



COORDINATED ENTRY SYSTEM

Written Standards & Policy

IL509 – DeKalb County Continuum of Care

In compliance with the Continuum of Care Program interim rule under the HEARTH Act, 24 CFR 578.7 (a)(8) and in compliance with Notice CPD-17-01

Adopted August 2015
Amended June 27, 2018

Introduction

These written standards are in compliance with the Continuum of Care (CoC) Program interim rule under the HEARTH Act, [24 CFR 578.7\(a\)\(8\)](#) which requires all Continuum of Care to implement a Coordinated Entry System (CES) in collaboration with their local Emergency Solutions Grant (ESG) recipients and subrecipients. These standards are developed in compliance with [Notice CPD-17-01](#), where the U.S. Department of Housing and Urban Development (HUD) put forth a list of Coordinated Entry System requirements to be met by each CoC as outlined in the Notice.

Coordinated Entry is defined as a centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals for persons experiencing a housing crisis. In a Coordinated Assessment system, individuals and families experiencing homelessness or at imminent risk of homelessness know where to go to get help, are assessed in a standardized manner and are matched with the housing and/or services that best meet their needs as available.

It is the policy of the DeKalb County Continuum of Care (CoC) to have a Coordinated Entry System (CES) to prioritize placement in CoC housing programs to result in better outcomes for those experiencing a housing crisis. The Coordinated Entry Process is intended to ensure that limited resources available are being used in the most effective manner, to target those who are most in need of assistance, and to prioritize those with the highest needs and the greatest barriers to the most appropriate program. The CES will not delay access to Emergency Shelter to the extent that shelter is available.

The CES will incorporate the CoC's expectations of community-wide standardization of assessment, placement, and prioritization. The CES will be well coordinated amongst COC agencies with respect to private client information; agencies will secure client consent to participate in a standard fashion. Access to system will be fair, equal, and appropriately marketed to all persons especially those least likely to apply. The CES will utilize the COC Homeless Management Information System and data driven methods. DeKalb County CoC will evaluate community-wide needs and HUD priorities annually. The CoC, as well as recipients of CoC Program-funded permanent housing (PH), will maintain evidence of implementing CoC Prioritization. The CES will apply to placement of homeless persons within the entire DeKalb County geographic area into DeKalb County Continuum of Care (CoC) housing programs.

The CoC's Coordinated Entry System will:

1. Target resources to those who are the most vulnerable with the most intensive needs, using the Housing First model;
2. Minimize the time one experiences a housing crisis;
3. Link clients to the most appropriate housing intervention;
4. Provide system level outcomes and reporting.

Housing First

Housing First as an approach centers on providing people experiencing homelessness with housing quickly and then providing services as needed. What differentiates a Housing First approach from other strategies is that there is an immediate and primary focus on helping individuals and families quickly access and sustain permanent housing. This approach has the benefit of being consistent with what most people experiencing homelessness want and seek help to achieve. The Housing First philosophy our community proudly embraces includes the following critical elements:

- There is a focus on helping individuals and families access and sustain rental housing as quickly as possible;
- Housing services are provided without requiring participants to meet other criteria such as having a stable income or participation in substance use treatment;
- A variety of services are delivered primarily following a housing placement to promote housing stability and individual well-being;
- Such services are time-limited or long-term depending upon individual need; and
- Housing is not contingent on compliance with services, instead, participants must comply with a lease agreement and are provided with the services and supports that are necessary to help them do so successfully.

Marketing

The DeKalb County CoC Coordinated Entry System marketing plan recommends widely advertising housing and supportive services to eligible homeless persons in DeKalb County. The plan includes strategies for marketing housing to eligible persons as well as to landlords and landlord associations. Marketing strategies include digital and printed media, COC and the Housing

Authority of DeKalb County’s websites, and our community’s 211 system. The 211 system is an information and referral system that connects community members to services. The system also features a searchable website database, updated every six months, and a live online chat feature with a translation option to communicate to callers in over 150 languages.

The coordinated entry system is available to all eligible persons regardless of race, color, national origin, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, or marital status. Initial points of contact include social service agencies, libraries, churches, law enforcement, community members, or government entities that refer homeless individuals to Hope Haven, the COC’s single site access point for assessments and homeless programs, resources, and services. All referral sources will support marketing efforts as well.

Non-Discrimination

The coordinated entry system is intended to serve all individuals, regardless of race, color, national origin, religion, sexual orientation, gender identity, disability, age, sex, familial status, or marital status. All programs receiving Federal and State funds will comply with applicable civil rights and fair housing laws and requirements, and 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 law. [See [Related Policies](#)]

In addition, the COC:

- Will ensure access points, if physical locations, are accessible to individuals with disabilities, including individuals who use wheelchairs; and
- Will ensure the referral process is informed by Federal, State, and local Fair Housing laws and regulations and ensures participants are not “steered” toward any particular housing facility or neighborhood because of race, color, national origin, religion, sex, disability, or the presence of children.

At any time during the coordinated entry process, Applicants have the right to file a complaint, should they feel that this principle has been violated. All Applicants, whether individuals or families, will be provided with the process for filing a complaint. All complaints will be addressed and resolved in a timely and fair manner. The following three contacts will be provided to address discrimination or grievance related concerns:

- For discrimination complaints, contact the Department of Housing and Urban Development through the online portal:
<https://portalapps.hud.gov/AdaptivePages/HUD/complaint/complaint-details.htm>
- For complaints with Coordinated Entry policies or procedures, contact:
The Housing Authority of DeKalb County:
Michelle Perkins at sperkins@dekcohousing.com
- For housing program related complaints, grievances will be directed to the appropriate housing provider for resolution.

Data Management

The HMIS is key to the centralization of information to help measure outcomes and determine client need through Coordinated Entry. Not all stakeholders have direct access to HMIS. Throughout the CoC, there are certain agencies, usually the service provider agencies that are directly interacting with people facing homelessness, that actively use and contribute to the HMIS. Any agency with access to the HMIS is required to sign an Agency Partnership agreement and is known as a “participating agency”. All HMIS Lead personnel and all participating agencies and their personnel, are required to comply with the HMIS Standard Agency Privacy Policy Notice.

To comply with federal, state, local, and funder requirements, information about the homeless, their dependents, and the services that are provided, is required to be collected in the HMIS. When assistance is requested, it is assumed that the client is consenting (“inferred consent”) to the use of the HMIS to store this information. The clients have the right to explicitly refuse the collection of this information, and participating agencies are not permitted to deny services for this reason; however, this may severely impact the ability of any participating agency throughout the Collaborative to qualify the client for certain types of assistance or to meet their needs.

Data collection should not be confused with data sharing (“disclosure”). Participating agencies are required to provide the client with an opportunity to consent to certain disclosure of their information, either in writing or electronically. If the client consents to the disclosure of their information, they enhance the ability of the Collaborative to assess their specific needs and to coordinate delivery of services for them. Services will not be denied if the participant refuses to allow their data to be shared unless Federal statute requires collection, use, storage, and reporting of a participant’s personally identifiable information as a condition of program participation. HMIS users will be informed and understand the privacy rules associated with collection, management, and reporting of client data. The assessment process does not require that the Applicant share a specific disability if the Applicant does not wish to do so. In cases where Applicants share

private information it is kept confidential and only shared with the permanent housing team and the housing provider receiving the referral. [See [2017 DeKalb County Continuum of Care HMIS Policies and Procedures](#)]

Privacy Protections

Applicants are asked to offer consent to share information to limited parties after the consent is reviewed verbally and offered in writing. This includes reviewing privacy rules related to the collection, management, and reporting of client level data. Applicants who do not consent to share information are not prohibited from utilizing services such as emergency shelter or street outreach supports.

Safety Planning

Safety planning is done for all individuals who may be in danger or could potentially be a danger to themselves or others including identifying appropriate supports and resources. CES will address the unique needs of individuals and families who are fleeing, or attempting to flee, domestic violence but who are seeking shelter or services from non-victim service providers.

Veterans

The DeKalb CoC allows Veteran Affairs partners to conduct assessments and make direct referrals/placements to any veteran specific housing assistance programs. Coordination and referrals are completed via direct referral to providers or case conferencing at the monthly Veteran’s Task Force. The Veterans task force meets monthly to monitor and support case coordination with case management and other staff serving Veteran’s experiencing homelessness in the community. Each month, staff reviews all of the Veterans on the “By Name” list to identify those who would benefit from a case conference among providers and assign those individuals to a Veteran Provider staff member.

If after the initial assessment its determined that the recommended housing intervention based on the VI-SPDAT score does not accurately reflect the participants needs, the score can be adjusted though case conferencing to another level of intervention (i.e., person scores for RRH but needs PSH, their score can be adjusted). Any adjustments should be documented in the case notes in HMIS as well as the revised score in HMIS’s Coordinated Entry Assessment.

In addition:

- a) Projects may have additional eligibility criteria. These criteria may be updated during the continuum's annual project review process. Additional eligibility criteria typically include special populations based on facility or best practice standards for specialty programs such as veterans, mentally ill, families or single adults.
- b) Approved Additional Eligibility Criteria can be used by projects to determine suitability but not to give preference to households.
- c) Agencies must maintain detailed eligibility and suitability criteria used to determine appropriate placement within their programs. Criteria must adhere to applicable HUD guidelines for their program type.

Youth

Unaccompanied youth, under the age of 18, will not be assessed and instead should be immediately connected to the Youth Service Bureau (815) 748-2010.

Recordkeeping

The CoC, as well as recipients of CoC Program-funded programs, will maintain evidence of implementing CoC prioritization through recordkeeping. 24 CFR 578.103(a)(4) outlines documentation requirements for recordkeeping for all recipients of dedicated and non-dedicated CoC Program-funded PH associated with determining whether an individual or family meets eligibility criteria. Evidence of following these orders of priority may be demonstrated by:

1. Evidence that the recipient can determine the severity of needs as defined in this policy using data-driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.
2. Evidence that the recipient is following CoC's written standards for prioritizing assistance as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new program participants into the project.

Assessment

In the CES, the initial assessment will be brief, asking only information necessary to make the referral at hand. The assessment is intended to be progressive, capturing different information about the client in different stages of homelessness. This system will not delay access to Emergency Shelter to the extent that shelter is available.

People who are currently fleeing domestic violence and human trafficking along with those who have previously experienced domestic violence and/or human trafficking require a path through the CES that promotes and protects their confidentiality and safety. DV Providers do not enter data directly into the Homeless Management Information System (HMIS). When a household working with a DV provider is attempting to flee or experiencing literal homelessness having already fled domestic violence, the applicant shall be connected to a skilled assessor.

Direct referrals will be provided to those who need access to Homeless Prevention Services, Emergency Shelter Services, Domestic Violence, and emergency housing for youth. Some clients will progress to a more in-depth assessment to gain access to Rapid Re-housing services and Permanent Supportive Housing. When need for these more intensive services outweigh the supply; access will be determined by a prioritization process.

DeKalb County CoC agencies will use community-wide standard processes and standardized assessment tools for assessment and recording of eligibility factors and severity of need. Timely assessments will be completed for persons who are literally homeless; staying in an Emergency Shelter, a place not meant for human habitation, a motel paid for by a charitable source, an institutional setting for fewer than 90 days, where they were previously staying in an emergency shelter or a place not meant for human habitation. Assessment may be completed either by phone or in-person, based on the policies and procedures established by each participating agency.

1. Agencies will respect private information and secure client consent to participate in a standard fashion.
2. Agency will review the Authorization to Use or Disclose Protected Information with the client and clearly document client consent, or the refusal to share data. Agencies will attach a copy of the signed authorization to the client's Release of Information record in HMIS when applicable. If consent is not granted, agencies will contact the HMIS Lead for further support before entering

any program Entry/Exit data into HMIS.

3. Agencies will collect and record uniform data to determine Chronic Homelessness (as defined in the Chronically Homeless Final Rule 24 CFR 578.3 published December 2015 and comply with the regulations promulgated by this rule as of January 5, 2016) or other housing status as established by the US Department of Housing and Urban Development (HUD).
4. Agencies will use the CoC Standardized Assessment Tool to determine those with the highest needs and greatest barriers toward obtaining and maintaining housing.
5. All agencies' client case files must show sufficient documentation of eligibility and determination of priority placement for assistance.
6. Client files will contain a copy of the priority wait list demonstrating the clients name and VI-SPDAT score and placement. Client Files will contain a staff certification of client eligibility and placement.
7. Each agency is responsible to train and monitor staff completing these standard processes. As a support, the DeKalb County CoC will provide resources and conduct periodic trainings on components of the standard process. Quality control within HMIS will be monitored.

The assessment tools are intended to be progressive, capturing different information about the participant in different stages. They gather only enough information to determine the severity of need and potential eligibility for housing and related services. The following tools will be used at all Access Points:

Prevention & Diversion Pre-Screen: When a caller is seeking housing, rental assistance, utility assistance, or shelter, the call specialist works to prevent homelessness and divert clients in crisis from the homeless system of care through referrals to appropriate resources based on the needs of the caller. The tool is brief and asks only information necessary to make the referral at hand.

Severity of Need: Participants on the street or those staying in shelter for 7 days or more will be assessed using the Vulnerability Index-Service Prioritization and Decision Assistance Tool (VI-SPDAT) developed by OrgCode as the standard assessment tool to evaluate and determine severity of need for homeless housing. The VI-SPDAT is an evidence based-tool that prioritizes literally homeless individuals and families for available permanent housing based on acuity and chronicity. The VI-SPDAT score helps to determine the appropriate housing intervention and is used in our prioritization process. See VI-SPDAT Recommendation Chart.

The Vulnerability Index-Service Prioritization and Decision Assistance Tool (VI-SPDAT) is the standard assessment tool to evaluate and determine severity of need for homeless housing. The VI-SPDAT has scoring applicable to either individuals or families (Family VI-F-SPDAT). The VI-SPDAT will be re-administered and subsequent score will be updated as needed. Prior to completing the VI-SPDAT or VI-F-SPDAT, it is necessary to complete training to ensure that the tool is properly administered. The Pre-Screen Total score helps to determine the appropriate housing intervention. VI-SPDAT recommendations are as follows:

VI-SPDAT Recommendation Chart			
Household Type	No Housing Intervention	Rapid Re-Housing	Permanent Supportive Housing
Individual	0-3	4-7	8+
Family	0-3	4-7	8+

Identification of Severity of Service Needs will be identified and verified through data-driven methods such as the standardized assessment tool described above. The process will be documented in a program participant’s case file. The determination is based on severity of need rather than a specific diagnosis or disability type and will not be based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see 24 C.F.R. § 5.105(a). Agencies will maintain documentation of information pertinent to how the determination was made, including notes associated with case-conferencing decisions.

Persons assessed for Permanent Housing will be those identified as having the most severe service needs. These persons will have at least one of the following conditions:

- a) A history of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support to maintain permanent housing.
- b) When applicable, CoC’s and recipients of CoC Program-funded programs may use an alternate criterion used by Medicaid departments to identify high-need, high cost beneficiaries.

Assessment data will be maintained in the Homeless Management Information System (HMIS). Agencies will follow their standard privacy practices. Agencies will enter client data using the Coordinated Entry

entry/exit workflow within HMIS. HMIS System Admin and the HMIS Policy Committee will develop and update training and workflow document for users. Authorizations to share information will be completed during the coordinated entry assessment and Permanent Housing prioritization process and will be entered and stored in the HMIS system.

Permanent Supportive Housing

Permanent supportive housing (PSH) is safe and affordable housing, the purpose of which is to provide housing without a designated length of stay.

Eligibility

1. Participants must meet categories 1- Literally Homeless or 4 – Fleeing Domestic Violence as outlined by the HUD definition of homelessness.
2. PSH who serve the chronically homeless can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability and they meet the definition of chronic homelessness as outlined by HUD
3. Referrals for PSH will be generated through the CoC Coordinated Entry process and the CoC-wide PSH priority lists for families and individuals.

Additional Eligibility Criteria

As vacancies arise, an agency will use a current HMIS generated priority list to find candidates as sorted in the order below. An agency may use pre-defined criteria for projects or dedicated beds to select their top candidate from the list.

Dresser Court	SRO	Gurler Street	SPC Vouchers
<ul style="list-style-type: none"> • Chronic Homeless • Single Adults • Disability • Male/Female 	<ul style="list-style-type: none"> • Chronic Homeless • Single Adults • Disability • Male/Female 	<ul style="list-style-type: none"> • Serious Mental Illness • Families • Individuals • Male/Female 	<ul style="list-style-type: none"> • Low Housing Barriers • Families • Individuals • Disability

Priority Order for Permanent Supportive Housing [PSH]

Using the assessment data, the DeKalb County CoC will rank severity of need and prioritize candidates to fill Continuum funded housing vacancies in both PSH dedicated and PSH non-dedicated beds using the priorities below. The prioritization for Permanent Supportive Housing (PSH) programs emphasizes housing those who have been homeless the longest and have the most severe service needs. Those with the highest scores combining length of homelessness and the VI-SPDAT score including applicable

portions used to determine severity of service needs will be candidates for Permanent Supportive Housing. The DeKalb CoC will follow HUD’s guidance for prioritizing as found in CPD-16-11, July 25th 2016.

Recipients of CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness would be required to follow that order of priority when selecting participants for housing, in a manner consistent with their current grant agreement. For example, a CoC Program-funded PSH project that is permitted to target homeless persons with a serious mental illness should follow the order of priority under Section III.A.1 of this Notice to the extent in which persons with serious mental illness meet the criteria. In this example, if there were no persons with a serious mental illness that also met the criteria of chronically homeless within the CoC’s geographic area, the recipient should follow the order of priority under Section III.B for persons with a serious mental illness.

Dedicated Chronically Homeless – (i.e., Dresser Court & SRO)

Order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.

First Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.

A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and
- ii. The CoC or CoC Program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs (see Section I.D.3. of this Notice for definition of severe service needs).

Second Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness.

A chronically homeless individual or head of household, as defined in 24 CFR 578.3, for which both of the following are true:

- i. The chronically homeless individual or head of household of a family has been homeless and

living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,

- ii. The CoC or CoC program recipient has not identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Third Priority–Chronically Homeless Individuals and Families with the Most Severe Service Needs.

A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- i. The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than one year; and
- ii. The CoC or CoC program recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Fourth Priority–All Other Chronically Homeless Individuals and Families.

A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for on at least four separate occasions in the last 3 years, where the cumulative total length the four occasions is **less than** 12 months; and
- ii. The CoC or CoC program recipient has not identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Non-dedicated Chronically Homeless – (i.e., Gurler & SPC Vouchers)

Order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.

First Priority - Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months and has been identified as having severe service needs.

Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter without Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

Rapid Re-Housing

Rapid rehousing is an intervention designed to help individuals and families exit homelessness as quickly as possible, return to permanent housing, and achieve stability in that housing. Rapid re-housing assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety) and the resources and services provided are typically tailored to the unique needs of the household.

The core components of a rapid re-housing program are housing identification and relocation, short-and/or medium term rental assistance and move-in (financial) assistance, and case management and housing stabilization services. Program staff is expected to remain engaged with the households from first contact to program exit (no more than 24 months of rental assistance, in addition to up to 6 months of continued case management), using a progressive engagement approach and tailoring services to the needs of the household in order to assist the household to maintain permanent housing.

Eligibility

The eligibility of each individual or family seeking CoC or ESG assistance is based on the individual's or family's living situation and the amount and type of assistance needed for the individual or family to (re)gain stability in permanent housing. One of the major differences between RRH assistance under the ESG program and the CoC program centers on eligibility. The differences are as follows:

1. To receive **ESG rapid re-housing (ESG-RRH)** assistance, an individual or family must demonstrate at initial evaluation that it is literally homeless (referred to as Category 1 in the Homeless Definition Final Rule). An individual or family is defined as “literally homeless” if (1) living in a public or private place not meant for human habitation, (2) living in temporary shelter, which includes congregate shelters and transitional housing, or (3) exiting an institution where the individual or family has resided for 90 or fewer days and was living in shelter or in a place not meant for habitation before entering the institution. RRH assistance is also available to people fleeing or attempting to flee domestic violence if they are also literally homeless (24 CFR part 576.104).
2. To receive **CoC rapid re-housing (CoC-RRH)** assistance, though, individuals and families may be defined as homeless under any of the four categories included in the Homeless Definition Final Rule:
 - Literally homeless (Category 1).
 - Imminently losing their primary night-time residence (Category 2).
 - Unaccompanied youth under 25 years of age or families with children and youth who do not otherwise qualify as homeless under this definition but who are defined as homeless under another Federal statute and meet additional specified criteria (Category 3). *Note: For CoC-RRH assistance to*

be provided to persons defined as homeless under Category 3, the project must be located within the geographic area of a CoC that has received HUD approval to serve this population.

- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions (Category 4).

The CoC Program Notice of Funding Availability (NOFA) may impose additional eligibility requirements not reflected in the regulation. Projects funded to carry out RRH assistance under the CoC program must follow both CoC Program NOFA and regulatory requirements.

ESG and CoC recipients must conduct regular re-evaluations, at least annually, of program participants receiving RRH assistance. To continue to receive ESG- and CoC-RRH assistance, a program participant's re-evaluation must demonstrate eligibility based on:

- Lack of resources and support networks. The program participant's household must continue to lack sufficient resources and support networks to retain housing without ESG or CoC program assistance.
- Need. The recipient must determine the amount and type of assistance that the individual or family will need to (re)gain stability in permanent housing.

In addition, an ESG-RRH re-evaluation must demonstrate:

- Income. The program participant household's annual income must **be less than or equal to 30** percent of Area Median Income (AMI).

Prioritization

The community-wide prioritization report will rank potential participants using the VI-SPDAT for homeless individuals and VI-F-SPDAT for homeless families.

Assistance

ESG-RRH

- Individual or family must pay 30% of their household's monthly income towards rent.
- Program participant can receive up to \$1,000 in utility assistance (including arrearage)
- The maximum number of months a program participant may receive rental assistance is 12.
- Rental assistance will be adjusted monthly based on participant's monthly income.
- Supportive Services must be provided as outlined in the ESG-RRH rule 24 CFR part 576.10

COC-RRH

- Individual or family must pay 30% of their household's monthly income towards rent.
- The maximum amount of rental assistance a program participant can receive is \$1,000 per month
- The maximum number of months a program participant may receive rental assistance is 12 months.

- The maximum number of times a program participant may receive rental assistance is 12 in a 24 month period.
- Rental assistance will be adjusted monthly based on program participant's monthly income.
- Supportive Services must be provided as outlined in the COC-RRH rule 24 CFR part 578.53

Street Outreach

Street outreach workers engage with people experiencing unsheltered homelessness in order to connect them with emergency shelter, housing, or other critical services. Street outreach services are provided in non-facility-based settings for people experiencing unsheltered homelessness who are not accessing emergency shelter, housing, or an appropriate health facility.

Eligibility

Participants must meet category 1 – Literally Homeless as outlined by the HUD definition of homelessness.

Priority

1. Priority will be given those who are not already engaged with the system
2. Due diligence will be exercised when conducting outreach and assessment to ensure that persons are prioritized for assistance based on their length of time homeless and the severity of their needs following the order of priority described in the CPD-16-11 and adopted by the DeKalb CoC.
3. An agency is not required to maintain a vacancy in an unoccupied unit indefinitely because of not being able to contact the top candidate. Subsequent candidates may be contacted for housing.
4. Attempts will be documented to contact candidate and if the candidate declines or does not reply it will be documented in the candidates file and the candidate can be removed from/closed out of the prioritization list.
5. If a project does not take the highest prioritized person or persons from the prioritization list (due to no response, or rejection) to fill an available spot, that project must document the reason for not accepting that referral in the HMIS client file.
6. If a project rejects a candidate and does not take the highest prioritized person from the list, it must document why, and the client stays on the list.
7. Candidates must complete the application process and prove eligible for placement.
8. The candidate will be required to provide documentation that meets HUD and project specific requirements to enter a DeKalb CoC housing program.
9. Agencies making candidate referrals to the prioritization list for PSH will be responsible for following up with the persons they refer to determine if the individual or family is still in

need of PSH. Follow up contact must occur every 90 days at a minimum until housed, otherwise removed, or determined inactive. All candidates have the option to not apply or decline the housing which is offered. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting PSH and where the CoC has adopted these Orders of Priority into the written standards, these individuals and families must continue to be prioritized until housed. Evaluation of those who remain unhoused will be used to guide homeless assistance planning and system change efforts.

Conclusion

DeKalb County CoC will evaluate community-wide needs and HUD priorities annually to determine a list of housing priorities for the year. Priorities may differ based on type of housing. The DeKalb County Continuum of Care will give priority to those persons with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens and with the most severe service needs. The CoC will establish an order of priority for PH that is not dedicated or prioritized for chronic homelessness in order to ensure that those persons who do not yet meet the definition of chronic homelessness, but have the longest histories of homelessness, the most severe service needs, and are therefore the most at risk of becoming chronically homeless, are prioritized.

Related Policies

As part of the Coordinated Entry System this policy hereby incorporates the nondiscrimination provisions of Federal civil rights laws, including, but not limited to:

- **HUDs Equal Access Rule 24 CFR 5.105 (a)(2)**
- **The Fair Housing Act**
- **Section 504 of the Rehabilitation Act**
- **Title VI of the Civil Rights Act;** and
- **Titles II or III of the Americans with Disabilities Act,** as applicable

This policy hereby incorporates the:

- **2017 DeKalb County Continuum of Care HMIS Policies and Procedures** which includes all security and data quality assurances as prescribed by HUD.
- The CoC adopted the hardest to house - housing first policy October 2, 2013. This policy is an attachment to the DeKalb County Homeless Continuum of Care Governance Charter.