Coordinated Entry HUD Self-Assessment Meeting Documents

Rural Nevada
CONTINUUM OF CARE

June/July 2024

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A. Planning **Required**

Core Requirements since 2012

CoC's coordinated entry process meets the requirements (below) established by the CoC Program interim rule.

A2. CES covers the entire geographic area claimed by the CoC.

Response: Participants agreed yes.

A3. CES is easily accessed by individuals and families seeking housing or services.

Response: Unknown- White Pine and Douglas County may not have some coverage- Telephonic access (sites within the county that are not designated access points can go to the closest point to conduct assessment over the phone if there is too broad of access). Hawthrone has to call Lyon County.

A4. CES is well-advertised.

Response: Participants agreed yes and stated they are in the process of rebranding the CoC.

A5. CES includes a comprehensive and standardized assessment tool(s).

Response: The participants agreed no. They are using the SAT and CHAT, but there is confusion around the SAT, and they have had some struggles.

A6. CES provides an initial, comprehensive assessment of individuals and families for housing and services.

Response: The participants agreed no, Policies and Procedures (P&P) if they are supposed to complete an SAT and, if necessary, a CHAT, but there are different intake policies.

A7. CES includes a specific policy to guide the operation of the centralized or coordinated assessment system to address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim specific providers.

Response: The participants agreed no- Policies for warm handoff (working on adding it into P&P before WWI Policies for warm handoff)

A8. CoC, in consultation with recipients of Emergency Solutions Grants program funds within the geographic area, has established and consistently follows written standards for providing Continuum of Care assistance which can guide the development of formalized policies and procedures for the coordinated entry process:

• Written standards provide guidance for evaluating individuals' and families' eligibility for assistance under 24 CFR Part 578.

• Written standards provide guidance for determining and prioritizing which eligible individuals and families will receive transitional housing assistance.

• Written standards provide guidance for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance.

• Written standards provide guidance for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance.

• Written standards provide guidance for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance.

Response: The participants agreed that there are no written standards for coordination with different housing programs.

A9. CoC and each ESG recipient operating within the CoC's geographic area must work together to ensure the CoC's coordinated entry process allows for coordinated screening, assessment and referrals for ESG projects consistent with the written standards for administering ESG assistance.

Response: The group agreed no.

Full Coverage

A10. If multiple CoCs have joined together to use the same regional coordinated entry process, written policies and procedures describe the following:

• The relationship of the CoC(s) geographic area(s) to the geographic area(s) covered by the coordinated entry process(es); and

• How the requirements of ensuring access, standardizing assessments, and implementing uniform referral processes occur in situations where the CoC's geographic boundaries and the geographic boundaries of the coordinated entry process are different.

Response: Participants agreed yes, they are not currently joined with any other CoC but the group is open to that possibility in the future.

Marketing

A11. CoC affirmatively markets housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, handicap or who are least likely to apply in the absence of special outreach.

Response: The participants agreed no, but there is language in the policies on nondiscrimination**.**

A12. Coordinated Entry written policies and procedures include a strategy to ensure the coordinated entry process is available to all eligible persons regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identify, or marital status.

Response: The participants agreed no.

A13. Coordinated Entry written policies and procedures ensure all people in different populations and subpopulations in the CoC's geographic area, including people experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence, have fair and equal access to the coordinated entry process.

Response: The participants agreed no.

Nondiscrimination

A14. CoC has developed and operates a coordinated entry that permits recipients of Federal and State funds to comply with applicable civil rights and fair housing laws and requirements. 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, including 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.

- 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.

Response: The participants agreed that they are in compliance, but they are finding issues with property managers who may or may not comply.

B. Access **Required**

Access Models

B1. CoC offers the same assessment approach at all access points and all access points are usable by all people who may be experiencing homelessness or at risk of homelessness. If separate access points are identified to meet the needs of one of the five populations allowable by HUD's Coordinated Entry Notice, initial screening at each access point allows for immediate linkage to the appropriate subpopulation access point (e.g. unaccompanied youth who access CES at the access point defined for adults without children are immediately connected to the youth-specific access point).

Response: The participants agreed no.

Accessibility

B2. CoC ensures that households who are included in more than one of the populations for which an access point is dedicated (for example, a parenting unaccompanied youth who is fleeing domestic violence) can be served at all of the access points for which they qualify as a target population.

Response: The participants agreed yes, and whoever is closest and available will do Coordinated Entry. All access points target all populations.

B3. CoC provides the same assessment approach, including standardized decision-making, at all access points.

Response: The participants agreed no. Each access point has a separate intake process. (virtual or over the phone assessment can be done if that is how it needs to be done).

B4. CoC ensures participants may not be denied access to the coordinated entry process on the basis that the participant is or has been a victim of domestic violence, dating violence, sexual assault or stalking.

Response: The participants agreed yes.

B5. CoC's access point(s) must be easily accessed by individual and families seeking homeless or homelessness prevention services.

Response: The participants agreed yes**.** It can be done virtually over the phone (they may need to expand the conversation about telephonic access).

Emergency Services

B6. CoC's CE process allows 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, to operate with as

few barriers to Entry as possible. People are able to access emergency services, such as emergency shelter, independent of the operating hours of the system's intake and assessment processes.

Response: The participants agreed no, each site needs to be assessed.

B7. CoC's written CE policies and procedures document a process by which persons are ensured access to emergency services during hours when the coordinated Entry's intake and assessment processes are not operating. CE written policies and procedures document how CE participants are connected, as necessary, to coordinated Entry as soon as the intake and assessment processes are operating.

Response: The participants agreed no.

Prevention Services

B8. CoC's written CE policies and procedures document a process for persons seeking access to homelessness prevention services funded with ESG program funds through the coordinated entry process, if the CoC defines separate access points for homelessness prevention services, written policies and procedures must describe the process by which persons are prioritized for referrals to homelessness prevention services. To the extent to which other (i.e.., non ESG -funded) homelessness prevention services participate in coordinated entry processes, the policies and procedures must also describe the process by which persons will be prioritized for referrals to these programs.

Response: The participants agreed no. Carson City and Churchill County have prevention, but other areas do not have the resources for prevention programs.

Full Coverage

B9. CoC's access points cover and are accessible throughout the entirety of the geographic area of the CoC.

Response: The participants agreed no. There might be gaps if White Pine is included.

Marketing

B10. CoC's written coordinated entry policies and procedures document steps taken to ensure access points, if physical locations, are accessible to individuals with disabilities, including accessible physical locations for individuals who use wheelchairs, as well as people in the CoC who are least likely to access homeless assistance.

Response: The participants agreed no.

B11. CoC's written CE policies and procedures document steps taken to ensure effective communication with individuals with disabilities. Recipients of Federal funds and CoCs must provide appropriate auxiliary aids and services necessary to ensure effective communication (e.g. Braille, audio, large type, assistive listening devices, and sign language interpreters.

Response: The participants agreed no.

B12. CoC's access point(s) take reasonable steps to offer CE process materials and participant instruction in multiple languages to meet the needs of minority, ethnic, and groups with Limited English Proficiency (LEP).

Response: The participants agreed no, Spanish language is needed for sure. Telephonic access targeting Spanish speakers to assist with those items and deaf and hard of hearing.

Safety Planning

B13. CoC has a specific written CE policy and procedure to address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers. At a minimum, people fleeing or attempting to flee domestic violence, and victims of trafficking have safe and confidential access to the coordinated entry process and victim services, including access to the comparable process used by victim service providers, as applicable, and immediate access to emergency services such as domestic violence hotlines and shelter.

Response: The participants agreed no. They were unsure we had a full list of populations for those seeking safety away from victimizers.

Street Outreach

B14. Street outreach efforts funded under ESG or the CoC program are linked to the coordinated entry process. Written policies and procedures describe the process by which all participating street outreach staff, regardless of funding source, ensure that persons encountered by street outreach workers are offered the same standardized process as persons who access coordinated Entry through site-based access points.

Response: The participants agreed yes and no. Coordinated Entry is in the field for street outreach in Carson City. Churchill County has staff that do outreach and can complete Coordinated Entry assessments.

C. Assessment **Required**

Assessment Process

C1. CoC consistently applies one or more standardized assessment tool(s), applying a consistent process throughout the CoC in order to achieve fair, equitable, and equal access to services within the community.

Response: The participants agreed no. It is not consistent.

C2. CoC's written policies and procedures describe the standardized assessment process, including assessment information, factors, and documentation of the criteria used for uniform decision-making across access points and staff.

Response: The participants agreed no. It is not consistent.

C3. CoC maintains written policies and procedures that prohibit the coordinated entry process from screening people out of the coordinated entry process due to perceived barriers to housing or services, including, but not limited to, too little or no income, active or a history of substance abuse, domestic violence history, resistance to receiving services, the type or extent of a 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.

Response: The participants agreed no. It is not consistent.

Assessor Training

C4. CoC provides training opportunities at least once annually to organizations and or staff persons at organizations that serve as access points or administer assessments. CoC updates and distributes training protocols at least annually. The purpose of the training is to provide all staff administering assessments with access to materials that clearly describe the methods by which assessments are to be conducted with fidelity to the CoC's coordinated Entry written policies and procedures.

Response: The participants agreed no. No policy dictates how often assessor training occurs.

C5. CoC's coordinated entry process training curricula includes the following topics for staff conducting assessments:
> • Review of CoC's written CE policies and procedures, including any adopted variations for specific subpopulations;
>
> • Requirements for use of assessment information to determine prioritization; and
>
> • Criteria for uniform decision-making and referrals.

Response: The participants agreed no.

Client-Centered

C6. Participants must be informed of the ability to file a nondiscrimination complaint.

Response: The participants agreed yes, a client can at any time submit verbally or in writing to complain if treated unfairly, and it will be reviewed by the steering committee for a final decision

Participant Autonomy

C7. CoC coordinated assessment participants are freely allowed to decide what information they provide during the assessment process, to refuse to answer assessment questions and to refuse housing and service options without retribution or limiting their access to other forms of assistance. Written policies and procedures specify the conditions for participants to maintain their place in coordinated entry prioritization lists when the participant rejects options.

Response: The participants agreed that it is in the Coordinated Entry Policies & Procedures under participant autonomy. A question was also added to CHAT.

Privacy Protections

C8. CoC has established written policies and procedures concerning protection of all data collected through the CE assessment process.

Response: The participants agreed no, they need to be beefed up. It only speaks to diagnosis for referrals.

C9. CoC has established written policies and procedures establishing that the assessment process cannot require disclosure of specific disabilities or diagnosis. Specific diagnosis or disability information may only be obtained for purposes of determining program eligibility to make appropriate referrals.

Response: The participants agreed yes.

D. Prioritization**Required**

Core Requirements

D1. CoC uses the coordinated entry process to prioritize homeless persons within the CoC's geographic area:
> • Prioritization is based on a specific and definable set of criteria that are documented, made publicly available and applied consistently throughout the CoC for all populations.

> • CoC's written policies and procedures include the factors and assessment information with which prioritization decisions are made.

> • CoC's prioritization policies and procedures are consistent with CoC and ESG written standards under 24 CFR 578(a)(9) and 24 CFR 576.4.

Response: The participants agreed yes**,** they made suggestions to look at the prioritization and look at it better to streamline the process and ensure appropriate referrals are provided.

D2. CoC's written CE policies and procedures include the factors and assessment information with which prioritization decisions are made for all homeless assistance.

Response: The participants agreed yes.

Emergency Services

D3. CoC's written CE policies and procedures clearly distinguish between the interventions that will not be prioritized based on severity of service need or vulnerability, such as Entry to emergency shelter, allowing for an immediate crisis response, and those that will be prioritized, such as permanent supportive housing

Response: The participants agreed no.

Nondiscrimination

D4. CoC does not use data collected from the assessment process 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. CoC's written policies and procedures for CE document how determining eligibility is a different process than prioritization.

Response: The participants agreed no.

D5. CoC's written CE policies and procedures document process for participants to file a nondiscrimination complaint.

Response: The participants agreed yes.

D7. CoC's written policies and procedures document conditions under which participants maintain their place in coordinated entry prioritization lists when the participant rejects referral options.

Response: The participants agreed that if the referral is rejected or denied (did not meet eligibility requirements), they go back to the queue. As long as they continue to check in, they will maintain their prioritization on the queue. They are not sent back to the queue if denied because of no contact.

Prioritization List

D8. If the CoC manages prioritization order using a "Prioritization List," CoC extends the same HMIS data privacy and security protections prescribed by HUD for HMIS practices in the HMIS Data and Technical Standards.

Response: The participants agreed yes.

Prevention Services

D9. If separate access point(s) for homelessness prevention services exist in the CoC, written CE policies and procedures describe the process by which persons will be prioritized for referrals to homelessness prevention services.

Response: The participants agreed yes

E. Referrals **Required**

Referrals to Participating Projects

E1. CoC's CE process includes uniform and coordinated referral process for all beds, units, and services available at participating projects within the CoC's geographic area for referral to housing and services.

Response: Lourdes explained their process when referrals are requested and agreed that it was outlined within their process.

E2. CoC and projects participating in the coordinated entry process do not screen potential project participants out for assistance based on perceived barriers related to housing or services.

Response: The group discussed barriers and questions related to housing or services. Jazzmine expressed that the ESG component and the process of the Coordinated Entry system isn't consistent. Michele touched on the need to broaden what the Coordinated Entry means to rural Nevada. She expressed that as the system grows, the Coordinated Entry will need to expand, which will allow more flexibility with HUD funding and opportunity. It was determined this is an item that needs to be worked on.

E3. CoC- and ESG-program recipients and subrecipients use the coordinated entry process established by the CoC as the only referral source from which to consider filling vacancies in housing and/or services funded by CoC and ESG programs.

Response: Jazzmine explained that the Coordinated Entry system is not consistent, which is causing an impact on the housing inventory and services available to individuals. This is an item identified as needing improvement.

Nondiscrimination

E4. CoC and all agencies participating in the coordinated entry process comply with the equal access and nondiscrimination provisions of Federal civil rights laws.

Response: There was an agreement of compliance with this item.

E5. CoC's referral process is informed by Federal, State, and local Fair Housing laws and regulations and ensures participants are not "steered" toward any particular housing facility or neighborhood because of race, color, national origin, religion, sex, disability, or the presence of children.

Response: All agreed that it was being practiced correctly.

F. Data Management ** Required**

Core Requirements

F1. When using an HMIS or any other data system to manage coordinated entry data, CoC ensures adequate privacy protections of all participant information per the HMIS Data and Technical Standards at (CoC Program interim rule) 24 CFR 578.7(a)(8).

Response: The group agreed everyone is in compliance with this item.

Privacy Protection

F2. CoC's written CE policies and procedures include protocols for obtaining participant consent to share and store participant information for purposes of assessing and referring participants through the coordinated entry process.

Response: Everyone discussed ROI's and storing client information and agreed everything is in compliance.

F3. CoC prohibits denying services to participants if the participant refuses to allow their data to be shared unless Federal statute requires collection, use, storage, and reporting of a participant's personally identifiable information (PII) as a condition of program participation.

Response: The group discussed how they go about hesitant clients and the process when there is a refusal to sign an HMIS consent. Kelly explained that if a client refuses to sign a consent form, they can be entered in deidentified, and services do not need to be refused. All agreed that this item needs to be looked at.

F4. If using HMIS to manage coordinated entry functions, CoC ensures all users of HMIS are informed and understand the privacy rules associated with collection, management, and reporting of client data.

Response: The group agreed there is no standard for this item, and it needs to be improved upon.

G. Evaluation **Required**

Core Requirements

G1. CoC consults with each participating project and project participants at least annually to evaluate the intake, assessment, and referral processes associated with coordinated Entry. Solicitations for feedback must address the quality and effectiveness of the entire coordinated entry experience for both participating projects and households.

Response: This group discussed challenges within the rural areas and that they had a monitoring system and reviewed dashboards in the past, but they hadn't been reviewed in quite some time. The group identified this as an area that needed enhancement.

Evaluation Methods

G2. CoC ensures through written CE policies and procedures the frequency and method by which the CE evaluation will be conducted, including how project participants will be selected to provide feedback, and must describe a process by which the evaluation is used to implement updates to existing policies and procedures.

Response: There was a discussion on how the policies and procedures were developed and the process. Mary Jane expressed that it was open to the full CoC during the development and that there wasn't a standard for the sites to participate. Moving forward, all agreed that any one part of the Coordinated Entry system must be a part of the reconstruction. This was identified as an area that needs improvement.

Privacy Protections

G3. CoC ensures adequate privacy protections of all participant information collected in the course of the annual coordinated entry evaluation.

Response: The group established this is an area that requires development.

Areas that need improvement:

1. A3
2. A5
3. A6
4. A7
5. A8
6. A9
7. A11
8. A12
9. A13
10. B1
11. B3
12. B6
13. B7
14. B8
15. B9
16. B10
17. B11
18. B12
19. B13
20. B14
21. C1
22. C2
23. C3
24. C4
25. C5
26. C8
27. D3
28. D4
29. D7
30. E2
31. E3
32. F3
33. F4
34. G1
35. G2
36. G3

Next Steps:

1. Danita will clean up the self-assessment and identify high-priority areas/prioritize areas that need to be addressed.
2. Once targeted areas are identified, task/ sub-committees will be delegated.
3. The next meeting will include looking at data, spending, utilization and how that affects the Coordinated Entry system.