

Coordinated Entry Policy Regarding Prioritization of the Chronically Homeless and Other Vulnerable Populations in Permanent Supportive Housing

Revised 9/7/2016

Purpose Revision to the policies and procedures of the Coordinated Entry System to align with HUD's Notice CPD-16-11 to update the orders of priority to reflect the definition of chronically homeless final rule.

Coordinated Entry System

All programs funded through the CoC are required to report all openings within 24 hours and take all referrals from the CoC Coordinated Entry System. The Coordinated Entry System will use a Master By-Name List to prioritize chronically homeless individuals and families for referral to all PSH openings. When there are not enough available PSH openings, chronically homeless will be referred to RRH as a bridge to PSH.

Chronically homeless will be prioritized based on acuity measured by the VI-SPDAT and those with the longest history of homelessness.

All beds and units dedicated to the chronically homeless will only receive referrals of chronically homeless individuals and families with documentation of chronicity and documentation of disabling condition.

All PSH units in the Continuum of Care that are not dedicated to the chronically homeless must prioritize the chronically homeless.

Order of Priority

The CoC has determined that all PSH units not currently dedicated to the chronically homeless shall be prioritized for the chronically homeless. All referrals to PSH programs will be made consistent to this prioritization in a manner consistent with the project's current grant agreement.

In the event there are no chronic households eligible for the program (based only on criteria established in the current grant agreement) a referral shall be made using the following order of priority, consistent with HUD Notice CPD-16-11:

- 1) Household had documented homelessness on the streets, in shelter, or in Safe Haven for at least 12 months but less than 4 occasions and with severe service needs.
- 2) Household has documented homelessness on the streets, in shelter, or in Safe Haven for less than 12 months total with severe service needs (by longest length of time homeless).
- 3) Household on streets, in shelter, or in Safe Haven without severe service needs (by longest length of time homeless).
- 4) Household coming from transitional housing based on severity of service needs and length of time homeless.

Priority	Disabling Condition	Current Residence	Total Length of Time Homeless	Severe Service Needs	Episodes Homeless
1	Disabling Condition	Living in a place not meant for habitation, safe haven, or emergency shelter	12 months or more	Severe Service Needs	Less than 4 episodes
2	Disabling Condition	Living in a place not meant for habitation, safe haven, or emergency shelter	--	Severe Service Needs	--
3	Disabling Condition	Living in a place not meant for habitation, safe haven, or emergency shelter	--	Severe Service Needs	--
4	Disabling Condition	Transitional Housing (prior residence was street, ES or SH). Includes those in TH who were fleeing DV prior.	--	--	--

Given the CoC data regarding chronic homelessness, it is expected that only PSH programs with the following eligibility criteria could be referred a household that is not chronically homeless:

- Veterans
- Youth
- Families

In the event a non-chronic household is referred to a PSH program before the CoC has ended chronic homelessness, evidence must be maintained to document that there were no persons experiencing chronic homelessness or no persons of higher priority to fill the PSH opening (see recordkeeping requirements below).

Programs are not allowed to impose eligibility criteria beyond those imposed by HUD for the project funding.

Non-Discrimination

PSH programs are required to prioritize otherwise eligible households in a nondiscriminatory manner. Program implementation, including any prioritization policies, must be implemented consistent with the nondiscrimination provisions of the Federal civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II or III of the Americans with Disabilities Act, as applicable. For example, while it is acceptable to prioritize based on level of need for the type of assistance being offered, prioritizing based on specific disabilities would not be consistent with fair housing requirements or program regulations.

Record-Keeping

Documentation of chronic homelessness shall meet the standards established by HUD under 24 CFR 578.103(a)(4). Evidence of following prioritization shall be demonstrated by the following recordkeeping requirements:

- A) Severe service needs shall be documented by VI-SPDAT score and documentation of disabling condition that meets HUD standards for eligibility for PSH. Severity of needs may also include documentation such as notes from navigation meetings where case conferencing is held.
- B) The CoC prioritization standards shall be incorporated into the intake procedures for agencies conducting coordinated entry functions. Housing providers should incorporate into their intake procedures and program policies that they accept all referrals from the Coordinated Entry System and accept the prioritization of clients through the system.

If there are no households meeting higher order of priority

When prioritized PSH is used to serve non-chronic households, the housing provider should obtain documentation from the Coordinated Entry System regarding how it was determined that there was no chronic household identified for assistance at the point in which a vacancy became available. The documentation may include the Master list at the time of the opening and documented attempts to engage any other chronic households.