



The Northwest Minnesota Continuum of Care (CoC) will operate a Coordinated Assessment (CA) system in conformance with 24 CFR 578, Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Final Rule published in Vol. 77 No.147 of the Federal Register on July 31, 2012.

# Northwest Minnesota Continuum of Care (MN- 506) Coordinated Entry System (CES) Policy Manual

Version 1.0

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## Introduction

### Overarching Policy

The Northwest Minnesota Continuum of Care (CoC) will operate a Coordinated Assessment (CA) system in conformance with 24 CFR 578, Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Final Rule published in Vol. 77 No.

The purpose of a Policy Manual is to define the local requirements for operating a Coordinated Entry System (CES). The CoC has a document called a Procedure Manual that pairs with this document. The Procedure Manual document will define how the Coordinated Entry System will meet the local requirements.

CES is planned and evaluated collectively by the Coordinated Entry Committee including key stakeholders representing; housing, shelters, services, and subpopulations and includes ESG and CoC funded projects. Final Policy Manual decisions are made by the CoC Board. Final Procedure Manual decisions are made by the Coordinated Entry Committee. CES policies align with State CES policies and other CoC Policies including the Policy for the Administration of CoC and ESG Assistance.

The Northwest Minnesota Continuum of Care (CoC) will operate a Coordinated Assessment (CA) system in conformance with 24 CFR 578, Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Final Rule published in Vol. 77 No.147 of the Federal Register on July 31, 2012.

The CA will support the purpose of the Continuum of Care program which is to: promote community wide commitment to the goal of ending homelessness;

- provide funding for efforts by nonprofit providers and state and local governments to quickly rehouse homeless individuals and families, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;
- promote access to and effective utilization of mainstream programs and resources by homeless individuals and families; and
- optimize self-sufficiency among individuals and families experiencing homelessness.

The CA system will have all the characteristics of a Centralized or Coordinated Assessment System as defined at §578.3: "...a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool."

All projects included in the Northwest Continuum of Care housing inventory chart (HIC) will participate in the CA system. Additional agencies may be added through completing a NWCoC CES Participation Agreement. Additionally, all CoC Program- and ESG Program-funded projects are required to participate in the local CE. The CoC still aims to have all homeless assistance projects participating in its CE process, and will work with all local projects and funders in its geographic area to facilitate their participation in the CE.

The CoC is committed to aligning and coordinating CE policies and procedures governing assessment, eligibility determinations, and prioritization with its written standards for administering CoC and ESG Programs funds. Common definitions or terms and roles can be found in the NWCoC CES Procedure Manual. Documents can be located on the [NWCoC Coordinated Entry Website](#).

The MN Homeless Management Information System (HMIS) is the primary location for the NW CES assessments and prioritization list.

The CoC's CE process covers the CoC's entire geographic area as outlined in Figure 1.



Figure 1 NWCoC Geography

## History and HUD Mandate

A coordinated assessment committee was formed in 2012 to assure compliance with HUD regulations.

The CoC interim regulations require that Continuums and ESG grantees create and participate in a coordinated assessment process. HUD defines coordinated assessment as, "...a centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool."

Further, some State of Minnesota Homeless Programs require that funded agencies participate in the Coordinated Entry System.

## Coordinated Entry Overview:

HUD requires each CoC to establish and operate a "centralized or coordinated assessment system," based on evidence that such systems increase the efficiency of local crisis response systems and improve fairness and ease of access to resources, including mainstream system resources. Participating projects use the coordinated entry process established and operated by the CoC to manage coordinated intake and assessment, standardize the prioritization process, and facilitate referrals to available

housing and resources. Coordinated entry processes are intended to help communities prioritize assistance to ensure that persons who are most in need of assistance receive it in a timely manner. When appropriate data are collected, CE processes can also provide information to CoCs and other stakeholders about service needs and gaps, which helps communities to strategically allocate their current resources and identify the need for additional resources.

### Guiding Principles

1. Promote client-centered practices – Every person should be treated with dignity, offered at least minimal assistance, have easy access to the system, and participate in their own housing plan. Participants will not be mandated to leave family and other support networks to access housing. Incorporate client choice in housing offer.
2. Prioritize most vulnerable – Limited resources should be direct first to persons and families who are most vulnerable\*. Less vulnerable persons and families will be assisted as resources allow. \*Vulnerability will be defined locally.
3. Eliminate barriers to housing placement – Identify system practices and individual project eligibility criteria which may contribute to excluding clients from services and work to eliminate those barriers.
4. Transparency – Deliberate, make decisions and communicate directives openly and clearly.
5. Focus on evaluation and adapting to meet the current needs of providers and consumers – Continually strive for effectiveness and efficiency and agree to make changes when those objectives are not achieved.
6. Accountability – Accountable to clients to provide the best service possible and to funders to make the best use of resources.
7. Promote collaborative and inclusive planning and decision-making practices.
8. Diversity - respect cultural, regional, programmatic, philosophical differences.
9. Honor Tribal Sovereignty.

### CES and homeless response system values include:

1. Rapid access to housing (Housing First model) aimed at helping homeless households quickly exit homelessness and stabilize in permanent housing.
2. Tailored services to provide the right services at the right level and the right time to meet households' needs.
3. Economic opportunities including engagement with Job Service, Migrant Employment and Training (MET), Veterans Employment Services, Vocational Rehabilitation, Workforce Centers; and supported employment services that help households advance toward self-sufficiency.
4. Maximizing use of mainstream resources to assure clients have access to comprehensive services and that service costs are shared.
5. Data and evaluation are used to inform system planning and decision-making.
6. Chronic Homeless persons are prioritized for PSH.

7. Clients are informed of their rights, responsibilities and provided with choices when possible.
8. Data is collected and shared only through informed consent and with data quality in mind.

### Marketing and Outreach

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

### Safety Planning and Risk Assessment

All persons who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking shall have immediate and confidential access to available crisis services within the defined CE geographic area.

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

### Nondiscrimination

The CE system must adhere to all jurisdictionally relevant civil rights and fair housing laws and regulations.

The CoC has designated the CE Governing Committee as the entity responsible for monitoring agencies on compliance with all CE requirements, including adherence to civil rights and fair housing laws and regulations. Failure to comply with these laws and regulations will result in a monitoring finding on the project, which may affect its position in the local CoC rating and ranking process.

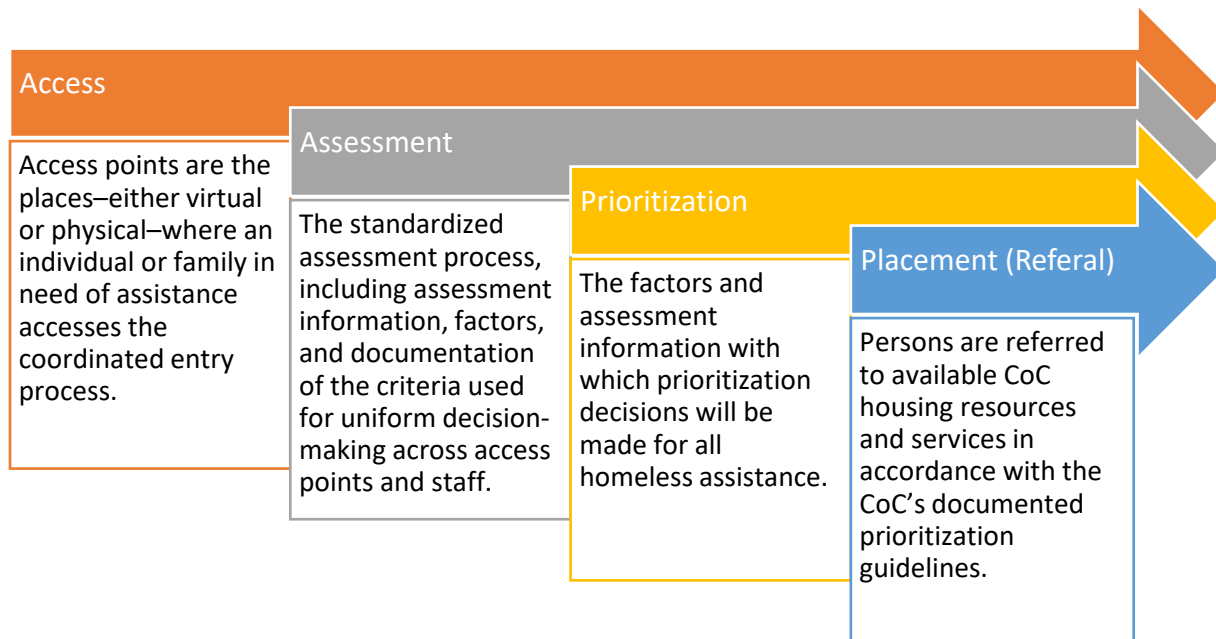
- Fair Housing Act – prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status.
- Section 504 of the Rehabilitation Act – prohibits discrimination on the basis of disability under any program or activity receiving federal financial 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 include 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.

## NWCoC Coordinated Entry System Overview

The CoC will have four key phases of coordinated entry as outline by HUD. Those four phases include:



### Access

The CoC has implemented a “no-wrong door” approach to CE with designated access points. In doing so, participants are able to access CE by appearing at any homeless assistance agency within the community. Access points can be found on the [NWCoC Coordinated Entry Website](#).

CES access and assessment sites offer individualized referrals specific to the unique needs and desires of each household from a comprehensive list of mainstream resources including, but not limited to, Veterans services, medical benefits, nutrition assistance, and income supports.

Access sites shall complete the required assessment documentation in HMIS or the alternative coordinated entry list.



### Designated Access Points

A new agency may become an Access Site by completing an application. The CoC will recruit, review and approve applications, as well as provide support and recommendations to those missing eligibility criteria. All designated access points shall execute a CE Participation Agreement with the CE Leadership Committee; that is, an agreement that documents all required functions and responsibilities to ensure CE access.

### Access Coverage

The CoC's entire geographic area is accessible through the designated access points. This geographic region is shown in Figure 1 of this document.

### Accessibility of Access Sites

The CoC will ensure that CE services are physically accessible to persons with mobility barriers. All CE communications and documentation will be accessible to persons with limited ability to read and understand English.

### Emergency Services

CE assessment services may only be available at access locations during business hours between 8:00 a.m. to 5:00 p.m., Monday through Friday (workweek). Furthermore, those services may be more restricted to certain days and times during the workweek. Access points will inform the CoC the hours at CE initial screening and assessment is offered. A coordinated entry assessment is not required to access emergency services, including emergency shelter. Emergency service providers shall complete assessments or refer to an access point within seven days of a person entering the program or shelter.

### Prevention Services

The CE system will ensure that all potentially eligible homelessness prevention participants will be assessed for homelessness prevention assistance. If an access point does not offer homelessness prevention assistance the access point shall perform the prevention assessment or coordinate with a partner access point to perform the prevention assessment. The CoC utilizes the Minnesota Prevention Assessment Tool to assess for homelessness prevention services. This tool can be found on the [NWCoC Coordinated Entry Website](#).

### Street Outreach

Street Outreach programs must link to the coordinated entry process. Street outreach teams will function as access points to the CE process, and will seek to engage persons who may be served through CE but who are not seeking assistance or are unable to seek assistance via projects that offer emergency shelter.

### Assessment

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

experiencing a housing crisis. The approved standardized assessment will be located on the [NWCoC Coordinated Entry Website](#). Participating Projects will be notified of changes and updates.

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

### Phases of Assessment

All projects participating in CE will follow the assessment and triage protocols of the CE system. The assessment process will progressively collect only enough participant information to prioritize and refer participants to available CoC housing and support services.

### Assessor Training

Participating Projects are responsible for designating staff to perform the assessment responsibility of the CE and ensuring staff complete training and follow the CE policy and procedures.

### Assessment Screening

The CoC's CE process shall not allow for participating projects to screen 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 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.

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

The CE process will consider a person's experience with discrimination impacting their ability to find housing.

### Assessor Training

The CoC is committed to ensuring that all staff who assist with CE operations receive sufficient training to implement the CE system in a manner consistent with the vision and framework of CE, as well as in accordance with the policies and procedures of its CE system.

### Participant Autonomy

It is crucial that persons served by the CoC's CE system have the autonomy to identify whether they are uncomfortable or unable to answer any questions during the assessment process, or to refuse a referral that has been made to them. In both instances, the refusal of the participant to respond to assessment questions or to accept a referral shall not adversely affect their position on the CE's prioritization list. Some

funders require collection and documentation of a participant's disability or other characteristics or attributes as a condition for determining eligibility. Participants who choose not to provide information in these instances could be limiting potential referral options.

#### Nondiscrimination Complaint and Appeal Processes

The CoC is committed to ensuring that no information is used to discriminate or prioritize households for housing and services on a protected basis such as race, color, religion, national origin, sex, age, familial status, disability, actual or perceived sexual orientation, gender identify, or marital status.

#### Privacy Protections

CE participating agencies are required to notify and obtain participant consent for the collection, use, and disclosure of participants' personally identifiable information (PII).

All participant information collected, stored, or shared in the operation of CE functions, regardless of whether or not those data are stored in HMIS, shall be considered personal and sensitive information worthy of the full force of protection and security associated with data collected, stored, or shared in HMIS.

#### Disclosure of Disability or Diagnostic Information

Throughout the assessment process, participants must not be pressured or forced to provide CE staff with information that they do not wish to disclose, including specific disability or medical diagnosis information.

#### Client Assessment Updates

Client assessment information should be updated at least once every 30 days. Additionally, staff will update participant records with new information as new or updated information becomes known by staff. If the client remains on the NWCoC prioritization list for greater than 90 days without updated information the client may be exited from the list. It is the assessor's responsibility to maintain contact with the client until the housing crisis is resolved.

#### Prioritization

CoC will use data collected through the CE process to prioritize homeless persons within the CoC's geography.

The CoC has established a community-wide list of all known homeless persons who are seeking or may need CoC housing and services to resolve their housing crisis. The prioritization list will be organized according to participant need, vulnerability, and risk. The prioritization list provides an effective way to manage an accountable and transparent prioritization process.

The CoC will use Dynamic Planning to monitor and evaluate the prioritization process.

The CoC will use case conferencing to determine complete referral requests from the priority list in accordance with the NWCoC CES Procedure Manual and the NWCoC Guiding Values for Prioritization.

### Guiding Values for Prioritization

1. Serve the most vulnerable clients who without supportive services, case management and/or ongoing rental assistance will remain homeless or become homeless;
2. Addressing disparities in the homeless response system and who is being served by programs;
3. Clients are referred through a case consultation process to the best available resource;
4. Clients who are not referred to supportive services are offered help problem solving to end their housing crisis;
5. Prioritization is client-centric and strength focused. Clients are referred to services they identified are appropriate to end their housing crisis; and
6. Through prioritization clients will be referred to programs they are in fact eligible to receive support from.

### Excluded Interventions

The following interventions will not be prioritized from the Coordinated Entry priority list based on severity of service need or vulnerability

- Access to Emergency Shelter;
- Access to service to flee intimate partner violence; and
- An immediate crisis response that is anticipated to require less than three (3) months of rental assistance and supportive services.

### Referral

#### Notification of Vacancies

All CE participating providers will enroll new participants only from the CoC's CE referral process. To facilitate prompt referrals and to reduce vacancy rates, participating providers must notify the CE coordinating entity of any known and anticipated upcoming vacancies. This includes permanent supportive housing, transitional housing, rapid re-housing, and other permanent housing offering supportive services as identified on the annual Housing Inventory Count (HIC).

#### Client-Declined Referrals

One of the guiding principles of CE is participant choice. This principle must be evident throughout the CE process, including the referral phase. Participants in CE are allowed to reject service strategies and housing options offered to them, without repercussion.

### Provider-Declined Referrals

There may be instances when participating programs decide not to accept a referral from the CE system. When a program declines to accept a referred prioritized client into its project, the program must notify the Priority List Manager of the denial and the reason for the denial through e-mail.

If the program is unable to accept the referral due to inability to contact the referred client the program will exit the client from the priority list.

### Client Denial Appeals

If a client is not satisfied with a CES decision for any reason, they have the ability to make an appeal. The process for an appeal is outlined in the NWCoC Coordinated Entry Receipt and Release of Information.

## Project Transfers

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

Tenants may also request a transfer to another program type (i.e. RRH to PSH) or, a different housing provider. This policy promotes client choice in finding the most appropriate level of care.

### Eligibility for Transfers

The following policy will outline eligibility requirements for transfer.

#### Violence Against Women Act Transfers

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

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

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

### **Client Project Transfers**

Clients must be assessed and determined to still need supportive housing services, and are offered client choice in the transfer.

The Priority List Manager must approve the transfer and may request that the transfer is discussed at a Case Conferencing meeting.

Documentation is required confirming the client was eligible for the existing program and proposed transfer program at the time of entry into the existing program.

## **Moving Up**

The CoC values the valuable and limited Permanent Supportive Housing (PSH) beds in the CoC region. PSH is a critical program type for homeless individuals and families with a disability to achieve stable housing and, overtime, can help someone get to the point where they are stable and successful without intensive services.

The CoC will implement a Moving Up strategy to support independence and choice for individuals and families who are ready and desire to move on from PSH to independent permanent housing (either subsidized or unsubsidized). Program participants might want to move on for a variety of reasons including increased privacy and independence, to move in with a partner or family, to be closer to employment or educational opportunities, or to feel like they are taking a next step in their lives.

## **Data Systems**

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

Participating programs must collect all data required for CE as defined by the CoC at each phase of the CE process (access, assessment, prioritization, and referral) as defined in the NWCoC CES Procedure Manual. The data collected through the CE process shall include the Universal Data Elements listed in the most recent version of the HMIS Data Standards Data Manual.

Data must not be collected without the consent of participants, according to the defined privacy policies adopted by the CoC. Any client that is entered into the HMIS or Alternative Database will complete the NWCoC Coordinated Entry Receipt and Release of Information.

## Evaluation

Regular and ongoing evaluation of the CES will be conducted to ensure that improvement opportunities are identified, that results are shared and understood, and that the CES is held accountable. The CoC uses Dynamic Planning to provide regular opportunities for Continuous Quality Improvement (CQI).

The Coordinated Entry Committee will lead the evaluation and monitoring of the CES. Information will be provided by a designee of the Collaborative Applicant.

Participating programs will also play a crucial role in the evaluation of CE. Participating programs will collect accurate and meaningful data on persons served by CE. In addition, participating agencies will review evaluation results and offer insights about potential improvements to CE processes and operations.

The NWCoC Board of Directs will annually evaluate and update this CES Policy Manual to ensure compliance with local, state, tribal, and federal regulations for providing homeless services. This review will include feedback from stakeholders including individuals with lived experience of housing instability and the NWCoC CES.

## Policy Amendments

The NWCoC CES Policy Manual may be altered, amended, repealed or added to by majority vote of a quorum of the NWCoC Board of Directors with input from the Coordinated Entry Committee and General Membership of the NWCoC. General Membership shall be notified at least 30 days prior to an actual vote on any changes to this document.

Adoption of this policy will make null and void the following documents:

- Northwest Continuum of Care Coordinated Entry System Policy Manual as updated October 15<sup>th</sup>, 2020 and all prior versions of the document.
- Northwest Prioritization Policy as updated December 12<sup>th</sup>, 2018 and all prior versions of the document.

This policy as approved by the Northwest Continuum of Care Board of Directors will serve as the guiding document for the CES. All revisions of this document will be outlined in the following table. The signature of the Board Chair will match or occur after the date of the approved revision.

Version	Date Released	Key Changes

Signatures

As Chair of the NWCoC Board of Directors I attest that this Policy Manual was approved by vote in accordance with the requirements governance structure approved by the NWCoC.

Chair of the NWCoC Board of Directors

Maureen Hams

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Signature



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Date

07/14/2022

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