

Coordinated Entry Policies and Procedures

CoC Region 13

Overview

A Coordinated Entry (CE) process represents a new approach to coordination and management of a Continuum of Care's housing crisis response system. CE enables Region providers and homeless assistance staff to make consistent decisions from available information to efficiently and effectively connect people in crisis to interventions that will rapidly end their homelessness. The CE approach also aligns with Indiana Balance of State (BOS) goals to transform crisis response systems to improve outcomes for people experiencing a housing crisis.

Region 13, which consists of Harrison, Washington, Floyd, Scott, Crawford, Orange, & Clark County, will be implementing a CE process mandatory for all CoC funds recipients. The lead agency for CE in Region 13 will be the Southern Indiana Housing Initiative (SIHI).

The following policies and procedures can be modified as needed to adapt to the growing and changing housing needs in Region 13, as well as to accommodate new agencies that become a part of the CE process.

Lead and Participating Agencies

The Lead Agency/Agencies from Region 13 will serve as the Managing Entity of the Waitlist/Prioritization List, implement CE, and will commit resources and staffing to administer assessments, analyze assessment results and support referrals to housing interventions. They will also serve on the Indiana BOS's Coordinated Entry Steering Committee. Participating agencies will support the implementation of Coordinated Entry and may commit resources and staffing, serve as entry points, and support data collection, analysis and referrals. SIHI is the lead agency for Region 13 and has no staff, permanent location, or resources. The Chair/Co-Chair will be responsible for the Lead Agency's responsibilities regarding CE.

Election/Assignment of Roles within CE

DEVELOP_ Because there are only 4 current participating agencies, the likelihood of a conflict of interest will need to be mitigated at all times. The role of Prioritization List Manager should float on a yearly basis between the agencies. All conflicts will likely be resolved by a meeting of all four participating agencies and any appropriate case managers.

Points of Access

Region 13 utilizes a De-Centralized Point of Access for intake of clients into CE. Each organization participating in CE will act as a point of access for services for individuals and families experiencing homelessness. These agencies will be the sole locations where homeless or those at risk of homelessness will be directed for assessment prior to being admitted to any homeless assistance program. Household ineligible for participating programs will be provided with information and referrals to agencies outside of the CE.

It is prohibited for any ESG or CoC funded homelessness assistance organization to admit or serve consumers without their first having gone through the CE process and received a referral to an agency. Failure to utilize the CE process when accepting new clients into ESG or CoC funded programs could result in the loss of that program's funding.

After-Hours/Emergency Services

There are currently no 24 hour access or afterhours emergency programs participating in CE, with the exception of PACT's 24 emergency hotline for Victims of Domestic Violence.

Safety Planning

DEVELOP- Safety planning – borrow PACT's?

Access and Assessment

All access point providers must administer the Indiana CE Standardized Assessment Tool (VI-SPDAT) according to HUD standards. CE will operate using a Client centered approach, allowing Clients to freely refuse to answer assessment questions and/or refuse referrals. (See Refusal of Services)

To ensure transparency in Client care coordination and decision making, all CE Participants receiving a comprehensive assessment and referral to a Region project must be offered written documentation of the assessment results and referral. The “receipt” of CE assessment and referral process should include a description of the CE screening, and assessment results, and indicates the CE participant’s prioritization for the referral intervention being offered.

Assessment

Prioritization

The State of Indiana has determined that an effective coordinated entry process ensures that people with the greatest needs receive priority for any type of housing and homeless assistance available in the Region.

The minimum VI-SPDAT score for referrals is _____. If a client/household does not meet the minimum requirement for services, they will not be added to the waitlist and will not be eligible for CE. They will be provided with information regarding more appropriate services in the area.

1. Individuals and families will be referred to Rapid Re-Housing according to the following prioritization criteria:

- 75% of available RRH resources must be filled with individuals or families that score the minimum established VI-SPDAT score.

2. Individuals and families will be referred to Permanent Supportive Housing according to the following:

- Chronic Homelessness as defined by HUD
- longest history of homelessness
- most severe service needs as determined by the VI-SPDAT score

Priority List Management and Notification of Referral

Priority list management and notification of referrals will be the responsibility of the Lead Agency staff members. Lead Agency staff members may be assigned or may periodically trade off responsibility among Lead Agency staff members for alerting the Client's case manager when a slot has become available for them in a specific program. When it is a Lead Agency staff member's given time (Day, week or month) to take on this responsibility, they will need to check program availability at least weekly to see if new spots are becoming available and contact the Client's case manager for them. However, because SIHI has no staff, all agencies will be responsible for checking the waitlist and communicating openings and referrals.

Referral

Once the client/household has received their VI-SPDAT score, they will be eligible for a referral of services to any of the CE's participating programs. (See Region 13 Current Programs & Eligibilities). If the household does not meet the eligibility for any of programs offered in the CE, they will not be added to the waitlist. If they are not added to the waitlist, referrals to outside agencies are permitted. When a referral is made the HMIS waitlist will be immediately updated and SIHI will be informed of the change in status. SIHI will in turn notify other participating agencies of the update.

Declined Referrals and Grievance Procedures

If a client is given a referral and does not wish to accept the referral –NEED TO DEVELOP-Because of the limited resources available in Region 13, refusal of appropriate referrals will likely result in the immediate forfeiture of the opening. Because of the scarcity of resources clients should be made aware of the limited options in the CE.

Grievance Procedures – likely will involve a meeting with SIHI Chair and Co-Chair providing they are not members of the agency that grievance is being made against.

Grievance Procedures should be explained to clients during their initial contact with a participating agency.

Referral Rejection

CE Programs/Participants may deny or reject referrals from the CE waitlist, although service denials should be infrequent and must be documented in HMIS. –DEVELOP CRITERIA FOR DENIAL:

Denials could include: receiving a referral for an ineligible client.) Any agency that denies a CE client must provide the reason for the service denial. (Develop acceptable number of denials before further inquiry) Aggregate counts of service denials, categorized by reason for denial, must be reported by the Region annually.

At a minimum, project's referral rejection/denial reasons must include the following:

- Client/household refused further participation (or Client moved out of Region 13)
- Client/household does not meet required criteria for program eligibility
- Client/household unresponsive to multiple communication attempts
- Client resolved crisis without assistance
- Client/household safety concerns. The Client's/household's health or well-being or the safety of current program participants would be negatively impacted due to staffing, location, or other programmatic issues.
- Client/household needs cannot be addressed by the program. The program does not offer the services, and/or housing supports necessary to successfully serve the household.
- Program at bed/unit/service capacity at the time of referral.
- Property management denial (include specific reason cited by property manager)
- Conflict of Interest

In the event of a service denial, or participant rejection, the following steps must be followed:

1. Any referral provisionally reviewed by participating agencies and a preliminary enrollment determination made must be communicated back to the SIHI Prioritization

List Manager, assessment and referral provider, or Client advocate designated by Region 13.

2. All referral requests that result in a denial must be reviewed by the SIHI Prioritization List Manager, assessment and referral provider, or Client advocate designated by Region 13.
3. If a referral is returned to the housing referral provider or designee, the HMIS record must be updated to reflect the reason for the denial.
4. Any Region 13 project denying the referral must notify SIHI Prioritization List Manager, assessment and referral provider, or Client advocate within 3 business days of the denial. Further communication must include a detailed written justification of the referral denial provided within 3 business days of the notice to the SHIH Prioritization List Manager. The written justification of service denial must also be shared with the Client and documented in HMIS.
5. A provider who denies three sequential referrals will be required to participate in a case conferencing meeting with the SIHI Prioritization List Manager, unless the PLM is employed by the provider, assessment and referral provider, or Client advocate designated by Region 13.
6. A Client who denies three sequential referrals will be required to participate in a case conferencing meeting the SIHI Prioritization List Manager, assessment and referral provider, or Client advocate designated by Region 13.

Coordinated Entry Statewide Policy on Transfers around the State

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Equal Opportunity/Non-Discrimination Access

CoC has developed and operates a coordinated entry that permits recipients of Federal and State funds to comply with applicable civil rights and fair housing laws and requirements. Recipients and sub-recipients of CoC program and ESG Program-funded projects must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws, including the following:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, or marital 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, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, or marital status.
- Title II of the Americans with Disabilities Act prohibits entities, which includes State and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which includes 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 includes shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

Inclusivity of subpopulations

All subpopulations including chronically homeless individuals and families, Veterans, youth, persons and households fleeing domestic violence, transgendered persons, and refugees and new immigrants must be provided equal access to Region 13 crisis response services regardless of the characteristics and attributes of their specific subpopulations.

Full Coverage

Not possible with the current resources but dammit we'll "try"

Privacy Protections

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List of Resources

Each CES operator will maintain a list of all available Region 13 resources, including each project's eligibility criteria. The list of resources must be updated annually and be made publicly available. *Check to see if this list is just for CE participating programs at a minimum.

Mainstream Services

Region 13 will use the VI-SPDAT to evaluate for each Client's potential eligibility for the following mainstream services or resources:

- Housing
- Medical Benefits
- Nutrition Assistance
- Income Supports

CE Training

Training will be provided by SIHI on an annual basis or as needed when new organizations enter or old organizations leave the CE process.

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Region 13 Current Programs & Eligibilities

No Client/Household should be entered into CE unless they meet the minimum guidelines of at least one participating program. Clients/Households who do not meet the criteria for the participating programs should be referred to appropriate services outside of CE.

- Stepping Stone Apartments- Permanent Supportive Housing- Offers 7 fully furnished apartments, Case Management onsite, linkage to supportive services, and access to transportation. This program operates on Housing First principles. To be eligible, clients must at a minimum be:
 - 18-15 years of age, or emancipated
 - Homeless
 - Disabled – proof of disability will be required.

Intake is provided by the Case Manager of Stepping Stone and the apartments are managed by Blue River Services, Inc.

- Life Spring
- PACT
- VOA

Victims of Domestic Violence

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Marketing

Information regarding CE will be available at all access points and be a part of any brochures, or marketing in relation to the specific programs.

State Reporting