

**Rensselaer County**  
**Homeless Services Collaborative**  
**Coordinated Entry**  
**Policies and Procedures Manual**

Implementation, Governance and Evaluation of  
the Coordinated Entry System in the  
Rensselaer County Continuum of Care (CoC)

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## INTRODUCTION

The HUD Continuum of Care (CoC) Program Interim Rule requires that each continuum of care establish and operate a Coordinated Entry system. Most projects receiving funding under either the CoC or Emergency Solutions Grant (ESG) programs are required to participate in the system in operation in their community.

The Coordinated Entry system for the Rensselaer Continuum of Care (NY-512) was developed to meet federal regulations and local priorities for creating a systemic response to homelessness in the community. The Rensselaer Coordinated Entry System strives to ensure that people experiencing homelessness are prioritized for and matched with the most appropriate available intervention as quickly as possible. This process standardizes the access, assessment, prioritization and referral process across all providers who are Continuum of Care (CoC) or Emergency Solutions Grant (ESG) - funded, and for some that are non-CoC or ESG funded.

To implement and maintain a county-wide Coordinated Entry (CE) system, the Rensselaer County Homeless Services Collaborative (RCHSC) formed the Coordinated Entry Committee, which consists of partner agencies who receive CoC, ESG, and other types of funding. The CE Committee created a CE system that is informed by HUD regulations, national best practices, and local policies and priorities as described in the RCHSC Written Standards and Strategic Plan. The CE Committee, Joseph's House & Shelter as the Lead Agency for Coordinated Entry, and CARES as the Collaborative Applicant, have jointly developed the following *Policies and Procedures Manual* to outline and define the RCHSC Coordinated Entry system.

The RCHSC CE *Policies and Procedures Manual* provides the community with a framework to:

- Assist with the coordination of homeless housing and emergency services access and delivery across Rensselaer County as the foundation of the Coordinated Entry system;
- Unify the assessment and prioritization process for individuals and families seeking services, resulting in consistent and appropriate referrals to housing and services;
- Support homeless service projects in administering assistance fairly and methodically;
- Delineate roles and responsibilities of each agency and user involved in the system;
- Establish protocols for system assessment, user training, client privacy, and consumer disclosure;

- Strengthen community-level performance measures; and
- Support common project-level eligibility, assistance, and performance standards for all CoC and ESG-funded project components, as outlined in the RCHSC Written Standards

The *Policies and Procedures Manual* has been established to ensure that persons experiencing homelessness who enter homeless services projects throughout Rensselaer County will be given similar information and support to access and maintain permanent housing. Most projects that receive ESG or CoC funding are required to abide by the *Policies and Procedures* guidelines (with exception for certain projects serving victims of domestic violence). The CoC strongly encourages and welcomes collaboration with projects that do not receive either of these sources of funding, in order to provide comprehensive services to the community's homeless population. Agency procedures should reflect the policy and procedures described in this document. The Director of each participating agency must sign the Agency Agreement at the end of this document, indicating that the agency has reviewed these policies and procedures and will comply with them.

Coordinated Entry systems work by establishing a common process to assess the needs of all households who request help through the local housing crisis response system. There are four core elements to the Coordinated Entry System: Access, Assessment, Prioritization, and Referral. These elements will be described in detail in this manual.

## GOALS OF COORDINATED ENTRY

Coordinated Entry is intended to increase and streamline access to housing and services for households experiencing homelessness, match appropriate levels of housing and services based on their needs, and prioritize persons for the most intensive interventions. It helps communities prioritize assistance based upon vulnerability, severity of service needs, and length of time homeless to ensure that people who need assistance the most can receive it in a timely manner. CE also provides information about the need for additional services and gaps in housing availability to help the RCHSC plan their assistance and identify needed resources.

Primary goals for the Coordinated Entry process in the Rensselaer County CoC are:

- To allocate homeless services and housing as effectively as possible, and
- Ensure that homeless assistance is easily accessible, no matter where or how people present

## PURPOSE OF COORDINATED ENTRY

Coordinated Entry is considered one of many interventions in a community's united effort to end, reduce, and combat homelessness. The process works best and provides the greatest value if it is driven by an approach that considers each client's unique circumstances and needs, rather than by provider eligibility. The term "Coordinated Entry" refers to the process used to assess and assist in meeting the housing needs of people at-risk of homelessness and people experiencing homelessness. The RCHSC Coordinated Entry process is designed to identify, engage, and assist homeless individuals and families, and ensure those who need assistance are connected to appropriate housing and services. The implementation of Coordinated Entry is considered a national best practice.

When implemented effectively, Coordinated Entry can:

- Reduce the amount of research and the number of phone calls or visits to providers people experiencing homelessness must make before finding crisis housing or services;
- Reduce new entries into homelessness through coordinated system-wide diversion and prevention efforts;
- Prevent households experiencing homelessness from entering and exiting multiple projects before their needs can be met;
- Reduce or erase entirely the need for individual provider wait lists for services;
- Foster increased collaboration between homelessness assistance providers; and
- Improve a community's ability to perform well on Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act outcomes and make progress on ending homelessness.

The RCHSC Coordinated Entry process makes referrals to all projects receiving ESG and CoC program funds, including emergency shelter (ES), street outreach (SO), rapid re-housing (RRH), permanent supportive housing (PSH), transitional housing (TH), and homelessness prevention (HP) in the continuum, as well as other housing and homelessness projects. These ESG and CoC-funded projects in the community that are dedicated to serving people experiencing homelessness fill vacancies exclusively through CE referrals, while other housing and services projects are encouraged to participate but ultimately determine the extent to which they rely on referrals from the coordinated entry process.

## ROLES AND RESPONSIBILITIES OF KEY PARTICIPANTS

**CE Lead Agency:** Joseph's House as the CE Lead Agency will be responsible for tracking client information from initial application to housing by maintaining client data in excel spreadsheet and/or HMIS system; working with Collaborative Applicant to ensure project compliance; and conducting regular Coordinated Entry Review Team meetings. The CE Lead Agencies provides regular training to all key participants, using a training curricula approved by the CE Committee. A representative from the Lead Agency will also meet quarterly with the Collaborative Applicant and other regional Coordinated Entry Lead Agencies to discuss policies & procedures, best practices, the prioritization process, and other related topics.

**Funded Agencies:** Participation from most projects funded through the either the CoC or ESG Programs is required. Funded agencies will be responsible for: updating the Lead Agency on housing vacancies, receiving referrals, and updating the Lead Agency upon acceptance or rejection. All funded agencies also serve as a "No Wrong Door" point of entry access point by assisting potential CE applicants with triage and assessment including collecting disability and homeless documentation, and attending Review Team meetings. Relevant staff from funded agencies will participate in the CE Lead Agency-led training at least once upon start up, and once annually. All funded agencies will make every reasonable effort to locate chronically homeless persons in the CoC.

**Non-Funded Agencies:** Non-funded agencies are those who do not receive funding through the CoC or ESG program, but serve persons who are homeless or at risk of homelessness in a variety of ways. Non-funded agencies are strongly encouraged to participate and submit Coordinated Entry applications to the lead CE Agency to effectively and efficiently refer all households to services. Non-funded agencies may also serve as a "No Wrong Door" point of entry access point by assisting potential CE applicants with triage and assessment including collecting disability and homeless documentation, and attending Review Team meetings. Relevant staff from participating non-funded agencies will attend the CE Lead Agency-led training at least once upon start up, and once annually. All participating non-funded agencies will make every reasonable effort to locate chronically homeless persons in the CoC.

**Coordinated Entry Committee:** Created as a standing committee in the RCHSC Governance charter, the CE Committee is responsible for creating the coordinated entry process in Rensselaer County. It reviews all stages of the assessment, referral, application, vacancy posting, and acceptance/denial processes.

**Coordinated Entry Review Team:** A subcommittee of the RCHSC CE Committee, the CE Review Team is comprised of at least one staff member from each participating funded and non-funded agency. The Review Team is responsible for reviewing applications for completeness, determining a priority score, and making collaborative referrals to projects with vacancies.

**Collaborative Applicant:** Conducts quarterly trainings with regional CE representatives, and provides technical assistance as requested to any of the key participants or as deemed necessary by the CE Committee.

## CORE ELEMENTS OF COORDINATED ENTRY

Full implementation and operation of the Coordinated Entry system includes core elements that are guided and informed by HUD regulations, national best practices, and local policies as described in the RCHSC Written Standards. The RCHSC Written Standards, which were developed in consultation with recipients of CoC and ESG funds, establish the baseline guidance for evaluating project-level eligibility and prioritization factors for all project types (including ES, SSO, HP, TH, RRH, and PSH), as well as the percentage or amount of rent participants must pay when receiving rapid rehousing financial assistance.

**ACCESS:** The engagement point for persons experiencing a housing crisis.

The RCHSC Coordinated Entry Committee chose a No Wrong Door approach to Coordinated Entry, whereby triage and assessment can be conducted regardless of which community stakeholder and/or participating homeless services provider the client presents. This ensures that participants have equal access to information about and referrals to the housing assistance for which they are eligible, and assists them in making informed choices about available services that best meet their needs regardless of language barriers or impairments.

- Examples of points of entry (POE) in the Rensselaer County CE System include: homeless shelters, RCDSS Temporary Assistance staff, street outreach projects, PSH providers, RRH providers, Homelessness Prevention providers, hospitals, probation/parole, and outpatient treatment clinics. See Addendum 1, or the Continuum's website for a list of currently participating POEs and special access considerations.
- **Access to Emergency and Outreach Services:**
  - The Coordinated Entry process does not delay access to emergency services, such as shelter through Rensselaer County Department of Social Services (RCDSS), Joseph's House, or Unity House. Very low-barrier emergency shelter and street outreach services are provided by immediate referral to ES or SO providers in the Rensselaer CoC.

- See Addendum 2 for the Emergency Shelter Index and Addendum 3 for the Street Outreach Index, which gives contact information, description of services, and eligibility requirements by project in the Rensselaer CoC.
- Emergency Shelter and Street Outreach programs, including those funded by the ESG program, regularly attend CE Review Team meetings and participate in the RCHSC Coordinated Entry Committee.
- **Access to Homelessness Prevention Services:**
  - The Coordinated Entry System provides immediate referral to Prevention Services Providers in the Rensselaer CoC.
  - See Addendum 4 for the Homelessness Prevention Services Index, which gives contact information, description of services, and eligibility requirements by project in the Rensselaer CoC.
- **Access to Permanent Housing Projects**
  - Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH) services are provided based on the elements of assessment, prioritization and referral.
  - PSH and RRH assessments, prioritization, and referrals are uniformly available to all persons, regardless of which POE the person chooses to access.
  - See Addendum 5 for the Permanent Supportive Housing Index and Addendum 6 for the Rapid Rehousing Index which gives contact information, description of services, and eligibility requirements by project in the Rensselaer CoC.
- **Special Considerations for Access:**
  - All POEs in the CE system comply with federal, state, and/or local laws regarding physical accessibility for public buildings, and have reasonable accommodations in place for access by persons with disabilities, including those who use wheelchairs, as well as people in the CoC who are least likely to access homeless assistance.
  - All printed Coordinated Entry materials are available in English, and the core materials are also available Spanish (assessments, grievances). Specific POEs can also accommodate persons whose primary language is not English or Spanish via use of language line services.
  - Persons with vision impairment or who are illiterate will be offered all materials verbally or in recorded format. Those with hearing impairment will be offered materials in print format.
  - The Coordinated Entry process does not jeopardize the safety of persons seeking assistance. Individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions (including human trafficking), may access specialized safe and confidential services with Unity House Domestic Violence

Services Program by hotline (518-272-2370) or in-person at the program's offices (see Addendum 1). Individuals and families presenting at mainstream POEs will be offered an immediate referral to safe and confidential services provided by UH DV. These services are voluntary, and include a safety assessment to establish a safety plan for the individual or family, which may include special considerations such as safe meeting points, transportation methods, contact methods, and temporary housing for pets. Persons accessing the CE system through a victim services provider will have confidential access to the same coordinated entry processes and services as those presenting at a mainstream POE, including immediate access to emergency shelter. Any person who is in imminent danger is always encouraged to contact the police or call 911.

**ASSESSMENT:** Upon access, CE point of entry (POE) staff will begin assessing the person's housing needs.

- Each POE offers the same assessment approach using uniform decision making processes. A person presenting at a particular POE location is not steered towards any project or provider simply because they presented at that location.
- A universal triage and assessment form is used for all participants at all points of entry. The process is designed to be easy on the client, and provide quick and seamless entry into homelessness services. Individuals and families will be referred to the most appropriate resource(s) for their individual situation and self-identified goals. The process will prevent duplication of services, reduce length of time homeless and improve communication among agencies.
- The first stage of the assessment is triage. Information collected is extremely brief, screening for an immediate referral to Emergency Shelter, Street Outreach, Homelessness Prevention, or Victim Services projects based on client choice.
- The second stage of the assessment is a more formal application, yet requests the minimum amount of client information in order to complete the prioritization and referral process. The POE agency explains the two types of permanent housing available in our community - permanent supportive housing and rapid rehousing - and the client may choose to apply for one or both types. POE staff offers assistance in completing the CE application, and serves as a witness of the signed consumer consent/release form. The POE is also responsible for gathering proof of homeless status and documentation of a HUD-defined disabling condition, if applicable. Each CE application is sent to the CE Lead Agency, who presents all new application to the CE Review Team.
- Clients are free to choose how much or what types of information they are willing to provide when completing any stage of the CE assessment. Clients will not be required to

disclose specific disabilities, unless necessary to determine eligibility for referrals to projects that serve a specific subpopulation. POEs will explain which minimal types of information are necessary to successfully complete an assessment, and offer alternative solutions whenever possible. Some examples are:

- Client doesn't know or doesn't have access to records proving homeless history -> POE will offer to obtain that information from emergency shelters, outreach teams, or other providers on the client's behalf, pending a signed release of information. If unsuccessful, POE offers to submit the client's assessment to the Review Team, but explains that acceptance to a particular project typically requires determining eligibility.
- Client doesn't know or doesn't have access to records proving disability -> POE will offer to obtain that information from Social Security, medical or behavioral health providers on the client's behalf, pending a signed release of information. If unsuccessful, POE offers to submit the client's assessment to the Review Team, but explains that acceptance to a particular project typically requires determining eligibility.
- Client refuses to sign any consent forms to release personal information -> POE offers to take down a statement that the client would like the POE to submit the assessment anonymously on their behalf *without* identifying information, and explains what types of information the client may be ultimately be required to provide to the housing program in the event of acceptance.
- Client refuses to provide information that relates to prioritization factors -> POE explains that while these fields are not required, complete answers would assist with the prioritization process, and could increase the likelihood of receiving a successful referral to a housing project.

#### PRIORITIZATION:

- Coordinated entry process ensures that people with the greatest needs receive priority for any type of homeless housing assistance available in the CoC, including PSH and RRH.
- The RCHSC Written Standards establish the prioritization standards for the Coordinated Entry system, with the intent to ensure that people with the most severe service needs, highest levels of vulnerability, and longest history of homelessness are prioritized for the most intensive housing and homeless assistance services. The prioritization process is separate and distinct from determining project-level eligibility. Project staff are ultimately responsible for determining eligibility, and may have different or more stringent documentation requirements than are necessary or practical for the CE system.
- In line with the RCHSC Written Standards, the CE process is designed so that persons experiencing chronic homelessness are prioritized for Permanent Supportive Housing. In addition to prioritizing people experiencing chronic homelessness, the coordinated

entry process prioritizes people with the most severe services needs, who are more likely to need some form of assistance to end their homelessness or who are more vulnerable to the effects of homelessness into PSH. The prioritization process does not, under any circumstances, take into account specific diagnosis or disability type.

- Rapid Rehousing financial assistance currently available in the CoC consists of extremely short term rental assistance (typically one month, occasionally up to three months), with the following project-level eligibility factors: persons who are literally homeless, and have either current stable and sufficient income or reasonable expectation of income before the term of assistance ends. The coordinated entry process prioritizes RRH assistance to persons who have more severe service needs who are more likely to need some form of assistance to end their homelessness or who are more vulnerable to the effects of homelessness, measured as receiving two or more points based on vulnerability factors in the RRH assessment.
- Driven by consumer consent, the CE Review team checks applications for completeness, and prioritizes applications based on a vulnerability score, which assigns priority points based on whether the household is currently experiencing (or has a history of) the following objective and documentable factors:

*Factors apply to both PSH and RRH unless otherwise noted*

- Chronic homelessness and/or total length of time homeless (3-15 points) *PSH only*
- Currently homeless, unsheltered, or unhoused (1-3 points)
- More than one disabling condition in the household (3 points)
- History of 3 or more evictions (1 point) *RRH only*
- Youth 24 years old and under (1 point)
- Served at least one day of active military service (1 point)
- Household has 3 or more children aged five years or less (1 point)
- Homeless due to sex trafficking or work in sex industry (1 point)
- Current parole, probation, or child protective services (CPS) involvement (1 point)
- Currently pregnant (1 point)

Applicants who are not chronically homeless are referred for PSH vacancies only when there are no chronically homeless households identified in the CoC's geographical area.

**REFERRAL:** The CE Review team will apply the prioritization factors to assign a vulnerability score to any active applications, and the resulting prioritized list is used as the basis for referring households to available homeless housing resources.

- Using the prioritized list sorted by score from high to low, the applicant's housing preferences, and an understanding of project-level eligibility, the CE Review Team

- makes referrals to projects with vacancies for which the household with the highest vulnerability score is eligible.
- At times, due to the limited number of new vacancies in the CoC, the Review Team may offer a client a referral to a project that does not appear on their Housing Preference checklist (see Client Referral Rejection Policy below).
  - At times, due to the limited number of new vacancies in the CoC, one or more applicants may receive the highest vulnerability score on the prioritized list, but there is only one vacancy. In this case, the Review Team will choose one referral by majority vote of members present based on case conferencing, total length of time homeless, and date of application.
  - See Addendum 5 and 6 for an overview of project-level eligibility of PSH and RRH in the Rensselaer CoC.
  - Projects that participate in the CoC's coordinated entry process accept all eligible referrals, unless the project submits to the Review Team an approved reason that would support rejecting a referral (see below). In the event that a project or client rejects a referral, the Review Team will refer a household with the next-highest vulnerability score.
  - **Project Referral Rejection Policy:** Service denials by the housing provider should be infrequent. However, providers may defer 1 out of every 4 referrals, for specific and serious reasons such as an order of protection against another tenant or staff. To the extent practical, project staff should come to the Review Team meeting prepared with information about orders of protection to minimize delays in referrals. Members of the CE Review Team (except those from the rejecting provider) shall vote using simple majority to determine if a referral rejection request is accepted. If the members of the Review Team cannot come to a majority vote, the Review Team may refer the issue to the CoC Executive Board.
  - **Client Referral Rejection Policy:** The Coordinated Entry system is designed to allow the maximum level of client choice via the "Applicant's Housing Preference(s)" section of the assessment. To the extent possible, the CE Review Team will attempt to match clients with the highest vulnerability score with projects they have indicated they would accept. However, due to the infrequency of vacancies in the Rensselaer CoC, clients may be offered referrals to programs that they do not prefer. Therefore, clients may reject an unlimited number of referrals and remain on the prioritized list.
  - If there are no eligible chronically homeless households identified throughout the entire Rensselaer CoC, per HUD guidance, an eligible homeless household that is not considered chronic may be referred to vacant PSH unit. The CE Lead Agency staff will reach out to all CE partners and participating agencies to verify that all efforts have

been undertaken to locate persons that would be considered the highest priority. In this case, Lead Agency staff will provide the accepting agency with a statement indicating that at time of referral, there were no other eligible chronically homeless households located in the CoC.

- **Project Transfers:**

- The CE Review Team will consider all **client-initiated project transfer** requests for vacancies in PSH. Clients may present at any POE for assistance with a transfer request, and POEs will screen for grievances or opportunities to collaboratively resolve possible housing issues without a transfer.
  - If the client chooses to proceed with a transfer request, the Review Team will consider the following when deciding to accept or deny the request: the client-identified reason for request including whether the transfer is anticipated to improve physical or behavioral health factors; whether a transition between on-site and off-site services is expected to better meet the client's service needs; potential grievance factors involved in the POE's screening; and whether the transfer will ultimately result in a new vacancy.
  - Using a simple majority vote, the Review Team will accept or deny the request. If the request is accepted, the client would maintain a priority score equal to the highest-scoring new applicant on the prioritization list, and the Review Team will make referrals from the prioritized list using the process described above. If denied, the client has the opportunity to appeal (see Grievance and Appeals Process below)
- The CE Review Team will also consider **project-initiated transfer requests** that are not voluntary on behalf of the project participant. Such requests will result in a thorough case review for grievances or opportunities to collaboratively resolve possible housing issues without a transfer. Using a simple majority vote (excluding members from the initiating agency), the Review Team will accept or deny the request. Project-initiated transfer requests should be extremely rare, and excessive requests from a particular project may be referred to the CoC Executive Board for review.

## DETAILED PRINCIPLES OF COORDINATED ENTRY

### COORDINATED ENTRY SYSTEM ENSURES:

- **Low Barrier Entry:** The RCHSC Coordinated Entry process does not screen people out for assistance because of perceived barriers to housing or services, including, but not limited to, lack of employment or income, drug or alcohol use, or having a criminal record, or historical non-compliance with program requirements. Participating projects restricting access to housing or services based on specific client attributes or characteristics will need to provide documentation to the CoC providing a justification for their enrollment policy. CoC or ESG projects offering Prevention and/or short-term Rapid Rehousing assistance (0-6 months of financial assistance) may choose to apply some income standards for their enrollment determinations, provided the standards are in compliance with the RCHSC Written Standards.
- **Person-Centered Approach:** The coordinated entry process encourages participant choice, which may be facilitated by questions in the assessment tool or through other methods. Choice can include location and type of housing, level of services, and other options about which households can participate in decisions.
- **Inclusiveness:** All subpopulations including chronically homeless individuals and families, Veterans, youth, persons and households fleeing domestic violence, transgendered persons, and refugees and new immigrants will be provided equal access to the CoC's Coordinated Entry System services regardless of the characteristics and attributes of their specific subpopulations.
- **Ongoing Planning and Stakeholder Consultation:** The CoC 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 through surveys, focus groups, and other means and is used to improve the process.
- **Informed Local Planning:** Information gathered through the coordinated entry process is used to guide homeless assistance planning and system change efforts in the community.
- **Safety Planning:**
  - The coordinated entry process ensures the safety of the individuals seeking assistance. This ensures that people fleeing domestic violence have safe and confidential access to the coordinated entry process and domestic violence services, and that any data collection adheres to the Violence Against Women Act (VAWA).

- The CoC coordinates with victim/ non-victim providers to ensure DV survivors are provided housing services that uphold safety by prioritizing programs that collaborate to offer victims a wide range of options. Households presenting at non-victim provider POEs are linked with DV services via a phone assessment. Households are given options including VAWA and CoC services to guard personally identifiable information. If a client is eligible and elects DV services the POE will end triage or assessment, delete paper or electronic record if applicable, and connect victim with DV service provider. If client elects for non DV services, the client may continue to fulfill the CE process with the same or another POE. VAWA-compliant informed consent is required to provide information to other providers.
- **Street Outreach:**
  - Programs that are staffed by outreach workers will address homeless individual and families' housing needs by offering ongoing and progressive engagement with those not able or willing to access housing services on their own. Street outreach staff will complete Coordinated Entry triage and assessment, and provide follow up with the client while the client transitions to housing. Unsheltered persons will be engaged to provide immediate support, intervention and connections with homeless assistance programs, social services and housing programs including permanent supportive housing and rapid rehousing programs.
  - Street outreach efforts are extensively linked to the coordinated entry process and participate in Review Team meetings. Through the street outreach efforts, Rensselaer County Coordinated Entry ensures that people on the streets are prioritized for assistance in the same manner as any other person assessed through another Point of Entry.
- **Privacy and Protection of Client-Level Data**
  - The Lead Agency may use HMIS and/or Excel workbooks to collect and manage data associated with assessments and referrals. The data management system is designed to allow the CE Lead Agency track activity, produce reports, and maintain regular communication. The CE Lead Agency is dedicated to managing client-level data in a way that affords each client the highest level of privacy and protection.
  - Client consent protocols, data use agreements, data disclosure policies, and any other privacy protections offered to households participating in the CE system will be developed in accordance with all applicable federal and state law, and protocols for maintaining the privacy and protection of individual client data will follow the same regulations governing HMIS as found in HUD HMIS Data and Technical Standards

- **Fair and Equal Access:**
  - The RCHSC Written Standards establish protocols for fair and equal access to CoC and ESG housing and services, including Coordinated Entry. The Coordinated Entry system in Rensselaer will ensure fair and equal access so that all people can easily access the Coordinated Entry process and the process for accessing help is well known.
  - All participating projects and POEs will ensure fair and equal access to CE system programs and services for all clients regardless of actual or perceived race, color, religion, national origin, age, gender identity, pregnancy, citizenship, familial status, household composition, disability, Veteran status, sexual orientation, or domestic violence status. Physical and communication accessibility barriers must be addressed by appropriate accommodation within the Coordinated Entry System.
  - If an individual's self-identified gender or household composition creates challenging dynamics among residents within a facility, the host program should make every effort to accommodate the individual or assist in locating alternative accommodation that is appropriate and responsive to the individual's needs.
  - **Marketing and Advertising:** CoCs and recipients of HUD CoC Program and ESG Program funding are required to affirmatively market their housing and supportive services projects to eligible persons who are least likely to apply in the absence of special outreach. Marketing strategies for Coordinated Entry may include: participating agencies utilizing their websites to advertise that they are a point of access, and flyers and brochures outlining the RCHSC Coordinated Entry process and locations of points of entry (POEs). These materials will be shared with mainstream community organizations such as health centers, churches and libraries.

## TRAINING

The Lead Agency, in consultation with the Coordinated Entry Committee and the Collaborative Applicant, will develop a Coordinated Entry User Guide and provide regular trainings to the community at least semiannually, to ensure that each staff administering assessments has access to materials that clearly describe the methods by which assessments are conducted. Training will also include a review of the *Policies and Procedures Manual* and the prioritization process for Coordinated Entry. A webinar training will be available for project staff, that will provide step by step instructions on how to complete assessment tool, what documents must be submitted with tool and walk participants through the referral process. A checklist noting

the specific documents that should be submitted to verify disability and homeless status is attached to the User Guide.

## EVALUATION AND OVERSIGHT

### GRIEVANCE AND APPEALS PROCESS

- The grievance and appeals process is overseen by the Coordinated Entry Committee. Consumer choice is central to the RCHSC Coordinated Entry system, and the grievance and appeals process will embrace that same person-centered and easily-navigable model. The Coordinated Entry Committee is dedicated make every effort to settle difficulties and problems which may occur in the Coordinated Entry process. Clients are informed about the grievance and appeals process during triage and assessment.
- **Appeals:** A participant may appeal a decision or action made by the CE Review Team if they feel they did not receive fair treatment or were discriminated against during the prioritization process, or given an inappropriate referral.
- **Grievance:** A participant may file a grievance if they have a complaint about the Coordinated Entry-related services they receive from any participating agency or point of entry (POE). The Coordinated Entry Committee encourages every client to first attempt to resolve problems directly with the agency or POE they are working with in the housing process. If, after addressing concerns with the agency, the client is not satisfied with the outcome, then the client should proceed with the grievance process with any other POE.
- RCHSC Coordinated Entry Grievance and Appeals Form will be available at each participating agency and POE. A participant may choose to file a grievance and appeals form with any POE they choose. This form will be forwarded to the Coordinated Entry Committee for review. If the Coordinated Entry Committee is not able to bring the grievance or appeal to resolution, it may choose to refer the issue to the CoC Executive Board.

### ONGOING SYSTEM EVALUATION

- Coordinated Entry is an evolving practice and new research, models, and assessment tools are continually being created. The RCHSC CE Committee will be flexible and responsive to new information about more effective approaches as the process evolves and additional services are wrapped into the Coordinated Entry process.
- The Coordinated Entry Committee will engage in regular evaluations at least annually.

The committee will seek input from relevant parties including Review Team members, POEs, housing providers, and clients. The CE Committee will solicit feedback on the quality and effectiveness of the entire CE process experience both for participating projects and for households, and may develop recommendations to changes in the Coordinated Entry system after these evaluations. Evaluations may be conducted by survey, focus groups, and/or online polling, of all participating projects as well as a randomly selected representative population of clients served by the CE system. All participant information collected in the course of evaluation will be protected to maximize client privacy.

- The evaluation process may result in changes that could include updates to the Policy and Procedures Manual, Assessment Forms, and user guides or training materials. The Coordinated Entry Committee will present all changes to documented processes to be approved by the RCHSC Board.
- The Coordinated Entry Review Team meetings will occur in person or by telephone at least monthly, or more frequently as vacancies arise. This meeting should serve as a space for agency representatives to discuss participants' progress and referral status, troubleshoot any issues, and coordinate outreach. The agency representatives can make recommendations to the CE Lead Agency on changes or improvements to the coordinated entry system.
- Participating projects will be evaluated on their level of participation in the Coordinated Entry system including having staff trained to complete CE applications, participating in the Review Team meetings, taking referrals from Coordinated Entry, and providing regular updates on vacancies. The CE Lead Agency may provide the NOFA Committee with participation information as it relates to grant applications or rank and review processes. Project-level participation in Coordinated Entry may be tracked through HMIS for quality, and agencies will be given the opportunity to submit their feedback on the process.

All components of the Coordinated Entry System will be reviewed and assessed by all stakeholders continuously. Recommendations for policy change will be presented by the Coordinated Entry Committee to the RCHSC Board.