



Continuum of Care

Coordinated Entry System Policies and Procedures

Housing for all = A Stronger Montgomery

Completed by the
Montgomery County Continuum of Care
Operations Committee
January 17, 2018
Updated January 23, 2018

Table of Contents

1. REGULATORY REQUIREMENT AND BACKGROUND	3
2. VISION AND GUIDING PRINCIPLES	4
• Fidelity to Housing First	4
• Non-Discrimination Policy	4
• Reasonable Accommodation	5
• Staffing Roles	5
3. ACCESS	6
• Families	6
• Domestic Violence Survivors	7
• Domestic Violence Shelter and Placement	8
• Singles and Youth	8
4. ASSESSMENT	10
• Reassessment	11
• VI-SPDAT/Family VI-SPDAT Scoring	12
5. THE COORDINATED PRIORITIZATION LIST	12
• Matching	12
• Matching vs. Placement	13
• Program Decline Policy	13
• Consumer Decline Policy	14
6. PRIORITIZING POPULATIONS FOR HOUSING	14
• Permanent Supportive Housing	14
• Rapid Re-Housing	16
• Transitional Housing	16
7. MARKETING	17
8. GRIEVANCE POLICY	18
9. EVALUATING COORDINATED ENTRY	18
10. DATA MANAGEMENT	19

1. REGULATORY REQUIREMENT AND BACKGROUND

A Coordinated Entry System (CES) is an evidence-based strategy that focuses on housing and service coordination to link homeless consumers to the most appropriate housing solution based on their needs. The U.S. Department of Housing and Urban Development (HUD) requires all homeless Continuums of Care (CoC) to utilize CES as stated in 24 CFR 578.7 (a)(8) of the CoC Program Interim Rule.

The goals of an effective CES are to quickly identify homeless consumers, to prevent homelessness whenever possible, to appropriately assess the needs of consumers that request help and to connect them to housing and services quickly. Core components of CES as defined by HUD include:

- Prioritization-having a transparent way to prioritize consumers who are most vulnerable;
- Low Barrier-operating programs that do not screen consumers out for assistance because of perceived barriers to housing or services, including, but not limited to, lack of employment or income, drug or alcohol use, or having a criminal record;
- Housing First Orientation-housing consumers quickly without preconditions or service participation requirements
- Person-Centered-incorporating consumer choice in the type of housing and level of services and other options that are relevant to success;
- Fair and Equal Access-developing processes in which all consumers have fair and equal access to the coordinated entry process, regardless of where or how they present for services;
- Emergency Services-ensuring that CES does not unintentionally impede access to emergency shelter; and
- Standardized Access and Assessment-offering the same assessment approach and referrals using uniform decision-making processes.

The Montgomery County CoC and Emergency Solutions Grant programs and all other federal, state and county-funded homeless programs must comply with the CES as outlined in this document. Further these programs must use the CES as the only referral source from which to consider filling vacancies in housing. The CES is open to all Montgomery County residents who meet the HUD definition of homelessness, as outlined in the HEARTH Act regulations.

2. VISION AND GUIDING PRINCIPLES

The vision of the Montgomery County CoC is embodied in the *Housing for All = A Stronger Montgomery* campaign. This campaign outlines a strategy for ending homelessness in all forms by 2020. Paramount to this vision is the fundamental belief that homelessness is a solvable problem for all Montgomery County residents.

Housing for All = A Stronger Montgomery campaign embodies the guiding principles and shared values of our County and CoC which are:

- Operation of a person-centric system of care;
 - Commitment to a comprehensive crisis response system; and
 - Expansion of prevention, diversion and permanent housing solutions that are based on need.
- **Fidelity to Housing First**

Housing First is a programmatic and systems approach that centers on providing people who are homeless with housing quickly and then providing services as needed.

- Housing is not contingent on compliance with services.
- Participants are expected to comply with a standard lease agreement and are provided with services and supports to help maintain housing and prevent eviction.
- Services are provided post-housing to promote housing stability and well-being.
- All programs are expected to ensure low barriers to program entry for program participants.

The CES Policies and Procedures described herein is Phase 1 of our adoption of a full scale CES. The Montgomery County CoC envisions the implementation of a robust CES with onsite diversion, more integrated employment services, limiting the use of motel placements and scaling Rapid Re-housing to take approximately three years to launch.

- **Non-Discrimination Policy**

Providers must have non-discrimination policies in place and assertively outreach to people least likely to engage in the homeless system.

Providers must comply with all federal statutes including the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of Civil Rights Act and Title II and III of the Americans with Disabilities Act (ADA).

The Montgomery County CoC practices a person-centered model that strongly incorporates participant choice and inclusion of subpopulations present in Montgomery County, including, but not limited to, homeless veterans, youth, families with children, and victims of domestic violence.

The CES assessment procedures follow federal Fair Housing Laws for protected classes such as race, color, religion, national origin, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity or marital status. Data will be protected by the Homeless Management Information System (HMIS) and only shared as allowed for based on the consent of the consumer.

- **Reasonable Accommodation**

The Fair Housing Act provides consumers with disabilities the right to request reasonable accommodations when needed to participate in, and benefit from, housing and related programs and services. The ADA and Section 504 of the Rehabilitation Act have similar requirements. These laws apply throughout the entire CoC process, from initial contact through permanent housing placement. Examples of reasonable accommodation requests include assisting a consumer with a learning disability with completing or collecting eligibility documents; providing a Sign Language interpreter for a consumer who is deaf; moving a bed near an electrical outlet for someone using a medical device; or permitting a service animal into a shelter to assist a consumer with a disability. Montgomery County CoC programs must have a reasonable accommodation policy in place. Policies must be reviewed by the Services to End and Prevent Homelessness (SEPH) ADA/Fair Housing Coordinator. Responses to the requests must be made in a timely fashion. Programs may not deny a request for reasonable accommodations without prior consultation with the SEPH ADA/Fair Housing Coordinator.

- **Staffing Roles**

As the lead agency for the Montgomery County CoC, the SEPH Department is the designated Collaborative Applicant, HMIS Lead and CES Lead. The SEPH is responsible for the day-to-day administration of the CES, oversight of the system and tracking performance.

The Operations Committee of the Montgomery County Interagency Council on Homelessness (ICH) will evaluate the progress of the CES as described herein.

Basic duties of the SEPH in its management role include:

- Providing training at least quarterly to CoC membership organizations including but not limited to process training on CES, best practice service delivery strategies and CoC requirements;
- Monitoring data collection in the HMIS, providing reports on outputs and outcomes for CES;

- Overseeing eligibility determination, appeals processes, consumer placement declines/provider placement rejections and grievance protocols described herein for CES;
- Improving CES protocols to ensure consumer access to services and housing is completed in an expedited manner;
- Overseeing Housing Prioritization list(s); and
- Updating policies and procedures.

The CES Project Manager – The project manager role includes management and oversight of the CES, including but not limited to the following:

- Serving as the primary point person and lead to all workgroups and transition teams
- Overseeing access points;
- Liaison with community partners;
- Providing technical assistance to participating agencies; and
- Reviewing and monitoring CES system performance and consumer outcomes.

3. ACCESS

- **Families**

The Montgomery County CoC access points cover the entire geographical area of the CoC. Montgomery County CES provides homeless or at-risk consumers with children access to eligibility determinations, basic services, prevention, triage assessment and shelter locations across the County.

These access points are Montgomery County Department of Health and Human Services (DHHS) offices and have historically been used for homeless prevention, eligibility and assessment, therefore it is a common referral point for mainstream or community agencies that interact with homeless and at-risk families in need of service.

These DHHS offices also provide other critical interventions such as the provision of public benefits. Therefore, families applying for food stamps or temporary assistance for needy families may also access homeless services if needed and vice versa.

Staff at both singles and family access points will be trained to serve youth wherever they present.

The current access points for families and youth within the Montgomery County CoC CES are provided in the following chart.

ACCESS POINTS FOR FAMILIES WITH DEPENDENT CHILDREN AND UNACCOMPANIED YOUTH

Health and Human Services Social Services Offices	Phone Number	Services
Housing Stabilization Services 1301 Piccard Drive Second Floor Rockville, MD 20850 (Accessible)	240-777-4550	8:30 a.m.–5:00 p.m. provides emergency assistance on a first-come first served basis, for homeless prevention, utility assistance, domestic violence referral, and homeless eligibility and triage Tuesday evening hours are available from 5:00–7:00 p.m.
Housing Stabilization Services 12900 Middlebrook Lane Second Floor Germantown, MD 20874 (Accessible)	240-777-4448	8:30 a.m.–5:00 p.m. provides emergency assistance on a first-come first served basis, for homeless prevention, utility assistance, domestic violence referral, and homeless eligibility and triage. Tuesday evening hours are available from 5:00–7:00 p.m.
Housing Stabilization Services 8818 Georgia Avenue Silver Spring, MD 20910 (Accessible)	240-777-3075	8:30 a.m.–5:00 p.m. provides emergency assistance on a first-come first served basis, for homeless prevention, utility assistance, domestic violence referral, and homeless eligibility and triage. Tuesday evening hours are available from 5:00–7:00 p.m.
Crisis Center Abused Persons Program 1301 Piccard Drive First Floor Rockville, MD 20850 (Accessible)	240-777-4000	After 5:00p.m. The Crisis Center which is 24 Hours / 7 days a week, utilized for providing information regarding the homeless system for Families with Minor Children and domestic violence referral

- **Domestic Violence Survivors**

Domestic violence victims with children and those who are single may also access a network of domestic violence shelters located throughout the County from the access points listed above. Intake workers are trained to serve domestic violence victims with care and confidentiality. Through the triage and Vulnerability Index-Service Prioritization and Decision Assessment Tool (VI-SPDAT) assessment process described below, persons identified as fleeing domestic violence or sex trafficking situations will have their information recorded on paper forms. Their personal protected information (PPI) will not be entered into the HMIS.

The safety of persons fleeing domestic violence situations is a priority for Montgomery County. Families and individuals that are deemed to be fleeing domestic violence will be immediately referred to the Montgomery County DHHS Behavioral Health Services, Abused Persons Program. This comprehensive and robust County driven service provides crisis and ongoing counseling, group counseling and support groups, crisis shelter, support and advocacy services to victims of partner-related domestic abuse (domestic violence) and their families. Services provided through the Abused Persons Program include crisis shelter, abuse counseling and Family Violence Prevention. Families may also access services through the Housing Stabilization Services related to welfare support, food stamps and county specific benefits.

- **Domestic Violence Shelter and Placement**

Consumers in need of temporary accommodations will be referred to the Betty Ann Krahnke Center which is a 60-bed, short-term crisis shelter for women and children who are fleeing domestic violence and/or victims of sexual assault or human trafficking. The Betty Ann Krahnke Center provides crisis intervention, safety planning, victim advocacy services, counseling and therapeutic interpersonal skill-building, with an emphasis on trauma reduction and personal empowerment.

If the Betty Ann Krahnke Center is full or if there is a male victim requiring placement, the CoC works closely with the County's Abused Persons Program to provide motel placement. If a victim of domestic violence requires ongoing CoC housing solutions, they may be placed on transitional housing or permanent housing queues and will be prioritized based on their score as described herein. The CES Manager will maintain a paper based housing queue for victims of domestic violence.

- **Singles and Youth**

The Montgomery County CoC access points cover the entire geographical area of the CoC. The CoC CES provides homeless or at risk single individuals access to eligibility determinations, basic services, triage assessment and shelter referrals from multiple community access points across the County including homeless shelters serving individuals, the County Corrections, the County Hospitals and through homeless outreach teams. The most common points of entry are shelters and street outreach.

This comprehensive approach to eligibility determination and basic assessment of need ensures that virtually anywhere a homeless individual may present will offer a basic homeless eligibility screening, a triage assessment which focuses on determining immediate needs and a referral to a short-term shelter placement from which more comprehensive services may be accessed.

Montgomery County has developed a universal referral form that determines homeless eligibility and will triage and navigate individuals who present at mainstream (non-

homeless) access points to shelters for more comprehensive assessment. This form is used to direct homeless people to the appropriate shelter where more thorough services, shelter or prevention services may be accessed.

ACCESS POINTS FOR SINGLES AND UNACCOMPANIED YOUTH		
Location	Phone Number	Services
<u>Corrections</u> (Accessible)		
Montgomery County Detention Center 1307 Seven Locks Road Rockville MD 20854	240-777-9960	MC Universal Referral Form completed; basic eligibility determination, referral to shelter for prevention, shelter access or more comprehensive housing
Montgomery County Correctional Facility 22880 Whelan Lane Boyd's, MD 20841	240-773-9700	
Montgomery County Pre-Trial Services and Pre-Release Center 11651 Nebel Street Rockville MD, 20852	240-777-5400	
<u>Hospitals</u> (Accessible)		
MedStar Montgomery Medical Center 18101 Prince Philip Drive Olney, MD 20832	855-633-0207	MC Universal Referral Form completed; basic eligibility determination, referral to shelter for prevention, shelter access or more comprehensive housing
Suburban Hospital 8600 Old Georgetown Road Bethesda, MD 20814	301-896-3100	
Holy Cross Hospital 19801 Observation Drive Germantown, MD 20876 1500 Forest Glen Road, Silver Spring, MD 20910	301-557-6000 301-754-7000	
Adventist HealthCare Shady Grove Medical Center 9901 Medical Center Drive Rockville, MD 20850	240-826-6000	
Adventist HealthCare Washington Adventist Hospital 7600 Carroll Avenue Takoma Park, MD 20912	301-891-7600	

<u>Crisis Center</u> (Accessible)		
Crisis Center, DHHS 1301 Piccard Drive First Floor Rockville, MD 20850	240-777-4000	MC Universal Referral Form completed; basic eligibility determination, referral to shelter for prevention, shelter access or more comprehensive housing. After 5:00 p.m. The Crisis Center which is 24 Hours 7 days a week, utilized for providing information regarding the homeless system for Singles with crisis referral
<u>Emergency Shelters</u>		
Men's Shelter Montgomery County Coalition for the Homeless 600-B East Gude Drive Rockville, MD 20850	301-545-5025 Fax 301-294-6579	VI-SPDAT shelter, prevention services, housing referral
Women's Shelter Interfaith Works 2 Taft Court, Suite 100 Rockville, MD, 20850	301-770-2413 Fax 301-762-5823	VI-SPDAT shelter, prevention services, housing referral
<u>In-Reach</u> (Accessible)		
Interfaith Works Empowerment Center 8106 Georgia Avenue, Second Fl. (Progress Place Building) Silver Spring, MD 20910	301-585-4471	Monday-Friday 8:30 a.m.-6:00 p.m.; VI-SPDAT, prevention services, shelter/housing referral
Shepherds Table 8106 Georgia Avenue, First Floor (Progress Place Building) Silver Spring, MD 20910	301-585-6643	Monday-Friday 1:00-6:00 p.m.; VI-SPDAT, shelter/ housing referral

4. ASSESSMENT

If a consumer is experiencing a housing crisis the first step will be to connect the person and/or family with shelter placement (singles) or motel placement (families) as capacity allows. An intake worker will follow up with a connection to complete more comprehensive assessments for housing, employment or vulnerability based on the need. The CoC sets a goal to complete comprehensive housing and needs assessments within 5-7 business days from shelter placement. This time period allows for singles and families who may be able to self-resolve.

Skilled intake workers complete assessments via HMIS and connect consumers to direct housing placements or place them on a prioritization list.

The Montgomery Vulnerability Index (a locally developed tool that assesses Acuity) should be updated every six months for persons on the Permanent Support Housing (PSH) prioritization lists. Life changes should be documented on Vulnerability Indices such as emergency room visits, hospitalizations, learning about a new diagnosis, involvement in the child welfare system, or juvenile detention center encounters which may change a consumer's placement on a prioritization list.

Any consumer facing homelessness may be assessed at any time and prior refusals to participate in the CES should not prevent a consumer from choosing to re-engage at any time. Additionally, barriers including but not limited to income, active or history of substance use, domestic violence history, lack of interest in services, disabling condition, evictions or poor credit, lease violations or any type of criminal record cannot be barriers to engaging the CES for housing placement.

The assessment process will not require disclosure of specific disabilities or diagnosis. Specific diagnosis or disability information should only be obtained for purposes of determining program eligibility to make appropriate referrals. Finally, consumers may refuse to answer any assessment questions that are asked of them. However, doing so may limit access to potential housing placements or possible service referrals.

For singles, families and youth, the Vulnerability Index-Service Prioritization and Decision Assessment Tool (VI-SPDAT/Family VI-SPDAT/Youth SPDAT) is used to assess individuals and families who need housing intervention(s). Coordinated entry access points use the tools to prioritize the housing needs of each presenting household. The tools offer a uniformed and transparent way to collect information necessary to initially assess individuals or families who enter the CES. The following table shows the scores needed for various housing considerations for each tool.

- **Reassessment**

Typically, assessments should occur no more than once a year. However, a consumer should be reassessed when there is a major life change occurs. Examples include a diagnosis of a disability (new to the consumer or newly revealed to the assessor), changes in household size, and health related changes.

VI-SPDAT/FAMILY VI-SPDAT SCORING	
Consideration	Household Score Needed
Prioritization for Permanent Supportive Housing and Montgomery Acuity Scale	8+ or above for single 9+ or above for family Chronically homeless Literally homeless High to Moderately High Score
Prioritization for Transitional Housing	4 to 7 for single 4 to 8 for family Literally homeless Non-chronic Fleeing Domestic Violence
Prioritization for Rapid Re-Housing	4 to 7 for single 4 to 8 for family Literally homeless Imminent risk Fleeing Domestic Violence
Prevention	Imminent risk Income (cash or non-cash) 0 TO 3
Diversion	0 TO 3

5. THE COORDINATED PRIORITIZATION LIST

A by-name registry called the COORDINATED PRIORITIZATION LIST is a report run through the HMIS that records all consumers experiencing homelessness in the CoC. This list can only be viewed with identifying information by the SEPH Department and HMIS System Administrators.

This list includes all literally homeless people organized by housing need and VI-SPDAT / Montgomery Acuity Scale or Family VI-SPDAT score. These consumers are staying in shelters, housing programs or engaged with street outreach providers. As consumers accept matches to housing placements, they are removed from the list.

- **Matching**

The CES Manager and the Prioritization Team review assessment results and connect consumers with vacancies. When a program has a vacancy, they must communicate this to the CES Manager via email within 24 hours of availability. If service providers know of an

impending vacancy they should communicate this and a projected availability date as soon as possible. For Permanent Housing vacancies, service providers should fill out the PERMANENT HOUSING VACANCY form.

Eligibility criteria for the vacancy must be included in the email. Eligibility criteria for every publicly funded program in the CoC must receive prior approval by the SEPH Department at the time of contract execution. This review of eligibility requirements ensures that all programs in the CoC follow Fair Housing Laws and have limited program barriers to entry.

The CES Manager matches consumers to vacancies based on prioritization scores and eligibility. The CES Manager works with shelters and outreach providers to contact a consumer regarding an available vacancy for which they qualify. If a consumer is not interested in the vacancy or cannot be located within five business days, the vacancy is given to the next qualified person on the prioritization list.

When a consumer is identified, who qualifies for the vacancy, a match e-mail will be sent to the program within three business days of receipt of the reported vacancy. Basic consumer qualifications will be provided (with signed consumer consent). Service providers may request a new match after 10 days if they have followed all contact protocol and cannot locate the consumer.

- **Matching vs. Placement**

Sometimes a consumer may be matched to a housing solutions such as Rapid Re-housing or Permanent Supportive Housing however, there may not be availability. In these circumstances, a consumer will receive a placement when it is available to an alternative temporary accommodation such as an emergency shelter or transitional housing. A temporary placement will not negate the housing solutions for which the consumer has been matched.

- **Program Decline Policy**

Publicly funded service providers are allowed two consumers declines a year. Rapid re-housing, transitional housing, and permanent supportive housing providers may only decline consumers found eligible for their programs under limited circumstances—such as when:

- The consumer does not meet eligibility criteria for the program.
- The household configuration cannot be accommodated with the space available in the housing program because the household composition has changed.

If the provider has made three documented attempts to contact the consumer for which no response was received to engage in intake, they must report this to the CES Manager. This will result in the next consumer qualified to be referred to the program. This will not count as a program decline.

If a program declines a consumer, they must issue a program decline decision notification. This should include, at a minimum, the following details, if applicable:

- The reason the client cannot enter the program, including the reason for rejection by the client or program
 - Instructions for appealing the decision, including the contact information for the person to whom and under what time frame the appeal should be submitted
- **Consumer Decline Policy**

Consumers may decline housing matches because of program requirements that are inconsistent with their needs or preferences. Consumer choice is an important theme of the CES in Montgomery County. Therefore, consumers should only be referred to housing interventions they are eligible for and have an interest in living/participating. Consumer program declines do not disqualify the person from the prioritization list but it may have an adverse impact on how long the consumer remains on the list prior to being housed.

6. PRIORITIZING POPULATIONS FOR HOUSING

- **Permanent Supportive Housing (PSH)**

For permanent supportive housing programs, consumers must meet both the HUD definition of homelessness under Category I and have a disability. Once meeting the Category I eligibility requirements, consumers are then prioritized by Montgomery County's target populations. Programs may not establish additional eligibility requirements beyond those specified in Category I and those required by funders.

Category I: Literally Homeless - PSH

Consumers qualify as Category I if they are:

- Sleeping in a place not designed for or used as a regular sleeping accommodation, including the street, a car, park, abandoned building, bus or train station, airport, camping ground, etc.
- Living in a shelter designed to provide temporary living arrangements (including emergency shelter, congregate shelters, transitional housing, hotels and motels paid for by charitable organizations or by government programs).
- Exiting an institution where they resided for ≤ 90 days, and were residing in an emergency shelter or place not meant or human habitation immediately prior to entering the institution.

Of those eligible consumers, the populations must be prioritized in accordance with:

- Montgomery County's *Strategic Plan to End Homelessness*.

- The U.S. Interagency Council on Homelessness (USICH) plan, *Opening Doors*.
- HUD’s guidance on prioritization of chronically homeless consumers and policy brief on coordinated entry systems.

Montgomery County CoC has established the following priority populations for PHS for individuals and families. These priorities have been established because solving homelessness for Montgomery County CoC’s most vulnerable people and highest users of resources will enhance the CoC’s goal of quickly transitioning people who are homeless to PSH, and ultimately eradicating homelessness throughout the entire geographic area. Acuity and severity of need are determined by the Montgomery Acuity Scale. This prioritization encompasses Montgomery County CoC’s coordinated entry system:

1. Chronically homeless individuals and families who are veterans
2. Chronically homeless individuals and families with the most severe service needs
3. Chronically homeless individuals and families with the longest history of homelessness
4. All other chronically homeless individuals and families
5. Homeless individuals and families with a disability with the most severe service needs
6. Homeless individuals and families with long period of continuous or episodic homelessness
7. Homeless individuals and families coming from places not meant for human habitation (such as emergency shelters, streets, safe havens, etc.)

The most severe service needs will be determined by the household’s score on the VI-SPDAT or the Homeless Assessment Tool, and projects will prioritize those with the highest scores within each category first.

As Montgomery County, has ended veteran homelessness the goal is to maintain a level of “functional zero “each month. This means that sufficient permanent housing resources are available at a level to accommodate all Veterans who might become homeless during a month. For Montgomery County, the number of Veterans identified as homeless and needing housing should not exceed six persons at any given time. The CoC will prioritize veterans over non- veterans in each prioritization category listed above. Essentially, this means that if two households present for assistance and both fall under the same order of priority (e.g. both chronically homeless and fall under Category 1), but one is a veteran household and the other is not, the veteran household should be prioritized first. In general, the CoC will prioritize veteran households that are not eligible for Veteran Administration housing or services.

- **Rapid Re-Housing**

For Rapid Re-Housing Programs, consumers must meet the HUD's definition of homelessness under Category I, any subsequent CoC Program Notice of Funding Availability (NOFA) eligibility requirements, and any additional funder eligibility requirements. Once meeting the rapid re- housing eligibility requirements, consumers are then prioritized by Montgomery County's target populations.

The Montgomery County CoC has established the following priority populations for Rapid Re-Housing Programs for individuals and families. These priorities have been established because solving homelessness for Montgomery County CoC's most vulnerable people and highest users of resources will enhance the CoC's goal of quickly transitioning people who are homeless to rapid re-housing and ultimately eradicating homelessness throughout all the entire geographic area.

Montgomery County CoC has small rapid re-housing program models but is working hard to fund more. The CES is designed to ensure that consumers with the most needs are referred to the appropriate model of rapid re-housing first. The process for prioritizing participants for rapid re-housing resources will include that participants are referred to the rapid re-housing program which they meet eligibility requirements and prioritized based on the following scores:

1. Consumers with a score of 7 and 15 on the Homeless Assessment Tool and individuals with a score of 4-8 on the VI-SPDAT
2. Consumers with the ability to increase their income and pay the entire rent by the end of the assistance period
3. Consumers expected to sustain housing once they have addressed housing barriers through case management
4. Consumers with the longest history of homelessness

- **Transitional Housing**

For transitional housing programs in the CoC, consumers must meet the HUD definition of homelessness, under Categories I or IV. Consumers are then prioritized by Montgomery County's target populations and any unique criteria for the CoC's transitional housing programs.

Category I: Literally Homeless – Transitional Housing

Consumers qualify as Category I if they are:

- Sleeping in a place not designed for or used as a regular sleeping accommodation, including the street, a car, park, abandoned building, bus or train station, airport, camping ground, etc.

- Living in a shelter designed to provide temporary living arrangements (including emergency shelter, congregate shelters, transitional housing, hotels and motels paid for by charitable organizations or by government programs)
- Exiting an institution where they resided for ≤ 90 days, and were residing in an emergency shelter or place not meant or human habitation immediately prior to entering the institution

Category IV: Fleeing/Attempting to Flee Domestic Violence

Consumers qualify as Category IV if they meet the following requirements:

- They are fleeing, or attempting to flee domestic violence
- No subsequent residence has been identified
- They have no resources or support networks to obtain permanent housing

The process for prioritizing consumers for transitional housing first includes meeting HUD’s homeless definition, and then based on the below prioritization. Transitional Housing facilitates the movement of homeless consumers to permanent housing within 24 months of entering transitional housing.

In Montgomery County, very limited transitional housing is available. If multiple consumers meet the transitional housing programs eligibility criteria, then prioritization will take place in the following order:

1. Consumers with a score of 7 and 15 on the Homeless Assessment Tool and individuals
 - a. with a score of 4-8 on the VI-SPDAT—based on their score, consumers with the highest service needs will be prioritized first
2. Length of time homeless
3. Falling under one of the target populations for transitional housing:
 - a. Family with head of household between the ages of 18-24 years’ old
 - b. Consumers fleeing domestic violence

7. MARKETING

The coordinated entry system is publicly advertised through the Montgomery County’s Department of Health and Human Services (DHHS) website, the CoC website, through the County’s 311 system, and through community events.

The entry points are also advertised through trainings for service providers and information is passed along from emergency shelter and street outreach workers directly to people sleeping on the street. The broad advertisement of the system ensures that all people within Montgomery County in need of homeless services will have fair and equal access to

the system regardless of where or how the household presents at any entry point. Outreach conducted by emergency shelter and street outreach workers ensures that people who are sleeping on the streets are equally prioritized for assistance as anyone else presenting with service needs.

Montgomery County access points may utilize the Limited English Proficiency (LEP) services to help consumers who present for services <http://www.montgomerycountymd.gov/lep>. In order to improve linguistic access to services for people with limited English proficiency (LEP) language translation services are available for the most frequently spoken second languages in the County. These languages are Spanish, Chinese, French, Korean, Vietnamese and Amharic. The LEP services may also help with language access for other languages.

8. GRIEVANCE POLICY

Immediately upon working with any consumer, intake workers must provide the individual or family with the Coordinated Entry Grievance Policy. All individual's or family's concerns and grievances must be resolved promptly and fairly, in the most information and appropriate manner. Providers shall inform individuals and families of the following process for filing a grievance.

- HOUSING PROGRAM GRIEVANCES are grievances that are related to the individual's or family's experience(s) with a homeless housing program. These grievances shall be redirected back to the Provider to follow the Provider's grievance policies and procedures. Grievance policies should be sent to the SEPH Department as a part of contract execution for review and approval.
- FAIR HOUSING GRIEVANCES are grievances that are related to discrimination based on race, color, national origin, disability or family status. These grievances may be directed to the SEPH ADA/Fair Housing Coordinator. Grievances may also be directed to the Montgomery Office of Human Rights at 240-777-8450 or to the Philadelphia Regional Office of HUD at 1-888-799-2085.
- COORDINATED ENTRY GRIEVANCES are grievances that are related to CES policies, procedures or housing placements. Grievances related to CE policies and/or procedures shall be directed to: The Coordinated Entry Manager.

9. EVALUATING COORDINATED ENTRY

The implementation of a full and robust Coordinated Entry System will take time and thoughtful planning. The Goals for the system include expanding Rapid Re-housing, piloting diversion programs, reducing reliance on motels for families and expanding access to employment services.

Coordinated Entry also represents a fundamental change in the way the CoC operates. Therefore, the MC CoC expects that periodic and frequent adjustments to the procedures set forth may be required as the system is implemented. To inform those adjustments, CES will be periodically evaluated by the Operations Committee (a leadership group comprised primarily of service providers) of the ICH. According to the ICH Charter, the Operations Committee plays an important oversight role in evaluating the success of new initiatives undertaken by the CoC. In the first year of evaluation, the Operations Committee will primarily review outputs in the system to ensure that basic operations of CES such as:

- Tracking the time, it takes to match a consumer to a housing program,
- Assessing the frequency of declines on the consumer and provider side,
- Reviewing the volume of vacancies across program types and the rate at which they are filled,
- Documenting participation of service providers in training and planning, and
- Examining the amount of exits to permanent housing solutions.

To obtain broader stakeholder feedback on the overall implementation of CES, the Operations Committee will also initiate a service provider survey annually to document areas of improvement and expansion.

10. DATA MANAGEMENT

The Montgomery County CoC HMIS is administered by the County Department of Health and Human Services. Any service provider receiving county, state or federal homeless funds must enter consumer information in the HMIS. All organizations which have a principle mission of serving the homeless, regardless of funding source, are invited to participate in the HMIS. The HMIS is an internet-accessible database that is used by homeless service organizations to record and store client-level information about the numbers, characteristics and needs of homeless persons and those at risk of homelessness. The HMIS is used to generate the by-name registry for singles called the COORDINATED PRIORITIZATION LIST. In the first quarter of 2018, the CoC HMIS will be broadening the HMIS generated registry to include all populations; specifically focusing on families and youth. Only the HMIS Database Administrators and CES Manager who have the highest HMIS license level in will be able to access the Coordinated Prioritization List. The CoC extends the same HMIS data privacy and security protections prescribed by HUD for HMIS practices in the HMIS Data and Technical Standards to the Coordinated Prioritization List.

In addition to CoC's Coordinated Entry Policy and Procedure Manual, there are several other documents relating specifically to HMIS that also must be adhered to when using HMIS for Coordinated Entry. These include the Governance Charter which is reviewed and

approved annually by the ICH and outlines the governance of the HMIS; Agency Participation Agreements which outline approved uses of the system for all participating agencies; CoC User Agreement which specifies individuals' responsibility in entering information, accessing information, generating reports and sharing information; and the HMIS Policies and Procedures Manual which outlines all the business processes required to operate the HMIS. Data Security and Privacy training is required for all HMIS users and occurs annually.

Before collecting any information as part of the Coordinated Entry system, all staff must first either (1) obtain the participant's informed consent to share and store participant information for the purposes of assessing and referring participants through the Coordinated Entry process, or (2) confirm that such consent has already been obtained and is still active. Consumer consent should be in written form.

The CoC will not deny services to any participant based on that participant's refusal to allow their data to be stored or shared unless a Federal statute requires collection, use, storage, and reporting of a participant's personally identifiable information as a condition of program participation. Where appropriate, non-personally-identifiable information about participants who refuse consent to share personally identifiable data should be logged in an electronic case file that uses pseudonyms, e.g., "Jane Doe," nick name, or description to preserve as much non-personally-identifiable information as possible for statistical purposes.