a certain location and how they might overcome.

If answer to this question is yes, household qualifies for diversion assistance. Skip to Concluding Questions.

If answer to this question is no and shelter diversion has therefore been ruled out, go to Prevention Questions.

Prevention questions.

3. Are you safe in your current living situation?

☐ Yes ☐ No

If no, and the household is in immediate danger, refer them to law enforcement and/or the appropriate local domestic violence provider.

4. Do you believe you will become homeless within the next seven (7) days?

☐ Yes ☐ No

5. If you are currently housed, what type of assistance would you need to stay there?

Food Assistance Rental Assistance Utility Assistance Tenant/Landlord
Mediation

6. Have you ever been to a shelter or another homeless assistance program before?

☐ Yes ☐ No

7. If you answered yes to the previous question, what was the name of the program?

When were you last there? ____/____/____

8. I would like to refer you to _____ service. May I ask you a few questions to facilitate the referral?

If yes, continue onto HMIS Intake Form.

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The CoC is committed to further integrating prevention, diversion, and mainstream services into the coordinated entry system.

D. REQUIRED INFORMATION DURING THE ASSESSMENT PROCESS

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

Refusal to share information. All households have the right to refuse to share their information among providers within the CoC. However, some information may be required by the project, or by public or private funders to determine eligibility for housing or services, or to assess needed services, so it must be collected. In cases where a client does not consent to having their information shared, the information must still be collected by the service providers to determine whether the individual or family is eligible, but it must not be shared via the HMIS if the program participant objects.

E. ASSESSMENT SCRIPT

All assessments shall begin with Entry Point staff using the following script:

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"My name is (_____) and I work for an agency called (_____).

"I have a 10-minute interview that I would like to complete with you. Your answers tell us how we can start supporting you.

"Most questions only require a Yes or No. Some questions require a one-word answer. Some questions also are personal in nature. You can skip or refuse any questions you don't want to answer for any reason. We can also stop whenever you want. We'll do our best to help you with whatever amount of information you are willing to share with us now or any time in the future. But the more information we have about your situation, the better we may be able to help you.

"If you do not understand a question for any reason, let me know. I would be happy to clarify. I would be happy to get an interpreter in a different language or do my best to make

other adjustments that might make you more comfortable with understanding and answering any questions.

“The information you share with me will go in to a Homeless Management Information System, which is a shared database that only shelters and housing providers in Solano County can access. Once your information is in there, you should not have to complete this survey again in Solano.

“Completing this interview is not a guarantee that we will be able to find housing for you. We’ll do our best, but there are a number of challenges that we’ll have to address first. This is a marathon, not a sprint. This is just the first of many steps we’ll have to take.

“One last thing – what’s nice about this interview is that you get to tell me whatever you think is right. Don’t tell me what you think I want to hear. This survey is meant to find resources for you, in your exact, unique situation. It’s up to you, but the more open you are, the more likely it will be that we can figure out how best to support you.

“Would you like to proceed with a verbal conversation in English, here, right now?

“Thank you for your time. Let’s get started.”

F. ASSESSMENT TOOL

The Coordinated Entry System will consistently assess all persons using the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT). This tool was selected based on the community’s satisfaction that it met the following characteristics:

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

Application of the VI-SPDAT may not produce the entire body of information necessary to determine a household’s prioritization, either because of the nature of self-reporting, withheld information, or circumstances outside the scope of assessment questions.

Therefore, case workers and others who work with households may provide additional

Updated by the Housing First Solano Continuum of Care on February 27, 2019.

16

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

As of this version of Housing First Solano's Coordinated Entry Policies and Procedures, all persons participating in Coordinated Entry will be given the same assessment tool. The community may decide to introduce separate policies and procedures for the assessment of the following subpopulations in the future:

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

G. ASSESSMENT TRAINING

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

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

F. CONTACT INFORMATION

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

F. HMIS DATA ENTRY

After assessment, Coordinated Entry scores shall be transmitted to Coordinated Entry staff within 24 hours. Coordinated Entry staff shall enter those scores into Housing First Solano's Homeless Management Information System (HMIS) 48 hours within having received such scores.

Updated by the Housing First Solano Continuum of Care on February 27, 2019.

17

VI. PRIORITIZATION

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

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

A. PRIORITIZATION SCHEME

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

	PERMANENT SUPPORTIVE HOUSING	RAPID REHOUSING
PRIORITY 1	<ul style="list-style-type: none"> VI-SPDAT Score: 8+; Chronic Homelessness; and, Tri-Morbidity <ul style="list-style-type: none"> Physical Health Mental Health Substance Use 	<ul style="list-style-type: none"> VI-SPDAT Score: 4-7; and, Chronic Homelessness
PRIORITY 2	<ul style="list-style-type: none"> VI-SPDAT Score: 8+; Chronic Homelessness; and, 2+ HUD Disabling Conditions <ul style="list-style-type: none"> Physical Health Mental Health Substance Use Developmental Disability 	<ul style="list-style-type: none"> VI-SPDAT Score: 4-7; and, 1+ HUD Disabling Condition <ul style="list-style-type: none"> Physical Health Mental Health Substance Use Developmental Disability
PRIORITY 3	<ul style="list-style-type: none"> VI-SPDAT Score: 8+; Chronic Homelessness; and, 1 HUD Disabling Condition <ul style="list-style-type: none"> Physical Health Mental Health Substance Use Developmental Disability 	<ul style="list-style-type: none"> VI-SPDAT Score: 4-7
PRIORITY 4	<ul style="list-style-type: none"> VI-SPDAT Score: 8+; and, 1 HUD Disabling Condition <ul style="list-style-type: none"> Physical Health Mental Health Substance Use Developmental Disability 	<p><u>Other RRH Prioritization:</u> Clients scoring 8+ on the VI-SPDAT may be considered for RRH if:</p> <ul style="list-style-type: none"> The client meets other RRH criteria (e.g., chronic homelessness, disabling conditions, etc.); The client is referred to case conferencing due

PRIORITY 5	<ul style="list-style-type: none"> VI-SPDAT Score: 8+ 	<p>to objective, community-wide criteria (factors TBD); and,</p> <ul style="list-style-type: none"> Through case conferencing, the community determines that there is a substantial likelihood that RRH will meet the client's housing and service needs.
NOTES	All priorities are subject to change as needed and decided on by the Coordinated Entry Workgroup.	

Permanent Supportive Housing.

Individuals and families will be prioritized for PSH according to HUD Notice CPD-16-11 and the CoC's Written Standards. People who are at risk of chronic homelessness but who are not literally homeless may be considered for PSH funded by No Place Like Home (NPLH) after all priority groups in HUD Notice CPD-16-11 have been exhausted. For purposes of NPLH, those at risk of homelessness are: persons exiting institutionalized settings, such as jail or prison, hospitals, institutes of mental disease, nursing facilities, or long-term residential substance use disorder treatment, who were Homeless prior to admission to the institutional setting; Transition-Age Youth experiencing homelessness or with significant barriers to housing stability, including, but not limited to, one or more evictions or episodes of homelessness, and a history of foster care or involvement with the juvenile justice system; and/or Persons, including Transition-Age Youth, who prior to entering into one of the facilities or types of institutional care listed herein had a history of being Homeless as defined under this subsection (f)(3): a state hospital, hospital behavioral health unit, hospital emergency room, institute for mental disease, psychiatric health facility, mental health rehabilitation center, skilled nursing facility, developmental center, residential treatment program, residential care facility, community crisis center, board and care facility, prison, parole, jail or juvenile detention facility, or foster care. Having a history of being Homeless means, at a minimum, one or more episodes of homelessness in the 12 months prior to entering one of the facilities or types of institutional care listed herein.

Rapid Re-Housing

Individuals and families will be prioritized for RRH according to the CoC's Written Standards. Written Standards for Rapid Rehousing will reflect prioritization and placement using the VI-SPDAT and F-SPDAT. People who are at risk of chronic homelessness but who are not literally homeless may be considered for RRH funded by No Place Like Home (NPLH) based on their ordinary priority (e.g. based on VI-SPDAT scores) in the Written Standards. For purposes of NPLH, those at risk of homelessness are: persons exiting institutionalized settings, such as jail or prison, hospitals, institutes of mental disease, nursing facilities, or long-term residential substance use disorder treatment, who were Homeless prior to admission to the institutional setting; Transition-Age Youth experiencing homelessness or with significant barriers to housing stability, including, but not limited to, one or more evictions or episodes of homelessness, and a history of foster care or involvement with the juvenile justice system; and/or Persons, including Transition-Age

Updated by the Housing First Solano Continuum of Care on February 27, 2019.

19

Youth, who prior to entering into one of the facilities or types of institutional care listed herein had a history of being Homeless as defined under this subsection (f)(3): a state hospital, hospital behavioral health unit, hospital emergency room, institute for mental disease, psychiatric health facility, mental health rehabilitation center, skilled nursing facility, developmental center, residential treatment program, residential care facility, community crisis center, board and care facility, prison, parole, jail or juvenile detention facility, or foster care. Having a history of being Homeless means, at a minimum, one or more episodes of homelessness in the 12 months prior to entering one of the facilities or types of institutional care listed herein.

B. MANAGING THE PRIORITY LIST

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

C. DOCUMENT READY

Coordinated Entry staff shall assist in getting the top ten clients on the priority list document ready for enrollment into a housing program. Coordinated Entry staff shall maintain any such collected records until participant enrollment.

VII. MATCHING & REFERRAL

A. IN GENERAL

All CoC-program and ESG-program recipients must use the coordinated entry process established by the CoC as the only referral source from which to consider filling vacancies in CoC- or ESG-funded housing and/or services. Coordinated Entry staff shall maintain and annually update a list of all resources that may be accessed through referrals from the coordinated entry process.

B. DETERMINING PROGRAM ELIGIBILITY

Each CoC-funded project must establish specific eligibility criteria that the project will use to make enrollment determinations, and these criteria must be made available to the public.

Coordinated Entry System operators may not use the coordinated entry process to screen people out due to perceived barriers related to housing or services, including, but not limited to, too little or no income, active or past substance abuse, domestic violence history, resistance to receiving services, the type or extent of a disability, the services or supports that are needed because of a disability, a history of evictions or of poor credit, a history of lease violations, a history of not being a leaseholder, a criminal record, as well as sexual orientation or gender identity and expression. Exceptions are state or local restrictions that prohibit projects from serving people with certain criminal convictions or other specified

Updated by the Housing First Solano Continuum of Care on February 27, 2019. 20

attributes.

C. CASE CONFERENCING

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

Coordinated Entry staff shall strive to include at each case conference the participation of at least one representative from each CoC- and ESG-funded housing project, as well as representatives involved in street outreach, the veterans' Grant Per Diem program, emergency shelters, and hospitals. A Memorandum of Agreement between agencies shall be continuously disseminated such that only agencies that participate in case conferencing shall be able to recommend and accept referrals through the Coordinated Entry System.

For such case conferencing meetings, the aforementioned priority list shall be used for referencing clients. No other client data shall be transmitted for these meetings.

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

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

D. WHEN APPROPRIATE BEDS ARE NOT AVAILABLE

When a household is recommended for Permanent Supportive Housing but no PSH beds are currently available, the household may be referred to "bridge housing" in other program types, and/or for any other available CoC resource that would be of use to the household. In referring households to bridge housing, case conference participants shall attempt to balance the need to provide immediate care for the community's most vulnerable households against the need to match tenants with safe, adequately supported housing situations that will promote the community's long-term ability to increase its supply of available and affordable housing.

E. WHEN CLIENTS ARE DIFFICULT TO LOCATE OR REFUSE HOUSING

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

recording when and how attempts were made to contact the client during the five-business day period. Such records shall be kept for five years following the end of the five-business day contact attempt period.

The mere fact that a client could not be located or persuaded to enter housing should not be used to remove or cancel the client's priority for receiving housing or services. However, if a client cannot be found for, or refuses a housing opportunity matched for him or her by case conference participants, three times, then Coordinated Entry staff shall convene a case conference during which that client's appropriateness for housing placement is reevaluated to determine next steps on a case by case basis, including referral to alternate project types and reclassification in the Coordinated Entry System as "inactive." Case conference participants also shall determine which agency is best suited to reach out to the client to engage them in the discussion and report back to the group at the next case conference convening.

Some prospective tenants may explicitly reject a housing placement. When this happens, outreach workers should attempt to determine the reason for the clients' refusal to accept the offered housing and to communicate this reason to the coordinated entry system. Whenever possible, case conferencing participants should take clients' known preferences into account when generating referrals. Participants who reject referral options will still maintain their place in the coordinated entry prioritization list.

If case conference participants believe that a client no longer resides in the CoC's geographic area, and the CoC has no effective means of contacting that client, then Coordinated Entry staff may remove the client from the priority list.

I. WHEN PROGRAMS REJECT A CLIENT

Providers should rarely reject a referral from coordinated entry. CoC or ESG programs may reject a client referred by the Coordinated Entry System only if:

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

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

All CoC and ESG providers are expected to adopt a Housing First approach that continually lowers the barriers to entry for prospective clients, and that avoids screening out clients based on real or perceived barriers to success. A provider that repeatedly rejects referrals of high-needs clients based on an inability to safely accommodate those clients must attempt to improve its capacity to serve high-needs clients. The CoC will provide training and technical assistance on this topic upon request. The CoC's Rank and Review Committee is encouraged to reallocate the funding of low-capacity providers that cannot or will not make diligent efforts to improve their capacity to serve high-needs clients.

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

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

F. INCORPORATING MAINSTREAM SERVICES

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

VIII. SAFETY PLANNING

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

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

A. CATEGORY FOUR

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

- (1) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence*; and
- (2) Has no other residence; and
- (3) Lacks the resources or support networks to obtain other permanent housing.

Updated by the Housing First Solano Continuum of Care on February 27, 2019.

23

* This includes victims of human trafficking.

The CoC Program Interim Rule clarifies that the imminent threat of harm must be from further domestic violence, dating violence, sexual assault, or stalking, which would include threats from a third party, such as a friend or family member of the perpetrator of the violence.

Per Chapter 1, Section 1.6 of the Coordinated Entry Core Elements Guidebook, written Coordinated Entry policies and procedures must establish protocols that ensure at a minimum that people fleeing, or attempting to flee, domestic violence have:

B. PRIVACY AND DATA SECURITY PROTECTIONS

All victims of domestic violence shall be ensured safe and confidential access to coordinated entry.

All data collection practices under this section shall adhere to the applicable requirements of the Violence Against Women Act and the CoC's HMIS Policies and Procedures.

Documentation. HUD requires that a CoC program participant provide appropriate documentation of the original incident of domestic violence, dating violence, sexual assault, or stalking, and any evidence of the current imminent threat of harm. *Please see 24 CFR 578.103(a)(5).*

Personally Identifiable Information. The CoC Program Interim Rule Section 578.103(b) requires that records containing personally identifiable information (PII) are kept secure and confidential and the address of any family violence project not be made public. Housing First Solano

Alternatives to HMIS. When a CoC uses a system other than HMIS to record information from a coordinated entry process, it must meet HUD's requirements regarding Coordinated Entry Systems (24 CFR 578.7(a)(8), Section II.A, and any subsequent HUD Notices on the topic) and be compliant with HUD's HMIS Privacy and Security Notice or any future regulations that update the requirements therein.

C. SYSTEM ENTRY

Separate access point. At the time of the publishing of these Policies and Procedures, the CoC chooses not to create a separate access point for victims of domestic violence.

Pre-screening determination. When an individual or family presents at a System Entry Point, the head of the household shall be asked several pre-screen questions to determine, among other aspects of the household's status, whether the household is fleeing domestic violence. If the household answers in a way that suggests that the household is fleeing domestic violence, then Entry Point staff shall call a local domestic violence hotline with the

victim so that the hotline provider can proceed with Coordinated Entry assessment and data entry according to the practices kept by the receiving victim service provider.

Immediate access to emergency services such as domestic violence hotlines and shelters. If pre-screen questions suggest that the household wishes to be connected to emergency services, the Entry Point shall provide the household immediate access to the contact information for an appropriate emergency services provider, as well as arrange transportation for the household to the emergency services provider, as possible. The Entry Point shall, without transmitting any personally identifiable information, notify the local domestic violence hotline of the pre-screening interview and transfer to the emergency services provider within 24-hours of the exchange with the household.

D. ASSESSMENT

At the time of the publishing of these Policies and Procedures, there are no victim services providers in Solano County who receive CoC funds. As such, should a victim of domestic violence choose to access the Housing First Solano Coordinated Entry System for access to housing and supportive services, a victim service provider shall use the VI-SPDAT to assess that victim.

IX. VIOLENCE AGAINST WOMEN ACT

A. HMIS DATA ENTRY

Under the Violence Against Women Act, victim service providers are prohibited from entering client-level data into HMIS.

Consent to HMIS data entry. If a victim chooses to be enrolled in a CoC- or ESG-funded non-victim services provider program, that victim must be asked to sign a Release of Information form to consent to having personally identifiable information entered into the CoC's HMIS.

Refusal to have information entered into HMIS. All households, regardless of their domestic violence status, have the right to refuse to share their information among providers within the CoC. However, some information may be required by the project, or by public or private funders to determine eligibility for housing or services, or to assess needed services, so it must be collected. In cases where a client does not consent to having their information shared, the information must still be collected by the service providers to determine whether the individual or family is eligible, but it must not be shared via the HMIS if the program participant objects.

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

B. PRIORITIZATION

Victims fleeing domestic violence shall be prioritized according to the aforementioned prioritization protocols described for all other subpopulations. Case managers who conducted the assessment of a victim shall be informed by Coordinated Entry System Operator staff when one of these anonymous victim's records rises to the top ten spots in a prioritization queue.

C. MATCHING

Because victim information cannot be entered into HMIS, case managers who conducted the assessment of a victim shall be called by Coordinated Entry System Operator staff to participate in case conferencing meetings regarding the matching and referral of a victim in one of the top ten spots in a prioritization queue to be able to represent the victim in those discussions.

D. REFFERAL AND PLACEMENT

At the time of the publishing of these Policies and Procedures, there are no victim services providers in Solano County who receive CoC funds.

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

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

E. PLACEMENT OUTSIDE THE COC: TENANT BASED RENTAL ASSISTANCE.

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

F. TRAINING

Updated by the Housing First Solano Continuum of Care on February 27, 2019.

26

HUD's 2015 Coordinated Entry and Victim Services Providers shares the following recommendations:

All coordinated entry staff should be trained on the complex dynamics of domestic violence, privacy and confidentiality, and safety planning, including how to handle emergency situations at an access point(s), whether a physical or virtual location.

CoCs should also partner with their local victim service provider agencies to ensure that trainings for relevant staff are provided by informed experts in the field of domestic violence, dating violence, sexual assault, stalking, and human trafficking.

Finally, coordinated entry staff should have up-to-date information on domestic violence shelters and general homeless shelters and housing options that are best equipped to serve households experiencing domestic violence based on their location, program model, and linkages to other supportive services.

X. PARTICIPANT EVALUATION

Participating projects and participants shall be consulted at least annually to evaluate Resource Connect Solano's intake, assessment, and referral processes. Information collected will solicit feedback on the quality and effectiveness of the entire coordinated entry experience for participating projects and households.

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

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

XI. SYSTEM EVALUATION

The Housing First Solano Continuum of Care shall follow the policy and management structure to facilitate intensive coordination and communication among all the projects and agencies in the CoC, as well as others throughout the CoC's geography, that serve individuals and families experiencing homelessness.

In addition to the provisions below, the CoC shall follow the guidelines established in HUD's "Coordinated Entry Management and Data Guide."

A. POLICY OVERSIGHT

Updated by the Housing First Solano Continuum of Care on February 27, 2019.

27

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

Policy and procedure proposals shall first be vetted by a Coordinated Entry Work Group, whose membership shall be open to the General Membership but must include representation from the Collaborative Applicant, HMIS Lead, and mainstream service providers.

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

Data security and privacy.

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

In particular, the CoC General Membership shall:

- Establish the universe of coordinated entry–related uses and disclosures included in the standard authorization form for use in obtaining consent for uses and disclosures not covered in the CoC's Universal Privacy Notice (Attachment VI to these Policies and Procedures);
- Before revising the Universal Privacy Notice or changing the privacy policy in any material way, discuss the privacy policies and practices with appropriate stakeholders;
- Have a legal advisor review privacy practices and determine how other local, state, and federal laws affect the CoC's privacy and security requirements; and
- Determine how to implement a safe and confidential CE process for survivors of domestic violence, using guidance from the National Network to End Domestic Violence.

B. MANAGEMENT

The Coordinated Entry System Operator shall be responsible for the implementation of the day-to-day workflow of the Coordinated Entry process.

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

- Establishing day-to-day management structures
- Establishing clear, accessible communications plans
- Promoting standardized screening and assessment processes
- Developing and delivering training

- Monitoring the Coordinated Entry System

C. SYSTEM EVALUATION

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

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

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

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

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

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

I. Background

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

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

II. Purpose

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

III. Responsibilities of CAP Solano JPA:

CAP Solano JPA agrees to the following duties:

- Supervise the Coordinated Entry Systems Operator;
- Provide lead staff to guide the Resource Connect Solano Work Group and any relevant subgroups;
- Coordinate, integrate, and leverage resources to maximize impact of Coordinated Entry services for individuals who are experiencing homelessness;

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

IV. Responsibilities of Participating Agencies:

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

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

V. Terms of Agreement:

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

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

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

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

Participating Agency

Agency: _____

Address: _____

Name: _____

Title: _____

Date: _____

CAP Solano JPA

Name: _____

Title: _____

Date: _____

ATTACHMENT II:
FAIR HOUSING AMENDMENTS ACT OF 1988 NOTICE

U. S. Department of Housing and Urban Development



**EQUAL HOUSING
OPPORTUNITY**

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

(The Fair Housing Amendments Act of 1988)

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

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

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

1-800-669-9777 (Toll Free)

1-800-927-9275 (TTY)

www.hud.gov/fairhousing

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

Previous editions are obsolete

form HUD-928.1 (6/2011)

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

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

- Race
- Color
- Religion
- National origin
- Sex
- Actual or perceived sexual orientation or gender identity
- Disability
- Familial status
- Marital status

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

All aspects of the Housing First Solano Coordinated Entry process will comply with all Federal, State, and local Fair Housing laws and regulations. Participants will not be "steered" toward any housing facility or neighborhood because of race, color, national origin, religion, sex, disability, or the presence of children.

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

PROCESS FOR FILING A COMPLAINT

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

Housing First Solano Continuum of Care
870 Market Street, Suite 1228
San Francisco CA 94102
solano@homebaseccc.org

Updated by the Housing First Solano Continuum of Care on February 27, 2019.

34

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

The report will be kept on file for two years.

DISCRIMINATION COMPLAINT FORM

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

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

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

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

Signature _____

Signed on (Date) _____

Please return this form to:

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

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

EMERGENCY TRANSFERS

Housing First Solano is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), Housing First Solano allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.² The ability of Housing First Solano to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether Housing First Solano has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that Housing First Solano and its CoC- and ESG-funded providers are in compliance with VAWA.

KEY TERMS

Emergency Transfer Plan. Provides for emergency transfers for victims receiving rental assistance or in units subsidized under a covered housing program.

External Emergency Transfer. Emergency relocation of a tenant to another unit where the tenant would be considered a new applicant.

Internal Emergency Transfer. Emergency relocation of a tenant to another unit where the tenant would not be a new applicant.

Safe Unit. A unit the victim believes is safe.

Victim. A victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L.

² Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

ELIGIBILITY FOR EMERGENCY TRANSFERS

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

EMERGENCY TRANSFER REQUEST DOCUMENTATION

To request an emergency transfer, the tenant shall notify the management office of the HUD-funded housing provider that runs the program the tenant is enrolled in, and submit a written request for a transfer to a Safe Unit. The housing provider will provide reasonable accommodations to this policy for individuals with disabilities.

The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under the housing provider's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

CONFIDENTIALITY

CoC- and ESG-funded housing providers operating within the geographic boundaries of Housing First Solano will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives their housing provider written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant.

See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about CoC- and ESG-funded housing providers' responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

EMERGENCY TRANSFER TIMING AND AVAILABILITY

CoC- and ESG-funded housing providers operating within the geographic boundaries of Housing First Solano cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. Such housing providers will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. Housing First Solano housing providers may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If a CoC- and ESG-funded housing provider operating within the geographic boundaries of Housing First Solano has no safe and available units for which a tenant who needs an emergency is eligible, the housing provider will work with Resource Connect Solano, Housing First Solano's Coordinated Entry System, to assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, the housing provider will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

SAFETY AND SECURITY OF TENANTS

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Local assistance may be found through SafeQuest Solano's 24/7 Crisis Hotline at 1-888-487-7233, or in person Monday – Friday from 9 AM – 5 PM at 1049 Union Avenue, Fairfield, CA 94533.

ATTACHMENT V:
EMERGENCY TRANSFER REQUEST FORM FOR VICTIMS OF DOMESTIC VIOLENCE,
DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING FORM

**EMERGENCY TRANSFER
REQUEST FOR CERTAIN
VICTIMS OF DOMESTIC
VIOLENCE, DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING**

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2577-0286

Purpose of Form: If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA). Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

The requirements you must meet are:

(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.

If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.

(2) You expressly request the emergency transfer. Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.

(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you submit this form or otherwise expressly request the transfer.

Submission of Documentation: If you have third-party documentation that demonstrates why you are eligible for an emergency transfer, you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

Form HUD-5383
(12/2016)

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER

1. Name of victim requesting an emergency transfer: _____

2. Your name (if different from victim's) _____

3. Name(s) of other family member(s) listed on the lease: _____

4. Name(s) of other family member(s) who would transfer with the victim: _____

5. Address of location from which the victim seeks to transfer: _____

6. Address or phone number for contacting the victim: _____

7. Name of the accused perpetrator (if known and can be safely disclosed): _____

8. Relationship of the accused perpetrator to the victim: _____

9. Date(s), Time(s) and location(s) of incident(s): _____

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking a transfer? If yes, skip question 11. If no, fill out question 11. _____

11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit.

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

This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

Form HUD-5383
(12/2016)

ATTACHMENT VI: UNIVERSAL PRIVACY NOTICE

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

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

PERSONALLY IDENTIFIABLE INFORMATION DEFINITION

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

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

RESPONSIBILITY TO PROTECT PERSONALLY IDENTIFIABLE INFORMATION

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

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

USES AND DISCLOSURES OF PARTICIPANT INFORMATION

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

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

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

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

PARTICIPANT RIGHTS AND OPTIONS

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

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

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

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

PERSONALLY IDENTIFIABLE INFORMATION USE OR DISCLOSURE COMPLAINT FORM

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

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

- 1. Name of complainant:**

- 2. Your name (if different from complainant):**

- 3. Address or phone number for contacting the complainant:**

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

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

- 6. Description of perceived inappropriate use or disclosure suffered:**

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

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

Signature _____

Signed on (Date) _____

Please return this form to:

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

PARTICIPATING PROVIDER OBLIGATIONS

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

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

All participating organizations shall present participants a copy of this Privacy Notice before a VI-SPDAT interview.

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

The following statement should be read or shared with consumers: The Resource Connect Solano Coordinated Entry System collects personal information directly from you for reasons that are discussed below. It may be required to collect some personal information by law or by organizations that provide funding to operate the program. The personal information RCS collects is important to run its programs, to improve services for persons experiencing homelessness, and to better understand the needs of persons experiencing homelessness. Updated by the Housing First Solano Continuum of Care on February 27, 2019.

46

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

PROVIDER TRAINING

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