



Coordinated Entry Manual Rural Alabama Coordinated Access System

Continuum of Care & Emergency Solutions Grant Programs

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ATTCHMENTS

HUD Coordinated Entry Brief

Memorandum of Understanding

Introduction

In 2009, the law known as the McKinney-Vento Homeless Assistance Act (Act) was amended by the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act). Through the HEARTH Act, the Supportive Housing Program, Shelter Plus Care Program, and Section 8 Moderate Rehabilitation Single Room Occupancy Program were consolidated under the Continuum of Care Program (CoC), administered by the U.S. Department of Housing and Urban Development (HUD). Hearth also introduces a requirement that CoC funders strengthen the coordination of services and support provided to homeless people through The Homeless Continuum of Care (CoC) Systems. HUD Notice *CPD-17-01* of January 23, 2017, entitled "Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System, establishes new requirements for Continuum of Care Systems, recipients of the Continuum of Care Program and the Emergency Solutions Program (ESG) must comply in the development and use of a coordinated entry system.

This manual has been developed for the purpose of establishing the operational procedures of the Coordinated Entry System Project operated by the Alabama Rural Coalition for the Homeless, Inc. (AL Balance of State Continuum of Care AL-507). The Coordinated Entry System provides services to individuals and families throughout Alabama, with special emphasis on the 42 Counties that comprise the geographic area of the Balance of State Continuum of Care system. * ORANGE COUNTIES *



The Manual of Operational Policies and Procedures of the Coordinated Entry System of CoC AL-507 is the basis of the daily operations of the Alabama Balance of State Coordinated Entry System Project called the Rural Alabama Coordinated Access System (RACAS). This document is intended to establish and harmonize the day-to-day operations of the CoC, housing programs and RACAS.

The AL BOS CoC directs its efforts to ensure that the homeless receive services of high quality, sensitivity and excellence; based on respect for their dignity, integrity and freedom as human beings, ensuring the protection of

their civil rights, contained in Part 24, CRF 578.93, in relation to "Fair Housing and Equal Opportunity" and the "Equal Access Rule", as published. This is a living document, the amendments of which must be approved by the Members of CoC AL 507 before its implementation.

In accordance with Part 24 of the Code of Federal Regulations (24 CFR) governing CoC AL-507 (24 CFR 578) and the ESG Program (24 CFR 576), as well as the final regulations of the United States Department of Housing and Urban Development (HUD), related to the definition of homeless person and chronic homeless person (24 CFR 91), written standards for establishing and operating a Coordinated Entry System (CES), herein after referred to as the "Rural Alabama Coordinated Access System (RACAS)", have also been developed.

Overview of the Coordinated Input System

The Continuum of Care Interim Rule [578.7(a)(8)] identifies several responsibilities for the Continuum of Care System. One of these is to establish and operate a Coordinated Entry System, which is defined as a process designed to coordinate access, needs assessment, referrals, and placement in housing alternatives for homeless individuals and families requesting services related to available housing options and services, including community outreach, prevention, and diversion to other social assistance systems.

The Coordinated Entry System is a CoC-wide process to facilitate the connection to all resources for homeless individuals and families in a coordinated and standardized manner and referring participants to the most appropriate service strategy or housing intervention according to their needs. This system must ensure that homeless people have equitable, coordinated and timely access to housing resources, with a person-centered approach, respecting the decision, selection and dignity of participants.

In addition, the *Coordinated Entry System* is defined as a process designed to coordinate access, assessment, identification, referrals, and location to homeless individuals and families requesting services related to available housing options and services. As part of this process, standardized policies were developed that guide the operation of the Rural Alabama Coordinated Access System in its attention to the needs of the participants; always in compliance with the requirements established by HUD. The main purpose of the *Coordinated Entry System* is that homeless people can have access to housing alternatives and the services available according to their needs, within the Continuum of care of homeless people, quickly and with the minimum of access barriers.

The expectations or benefits of operating a Coordinated Entry System effectively is:

- Align the intervention with individuals or families appropriately, particularly considering participants with the greatest need.
- Reduce barriers to finding housing or housing-related services.
- Promote effectiveness in the placement processes in housing programs.
- Increase the quality and satisfaction of the participants in their direct access to housing and their recovery process.
- Encourage greater collaboration among providers who offer assistance to the homeless.
- Demand the highest standards in the management of homeless people and thus, improve the performance of programs within the system.
- Develop uniformity in the processes of eligibility, identification, referrals and location in housing, regardless of who the participant is or how they arrive.

Once the procedural amendments are approved by AL-507 CoC, each participating agency that receives housing funds and homeless support services, or that has regulatory requirements from other HUD funds or any other federal and state agency, within AL-507 shall actively participate in the processes established by the CoC, as a

measure of compliance and execution in the system of Continuum of care and compliance with the Notice issued. Likewise, the referrals will be carried out considering the entire continuum of programs, including their focus populations, specific needs, services offered, and the availability of beds or available living spaces.

Necessary provisions will be made to ensure that the Rural Alabama Coordinated Access System, as well as organizations, municipalities and government agencies, remain in compliance and will guide organizations and service providers on the Rural Alabama Coordinated Access System and Written Standards and its operation. The guidance and trainings will include the tools, guidance and procedures related to referrals and uniform processes to be used, Notice CPD-16-11, of July 25, 2016, "Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing", and Notice CPD-17-01, of January 23, 2017 Establishing Additional Requirements for a Continuum notice of Care Centralized or Coordinated Assessment System. This training shall involve all direct service components of CoC organizations, municipalities and government agencies, and any other personnel, paid or volunteer, assigned to provide services to homeless individuals and families involved in approved procedures and standards.

The Rural Alabama Coordinated Access System will operate, be available and undertake not to discriminate on the basis of age, race, color, sex, social or national origin, physical or mental impairment, social status, actual or perceived sexual orientation and gender identity, or political or religious ideas, in eligibility for and access to housing in publicly funded programs, nor in service practices to any person seeking all components of service and employment, applicable under federal and state statutes.

Category 1: Literally homeless

Individual or family lacking a fixed, regular, and suitable place to spend the night (overnight), meaning:

- 1. It has as its main night residence a public or private place not suitable for human habitation;
- 2. Live in a public or private shelter designated to provide temporary location (including emergency shelter, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local programs; or
- 3. You are leaving an institution where you have resided for the past 90 days or less and who resided in an emergency shelter or place unfit for human habitation immediately before entering the institution.

Category 2: At imminent risk of wandering

Individual or family who is at imminent risk of losing their primary night residence, and who:

- 1. You will lose residency within the next 14 days of the date of request for assistance as a person without home:
- 2. Another alternative residence has not been identified; and
- 3. Individual or family lacks the resources or support networks necessary to obtain other permanent housing.

Category 3: Homeless person under other federal statutes

Single person under 25 years of age, or families with only youth and children, who do not otherwise qualify as homeless under this definition, but:

- 1. Is defined as a homeless person under other federal regulations;
- 2. You have not had a lease, owner interest, or occupancy agreement in permanent housing for the past 60 days prior to the request for assistance;
- 3. You have experienced persistent instability, measured by two or more moves over the past 60 days; and
- 4. It is expected to continue in this situation for an indeterminate period of time due to a need special or barrier.

Category 4: Fleeing/attempting to flee domestic violence

Any individual or family that:

- 1. You are fleeing or attempting to flee domestic violence;
- 2. You have no other residence; and
- 3. Lacks resources or support networks to obtain other permanent housing.

Eligibility

The Rural Alabama Coordinated Access System is intended to serve any homeless individual or family in the search for housing. As established by HUD, there are four defined categories under which individuals and families could be classified or defined as *homeless*:

* DEPARTMENT OF HOUSING and URBAN DEVELOPMENT 24 CFR Parts 91, 582, and 583 Homeless Emergency Assistance and Rapid Transition to Housing: Defining "Homeless", Federal Register / Vol. 76, No. 233 / Monday, December 5, 2011.

Memorandum of Understanding (MOU)

The Memorandum of Understanding (MOU) of the Coordinated Entry System, approved and signed between members of the Alabama Balance of State Coalition and AL-507 states that it allows homeless individuals and families to move in the system more quickly and to provide assistance or referral most appropriate to their needs, taking into account and respecting their right to choose and decide on their housing options. This is expected to reduce duplication of efforts, recurrences of repeated episodes, reduce and eliminate barriers to access to housing and services to standardize the processes of eligibility and stable location.

Functions and Responsibilities of the MOU

- The Rural Alabama Coordinated Access System is considered one of the main doors of the AL Balance of State CoC Care AL-507.
- 2. It will integrate the tools for the entry of data into the Homeless Management Information System (HMIS), as a tool for registration, determination of eligibility, evaluation preparation of individualized service plans, location and assessment of needs of participants, standardized (VI-SPDAT) or any other need that may arise in the future and lists of expectations, including the necessary follow-up to ensure their stability and prevent their return to wandering.
- 3. Develop and implement coordinated entry system operational policies and procedures.
- 4. Provide direction and oversight to the designated coordinated entry system personnel operated by Coalition.
- 5. Maintain continuous communication with the designated personnel of the organizations, municipalities and government agencies for the discussion of the needs and circumstances of the participants, in the design of the individualized plan of services, during their stay and participation of the housing alternatives and services offered and before any decision on the continuity of the participation of the same.
- 6. It will disclose the telephone number, access points and direct service offices that will serve as entry points to, both to the general public and government agencies and entities that provide services to the homeless.
- 7. It will carry out as quickly as possible the referral of housing with the purpose of placing the individual or homeless family, in housing according to the availability and the specific needs of the individual or homeless family and the selection of the individual or homeless family.
- 8. Coordinate the support services required to accelerate and augment the process of the homeless individual or family accessing the coordinated access system, benefits and services according to the needs identified in the individualized service plan designed with the homeless individual or family and organizations, municipalities and government agencies.
- 9. It will provide tracking of need of the referred homeless individual or family.
- 10. It will take the necessary provisions to ensure that the coordinated entry, as well as organizations, municipalities and government agencies, remain in compliance and will guide organizations and service providers on coordinated entry and written standards and their operation. The guidance and training will include procedures related to referrals and uniform processes to be used, notice CPD-16-11, of July 25, 2016 "Notice on Prioritizing Persons Experiencing Chronic Homelessness and other vulnerable Homeless Persons in Permanent Supportive

Housing" and Notice CPD-17-01, of January 23, 2017 Notice Establishing Additional Requirements for a continuum of care Centralized or Coordinate Entry System", as part of the signed Memorandum of Understanding. This training shall involve all direct service components, such as organizations, municipalities, government agencies, and any other paid or volunteer personnel assigned to provide services to homeless individuals and families involved in approved procedures and standards.

- 11. Submit to the Board of Directors a monthly performance report and provide recommendations, as well as to the Continuum Members at meetings containing:
 - Organizations, municipalities and government agencies that are actively participating in the approved procedures of the Rural Alabama Coordinated Access System.
 - Organizations, municipalities and government agencies that may be facing difficulties related to the approved procedures of the Rural Alabama Coordinated Access System and will propose solutions.
 - Organizations, municipalities and government agencies that may be facing difficulties related to the approved Written Standards and will propose solutions.
 - Barriers and outcomes in service delivery and housing.
 - Number and types of participants referred and served, located and not located in each program.
 - Any changes in regulations and amendments deemed necessary to maintain the operations of the Coordinated Entry System and the Written Standards in compliance with applicable regulations.
 - It will present an annual training plan to organizations, municipalities and government agencies.

Coordinated Entry System Policies: Determination of Eligibility and Location

The Alabama Balance of State COC AL-507 establishes the *Coordinated Entry System* policy as a system of broad and free access, eligibility determination, identification, coordination, and location that represents a critical component in a community's effort to end and prevent the number of homeless people within the geographic area it represents.

The following policies of the *Rural Alabama Coordinated Access System* describe the characteristics that will define the offer of services to homeless individuals and families that will be provided in the geographical area of CoC AL-507.

- Fair and equitable access to housing and services: The Rural Alabama Coordinated Access System promotes easy access for homeless individuals and families in the search for housing alternatives and support services throughout the geographic area of CoC AL-507. The Rural Alabama Coordinated Access System shall provide different modes of access, whether through free telephone systems, direct access through strategically located service centers, referrals received by community members, from public and private service agencies, and through the network of housing and support service providers that receive funding from the CoC Program, the ESG Program, or any other program, regardless of the source of funds that fund such programs. This policy promotes "social visibility" strategies that include the community outreach component on the street, and information leaflets about the program, mass media, or through agreements with public and private agencies interested in serving as facilitators of access to the Continuum of care system, among others. These procedures ensure that direct service providers have strategic and culturally accessible geographical locations to a diversity of populations with different special needs and easy access. The Rural Alabama Coordinated Access System should serve participants on equal terms and in language, facilitating access to services and in turn respecting the cultural diversity of the population, language, cultural and social barriers.
- Standardized access and evaluation: Participants' entry into the continuum of care system will be guided by standardized protocols for access, evaluation, prioritization, referrals, and location. This will provide a sense of unity and uniformity to the decision-making process.

- Assigned Agency: The Alabama Rural Coalition for the Homeless is the Coordinating Agency of the Rural Alabama Coordinated Access System and must establish and formalize collaboration agreements with the agencies that are part of the network of housing providers and homeless support services of the AL-507 CoC, which guarantee their integration and standardization in the procedures included in this Manual.
- Geographic Area: The Rural Alabama Coordinated Access System should serve homeless individuals and
 families who are in search of housing alternatives and support services located in the 42 counties that comprise
 the geographic area of the Continuum of Care AL-507. Given the geographic mobility that characterizes the
 experience of being homeless, the services of the Rural Alabama Coordinated Access System will be available to
 serve homeless people located in the 42 counties, taking in consideration of security situations, availability of
 housing alternatives and preference for the homeless.
- Training: Activities will be developed to train, at least once a year, both the direct work team of the Rural Alabama Coordinated Access System, as well as the personnel of the agencies that are part of the network of housing and support services for homeless people of the AL-507 CoC with the purpose of properly and uniformly implementing the Coordinated Entry System. A curriculum based on federal, and state public policy will be adopted that shelters the homeless, the social determinants of health, the reduction of stigmas towards the homeless, the reduction of harm, the elimination of barriers to access to available housing alternatives, and the use of culturally sensitive and evidence-based intervention models. Training and training activities will be developed available in different technological modalities, from individualized training, small groups, digital systems, videos, among others.
- Cultural competence: Staff responsible for providing all housing and support services, including, but not limited to community outreach activities, conducting screening and assessment interviews, and all staff in direct contact with homeless individuals and families, should make use of practices conducive to cultural competence and tools that include language based on cultural competence. For example, the language used should reflect an understanding of issues and needs related to the LGBTQ community and other communities and cultural groups, such as immigrants, refugees, and first-generation people, as well as social, racial, economic, and disability conditions. All staff must be trained to use language appropriately and respectfully and offer options that reflect the specific needs of each population. Following the policies established by HUD, the placement in housing alternatives of participants self-identified as transgender and transgender people, will be carried out in accordance with this self-identification, established in CPD-17-01, of January 23, 2017, "Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System".
- **Composition of the Rural Alabama Coordinated Access System**: Personnel related to the Coordinated Entry *System* includes any personnel designated as authorized representative, but is not limited to:
 - o Work personnel appointed by Coalition to the *Coordinated Entry System* (Program Coordinator, Operational Support Officer, Community Outreach Work, Case Management, etc.).
 - o Personnel assigned to the Rural Alabama Coordinated Access System operations of participating partner agencies that are part of AL-507 CoC and that receive funding from the CoC Program, ESG, or any other source of funds intended to provide services to homeless individuals or families.
- Protection of Confidentiality and Privacy: The protection of privacy is one of the most valuable principles
 of the work of the Rural Alabama Coordinated Access System and the AL-507 CoC, with the purpose of ensuring
 the consent, protecting and making proper use of the information of the participants. In compliance with this
 policy, any homeless individual or family must sign a consent authorizing them to collect, store and share
 information that they may consider confidential, without detriment to the services to which they are entitled.
- **Prioritization:** Federal regulations provide that an effective Coordinated Entry *System* ensures that people in greatest need have priority when accessing opportunities for any type of homelessness available.

- **Focus on the person:** The autonomy of the participant and their freedom to refuse to answer questions and alternatives of housing and services will be taken into account, without detriment to access to services. The element of *self-determination* will be incorporated into decision-making, where the participant decides among the options available: location, type of housing program, levels of service and care, and other decisions concerning their needs: strengths, goals, risks and protective factors. Promote respect for the dignity and diversity of all homeless individuals and families receiving housing and support services throughout the geographic area of AL-507 CoC.
- **Gender Identity:** Participants will be treated according to their self-informed gender identity, regardless of appearance, genitals or other physical characteristics, or legal documentation and identification (e.g. driver's license). Persons with different characteristics or sexual identification that refer to housing projects attached to the Coordinated Entry *System* may not be rejected or referred to another shelter or program because they do not meet expectations of what a man or woman is "supposed" to be. Private information, such as medical information about a participant's status or transition, is confidential. Staff should address participants with names, titles, pronouns and other terms compatible with their gender identity and according to the preference expressed by the participant. In the same way, the treatment should be one sensitive to your life experiences. Promote respect for the dignity and diversity of all homeless individuals and families receiving housing and support services throughout the geographic area of AL-507 CoC.
- Evaluation of participants and other sectors of the community: Participants are required to conduct an annual evaluation process on the satisfaction of services received, referred to, and coordinated through the Rural Alabama Coordinated Access System and its components.
- Expectation for Community Projects: Programs dedicated to working with homeless people must ensure maximum utilization of existing housing resources while maintaining high levels of occupancy and ensure long-term permanence and stability in permanent housing.
- Inclusive: Through the Rural Alabama Coordinated Access System, services are provided to different populations or population groups, including chronic homeless people, veterans, families, youth, people with conditions associated with problematic substance use, including alcohol, people living with HIV/AIDS, survivors of domestic violence, people self-identified as LGBTQI+, immigrants, among others. However, according to the categories established by federal regulations, the populations served will be classified as:
 - o Families of Adults accompanied by minors
 - o Families of Adults Only (without minors)
 - o Youth Families Only
 - o Victims of domestic violence or fleeing domestic violence situations
- **Inform local planning:** The information obtained through the Rural Alabama Coordinated Access System will be used to guide other service planning processes to be offered to the homeless population and efforts to generate changes in service systems.
- **Service model:** The Rural Alabama Coordinated Access System follows an open structure, which means that participants have multiple gateways to the system. Homeless individuals and families seeking housing through the Coordinated Entry *System* can access it through:
 - a. Call toll-free 1-855-810-2724.
 - b. Homeless service providers phone intake.
 - c. Through agencies that provide service to homeless people within the geographic area of AL-507 CoC; and
 - d. The community outreach component will serve as direct access to the Rural Alabama Coordinated Access System for those who are in places unsuitable for human housing or lack a safe and stable place to live in a healthy and decent way (Category 1: Literally Homeless Person).

- Orientation towards the Housing First Model: The Housing First model starts from the premise that housing is a basic human right, being a value to which every human being aspires. Therefore, the model promotes that participants can be placed in housing quickly, without pre-conditions or requirements for participation in services. The Coordinated Entry System should reinforce the use of elements that are part of this model, namely: little or no entry; history or active substance abuse; criminal history; history of gender-based violence (protection orders) at the time of evaluation. The existence of conditions for the termination of the programs, such as: refusal to participate in the services; lack of progress on service plans; loss of income or inability to increase income; be a victim of gender-based violence or any other reason not justified and in clear violation of the rights of assisted living residents.
- **Right to Continuum of Availability of Services:** The AL-507 CoC protects the right of every resident and participant of any of the housing projects and support services within the provider network to be reconsidered for re-entry or readmission to any service after voluntarily or for any other reason, has had to terminate the service, without the previous situation being considered in any way at the time of re-entry, only the situation existing at the time of the application, as well as considerations related to eligibility requirements and other regulatory requirements of the service program to which you are entitled.
- **Safe Planning:** A security protocol will be established to ensure the safety of individuals, personnel, and programs that receive and provide assistance; with particular attention to the management of the Coordinated Entry System in domestic violence cases (according to the Federal Law: "Violence *Against Woman Act*" (VAWA).
- **Referral Protocol:** Programs participating in AL-507 CoC must perform and receive all eligible referrals through the *Coordinated Entry System*. If they have any reason or justification for not receiving a referral from a participant, the programs must notify in writing of the decision made, allowing them to identify and access other housing programs and services available.
- Reducing Barriers: The Rural Alabama Coordinated Access System promotes that available housing programs
 and support services lower barriers to entry. These barriers include but are not limited to: little or no income,
 active use or history of substance use, history of domestic violence, resistance to receiving services, the type or
 extent of services related to impairments or support needed, history of evictions, prior to lease violations or
 history of not having prior contracts, or criminal record, except where there are state or federal laws prohibiting
 certain convictions.
- **Project** Referrals: Referrals will be made for placement in housing options available in all housing projects and support services at AL-507 CoC that receive funding, including programs: Emergency Shelters, Rapid Relocation, Transitional Housing, Rent Assistance, Section 8, Subsidized Housing, Public Housing, HUD-VASH, Supportive Services for Veterans Families (SSVF), among others.
- Emergency Services: The Coordinated Entry System will not be able to delay access to emergency services, being able to access the shelter services available the night they require while the needs assessment and identification of available housing opportunities are completed.
- Use of the Homeless Management Information System: It is a mandatory regulatory requirement for the programmatic compliance of all participating agencies of the Rural Alabama Coordinated Access System that are part of the network of housing providers and homeless support services of the AL-507 CoC for the entry of data of all homeless people served who have signed a Consent, in the information management system for homeless people (HMIS). The personnel of the HMIS shall guarantee access to all the instruments and modules available in the electronic system for the data entry of the Rural Alabama Coordinated Access System, as well as provide the necessary training and technical support to guarantee the optimal operations of the Rural Alabama Coordinated Access System

Minimum Standards

In accordance with the requirements of the CoC Program regulations, the participating agencies of the Rural Alabama Coordinated Access System will operate according to *minimum standards*, guaranteeing a uniform and equal access system for all persons who need access to the service system designated as a Continuum of care system. Some of the principles that will guide the expected minimum standards will be, but not limited to:

- 1. All participating agencies that are part of the network of homeless housing and support services providers agree to consider terminating the stay only through the communication and coordination mechanisms established by the Rural Alabama Coordinated Access System, primarily using the Housing First model.
- 2. All agencies that provide services funded by the CoC and ESG Program must have a fair and clear policy of termination of services, stays, claims, complaints, and dispute resolution. Policies should ensure that a resident has the right to formally dispute a decision that puts their stay on the housing project at risk and its stability. This policy must be informed to the resident at the time of admission to the project and included in the agreement or lease signed between the parties, a copy of which must be delivered to the resident.
- 3. All organizations must have policies in place that ensure residents receive written notice containing clear reasons for termination of service or stay, including a detailed statement of the facts, the source of the information on which it is based, and the resident's right to a review of his or her record of the project, any evidence on which the decision was based and the right to request an impartial reconsideration or appeal of the decision.
- 4. If for any justified reason an agency collaborating with the Rural Alabama Coordinated Access System decides to terminate or transfer a resident, it must contact the Rural Alabama Coordinated Access System within a period of no more than 48 hours by written communication. The Rural Alabama Coordinated Access System will use the HMIS Exit Sheet to document any situation that requires the termination, closure or transfer of a resident, as well as update the information in the Individualized Service Plan.

Requirements of Record Keeping

Documentation for effective service management and monitoring will be kept up-to-date and the confidentiality of program residents will be maintained.

Minimum Standards

- 1. Each participant and resident record shall include, as a minimum, a consent document to collect, share and enter information into the electronic system that is considered confidential, information and supporting documentation of eligibility required by the agencies providing the funds, the participation agreements and/or lease agreements signed, individualized service plans, notes from the Rural Alabama Coordinated Access System, information about the services provided, both directly and through referrals, and any monitoring and evaluation data that is collected for the duration of the participation.
- 2. The information of the participants and residents must be entered into the HMIS System, ensuring that they have the authorization and signature of a consent for the storage of information in electronic format, maintain the quality of the data, in the determined time and following the additional requirements established.
- 3. The project of housing and support services for homeless people, participants of the Rural Alabama Coordinated Access System and attached to the AL-507 CoC must keep each file of the participants and residents in a safe place with restricted access. You agree to report the right to refuse to share information that is considered confidential, unless the information is necessary to establish or document eligibility for a program in accordance with applicable regulations, not to disclose record data without the written permission of the participant or resident, except for project staff and other agencies, as required by law.

PARTICIPATION REQUIRED

HUD and the Veterans Administration (VA) have issued instructions requiring all organizations and agencies to participate and collaborate with the applicable CoC Coordinated Entry *System*. Any project that receives funding from HUD (CoC and ESG Program) or VA funds (Supportive Services for Veteran Families [SSVF], Veterans Affairs

Supportive Housing [HUD-VASH], and Grants Per-Diem [GPD]) must meet the participation requirements.

To formalize this requirement, a Memorandum of Understanding is required to ensure that all housing and service providers located in the geographic area of the CoC use the *Coordinated Entry System* in an open, transparent and consistent manner. In addition, this document serves to establish the responsibilities between Coalition Members, AL-507 CoC and the partner agencies of the Coordinated Entry *System*.

Process

The Rural Alabama Coordinated Access System is a process through which the needs of homeless individuals and families requesting services related to available housing options and services are assessed. It organizes in order of priority the most vulnerable and needless individuals and families, identifies the housing alternatives and services that best suit their particular needs, and refers to available and adequate housing resources in a systematic and efficient manner. The Rural Alabama Coordinated Access System team has developed a manual as a guide to establish how each process should be operated according to the stage within the Rural Alabama Coordinated Access System. This document includes information on the steps to follow in the process of determining eligibility, needs assessment and location, and the forms needed to perform each step of the procedures.

The Rural Alabama Coordinated Access System process consists of four main components or stages: access, assessment, identification and location.

1. Access and Entry

The first part of the process is intended to determine the eligibility of individuals or families to receive CoC services through the Rural Alabama Coordinated Access System. It is carried out for the need of individuals and families requesting services. The AL-507 COC follows a hybrid model where four (4) general entry points have been established to access housing-related services. The access points are: (a) toll-free telephone line; (b) Service centers of the Coordinated Entry System; (c) community scope; and (d) partner organizations and agencies of AL-507 CoC.

From any of the access points, the initial screening process must be initiated, with the purpose of determining the eligibility of the individual or family for location services in housing options under the established definitions as homeless persons. (See "DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT 24 CFR Parts 91, 582, and 583 Homeless Emergency Assistance and Rapid Transition to Housing: Defining "Homeless", Federal Register / Vol. 76, No. 233 / Monday, December 5, 2011.) However, all entry points will use the same method of access, evaluation, identification and location, using the uniform decision-making process set out in this Manual.

Individual or family fleeing or attempting to flee domestic violence

As a measure of safety and protection of their lives, regardless of the point of entry used by the individual or family in search of protection, housing and services, as soon as it is identified that it is a situation of domestic violence or gender according to the definition, the interview must be stopped and diverted to one of the organizations and projects dedicated to serving this population available in the network of providers of the AL-507 CoC, for their appropriate intervention. Once the intervention is diverted, the organization and project to which the intervention is diverted will continue with the location process, as established by the applicable standards. Coalition members shall sign a Memorandum of Understanding with organizations dedicated to providing housing and services to individuals and families fleeing gender-based violence and sexual abuse, which will include the conditions and responsibilities under which the diversion of this population to the corresponding service system will be carried out to guarantee its safety and confidentiality.

Documentation of eligibility elements:

Category 1: Literally homeless person – the situation raised must be documented by the professional in charge, either through personal verification, history in the electronic files of the HMIS, or through certification of third parties and

institutions.

Category 2: At imminent risk of Homelessness – the situation raised must be documented by the professional in charge, by means of a written communication of a legal or informal nature, which clearly identifies the date in which the action of being homeless will be carried out, which must take place in a period of 14 days or less. If necessary, the professional in charge in consultation with the Project Coordination, will carry out an advocacy intervention for the identification of solutions that avoid or delay the action determined by the document presented. Once the status of the action to be taken has been determined, the needs assessment process will continue, as established, or the parties will be guided on possible future actions and the services of the Coordinated Entry System or other remedies and resources available.

Category 3: Homeless person under other federal statutes – this category requires highly confidential and sensitive management and refers to a "Single person under the age of 25, or family with only youth and children, who otherwise do not qualify as homeless persons under this definition." In the case of young people or families with only young people and children under 18 years of age, they must be consulted and referred to the Project Coordination for its corresponding action. In the case of young people or families with only young people and children from 18 to 21 years of age, the needs assessment process will be completed to determine the action to be taken and to identify the available housing alternatives. In the case of young people or families with only young people and children from 21 to 25 years of age, the needs assessment process will be completed to determine the action to be taken and to identify the available housing alternatives.

Category 4: Fleeing or attempting to flee domestic violence – this category requires highly confidential and sensitive management and works under the "diversion" model. In it, once the initial identification of the situation under this category has been made, the professional in charge stops the interview and informs the informant that, due to the situation, it will be referred to one of the organizations providing housing and support services available in the geographical area of the AL-507 CoC, dedicated to providing specialized services in matters of domestic violence and gender. Next, you will make contact with any of the organizations identified, connecting the informant with the resource available for your attention.

Diversion

Any individual or family requesting housing location services, if after interviewing and evaluation it is determined that they do not qualify within the eligibility criteria established in the System of Continuum of Care and Homeless Support Services, shall be referred to an alternate system of available social assistance that allows the satisfaction of the identified need. Alternate systems include but are not limited to: Victims of Domestic Violence, Homeless Veterans, and Homeless Youth.

The mode of Diversion is considered at the time when in the initial assessment process the homeless individual or family does not qualify under any of the definitions determined by the regulations. This modality is also applied in the cases of young people and families with only young people and children under 18 years of age, situations of domestic and gender violence, homeless veterans, and any other situation presented in the communication received.

- Young people or families with only young people and children under 18 years of age: they must be consulted and referred to the Project Coordination for its corresponding action.
- Domestic violence and gender: it will be referred to one of the organizations providing housing and support services available in the geographical area of AL-507 CoC, dedicated to providing specialized services in domestic violence and gender issues.
- **Homeless Veterans**: It will be referred to the Veterans Administration's Homeless Veterans Program for the appropriate process, connecting the person to the resource available for their care.
- **Ineligible as a Homeless Person**: If the informant is not eligible under any of the definitions of homeless persons according to the regulations, once the situation has been identified, information will be provided about the services of the Coordinated Entry System and assistance will be provided in identifying other resources

available to address the situation presented. The professional in charge of the communication will make the necessary efforts to identify and share all the available information that adequately attends to the situation presented.

Emergency Shelters

Any individual or family requesting housing location services, if once interviewed and evaluated determines for whom a housing option appropriate to their needs is not identified, they will be offered the option of an available Emergency Shelter, which they have the regulatory option of rejecting without penalty or detriment to their right to housing and services. The Emergency Shelter will proceed according to the parameters and conditions set forth in the CoC Written Standards.

2. Evaluation of Necessity

The second stage is intended to gather the necessary information from applicants for the purpose of assessing specific housing needs and support services that encourage appropriate placement to available placement options in housing alternatives and their long-term stabilization. Once an informed consent has been signed and through an interview with the participant and using a standardized instrument, efforts will be made to collect the necessary information to know: identification data, housing and experience of wandering, economic situation, physical and mental health, situations of gender violence, or any other situation you are experiencing that affects your life. As part of this stage, it is necessary to demonstrate and document the veracity that the individual or family requesting services meets the definition of homeless person, according to their situation. This evidence must be included in the participant's file. The immediate absence of this evidence should not be considered or used as a barrier to continue and completing the evaluation process and eventual location.

- 1. After the assessment process and determining the eligibility of the homeless individual or family is completed, the needs assessment process begins, which includes completing an instrument known as VI-SPDAT and the preparation of the Individualized Service Plan.
- 2. Once the needs assessment process is completed, given the score established by the VI-SPDAT, it is assigned to the Waiting List corresponding to the case: Prevention, Transitional Housing, Permanent Housing, and Rapid Rehousing. The needs assessment process considers the most pressing needs of the homeless individual or family, as raised and documented. This process is aimed at achieving the fair location of the homeless individual or family, according to the identified needs and taking into consideration the services necessary for stabilization using biopsychosocial criteria.
- 3. Participants who identify themselves under Category 2 At imminent risk of homeless, the situation raised must be documented by the personnel in charge, by means of a written communication of a legal or informal nature, which clearly identifies the date on which the action of being homeless will be carried out, which must take place within a period of 14 days or less. These cases will be evaluated and included in the Prevention waiting list and carry out the referral of location to the programs with available funds.

Waiting List

Any individual or family who, having been assessed and is ready for location, for whom for some reason an available housing alternative that meets their housing need cannot be identified, or is rejected by the individual or family, will be placed on a Waiting List according to the given priority level. The Waiting Lists will be divided into the categories of: Prevention, Permanent Housing – Chronic; Transitional Housing; Rapid Relocation.

Prioritization Criteria

After completing the process of needs assessment and assignment in a shift in the corresponding Waiting List, the Coordination of the Coordinated Entry System verifies the List of Beds Availability in the HMIS System. In the process of assigning priority in the Waiting Lists, the following prioritization criteria will be used, in accordance with current regulations:

- Determination of Chronicity (Except in TH Waiting List)
- User ratings VI-SPDAT
- Length of homelessness
- Families with children
- Age
- Mental Health Condition
- Conditions Associated with the Use of Substances
- Date "Intake" or "engagement", as the case may be.

Special Waiting Lists

The Rural Alabama Coordinated Access System may establish Special Waiting Lists to deal with emergency matters, disasters or special initiatives authorized by AL-507 CoC. Among the issues considered as "Special" are not limited to: natural disasters such as hurricanes, floods, earthquakes or earthquakes; emergencies and public health situations such as COVID-19, hepatitis, HIV, gender-based violence, homeless youth subject to human trafficking conditions; in addition to other conditions that are determined as "Special", such as homeless veterans, LGBTTQI+ community, people with functional diversity, migrants, among others.

Any homeless person or family evaluated and included in any Special Waiting List that is determined to be incorporated into the procedures established in the Rural Alabama Coordinated Access System must be evaluated initially with all the prioritization criteria established in the previous section. In addition, these prioritization rules will apply consistently to all homeless individuals and families, without regard to federal and state non-distorted discrimination requirements as classes protected by federal civil rights laws and requirements, namely: race, color, religion, national origin, sex, age, family status, or disability, as well as compliance with HUD's Equal Access Rule. Any person with disability or functional diversity shall be offered three (3) reasonable accommodation options.

In the case of the COVID-19 Special Waiting List, the following criteria will be included:

- People over 60 years of age;
- People of any age with the following health conditions:
 - ✓ Cancer;
 - ✓ Chronic Kidney Disease;
 - ✓ COPD (Chronic Obstructive Pulmonary Disease in Spanish);
 - ✓ Compromised Immune System (HIV, Hepatitis, Lupus, Rheumatoid Arthritis, Organ Transplants, among others);
 - ✓ Obesity (Body Mass Index greater than 30);
 - ✓ Serious heart conditions, such as heart failure, coronary heart disease or cardiomyopathy;
 - ✓ Sickle cell disease:
 - ✓ Type 2 Diabetes (Mellitus)
 - ✓ Any other diagnosed chronic health condition that poses a risk to the life of the homeless person that may be included in the future.

In addition, the AL-507 CoC will take into consideration the following factors when addressing the impact of COVID-19 on individuals and families who are homeless or at risk of homelessness:

- High risk of covid-19 infection in the place where you are or overnight (place not suitable for human housing, congregated locality, such as shelters, prisons, or congregated treatments, among others.
- Inability to take action to prevent contagion in the place where you spend the night or work, including
 inadequate availability of personal protective equipment (PPE).
- Lack of access to health care services due to lack of health plan, lack of primary caregiver, use of emergency rooms for health care services.

3. Identification of Alternatives

The third stage is the process of identifying the best housing alternative and support services available, according to the specific needs identified in the evaluation process and the objectives and preferences. The *Rural Alabama Coordinated Access System* will use the information provided by the HMIS system for the current bed layout in the Continuum of care system in order to be able to allocate the corresponding referrals to the best available alternative that meets the participant's housing needs.

- On a daily basis, the Coordination of the Coordinated Entry System will carry out a pairing between homeless
 individuals and families and the available vacant units and beds, with the purpose of identifying the available
 housing alternatives, according to the shift occupied in the corresponding Waiting List.
- 2. The Project Coordinator will notify via protected email, the Rural Alabama Coordinated Access System professional or gateway project staff where the process of needs assessment and assignment to the Waiting List originated and completed, the availability of units or beds, identifying the location of the identified provider and instructing for the location of the applicant homeless individual or family and initiating the location process.

Discussion or Case Conference

As a community process, the Coordinated Entry System promotes and requires constant dialogue with all components of the Continuum of Care System and agencies that interact and intervene with housing-related issues and services aimed at addressing the needs of homeless individuals and families.

Comprehensive analysis and evaluation of homeless individuals and families often requires Case Discussion or Conference. The Discussion or Conference of Cases allows to include elements from different sources and community resources, which in some ways are or have previously intervened with homeless individuals and families who request housing through the Coordinated Entry System. This process may include conversations with service personnel from multiple projects and agencies, including the same individual or homeless family, for the purpose of ensuring that the results of the assessment are aligned with established prioritization processes. The Case Discussion or Conference allows to take into consideration specific and unique conditions of vulnerability of homeless individuals and families, as well as the risk factors that must be considered in the design of the individualized plan of services related to the housing location.

The professionals of the Rural Alabama Coordinated Access System should make all the necessary efforts to promote and carry out a Discussion or Conference of Cases throughout the process of sifting, needs assessment, identification of housing alternatives, and location, as part of the decision-making processes, promoting the achievement of the objectives of stability in long-term housing of homeless individuals and families seeking housing services through the Coordinated Entry System.

4. Location

The fourth stage is the location process by which each individual or family is coordinated and connected with the most appropriate housing and service option for each previously identified participant. All referrals must be made through the *Rural Alabama Coordinated Access System*, after a communication and case discussion with the authorized representatives of the collaborating agencies and organizations and the participants. When making the referrals it is essential to take into account, value, consider and respect the objectives and preferences of the participants when making decisions that affect them.

Once the Rural Alabama Coordinated Access System professional where the waiting list and needs assessment
process was completed receives the location notification, they will proceed to locate the homeless individual or
family on duty and offer the housing alternatives available for their decision-making.

- 2. If the individual or homeless family accepts any of the housing alternatives presented, we proceed to coordinate the details related to the location, such as transportation or any document or management pending completion, ensuring its successful and satisfactory location.
- 3. If it is a location through a Rental Assistance Program, Section 8, HOPWA, among others, it will assist the homeless individual or family in identifying and negotiating the rental conditions of the housing unit, as well as the basic rules of coexistence and other necessary basic procedures. When identifying a housing unit suitable for your needs, it is recommended to take into account that the income required by the housing unit includes at least one of the utilities, preferably both, and that an inspection of the housing unit is carried out, complying with the criteria of minimum quality standards, habitability and security.
- 4. As a Public Housing unit, assistance will be provided throughout the placement process.
- 5. Both in the cases of Income Assistance and Public Housing, it is necessary to consider the provision of other economic aid for the payment of accumulated debts of utilities and deposits, the availability of basic equipment such as refrigerator and stove, and the possibility that the individual or homeless family does not have a basic furniture, kitchen utensils, sheets, towels, and food, among other needs. Every effort should be made to assist homeless individuals and families facing these situations, in order to ensure a successful and adequate transition and location to stable housing.
- 6. If the applicant homeless individual or family does not accept any of the available housing alternatives submitted for their consideration, the current housing situation is used to identify any safety situation or special needs that may exist. According to the information updated at this time, you are offered guidance on the available alternatives, if any, of emergency shelters, reinforcing your right not to accept the housing alternatives presented, and ensuring your permanence on the corresponding Waiting List, until other alternatives are identified in the future.
- 7. If the agency, project, or municipality providing housing for the homeless person rejects the assignment of the qualified homeless individual or family on the appropriate shift, it must provide a written explanation of the reasons why it rejects this housing allowance. If this is a situation in which the reasons expressed reflect the possibility of discrimination by the characteristics of the homeless individual or family, you will be offered information about your rights under the Fair Housing Act. This Act considers as "protected classes" those persons who are denied access to a HUD-subsidized housing project on the grounds of: Race, National Origin, Color, Condition of Physical or Mental Impairment, Creed, Family Status (The Presence of Children in the Family Unit), Sex, Sexual Orientation, Religion, and Gender Identity.
- 8. The documented situation of rejection must be included in the Weekly Reports submitted to the Coordination of the Project, which in turn will be part of the Monthly Report of the Rural Alabama Coordinated Access System Management of the AL-507 CoC for its corresponding action.

SIFTING AND EVALUATION INSTRUMENTS

The Coordinated Entry System and its partner agencies will use as an initial step the "Sifting and Determination of Initial Eligibility Sheet", which determines the applicant's eligibility within the regulatory criteria of the definition of homeless person.

Once their eligibility has been certified, the "Evaluation Interview" instrument will be completed, in which a complete interview is conducted in order to know the circumstances of the applicant's situation at the time of the interview, as well as their specific needs and conditions. As part of the second stage of the Rural Alabama Coordinated Access System entry process, an Evaluation Interview must be made to each applicant, once it is determined that they are eligible for housing services under the definition of homeless person, as applicable. To

make this interview will be used an instrument in a standardized way to all the / the applicants, regardless of demographics and location. The *Evaluation Interview* instrument has been designed in compliance with HUD's requirements established by the Data Standards in force for the operations of the HMIS System, to collect the necessary information to help know: identification data, housing and wandering, economic situation, physical and mental health, including substance use. The *Evaluation Interview* will serve as a guide to complete the *VI-SPDAT* and to evaluate the options available for each participant's location in the housing alternatives available at the time of the interview.

The information contained in the *Evaluation Interview* will provide the information necessary to complete the instrument known as the "*Vulnerability Index - Service Prioritization Decision Assistance Tool*" (*VI-SPDAT*). The *VI-SPDAT* will serve as a tool for the establishment of the order of priority, based on the specific conditions and needs of each individual or homeless family, in the second stage of evaluation. This tool enables the establishment of the prioritization order based on vulnerability through five components: (a) housing history and wandering, (b) risks, (c) socialization and daily functioning, (d) well-being - including chronic health conditions, substance use, mental illness, and trauma, and (e) family composition (if applicable).

The *VI-SPDAT* allows service providers to evaluate and prioritize the universe of homeless people entering the care system and identify the order of priority they assign when considering housing location alternatives, based on the severity and level of complexity of their needs.

The following table shows the recommendations on housing alternatives according to the total score of the VI-SPDAT:

punctuation	recommendation
7 or More	Priority Permanent Housing with Support Services (PSH) (Chronic)
4 - 6	Rapid Relocation (HR) Priority
4 - 6	Transitional Housing Priority (TH)
0 - 3	No intervention of Housing with Support Services

^{*}Scores of o-3 will explore housing alternatives outside the CoC, according to the elements evaluated. https://www.hudexchange.info/programs/coc/toolkit/responsibilities-and-duties/#coordinated-entry

RESOURCES: HUD Information regarding Coordinated Entry

https://www.hudexchange.info/resource/4427/coordinated-entry-policy-brief/

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Description

This policy brief summarizes HUD's views on goals for the coordinated entry process. This brief does not establish requirements for Continuums of Care (CoCs), but rather is meant to inform local efforts to further develop CoCs' coordinated entry processes.

View the Coordinated Entry and HMIS FAQs, the Coordinated Entry and Victim Service Providers FAQs, and the Coordinated Entry and Youth FAQs to find out more information on how the coordinated entry process relates to Homeless Management Information Systems (HMIS), victim services providers, and youth for CoCs.

Resource Links

Coordinated Entry Policy Brief (PDF) - ATTACHMENT