

Somerville-Arlington CoC

Coordinated Entry Written Standards

Continuum of Care (CoC) Emergency Solutions Grant (ESG)

Section 1 | Introduction

1. Purpose

Coordinated Entry (CE) is a systematic approach to addressing and ending homelessness. CE involves comprehensive coordination among Continuum of Care (CoC) providers to help people experiencing homelessness and those at-risk of homelessness.

The purpose of the Somerville-Arlington CoC's CE is to ensure that people who have the longest histories of homelessness and those with a disabling condition are assessed, prioritized and matched to appropriate housing and service related resources. Use of CE is required for access to Continuum of Care (CoC) and Emergency Solutions Grant (ESG) funded resources.

2. Guiding Principles

- Easily accessible low-barrier access/entry points
- Standardized assessment tools to assess length of homelessness and disabling conditions that result in significant barriers for people to obtain and maintain housing
- Referrals, based on the results of assessments, to match clients to appropriate housing and service related interventions
- Person-centered:
 - Provide a standardized approach throughout the Coordinated Entry System;
 - Provide people with choices whenever possible;
 - Present information and use processes that are flexible and understandable;
 - Keep data confidential within a coordinated, collaborative process;

- Operate a fair, transparent process that applies uniform decision-making, while accommodating individual needs and special circumstances;
- Strive to reduce linguistic and cultural barriers and to make resources accessible to special populations including, individuals with disabilities, immigrants, youth and lesbian, gay, bisexual, transgender, queer or questioning (LGBTQ) persons.
- Capturing and managing quality data related to assessments in a Homeless Management Information System (HMIS)
- Well-advertised to specifically reach disabled homeless persons most difficult to engage
- Housing and service prioritization for clients that are disabled and experiencing the longest histories of homelessness

3. Requirements

Full Coverage

CE covers the geographic area for HUD CoC MA-517, which is the City of Somerville and the Town of Arlington, MA.

Safety Planning - People Fleeing/Attempting to Flee Domestic Violence and Victims of Trafficking

At present, there is one victim service provider receiving ESG funding within our CoC--Respond, Inc. However, all providers must provide safe and confidential access to Coordinated Entry for people fleeing or attempting to flee domestic violence and to victims of trafficking (DV survivors).

The process to ensure DV survivors have access to CE is as follows:

- DV survivors have access to safe shelter, including access to non-DV emergency shelter;
- If someone feels unsafe in a non-DV emergency shelter, a safety plan will be made. A safety plan will consist of coordination with the following to arrange for alternate placement:
 - Local domestic violence service providers for DV shelter placement or other safe options: **RESPOND, INC.**; and/or
 - MA Department of Transitional Assistance domestic violence unit to arrange for alternate safe shelter; and/or
 - CoC partners for other non-DV shelter or other safe options;

- DV survivors will have safe and confidential access to CE resources, including ESG- and/or CoC-funded prevention, Rapid ReHousing (RRH), and/or Permanent Supportive Housing (PSH). These resources will be well advertised to DV service providers, and they may refer candidates. The CE will coordinate with the DV providers on completion of relevant assessment tools.
- Data collection conforms to the applicable requirements of the Violence Against Women Act (VAWA) and/or HMIS Data Standards.

Survivors can contact [SafeLink](#), a resource for anyone affected by domestic or dating violence. Each call is answered by a trained advocate who provides non-judgmental support, assistance with safety planning, and information on appropriate resources.

SafeLink’s state-of-the-art technology allows the advocate answering the call to keep the caller on the line while they are being connected to a resource in their area, getting them help in just a single call. The SafeLink toll-free number is **(877) 785-2020**. Hearing impaired callers may use the SafeLink TTY number at **(877) 521-2601**. Advocates are bilingual in English and Spanish and have access to a service that can provide translation in more than 130 languages.

People may call SafeLink for:

- Safety planning resources for survivors to learn how they and their families can stay safe
- A safe and confidential space in which to talk about your relationship or someone else’s
- A direct connection to domestic violence programs across Massachusetts including shelter and transitional housing
- Referrals to local domestic violence and other community resources
- Support and resources for anyone who is concerned about a victim of domestic violence

Information about domestic and dating violence

Low Barrier

The CoC does not have a low threshold shelter within our geographic region, but encourages ESG programs to be as low barrier as possible. However, the CoC does provide ESG funding to a low barrier emergency shelter located within an adjacent CoC. Homeless people in need of low barrier shelter within our CoC may access this emergency shelter.

CE prohibits screening people out due to perceived barriers related to housing or services including, but not limited to: too 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. A criminal record

that may pose significant safety risks in housing will be reviewed, with opportunities to consider extenuating circumstances, but may make someone ineligible for PSH.

There are some non-CoC/ESG programs that participate in CE, but have funding restrictions which limit eligibility to certain criteria or subpopulations. These programs are encouraged to be low barrier. However, programs that do not receive CoC- or ESG-funds, but opt to participate in CE, may deny housing based on tenant eligibility criteria in their grant agreements.

Affirmative Outreach and Marketing

CE providers, individually or through the CoC, must affirmatively market their CE housing and services to eligible persons who are least likely to apply in the absence of special outreach. This outreach is regardless of race, color, national origin, religion, sex, age, familial status, marital status, handicap, actual or perceived sexual orientation, or gender identity.

Non-Discrimination

Recipients and subrecipients of CoC Program and ESG Program-funded projects must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws as specified at 24 C.F.R. 5.105(a), including, but not limited to the following:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status;
- Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance;
- Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin under any program or activity receiving Federal financial assistance; and
- Title II of the Americans with Disabilities Act prohibits public entities, which includes state and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing-related services such as housing search and referral assistance. Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

In addition, HUD's Equal Access Rule at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status, including any projects funded by the CoC Program, ESG Program, and HOPWA Program. The CoC Program interim rule also contains a

fair housing provision at 24 CFR 578.93. For ESG, see 24 CFR 576.407(a) and (b), and for HOPWA, see 24 CFR 574.603.

Section 2 | Coordinated Entry Access and Approach

The Coordinated Entry system serves the following five populations:

- **Homeless** adults without children (individuals),
- **Homeless** adults accompanied by children (families)
- **Homeless** unaccompanied youth,
- Households fleeing or attempting to flee domestic violence, and
- Persons **at-risk of homelessness**

Among the homeless sub-populations served, chronically homeless persons with the longest periods of homelessness have highest priority for most housing resources available through CE.

1. Coordinated Entry Access Points

HOMELESS	Somerville Homeless Coalition – 1 Davis Square; 14 Chapel Street, Somerville
Individuals – without children	Catholic Charities – 270 Washington Street, Somerville; 617-628-3015
	Respond, Inc. – DV Crisis Hotline 617-623-5900, Somerville
	City of Somerville, Housing and Health and Human Services Division: 617-625-6600, 50 Evergreen Ave., Somerville
	Housing Corporation of Arlington, Inc. (HCA): 252 Mass. Avenue, Arlington 781-859-5294
	Just-A-Start, Inc. (JAS): 1035 Cambridge Street, #12, Cambridge 617-494-0444
	Heading Home, Inc. - 529 Main Street, Suite 100, Charlestown, 617-864-8140
	Bay Cove, Inc. (formerly CASPAR, Inc.) - Low Barrier Individual Shelter (ESG funded; 240 Albany Street, Cambridge)
	Unsheltered – Access as detailed in section below: <i>Outreach to the Unsheltered Population</i>

<p>HOMELESS</p> <p>Families – with children</p>	<p>The Massachusetts Department of Housing and Community Development (DHCD) operates CE to emergency shelter and rapid rehousing for families through its Emergency Assistance (EA) offices.</p> <p>Chelsea EA office – 80 Everett Avenue, 3rd Floor, Chelsea Serves as the main access point for coordinating family emergency shelter placement</p> <p>Coordinated entry for permanent supportive housing for chronically homeless families is available at the following agencies:</p> <p>Somerville Homeless Coalition– 1 Davis Square; 14 Chapel Street, Somerville</p> <p>Catholic Charities– 270 Washington Street, Somerville; 617-628-3015</p> <p>Respond, Inc.– DV Crisis Hotline 617-623-5900, Somerville</p> <p>City of Somerville, Housing and Health and Human Services Division: 617-625-6600, 50 Evergreen Ave., Somerville</p> <p>Housing Corporation of Arlington, Inc. (HCA): 252 Mass. Avenue, Arlington 781-859-5294</p> <p>Just-A-Start, Inc. (JAS): 1035 Cambridge Street, #12, Cambridge 617-494-0444</p> <p>Heading Home, Inc. - 529 Main Street, Suite 100, Charlestown, 617-864-8140</p>
<p>HOMELESS</p> <p>Unaccompanied Youth</p>	<p>Youth may access the coordinated access points for adult individuals or families.</p> <p>Somerville Homeless Coalition - PSH for Youth; CE Project</p> <p>Wayside Youth Services - TH for Youth</p> <p>Respond, Inc.– DV Crisis Hotline 617-623-5900, Somerville</p>

<p>Households fleeing domestic violence</p>	<p><i>Households fleeing domestic violence may access all the CE access points</i></p> <p>Chelsea EA office – Domestic Violence coordinators to assess and arrange for emergency shelter for DV survivors with children.</p> <p>Emergency Individual and Family Shelters – All of the above shelters/agencies provide access to CE resources for DV survivors staying in non-victim shelters.</p> <p>DV Victim Shelter and Service providers – Access via 24-hour crisis hotline 617-623-5900</p> <p>Respond, Inc.– CE access includes a shelter location; DV Crisis Hotline 617-623-5900, Somerville</p>
<p>Persons at risk of homelessness</p>	<p>Somerville Homeless Coalition – 1 Davis Square, Somerville</p> <p>Catholic Charities– 270 Washington Street, Somerville; 617-625-1920</p> <p>Just-A-Start, Inc. (JAS): 1035 Cambridge Street, #12, Cambridge 617-494-0444</p> <p>Community Action Agency of Somerville - 66 Union Square, Somerville (non-CoC; non-ESG)</p> <p>Cambridge / Somerville Legal Services (CASLS) - 60 Gore Street, Suite # 203</p> <p>Respond, Inc.– DV Crisis Hotline 617-623-5900, Somerville</p> <p>Housing Corporation of Arlington, Inc. (HCA): 252 Mass. Avenue, Arlington 781-859-5294 (non-CoC; non-ESG)</p> <p>DHCD Chelsea EA Office – Households may contact the EA office (families) for prevention and/or diversion assistance through RAFT, HomeBase, or similar program</p>

2. Advertising and access to Coordinated Entry Access Points

- CE access points are well advertised through CoC general meetings and wider communication and coordination with social service, healthcare, educational and other partners in our area.
- Our CoC ESG funding provides 24/7 access to low barrier emergency services for our CoC's homeless population via shelter located in adjacent CoC.
- The emergency shelters for individuals will provide shelter to someone in an emergency that arrives after intake hours (*so long as shelters are not at capacity and/or restricted by local or state occupancy, health, safety, fire and other related laws*).
- Families with children seeking emergency services when the EA DHCD offices are closed are directed to any of the shelter access points within or beyond CoC borders; and, they are assisted to obtain temporary emergency shelter until the EA offices re-open.
- Persons who access emergency services during hours when coordinated entry intake is not operating will be connected to CE as soon as intake and assessment processes are operating. For individuals, an intake at the shelter access points is completed the following day. For families, DHCD will assess for EA shelter the next day during EA intake office hours.

3. Outreach to the Unsheltered Population

The following stakeholders provide limited street outreach to or otherwise interact with unsheltered individuals:

- Somerville-Cambridge Health Care for the Homeless (HCFH) Street Outreach Team consisting of members from the following:
 - Somerville-Cambridge Healthcare for the Homeless (Cambridge Health Alliance)
 - Eliot Community Human Services Street Outreach
 - Massachusetts Department of Mental Health (DMH)
 - On the Rise, Inc.
 - Roxbury Youthworks, Inc.
 - Bay Cove, Inc.: CASPAR First Step Street Outreach and Albany Street Shelter
 - Somerville Homeless Coalition, Inc.
- Somerville Homeless Coalition (SHC) Coordinated Entry Project

HCFH is the lead and provider members can make referrals to the SHC Coordinated Entry Project and other providers to ensure all unsheltered people have CE access.

4. No Wrong Door

Households that present at any access point, regardless of whether it is an access point dedicated to the population to which the household belongs, can access an appropriate assessment process that provides the CoC with enough information to make prioritization decisions about that household's immediate needs and a referral(s) is made to the most appropriate housing and/or service provider.

5. Affirmative Marketing and Reasonable Accommodation

The CoC's CE is especially intended to serve special populations, including persons experiencing chronic homelessness, veterans, adults with children, youth, and survivors of domestic violence. CE providers, individually or through the CoC, must do this by affirmative outreach, engagement, and lowering of barriers. As noted in the core elements, the CoC's priority special population is persons experiencing chronic homelessness (ie disabled people with the longest histories of homelessness), with most PSH units dedicated to serving them.

CE staff will provide variation to the process, e.g., a different access point, when needed as a reasonable accommodation for a person with disabilities. For example, a person with mobility impairments may request a reasonable accommodation in order to complete the coordinated entry process at a different location.

6. Limited English Proficiency

The CoC strives to reduce barriers for persons with limited English proficiency. Many access points include staff members that speak the prevalent foreign languages within the CoC (e.g., Spanish, Haitian Creole and Portuguese). The Somerville Homeless Coalition's Coordinated Entry Project has the capacity to communicate with persons speaking other languages through a telephone-based interpreter service (e.g. Language Link).

7. Participating Programs

The CoC and ESG-funded programs are required to be part of the Coordinated Entry system. Other housing and service providers are encouraged to participate. The CoC's participating housing programs can only be accessed through CE. ESG helps to fund some of the CoC's emergency shelters for individuals without children.

Resources listed below, except emergency shelter, are prioritized through CE (*at time of writing*):

Homelessness Prevention	Somerville Homeless Coalition – ESG (State and City) program Just-A-Start – ESG program Catholic Charities - ESG program Housing Corporation of Arlington, Inc. (HCA) :non-CoC; non-ESG
Emergency Shelter	Somerville Homeless Coalition - ESG helps support a shelter for individuals without children and a shelter for families Catholic Charities: St. Patrick’s - ESG helps support a shelter for women without children CASPAR, Inc. Low Barrier - ESG helps support a shelter for individuals seeking low barrier shelter (located in Cambridge)
Rapid Rehousing	Somerville Homeless Coalition – ESG RRH (State and City) Respond, Inc. - ESG RRH for Domestic Violence
Permanent Supportive Housing	Somerville Homeless Coalition - CoC PSH Heading Home, Inc. – CoC PSH Somerville Housing Authority - CoC Rental Assistance PSH (Shelter Plus Care) Housing Corporation of Arlington, Inc. (HCA) : CoC Acquisition and Rehab units
Transitional Housing	Wayside Youth Services, Inc. - CoC TH for Youth (18-22)

Section 3 | Prevention

The CoC seeks to prevent homelessness and divert households from shelter to stable housing whenever possible. The CoC strives to provide assistance prior to shelter entry, recognizing that shelter stays can be destabilizing and traumatic.

The CoC offers services and financial assistance to households in order to prevent eviction or other housing displacement. Programs that provide prevention assistance and are funded with City of Somerville and/or DHCD ESG funds will give priority based on the sustainability of the

tenancy. All applicants must have income of 30% or less of AMI. It is important to note that applicants are not registered on a By-Name List.

Section 4 | Assessment Process

Our CE Assessment Process is standardized, person-centered, encourages participant choice on services/housing clients desire, and quickly gathers basic information needed to help the individual or family be connected to the most applicable services they need at that given time.

1. Assessment Tool

CoC CE access points utilize a standardized **Coordinated Entry Referral Form** to conduct an initial assessment to determine the immediate needs of the person requesting assistance. The Form assesses services such as emergency shelter; domestic violence resources; permanent supportive housing; housing search and case management; homeless prevention and rapid re-housing; veteran's assistance; youth transitional and permanent housing; health services; and, many others. The CoC's standardize referral process efficiently facilitates connections to service and housing related assistance, including mainstream resources.¹ The staff utilizing the Referral Form will then proceed to make service and housing linkages to the most applicable program(s) based on the results of the assessment of needs.

The CoC utilizes a **By-Name List (BNL)**, which is generated via the CoC's **HMIS Assessment Tool** (DV program is consulted separately to ensure confidentiality), in order to determine placement and prioritization for housing (*see Section: Prioritization*).

2. Release of Information Form (ROI)

CE should request that the CE participant sign a Release of Information (ROI) Form, if this was not already completed at another CE access point. The signed ROI obtains participant consent to share and store participant information for purposes of assessing and referring them through the coordinated entry process. No personal information can be entered into HMIS or discussed during a case conferencing meeting unless the individual has signed the ROI Form.

Refusal and Participant Autonomy

Individuals who refuse to sign the ROI Form can still be referred for housing assistance. A case manager can discuss the individual at a case conferencing meeting, using initials or other

¹ To assist in making the most appropriate referrals our CES utilizes a comprehensive 50 page Resource Guide for those homeless in Somerville and Arlington. We also collaborate closely with our partners in Cambridge, which is a large adjacent city, and utilize their resource manual and connect clients across CoC boundaries in order to maximize services for each client.

non-identifying information. The case manager can then connect directly with the housing provider to make the match. The homeless person in this circumstance will still need to provide sufficient information to a housing provider so the provider can meet grant requirements (e.g. verification of homelessness and length of homelessness; disabling condition as barrier to housing).

3. Person-Centered and Special Populations

The intent throughout the CE process is to serve people respectfully and appropriately and to engage and serve the most vulnerable populations. The guidance in prior sections regarding person-centered approach and affirmative marketing apply throughout the assessment and prioritization process.

Section 5 | Prioritization

1. By-Name List (BNL)

Once a person completes an HMIS Assessment this information is entered into the HMIS and a HMIS-generated By-Name List (BNL) is completed. The purpose and benefits of a BNL are:

- Ensure all households experiencing homelessness within a community are identified and their housing needs are known;
- Track the status and progress toward permanent housing of each of these households;
- Coordinate housing and services for each household among community providers;
- Measure progress toward goals and how close a community is to reaching an end to homelessness among the subpopulation;
- Identify key barriers to goal attainment and opportunities to resolve them.

The CoC utilizes the BNL to prioritize people based on longest period of homelessness and accompanying disabling condition. The prioritized person(s) on the BNL will have all eligibility related criteria (homelessness and disabling condition) documented and verified as soon as a possible following notification of an anticipated housing vacancy.

Note: Respond, Inc., as the CoC DV shelter and service provider, does not participate in the BNL. Thus, when an opening is anticipated in PSH, the Coordinated Entry Project will contact Respond, Inc. to determine if Respond has a person with a higher prioritization (i.e. number of days of homelessness) than the highest prioritized person on the BNL.

Housing Vacancies

Each CoC provider of PSH and TH must notify the Coordinated Entry Project, in advance, when a vacancy in their programs is anticipated.

Privacy Protections

The CoC's HMIS privacy and confidentiality protocols are followed when using the BNL. Electronic and paper copies of the BNL are for review in preparation for and during the case conference meetings, and are not otherwise distributed or shared. Names of individuals on the list are only shared among parties covered by the Release of Information form; otherwise HMIS case numbers are used and unique identifying information is not shared.

2. Prioritization by Housing Type

Housing Type 1: Permanent Supportive Housing (PSH)

The CoC provides CoC-funded Permanent Supportive Housing (PSH) to help homeless individuals and families with severe service needs and long-term homelessness move into permanent supportive housing and achieve stability in that housing. Most of this housing is dedicated to households experiencing chronic homelessness.

Prioritization

The CoC has adopted an **Order of Priority** for all CoC Program-funded PSH that must be followed when filling CoC PSH beds. Below are definitions for the type of beds and eligibility, followed by the order of priority.

Beds for Chronically Homeless Persons

Dedicated PSH beds: CoC-funded PSH beds, which are required through the project's grant agreement to be used only to house persons experiencing chronic homelessness unless there are no persons within the CoC that meet that criteria. Dedicated beds, filled prior to the dedicated designation, that are currently occupied by persons who were not chronically homeless at entry, upon turnover will be filled by chronically homeless persons.

Eligibility

- Literally Homeless or Fleeing/Attempting to flee Domestic Violence, **AND**
- A household member has a disability
- For CoC-funded units: chronically homeless for dedicated units

- Some units, as per grant agreements, have restrictions for Youth, etc.

Order of Priority

Below is the CoC's order of priority for PSH. CoC-funded PSH providers must be familiar with the complete HUD Notice and follow the recommended recordkeeping requirements:

[Notice-CPD-16-11-prioritizing-persons-experiencing-chronic-homelessness.pdf](#)

The following is utilized to determine priority of a client for PSH based on a By-Name List that is HMIS derived:

- 1) Chronically homeless individual and/or family with the longest history of homelessness (i.e. greatest number of days of homelessness)
- 2) NON-Chronically homeless individual and/or family with the longest history of homelessness and a documented disabling condition
- 3) NON-Chronically homeless individual and/or family with longest history of homelessness

Target subpopulations: When the PSH project's grant agreement targets a particular subpopulation (e.g., youth with substance abuse disability), the CoC will follow the order of priority above for persons whose assessment indicate they are eligible for and need the services of the project (consistent with non-discrimination requirements).

Housing Type 2: Rapid ReHousing (RRH)

Rapid Rehousing (RRH) funded with Emergency Solutions Grant (ESG) dollars provides help with rent, security deposit and other financial needs as well as supportive services to help people enter into housing.

Each person accessing the Coordinated Entry System will have an opportunity to opt out of RRH as a strategy they are not interested in. Access to Emergency Solutions Grant Rapid Rehousing resources is granted only through the Coordinated Entry process, so the person with the most sustainable prospective tenancy is prioritized.

For Entitlement ESG funds from the City of Somerville, applicants must be a resident of the City of Somerville in order to be eligible. If a Somerville resident is placed in a shelter out of the region, they are still eligible for RRH. Respond, Inc. has Entitlement ESG RRH funds that are restricted to City of Somerville residents involved in domestic violence. All residents must be

Literally Homeless, as defined by HUD.

Section 6 | Housing Selection

1. Housing Referral

Once a person has been assessed and prioritized (after consultation with victim service provider-Respond, Inc), they will be referred for housing (based on availability of applicable housing). The availability of housing unit will determine to which agency the person is referred.

When a housing program has a vacancy or available subsidy slot, the household with the highest prioritization that also meets eligibility for the available unit is referred. Providers will strive to reduce barriers as they assist selected households with navigating the process, from referral to housing placement.

2. Eligibility Determination

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) – see the *CoC Written Standards and Policies & Procedures Manual*. The coordinated entry system only refers persons to projects for which they are eligible. The process of collecting required information and eligibility documentation might occur at any point in the CE process, *i.e.*, after or concurrently with assessment and prioritization. Projects may be legally permitted to limit eligibility through State or local preferences where Federal funding is not used and Federal civil rights laws are not violated. Programs are prohibited from restricting access to persons with a specific diagnosis unless it is a requirement of another funding source for the project.

3. Housing Match and Offer Process

When there is a housing opening, it will be offered to the highest prioritized, eligible person. The referral and match process is as follows:

The program with the housing availability will assist the next prioritized person. The homeless person will be notified and an attempt will be made to contact the person for five (5) business days; if there is a service provider working with the homeless person then contact will also be made to that provider.

Due diligence will mean at least three (3) attempts in-person, by phone or in writing to reach the person directly or via agencies known to have contact with the person. If the person cannot be

reached within that time, then staff moves to the next prioritized person on the list. Once staff makes contact with the person, the person must decide whether to accept the unit. If the person accepts, the person moves forward to move-in (if a unit) and/or housing search process (if a subsidy).

4. Participant Refusal of Housing Offer

The CoC's CE system respects participant choice. If an individual refuses a housing offer to which they are referred, the individual remains on the by-name list with the same priority status as before, based on current length of homelessness. The goal is to house people, especially those with severe service needs; there is no limit to the number of referrals that will be made for an individual.

5. Housing Provider Decline of Housing Offer

There may be unusual instances where programs do not to accept a CE housing offer. Refusals are permitted in limited circumstances, including:

- The person does not meet the program's eligibility criteria;
- The person would be a danger to others or themselves if allowed to stay at this program;
- The person has previously caused serious conflicts within the program (*e.g.* was violent with another consumer or program staff); and
- The person would seriously put the stability of the house at-risk due to the mix of current participants (*e.g.*, congregate housing) or due to landlord requirements (*e.g.*, limits on numbers of persons with active substance abuse). Such reasons will be documented and must be done within a framework of Housing First and striving to lower barriers.

If the program determines a consumer is not eligible, the homeless individual remains on the by-name list. The individual maintains the priority status they had prior to the referral.

CoC-funded programs that consistently refuse referrals will be reviewed for compliance with contract requirements and may risk suspension or loss of funding.

If the program determines a consumer is not eligible, the program shall provide the person with a written statement containing the reason(s) in sufficient detail to prepare a response and the process for requesting an appeal.

Section 7 | Governance

1. Roles and Responsibilities

Organizations / Providers Using HMIS

HUD only requires that those projects that receive CoC or ESG funding participate in the Coordinated Entry System for the CoC. The list of projects that meet these criteria can be found in the above Section “Coordinated Access Points”. Additional projects also participate in the CoC through HMIS and governance. These projects regularly contribute data to the Housing Inventory Chart (HIC) as well as the Annual Homeless Assistance Report (AHAR) and the System Performance Measures (SPM); the staff are active members of the CoC.

An organization is considered participating in Coordinated Entry if their data is uploaded into HomelessData.com, providing access to client information to the Coordinated Entry Project. In the case of Somerville, the same agency manages HMIS and a Coordinated Entry Project. Data sharing agreements have been amended to cover the work of Coordinated Entry. (Note: Respond, Inc., as a DV shelter provider, and CASLS, Inc., as a legal services provider, do not participate in HMIS but will still be considered participating in Coordinated Entry.

As projects contribute data, the clients are included in the region’s “by-name list” (BNL) which supports prioritization using HMIS data.

In order for this approach to be successful, participating organizations using HMIS must meet the following requirements:

- Agree to the prioritization model
- Designate primary contact
- Adhere to the HMIS policies and procedures of the Continuum of Care which detail standards for data quality and completeness for both client and project level data
- Make housing resources available to the next eligible person on the region’s by-name list and in accordance with the region’s prioritization approach.

Project contact(s) for participating organizations

- Collect and maintain HMIS data for projects and participants
- Obtain documents required for rehousing

- Obtain consent
- Assess for additional need(s) that impact housing
- If a separate project for CES, then enroll, or refer over to it

Organizations/ Projects that are not participating in the CE

- The Coordinated Entry Project can be accessed directly at the Somerville Homeless Coalition so any client can be referred directly and enrolled in the CE project

Coordinated Entry Project

- Designate housing navigator (ie case manager)
- Host Coordinated Entry case conferencing meeting(s)
- Assist with consolidation of existing housing wait lists
- Adopt and enforce written standards (prioritization, Data Quality, consent tracking, etc.)
- Have the ability to remove a person from the CE project if the participant revokes consent

City of Somerville / CoC Collaborative Applicant

- Advertise the CE
- Support addition of access point(s) into the CE
- Direct / encourage organizations to participate
- Advocate for the inclusion of other non-HMIS data sources to support the prioritization process

Simtech Solutions, Inc.

- Support automated exchanges of data from all HMIS vendors
- Provide tools to help ensure data quality
- Produce prioritized by name lists
- Provide eligibility filtering
- Provide mobile tech available for outreach and non-HMIS participants
- Provide performance dashboards
- Provide HUD reporting

HMIS Lead / Administrator

- Ensure proper project setup

- Support the regular consolidation of data. Frequency is based on standards.
- Oversee DQ using reports and dashboards, in accordance with HMIS policies and procedures
- Alert CoC Lead (ie Collaborative Applicant) if established standards are not being met

Other Entities: As all CoCs must to meet the same requirements, the State, region and Federal government play significant roles and can facilitate implementation of Coordinated Entry Systems by doing the following:

State / Regional Consortia (i.e., New England Regional HMIS-NERHMIS)

- Provide common consent form
- Provide common resource directory
- Provide common marketing
- Provide templates for policies and procedures, written standards

HUD

- Create data export standards that support data integration, rather than double data entry
- Revise data standards to support enrollments at a location, to address numerous operational and reporting issues
- Revise data standards to support consent tracking and revocation
- Support a common referral API for deeper integration of services

Section 8 | Grievance Procedure

Any person participating in the Coordinated Entry process has the right to file a grievance regarding issues related to the coordinated entry system. Grievances should be brought to the relevant provider involved in the CE issues of concern (for example, how the assessment was conducted, how the housing “match” was made, provider’s rejection of a CE referral). The grievances should be addressed through that provider’s grievance procedure. Appeals of the provider’s decision should be forwarded to the Somerville-Arlington CoC Board for review and a final decision. The CoC Collaborative Applicant will conduct this review (City of Somerville).

Section 9 | Privacy and Data Protections

CE operations and staff must abide by all state and federal privacy protections. Participant consent protocols, data use agreements, data disclosure policies, and any other privacy

protections offered to program participants as a result of each participant's participation in HMIS will be the same as for CE.